

PALLIA TECH

MMP - RFA

"REDACTED"

PALLIATECH

MEDICAL MARIJUANA DISPENSARY FACILITY
LICENSE APPLICATION

STATE OF CONNECTICUT

DEPARTMENT OF CONSUMER PROTECTION

September 18th, 2015

PRIVATE AND CONFIDENTIAL

PALLIA TECH

PalliaTech CT, LLC
19 Morgan Lane
Monroe, CT 06468

CONFIDENTIAL

FOIA CONFIDENTIAL TREATMENT REQUEST

September 18, 2015

BY HAND DELIVERY

Department of Consumer Protection
Drug Control Division
Medical Marijuana Program
RFA #2015-109387
165 Capitol Ave, Room 145
Hartford, CT 06106
DGP.MMP@ct.gov

Re: Request for Confidential Treatment of Certain Information and Materials
Submitted by PalliaTech CT, LLC in Response to RFA #2015-109387

Dear Commissioner Harris:

PalliaTech CT, LLC (the "Applicant") is concurrently filing with your office its response (the "Response") to the Department of Consumer Protection's (the "Department") Request for Application #2015-109387 (the "RFA").

Pursuant to the terms and conditions of the RFA, the Applicant respectfully requests confidential treatment of certain information and materials submitted as part of its Response (the "Confidential Information"). The Applicant makes this request because the Confidential Information contains trade secret, proprietary and confidential information that the Applicant believes: (a) will cause it and its affiliates harm if disclosed to the public, (b) would unfairly disadvantage the Applicant and its affiliates and unfairly advantage their competitors, and (c) is exempt from release pursuant to the Connecticut Freedom of Information Act ("FOIA"), Conn. Gen. Stat. § 1-210.

In addition to its request for confidential treatment of the Confidential Information, the Applicant also requests confidential treatment of: (a) this request and any subsequent

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UNDER THE FEDERAL FREEDOM OF INFORMATION ACT**

correspondence regarding this request for confidential treatment, and (b) any memoranda, notes, correspondence or other writings made by any member or employee of the Department relating to the request, or any conference or telephone call with respect thereto.

While the Applicant recognizes that the State of Connecticut (the "State") holds final administrative authority to release or exempt any material identified by Applicant as confidential, the Applicant requests prompt notice in the event any person makes a request to the Department or any other governmental body for disclosure of the Confidential Information. The Applicant further requests that it be furnished promptly with all written materials pertaining to any such request (including the requests and any determination with respect thereto) and that it be given sufficient notice of any intended release so that it may pursue what remedies may be available to it to disapprove of such disclosure.

Any such notice should be directed to:

Christine Rigby, CEO
PalliaTech CT, LLC

and to:

Matthew J. Guanci, Jr., Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Telephone: 860-275-8244
mguanci@rc.com

A. Legal Analysis.

Conn. Gen. Stat. § 1-210(b)(5) exempts two categories of confidential business information from FOIA's disclosure requirements: (1) "trade secrets" and, (2) "commercial or financial information given in confidence, not required by statute." FOIA defines "trade secrets" as:

Information, including formulas, patterns, compilations, programs, devices, methods, techniques, processes, drawings, cost data, customer lists, film or television scripts or detailed production budgets that (i) derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from their disclosure or use, and

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(ii) are the subject of efforts that are reasonable under the circumstances to maintain secrecy[.]

Conn. Gen. Stat. § 1-210(b)(5)(A). The Connecticut Supreme Court has held that this definition mirrors and should be construed in the same manner as the definition of “trade secrets” set forth in the Connecticut Uniform Trade Secrets Act (“CUTSA”), Conn. Gen. Stat. § 35-50 *et seq.* See *Univ. of Connecticut v. Freedom of Inf. Comm.*, 303 Conn. 724, 735-736 (2012).

Courts follow three steps when making a threshold inquiry about whether certain information constitutes a trade secret. These steps are to: (1) identify the information that is asserted to constitute a trade secret; (2) determine whether the information is of the kind included in the nonexhaustive list contained in the statute; and (3) decide whether the information sought to be protected is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. See *Bank of N.Y. v. Bell*, 120 Conn. App. 837, 858 (Conn. App. Ct. 2010). These steps therefore provide a useful framework for determining the applicability of this exemption from FOIA disclosure requirements.

The Connecticut Freedom of Information Commission (“FOIC”) has construed the term “commercial or financial information given in confidence, not required by statute” broadly to mean “any information related to business or trade.” See *James Craven and the Norwich Bulletin against Governor, State of Connecticut, and State of Connecticut, Office of the Governor*, FIC 2011-152 (Mar. 14, 2012).

In addition to the categories of confidential business information identified § 1-210(b)(5), FOIA exempts several other categories of information included in the Applicant’s Response, including:

- (a) personnel files and similar files “the disclosure of which would constitute an invasion of personal privacy (§ 1-210(b)(2));
- (b) statements of personal worth or personal financial data required by a licensing agency (§ 1-210(b)(8));
- (c) records, tax returns, reports and statements exempted by federal law (§ 1-210(b)(10));
- (d) records that, if disclosed, may result in a safety risk (§ 1-210(b)(19))’
- (e) records of standards, procedures, processes, etc., that, if disclosed, would compromise the security or integrity of an information technology system (§ 1-210(b)(20)); and

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(f) responses to requests for proposals or bid solicitations 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 (§ 1-210(b)(24)).

B. Reasons for Requesting Confidential Treatment of Confidential Information

As a general matter, all of the information and documents designated by the Applicant as “Confidential Information” constitutes, at a minimum, “commercial or financial information given in confidence, not required by statute,” thus satisfying the standard for exemption set forth in Conn. Gen. Stat. § 1-210(b)(5)(B). As explained above, the FOIC broadly interprets “commercial information” to mean “any information related to business or trade.” Given that the Applicant is not a publicly traded company and does not disclose its commercial and financial information to the public, the Confidential Information described herein falls squarely within this exemption to FOIA. Accordingly, the Applicant is providing this information in response to the Department’s request and with the understanding that this information will be maintained as confidential pursuant to the applicable exemptions from FOIA described below.

In addition to the overall applicability of the exemption set forth in § 1-210(b)(5)(B), and as required under the RFA, the Applicant below details each item of Confidential Information it believes is exempt from disclosure under FOIA and provides an explanation of the legal and factual bases for its request for confidential treatment.

1. Financial statements setting forth details of business transactions connected to the application (RFA (A)(3))

The Applicant’s response includes confidential commercial and financial information of both it and its affiliates and members in response to Section A(3) of the RFA.

As stated above, the Applicant’s disclosures include confidential commercial and financial information falling squarely within the exception set forth in Conn. Gen. Stat. § 1-210(b)(5)(B). The Applicant is not a publicly-traded company and does not disclose its financial information to the general public. This information is only available to a limited number of the Applicant’s employees and hired professionals (accountants, attorneys, etc.), and the Applicant makes significant efforts to maintain the confidentiality of such information.

Second, the financial statements submitted include information about the Applicant’s business transactions and organizational structure that constitute trade secrets under § 1-210(b)(5)(A). This information is not publicly available and was developed through significant expenditures of time and resources by the Applicant. If disclosed to the

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Applicant's competitors, would allow such competitors to unfairly compete with the Applicant and harm the Applicant's competitive advantage and its position in the marketplace.

2. The Applicant's Lease (RFA (B)(2))

The Applicant's Lease, disclosed in response to Section (B)(2) of the RFA, includes information that is confidential, commercial and financial information exempted from disclosure under Conn. Gen. Stat. § 1-210(b)(5)(B). Further, this information constitutes trade secrets regarding the Applicant's business which, if disclosed to Applicant's competitors would provide significant and proprietary information about the Applicant's business model, cost structure and operational capacities.

3. Facility Access Plan (RFA (C)(3)) / Marijuana Delivery Procedures (RFA (C)(6)) / Summary of Diversion and Theft Prevention Procedures (RFA (C)(8))

In response to Sections (C)(3), (6) and (8), the Applicant has disclosed information and documents regarding its facility access plan, marijuana delivery procedures and its diversion and theft prevention procedures. Given the critical importance of effective and secure procedures for facility access and product delivery, the Applicant has devoted substantial time and resources to developing, implementing and field testing these plans and procedures. A significant element of the value of the Applicant's business derives from this information which, if disclosed to the Applicant's competitors or to the public generally, would unfairly advantage the Applicant's competitors in the industry. Accordingly, this information is exempt under FOIA as trade secrets pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A).

Further, this information and materials, if publicly disclosed, could result in a safety risk to Applicant's employees and undermine the Applicant's efforts to prevent theft. Given the obvious safety concerns associated with the operation of medical marijuana dispensaries, the public disclosure of information regarding the Applicant's facility, delivery procedures and diversion and theft prevention procedures could aid potential criminals and threaten the safety of the Applicant's employees. Accordingly, the material is exempt from public disclosure under Conn. Gen. Stat. § 1-210(b)(19).

4. Detailed description of training and continuing education opportunities provided to dispensary facility employees (RFA (C)(7))

In response to RFA Section (C)(7), the Applicant has disclosed detailed information regarding its training and continuing education opportunities provided to employees. For the reasons discussed above, this information constitutes commercial information under § 1-210(b)(5)(B), and is exempt under FOIA.

Additionally, the training and continuing education of the Applicant's employees is a crucial component of its long-term success in this new and rapidly developing industry. As such, the Applicant has invested substantial resources and effort into developing training and continuing education policies, procedures and materials. This information and materials are not generally known to the public or to the Applicant's competitors and are critical aspects of the Applicant's overall business strategy. Disclosure of this valuable information would harm the Applicant's competitive position and would permit the Applicant's competitors to benefit from the substantial investment made by the Applicant in developing these materials. Accordingly, the materials constitute trade secrets covered by Conn. Gen. Stat. § 1-210(b)(5)(A) and are exempt from disclosure under FOIA.

5. Operating Agreement (RFA (E)(1))

The Applicant has submitted a copy of its Operating Agreement in response to Section (E)(1) of the RFA. The Operating Agreement contains confidential information regarding the Applicant's business and organization structure, as well as providing sensitive financial information about the Applicant and its members. As described above, this information is not publicly disclosed and is the subject of reasonable efforts to maintain its confidential nature. As such, the information constitutes "commercial and financial information" being disclosed to the Department in confidence, and is exempt from disclosure under FOIA.

6. Nature of Indebtedness (RFA (E)(5)) / Audited Financials (RFA (E)(6)) / Proformas (RFA (E)(7))

In response to Sections (E)(5), (6) and (7) of the RFA, the Applicant has disclosed information regarding the nature of indebtedness, audited financials and proformas. As discussed in detail above, each of these categories of information constitutes commercial and financial information being disclosed by the Applicant to the Department in confidence. This key financial information about the Applicant's business and its projections is not disclosed publicly and is available only to select employees and individuals with a specific need to know. As such, it is entitled to protection from disclosure under Conn. Gen. Stat. § 1-210(b)(5)(B).

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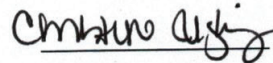
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7. Tax Returns (RFA (E)(8) and (9))

Pursuant to Conn. Gen. Stat. § 1-210(b)(10), records and tax returns exempted by federal law from disclosure under the federal FOIA scheme are similarly exempt from disclosure under the State's FOIA laws. Pursuant to Internal Revenue Code § 6103, tax returns and return information may not be disclosed to anyone unless specifically authorized under that statute. *See* IRS FOIA Guide, Exemption 3. Accordingly, this information required to be disclosed under the RFA is exempt from public disclosure under FOIA.

Please contact the undersigned at ^{(203) 253-1222} or ^{Matt Guanci, ESQ.} of Robinson & Cole LLP at (860) 275-⁸²⁴⁴ if you have any questions with respect to this request.

Very truly yours,



Enclosures

cc:

MEDICAL MARIJUANA DISPENSARY FACILITY LICENSE APPLICATION STATE OF CONNECTICUT- DEPARTMENT OF CONSUMER PROTECTION

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1. RFA (A)(1): BUSINESS INFORMATION OVERVIEW

1. RFA (A)(1): BUSINESS INFORMATION OVERVIEW

“Provide complete the Dispensary Facility Information Form, attached as Appendix A.”

PalliaTech is a seasoned medical marijuana company that is poised for rapid growth. With Roy Ciarlo, its Chief Pharmacist/Dispensary Manager, the Board of Directors is focused on making a contribution to the medical marijuana industry in Connecticut.

John O’Brien, Chief Security and Compliance Officer, has leveraged his experience running the medical marijuana in the State of New Jersey for Governor Chris Christy to help PalliaTech create one of the strongest anti-theft and diversion programs in the industry. The plan (see RFA (C)(8): SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES) describes PalliaTech’s emphasis on deterring theft and diversion, specifically through its procedures regarding:

- Labeling;
- Error Reporting;
- Recordkeeping Safeguards;
- Interfacing with the Prescriptions Monitoring Program (PMP);
- Reportable Events; and
- Inventory Controls.

As a first tranch, PalliaTech has allocated \$1 million for the development of a Connecticut medical marijuana dispensary and its board stands ready to devote all required resources to assure its success.

Once the dispensary is open, we will execute on its Operating Plan. In that plan, the Company has established its future hours of operation to allow for the convenient access to Connecticut’s qualified medical marijuana patients. The Company will open the facility doors approximately one half hour before opening the dispensary to give additional time for patients to peruse PalliaTech non-medical marijuana products and participate and learn more about the PalliaChatSM and PalliaWellSM programs.

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Completed Appendix A

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Completed Appendix A

"Provide complete the Dispensary Facility Information Form, attached as Appendix A."



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Appendix A Dispensary Facility 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: PalliaTech CT, LLC						
3. Trade Name of Applicant: PalliaTech						
4. Applicant's Business Address: 19 Morgan Lane						
5. City: Monroe				6. State: CT	7. Zip Code: 06468	
8. Daytime Telephone Number: (203) 445-1487				9. E-mail Address: crigby@spkgroup.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 their contact information changes.

16. Name of Primary Contact: Christine Rigby	17. Primary Contact Title: CEO
18. Primary Contact E-mail Address: crigby@spkgroup.com	19. Primary Contact Telephone Number: (203) 445-1487
20. OPTIONAL - Name of Alternate Contact: Richard Taney	21. Alternate Contact Title: Director
22. Alternate Contact E-mail Address: rtaney@palliatech.com	23. Alternate Contact Telephone Number: 5163045130

Section C: Formation/Incorporation Information

24. Date of Formation/Incorporation: 08 / 26 / 15	25. Place of Formation/Incorporation: Connecticut
26. Registered with the Connecticut Secretary of State: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	27. Sale and Use Tax Permit Number: 15W9900656025 (Confirmation # for Temporary Permit) Provide a copy of your Sale and Use Tax permit with your application.

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Completed Appendix A



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Section D: Proposed Dispensary Facility Information

28. Proposed Dispensary Facility Address: 1034 Highridge Road			29. City: Stamford
30. State: CT	31. Zip Code: 06905	32. Telephone Number: (203) 445-1487	33. Fax Number:
34. Own or Lease Property: <input type="checkbox"/> Own <input checked="" type="checkbox"/> Lease Provide a copy of the lease, deed or other documents evidencing the right to occupy if you are awarded a license.			35. Name of Property Owner: Amelaine Realty Company, LLC.

Section E: Business Association Information

36. Are you associated with any other dispensary facility licensee or license applicant or producer licensee or license applicant: <input 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. Licensee or Applicant Type: <input type="checkbox"/> Dispensary Facility <input type="checkbox"/> Producer
39. Applicant Name:	40. Licensee or Applicant Type: <input type="checkbox"/> Dispensary Facility <input type="checkbox"/> Producer

Section F: Proposed Dispensary Department Hours

41. State the proposed dispensary department hours of operation for each day. The dispensary department is where marijuana will be sold.			
Monday	10am	to	8pm
Tuesday	10am	to	8pm
Wednesday	10am	to	8pm
Thursday	10am	to	8pm
Friday	10am	to	8pm
Saturday	10am	to	8pm
Sunday	12pm	to	6pm

Section G: Proposed Dispensary Facility Hours

42. State the proposed dispensary facility hours of operation for each day. The dispensary facility includes areas where non-marijuana products and services will be offered.			
Monday	9:30am	to	8pm
Tuesday	9:30am	to	8pm
Wednesday	9:30am	to	8pm
Thursday	9:30am	to	8pm
Friday	9:30am	to	8pm
Saturday	9:30am	to	6pm
Sunday	11:30am	to	6pm

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Completed Appendix A



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Section H: 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.

43. Name: PalliaTech, Inc.	44. Time Period: October 2010 to Present
PalliaTech NY, LLC	November 2012 to Present
PalliaTech CT, LLC	August 2015 to Present
PhytaTech CO, LLC	June 2013 to 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.

45. Address: 111 Coolidge Avenue, Bellmawr, NJ 08031	46. Time Period: February 2013 to Present
879 Federal Blvd., Denver, CO 80204	December 2013 to Present

Section I: Dispensary Facility Backers

Provide the following information for each dispensary facility backer. A dispensary facility 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 dispensary 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.

47. Name: PalliaTech, Inc*	48. Percentage of ownership 100%
*Medtech International Group, LLC and its sole member, Boris Jordan, own 60% of PalliaTech, Inc.	
*William Todd and family members own 11% of PalliaTech, Inc.	
*Richard Taney and family members own 7% of PalliaTech, Inc.	

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Completed Appendix A



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

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

- directly or indirectly have control over, or participate in the management or operation of, the dispensary 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.

49. Name (First, Middle, Last): Christine Rigby	50. Title: President, PalliaTech CT, LLC	51. Role: Chief Executive Officer
Roy Ciarlo	Dispensary Facility Manager	Dispensary Facility Manager
Gretchen McCarthy	VP, HR & Operations	VP, HR & Operations
Richard Taney	Director	Director
Boris Jordan	Director	Director
Michelle Bodner	Director of Backer - PalliaTech, Inc.	Director of Backer
Steve Patierno	Director of Backer - PalliaTech, Inc.	Director of Backer

Section K: 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.

52. Expense Item: Real Estate Leases/Deposits	53. Cost: \$	54. Source of Funds: PalliaTech, Inc.
Project Management	\$	PalliaTech, Inc.
Writing Assistant	\$	PalliaTech, Inc.
Security Consultant	\$	PalliaTech, Inc.
Legal (Estimate)	\$	PalliaTech, Inc.
Production Costs (including Architect)	\$	PalliaTech, Inc.
Total:	\$	
	\$	

Section L: Security System

Identify the company or companies that will provide security services for the dispensary facility if a license is awarded. If more than two companies will provide security services, complete this section for each such additional company.

55. Primary Security Company Name: Associated Security Corporation	57. City: East Hartford
56. Primary Security Company Address (including Apartment or Suite #): 16 Pitkin Street	

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Completed Appendix A



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E-mail: dcp.mmp@ct.gov • Website: www.ct.gov/dcp/mmp



58. State: CT	59. Zip Code: 06108	60. Telephone Number: (860) 291-8111	61. Fax Number: (860) 291-8156
62. E-mail Address: bret@associatedsecuritycorp.com			
63. Backup Security Company Name (if applicable): Rapid Response Monitoring Services, Inc.			
64. Backup Security Company Address (including Apartment or Suite #): 400 West Division Street			65. City: Syracuse
66. State: NY	67. Zip Code: 13204	68. Telephone Number: (315) 422-9946	69. Fax Number: (203) 775-8222
70. E-mail Address: sales@rrms.com			
71. Attach a detailed description of the security plan to be offered by the security company or 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 M: Legal Proceedings

72. 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.

73. 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.

74. 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.

75. 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.

Section N: Criminal Actions

76. 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.

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Completed Appendix A



Medical Marijuana Program

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

E-mail: dcp.mmp@ct.gov • Website: www.ct.gov/dcp/mmp



Section O: 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.

77. Signature:

▶

78. Date Signed:

9/15/2015

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.

79. Signature:

▶

80. Date Signed:

9/15/2015

1. RFA (A)(1): BUSINESS INFORMATION


DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Section C: Copy of Sales and Use Tax Permit

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Section C: Copy of Sales and Use Tax Permit

8/27/2015	Taxpayer Service Center - Print	
<div style="display: flex; justify-content: space-around; align-items: center;"><div>STATE OF CONNECTICUT DEPARTMENT OF REVENUE SERVICES</div><div></div></div>		
<h3>Temporary Permit for Sales and Use Tax</h3>		
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*:	<div style="background-color: black; width: 100px; height: 1.2em;"></div>	
Organization Name:	PalliaTech CT LLC	
Business Address:	252 SEA CLIFF AVE SEA CLIFF, NY 11579	
This temporary permit will expire on 09/17/2015.		
<p>* This number will act as your temporary tax registration number. It will be replaced when you receive your registration confirmation package in the mail.</p> <p>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.</p> <p>Please contact the DRS Registration Section at (860) 297-4885 if you do not receive your registration confirmation package by the 15th business day following completion of REG-1 OL.</p>		
https://drsbusntax.ct.gov/COMMON/Print.aspx?DATType=REG&FormName=REG-1&FormDesc=Tax%20Type%20Registration&ControlUrl=~UserControls/... 1/4		

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Section D: Evidence of Right to Occupy

1. **RFA (A)(1): BUSINESS INFORMATION**
DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)
• Section D: Evidence of Right to Occupy

RETAIL LEASE
September 16, 2015
REFERENCE DATA

LANDLORD:

LANDLORD'S ADDRESS:

TENANT:

TENANT'S ADDRESS:

PREMISES:

LEASE COMMENCEMENT

DATE:

RENT COMMENCEMENT DATE:

OCCUPANCY DATE:

TERM:

EXTENSION TERMS:

MINIMUM RENT:

SECURITY DEPOSIT:

USE:

This portion of the RFA
is exempt from public release
under the Federal
FOIA exemption 5(DPP)

14147493-v4

1. **RFA (A)(1): BUSINESS INFORMATION**
DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)
• Section D: Evidence of Right to Occupy

[REDACTED]

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• Section D: Evidence of Right to Occupy

[REDACTED]

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

[REDACTED]

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DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Section D: Evidence of Right to Occupy

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

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This portion of the RFA is exempt from disclosure under the Federal Freedom of Information Act.

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Section D: Evidence of Right to Occupy



1. **RFA (A)(1): BUSINESS INFORMATION**

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

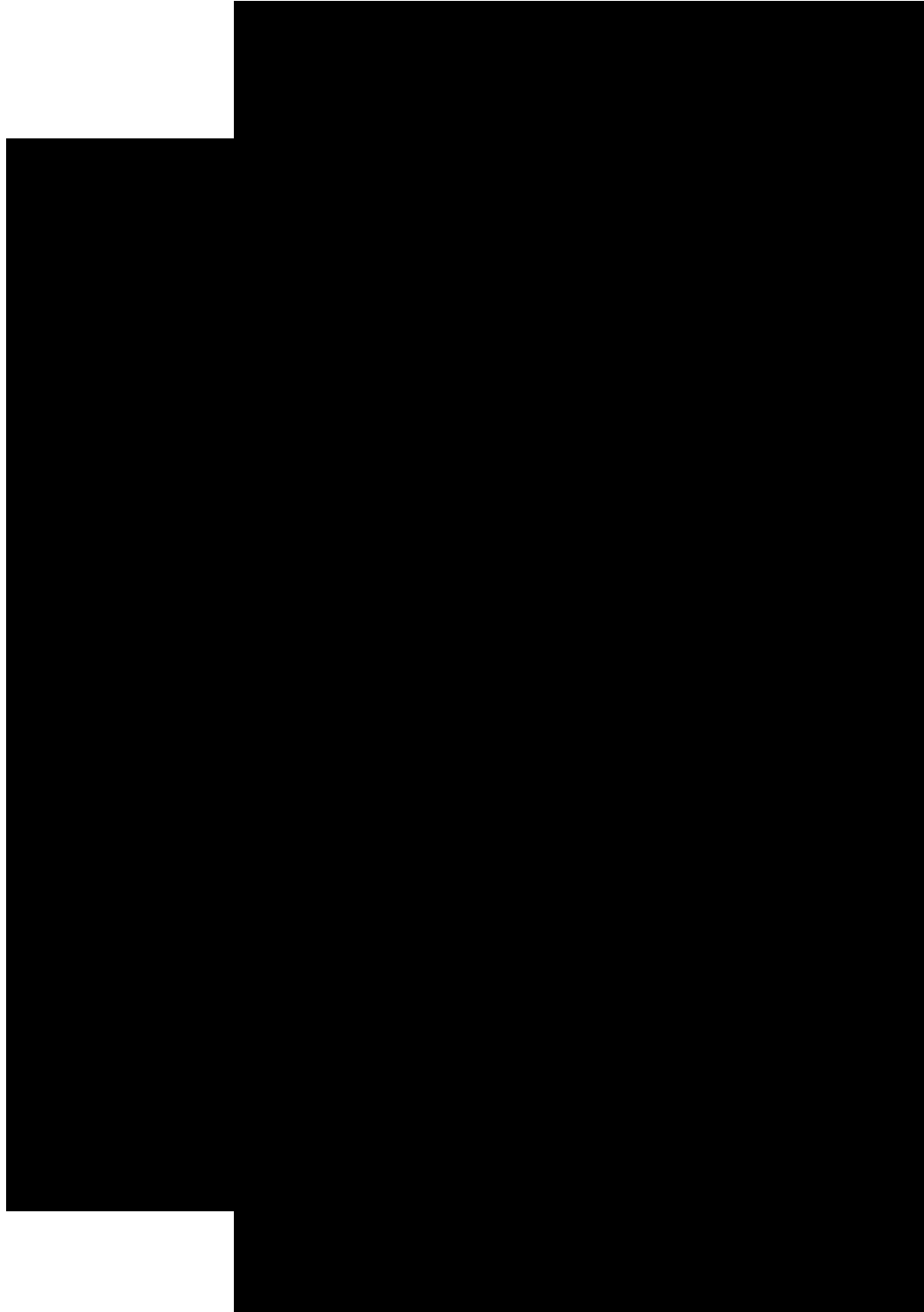
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DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

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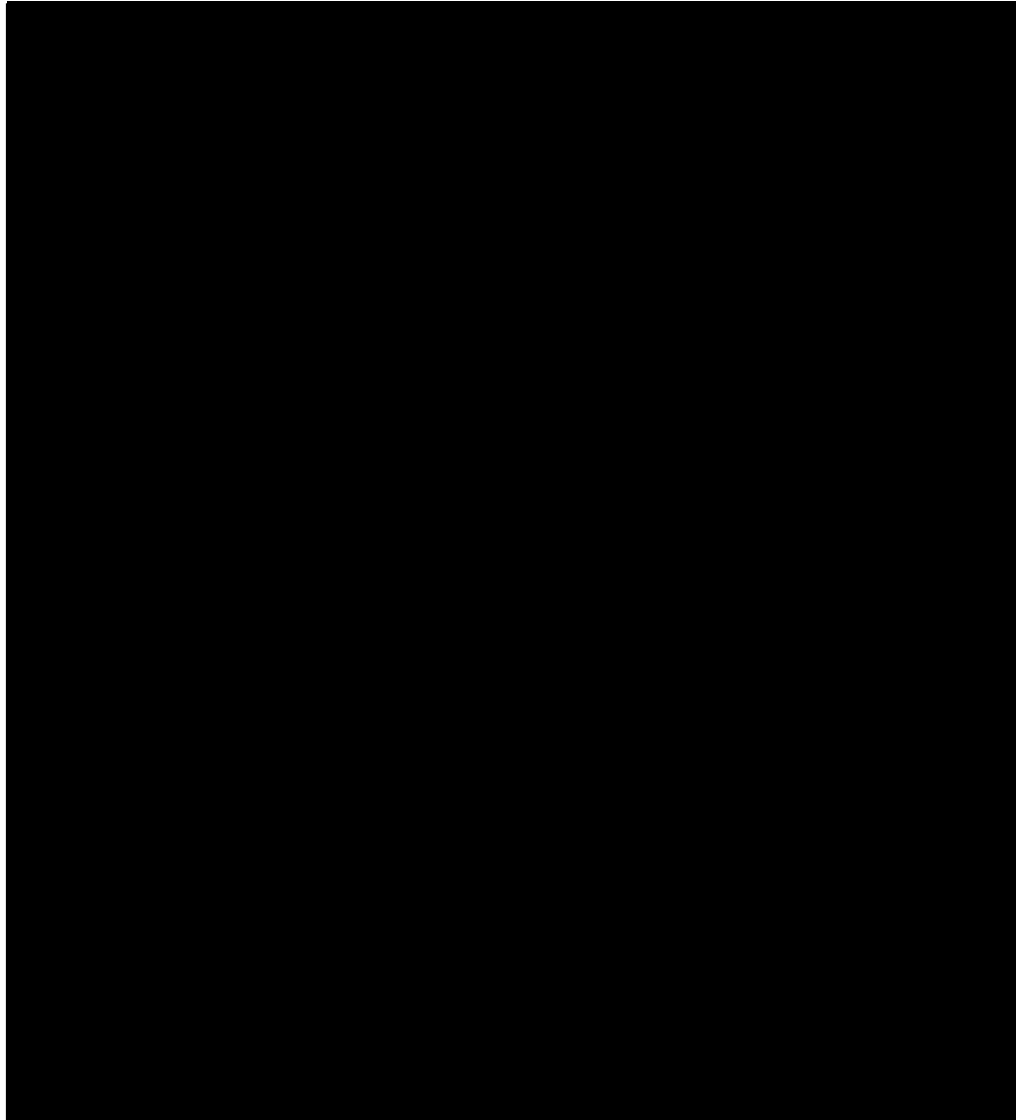


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1. RFA (A)(1): BUSINESS INFORMATION

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- Section L: Security Plan
(Regulations of Conn. State Agencies: Sec. 21a-408-62)

1. **RFA (A)(1): BUSINESS INFORMATION**

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- Section L: Security Plan
(Regulations of Conn. State Agencies: Sec. 21a-408-62)

A: BUSINESS INFORMATION
Request For Proposal para (A)(2)(L): Security Plan

PALLIATECH CONNECTICUT DISPENSARY SECURITY SYSTEM & SECURITY PLAN

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

- Section L: Security Plan
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PalliaTech Dispensary Security Plan

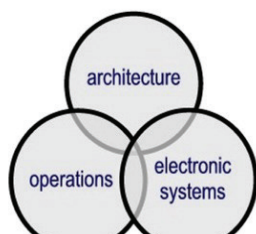
PalliaTech shall institute a comprehensive and robust security program at its dispensary location(s) that adheres to and exceeds the requirements set forth by the State of Connecticut Regulations of the Department of Consumer Protection (DoCP) concerning the Palliative Use of Marijuana - Sections 21a-408-1 to 21a-408-70 in their entirety, and which shall specifically address Sections (Sec(s).) 21a-408-10, 21a-408-36, 21a-408-37, 21a-408-51, and 21a-408-62 and referenced Regulations of other Connecticut State Agencies. This holistic program shall be implemented and managed to:

- maintain adequate control against the diversion, theft and loss of marijuana (Sec. 21a-408-62 (a));
- maintain the knowledge, understanding, judgment, procedures, security controls and ethics to ensure optimal safety and accuracy in the dispensing and sale of marijuana;
- ensure the health, safety, and welfare of patients, their caregivers, and the greater public, and;
- protects employees, assets, and operations.

PalliaTech has employed the services of a professional security consulting firm identified in this application with extensive experience in developing and implementing such a plan for both pharmaceutical and other high risk facilities. Their services have already included the assessment of proposed dispensary locations, and the development of proposed physical, technical and operational security program elements included as part of our application. PalliaTech shall further engage our consultant partner for the development of detailed implementation specifications, oversight and continued audits of the program.

A summary of planned security measures for PalliaTech's proposed dispensary location are included herein and are being submitted with our application as required by Sec. 21a-408-15(5).

Concepts and Strategies



The Security Plan described herein addresses the three primary elements of a security program: (i) Technical Systems; (ii) Physical

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/ Architectural security elements, and; (iii) Operational elements. Understanding that no single element can provide adequate security for the operation, all elements will be integrated to form a cohesive and centralized security solution. Specifics of each security program element are listed below and detailed in subsequent sections of the plan.

Technical Systems

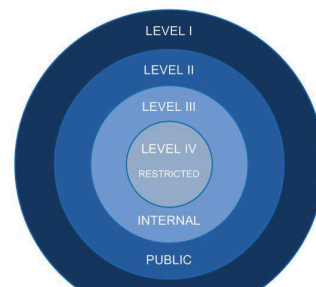
- Card Access Control and Alarm Monitoring System
- Biometric Access Systems
- Intrusion Detection and Alarm Monitoring Systems
- Video Surveillance Systems
- Visitor Management Systems
- Intercom Communications

Physical / Architectural Security Elements

- Crime Prevention Through Environmental Design (CPTED)
- Lighting levels
- Physical pedestrian controls
- Doors, door hardware, locks and keying systems
- Anti-Terrorism and Force Protection (ATFP)

Operational systems

- Written security management plan(s)
- Established policies and procedures
- Secure transportation plans
- Post orders and processes



1. RFA (A)(1): BUSINESS INFORMATION

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The application of the program elements will follow the security industry standard strategy of “concentric rings of protection.” This physical security protection scheme is based on providing multiple layers of protection that originate at the site perimeter and are replicated at various other “rings” as one proceeds towards the most critical areas and assets. Each ring provides deterrence, detection and delay; the areas in between the rings—referred to as “intervention zones”—provide for added time and incident response.

Technical Systems Security

PalliaTech's security program will feature the following state-of-the-art electronic security systems that will be installed and interfaced to provide situational awareness of activity (authorized and unauthorized) wherever medical *Marijuana* is being stored, handled, or dispensed consistent with Sec. 21a-408-62 – “*Security alarm systems; minimum requirements for dispensary facilities and production facilities*”. The systems will be installed by licensed professional Primary and Backup Security service providers as defined by including those identified in our application, who shall also be retained to maintain and service test all equipment at least two times per year and verify everything is in good working order (Sec. 21a-408-51 (a)(5) and Sec. 21a-408-62 (g)). These systems (primary and backup) as defined by Sec. 21a-408-62 (c)—combined with strong physical measures and proactive operational processes will serve to identify, deter and mitigate incidents that can result in the loss, theft or misuse of *Marijuana* products at the dispensary. Proposed Security Device Plans for the proposed PalliaTech facility have been developed to reflect the information herein and are included as part of the application submission. The following describes the types and functional operations of the proposed systems.

Access Control and Alarm Monitoring System

The Access Control and Monitoring (ACAM) System will be a computer-based software system manufactured specifically to control, monitor, and manage access to the facility, product(s), and other areas as required by Sec. 21a-408-1 through Sec. 21a-408-70. This system shall operate using a centralized server software for electronic access control with alarm monitoring, image verification, and event management capabilities. The ACAM System shall serve as the Primary security system to provide for the following minimum functionality:

- Programmable, automated locking and unlocking of doors based on time and date schedules
- Programmable access control for authorized individuals based on privileges defined by roles and responsibilities, work-flow, day, date, and time, otherwise referred to as “access levels”, and two-man rules
- Cardholder database and area access reporting, as well as card tracking by reader and user

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Request For Proposal para (A)(2)(L): Security Plan

- Event reporting of all access and associated alarm transactions throughout the facilities
- Alarm event monitoring for unauthorized access violation and intrusion activity
- Event logging and reporting of all system transactions
- Interface with other facility systems for security and life-safety
- Local and remote monitoring and reporting capabilities
- Interface and integration with other security systems such as the video surveillance, intrusion detection, visitor management, and intercom for enhanced situational awareness and reporting
- Password protected rights / privileges-based administration, reporting, and monitoring capabilities (Sec. 21a-408-49, Sec. 21a-408-51 (7), and Sec. 21a-408-70)
- Audit trail ability to track and report on system programming changes by user
- Graphical mapping of the security systems with dynamic graphics of system status and control of field devices
- Remote web-enabled monitoring and email notification of events
- Guard tour functions for the tracking and reporting of facility inspection by specified personnel

The ACAM System will be provided with network communications to local workstations and electronic control panels distributed throughout the facilities. These panels will be connected to various field devices to provide for:

Electronic Access Control

To control and facilitate access, we will distribute access readers (i.e. card and / or biometric reader devices) throughout designated areas of the dispensary. All employees will be issued an access credential / card with their photograph, name, and functional position tiles, as well as encrypted "smart-card" technology, which will be programmed into the system and defined with specific rights and privileges. The ACAM System shall utilize door position switches, access control card readers, and electric locking hardware to control and monitor the entire perimeter and restricted areas of the operations at the dispensary. Status monitoring of secured access control doors (i.e. open, forced, closed, and held) will be reported through the system based on pre-

1. RFA (A)(1): BUSINESS INFORMATION

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- Section L: Security Plan
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programmed parameters of operation. Access controls will also be deployed at the following locations:

- All perimeter doors to the facility (Sec. 21a-408-51 (a)(3) and 21a-408-62 (a)(1))
- All perimeter doors to the dispensary department (Sec. 21a-408-51 (a)(8))
- All specialty areas, including but not limited to:
 - Storage Vault (Sec. 21a-408-51 (a)(3))
 - Security Rooms (Check-In and Security Equipment) (Sec. 21a-408-62 (d))
 - Dispensary Department (Sec. 21a-408-51 (a)(8))

All secured rooms, shall include fail-secure locking mechanisms to preclude re-entry in the event of fire alarm activation, but shall always provide for adequate and appropriate egress as required by Connecticut State and Local Building Codes.

Moreover, a biometric reader will be used to secure the storage vault, to ensure that only authorized personnel have access.

Alarm Monitoring

In addition, PalliaTech will deploy intrusion alarm devices to detect unauthorized use of doors for entry or exit on the building perimeter or any secured spaces. This will include, but not be limited to:

- Door contacts / status monitoring at all perimeter doors (Sec. 21a-408-62 (a)(1))
- Door contacts / status monitoring at all interior access controlled doors
- Glass-break detection at all perimeter glazed window areas (active 24hrs)
- Motion detection throughout the facility (Sec. 21a-408-62 (a)(2))
- Line supervision of all connected devices to monitor possible tampering
- Tamper alarms on system cabinets / enclosures to monitor access to the controls and systems
- Bond sensors to determine if electromagnetic locks are engaged where used

1. RFA (A)(1): BUSINESS INFORMATION

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- Section L: Security Plan
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- Door management units will be installed that shall provide local sounder and systems alarms on any doors designated for “exit only”. These units shall also provide for authorized use, whereby authorized personnel with a key can override the local alarm function if necessary.

Furthermore, emergency buttons will be installed and connected to the ACAM System to facilitate notification of life-threatening or other emergency situations requiring a law enforcement response when manually activated. These buttons will be accessible throughout every facility installed in conspicuous locations to allow for easy identification by all occupants. When activated, an audible and visible alarm will pervade the facility and will be reported to the ACAM System monitoring stations. Duress, Panic and Hold-up buttons will also be deployed as described in the Intrusion Alarm System section.

System hardware and computers will be housed in secure dedicated closets or secured equipment racks with access limited to authorized personnel only (Sec. 21a-408-62 (b)).

Video Surveillance System

A state-of-the-art Video Surveillance System (VSS) will be deployed at the facility, which includes video cameras in all areas that may contain Marijuana and at all points of entry and exit, and are appropriate for the normal lighting conditions of the area under surveillance. Cameras shall be directed at all approved safes, approved vaults, dispensing areas, marijuana sales areas and any other area where Marijuana is being stored or handled. Cameras shall be of sufficient resolution and focus as to allow for the capture of clear and certain identification of any person entering or exiting the facility and shall (Sec. 21a-408-62 (a)(3)). The VSS will consist of color, day/night IP technology cameras with megapixel resolution networked and connected to digital video recorders or servers and workstations that will monitor and record surveillance images 24-hours a day (Sec. 21a-408-62 (a)(4)), which the dispensary facility or production facility shall make available for immediate viewing by the commissioner or the commissioner’s authorized representative upon request (Sec. 21a-408-62 (a)(4)). Surveillance monitoring shall be done via secure network with access from authorized employees’ computers using video management system software, which shall allow for comprehensive management of live and recorded video images, as well as for the integration of the VSS with the ACAM to support exception or event-based video call-up, event tagging, and recording retrieval.

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Recording apparatus for the VSS will be designed to support archived video for no less than 30-days (Sec. 21a-408-62 (a)(4)), and enable export of unaltered video and still photo images from any and all camera views. The VSS will also provide:

- 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 operator within five (5) minutes of the failure, either by telephone, email, or text message (Sec. 21a-408-62 (a)(9)).
- Export of still color photo images from any camera view (live or recorded) to a 9600dpi resolution printer using a Samsung CLP-680-ND color laser printer (Sec. 21a-408-62 (a)(10)).
- Time and date stamp on all recorded video (Sec. 21a-408-62 (a)(11))
- Video analytics such as:
 - Motion detection and event-based recording
 - Line crossing
 - Object detection
- Export of recorded video in any industry standard format (including .jpeg, .mpeg, or .gif), with the ability to be archived in a proprietary format that ensures authentication and guarantees that no alteration of the recorded image will have taken place in addition to watermark verification (Sec. 21a-408-62 (f)).
- The ability to save exported video in an industry standard file format that can be played on a standard computer operating system (Sec. 21a-408-62 (f)).
- The ability to remain operational during a power outage using an Uninterruptable Power Supply Unit (UPS) (sec. 21a-408-62 (12)).

Various types of camera, including fixed (standard), fixed (hemispheric), fixed (panoramic), and Pan, Tilt, Zoom (PTZ) will be installed throughout the facilities. The specific cameras to be used may vary, but will meet the performance specifications of the following units at a minimum:

Fixed IP Camera (indoor / outdoor) – Axis M3026-VE (<http://www.axis.com/node/31310>)

- Compact, vandal-resistant, outdoor-ready design

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- 3 MP / HDTV 1080p
- Day/night functionality
- Multi-view streaming
- Power over Ethernet

Fixed IP Camera (panoramic) – Axis M3027-PVE (<http://www.axis.com/node/31321>)

- 360°/180° views in up to 5 MP resolution
- Compact, vandal-resistant, outdoor-ready design
- Digital PTZ and multi-view streaming with dewarped views
- Enhanced capacity for video analytics

Fixed IP Camera (multi-view) – Aerecont -V8185DN
(<http://www.aerecontvision.com/product/SurroundVideo+Series/AV8185DN>)

- 8MP Panoramic Megapixel Camera
- Dual Encoder H.264/MJPEG
- Indoor / Outdoor IP66, Vandal Resistant and IK-10 Rated Dome
- Forensic Zooming
- PoE and Auxiliary Power

Pan, Tilt & Zoom (PTZ) IP Camera – Axis P5635-E (<http://www.axis.com/node/40888>)

- Continuous 360° pan
- HDTV 1080p and 30x optical zoom
- Day/night functionality
- 120 dB Wide Dynamic Range

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- Electronic image stabilization
- Shock detection, Advanced Gatekeeper
- PoE and Auxiliary Power

The cameras shall be deployed to provide:

- Site surveillance (perimeter and general area coverage)
- Building perimeter surveillance
- Capture of clear and certain identification images of any person entering or exiting the facilities
- Capture of clear and certain identification images of any person entering secured areas
- Surveillance of activity wherever medical *Marijuana* is being stored, handled, or dispensed

As will be the case with all security systems, system hardware and computers will be housed in secure dedicated closets or secured equipment racks with access limited to authorized personnel only (Sec(s). 21a-408-62 (b) and (d)). Installation, programming and maintenance of the system will be the responsibility of an experienced, authorized, and certified reseller.

Visitor Management System

While not required by the regulations, an electronic Visitor Management System (VMS) that allows for the creation of a database for logging visitor information as defined by policy for easier retrieval and reporting to the Commissioner, the Commissioner's representatives, or other authorized Connecticut agencies. The system shall be deployed at the dispensary to manage the enrollment, verification, recording, and reporting of all non-employee access to the facility (Sec. 21a-408-53 (g) (2)). The VMS will have a number of peripheral devices to assist in creating the database and to provide for identity verification, including an image capture camera and a license scanner. The database will contain information pertaining to the day/date/time of entry and exit activity, and will be fully searchable and reportable in several export formats. The VMS will also be integrated with the ACAM System so that visitor access credentials can be issued to all visitors who will go beyond limited access areas. This will allow for the tracking of those persons as they travel through a facility and present their credential at access control readers as required by policy. The selection of a system shall be made at the time of implementation, however, any system selected shall support the functions provided by the HID – EasyLobby Secure Visitor Management System at a minimum

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(http://www.hidglobal.com/sites/hidglobal.com/files/resource_files/el-secure-visitor-mgmt-10-software-ds-en.pdf), which includes:

- User Security Levels
- User Defined Fields
- Visitor Field Configurations
- License Data (Determines the information that is pulled from the driver's license scan into the visitor log)
- Alert Options: Visitor Check In, Package Check In, Watch List Alert, Expired Badges, Panic Message, Current Visitor, Maximum Visitor, Frequent Visitor, Time-Based
- Hardware Device Options: EasyLobby supports the following hardware devices: CardScan 800 Business Card Scanner, SnapShell driver's license/business card scanner, AssureTec ID-150 scanner, ICI DCM/2 Driver's License Reader, CSS 1000 Passport/License/Card Scanner, Topaz Signature Capture Pad, IDTECH magnetic stripe reader, Metrologic barcode scanner, RF Ideas pc Prox card reader, M2sys Biometric Fingerprint reader

Video Intercom System

While not required by the regulations, a Video Intercom System (VIS) using video camera and voice stations at select access controlled perimeter entries, along with master stations with video monitors to be used at security, reception, and service counter locations, shall be used to screen personnel requesting entry to the facility to further ensure only authorized personnel shall be permitted access. The system will allow operational personnel to verify whether persons requesting access have authorized business activities before they will be allowed to enter through the secure perimeter. The VIS system will interface with the VSS to record all video images. It will also integrate with the ACAM System to facilitate tracking and event logging of door release transactions.

Intrusion Detection System

An Intrusion Detection System (IDS) will be deployed at the dispensary as a backup alarm system to detect unauthorized entry during times when no employees are present. The system shall be installed by the Primary security company and monitored by the Backup security company identified in our application (Sec. 21a-408-62 (c)). The monitoring company shall possess a UL Certification for

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monitoring and be licensed for such business in the State of Connecticut. The IDS will be a commercial grade system, which maintains the following certifications (at a minimum):

- UL 609 – Local Burglar Alarm Units and Systems
- UL 365 – Police Station Connected Burglar Alarm Units and Systems
- UL 1610 – Central Station burglar Alarm Units
- UL 1635 – Digital Alarm Communicator System Units

Moreover, systems will meet the following criteria:

- A system Control Panel will be installed and connected to a number of field devices that will provide communications to the panel relative to active status or tampering.
- The system Control Panel will be interfaced with the ACAM System to provide for active monitoring of the IDS status for events and alarms.
- The Control panel will be capable of automatically sending a preprogrammed, prerecorded voice message over a telephone line, radio, or other communication system to a law enforcement, public safety, or emergency services agency requesting help. The selected communications methodology will utilize an alternate means (i.e. PSTN, Digital or Cellular) for back-up communications (Sec. 21a-408-62 (a)(8)).
- The Control Panel will facilitate communications via PSTN, Digital or Cellular communications to a UL Listed and State Licensed Central Station who will monitor alarms from the panels, and notify PalliaTech representatives and local law enforcement officials as required, based on the alarm condition and operating condition of the facility location. The selected communications methodology will utilize an alternate means (i.e. PSTN, Digital or Cellular) for back-up communications.
- The Control panel will also be capable of providing alert / alarm notifications directly to PalliaTech personnel.
- Arming Station Keypads will be installed and connected to the Control Panel to facilitate local programming, control and monitoring of the system and all connected devices based on each user's unique PIN assigned by Management and maintained by the Security Department. Users

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will also be provided with an “ambush” code, which upon activation will communicate a silent duress alarm. (Sec. 21a-408-62 (a)(5))

Additional field devices and functions supported by the IDS will include:

- Duress Alarms – A silent security alarm system signal will be generated by the entry of a designated code into a keypad / arming station to signal that the alarm user is being forced to turn off the system. (Sec. 21a-408-62 (a)(5))
- Panic Alarms – Employees will also receive a portable, wireless emergency or “panic” button that can be pinned to clothing and must be worn all times they are in the dispensary. They will be trained how to use the button and what procedures to follow in an emergency situation. When an employee presses a button it will send a signal to local law enforcement. (Sec. 21a-408-62 (a)(6))
- Holdup Alarms – The manual activation of a latching button will generate a silent alarm signal to signal a robbery in progress (Sec. 21a-408-62 (a)(7)). Fixed holdup alarm buttons will be located at the following locations:
 - All Dispensary Counters
 - Reception / Check-In Desk
 - Dispensary Manager's Desk
- Duress Alarms with Pull-Cords – The manual activation of a latching switch using a button or pull-cord will generate an audible alarm on arming station keypads and the ACAM System alerting dispensary staff that personnel in rest rooms may be in physical duress.
- Glass Break Alarm – Acoustic glass-break detection units will be installed in proximity to all glazed / window areas at the perimeter of the manufacturing and dispensary facilities (including vertical glazing and skylights) to generate silent and local audible alarms should the glazing be compromised by a force attack. The activation of a device will generate silent and local audible alarms.
- Motion Detection – Motion detection sensors will be installed in perimeter areas and within the facility to detect unauthorized occupancy activity at any time the facility is “closed”. Motion detection sensors will also be installed in plenum spaces above the manufacturing and dispensary facilities where there is an adjacent tenant. The activation of a device will generate silent and local audible alarms. Motion sensors will include anti-masking technology to detect

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tampering effort to block the infrared signals (i.e. paper, tape, spray, etc.) from reporting an alarm condition to the panel. (Sec. 21a-408-62 (a)(2))

- Door Contacts / Position Switches – Magnetic door contacts / position switches will be installed at all perimeter doors (primary, service and egress) to monitor the status of a door. The activation of a device will generate silent and local audible alarms. (Sec. 21a-408-62 (a)(1))
- Fire Alarm – The IDS will be provided with an auxiliary output from the building fire alarm system at each facility which will generate an alarm condition upon activation of a fire alarm.
- Safe Alarms – Heat detection and door contacts shall be installed on Product Storage Safes / Vaults and Cash Safes at each facility to generate an alarm notifying security of a forced entry or forced entry attempt. The door contact shall additionally be used to report activity of authorized use.

Systems hardware and computers will be housed in secure dedicated closets or secured equipment racks, and monitored so as to limit access to authorized personnel only.

The system will be installed, programmed and maintained by an authorized, certified reseller with experience furnishing such systems and has no commercial business relationship with the company furnishing the ACAM System and / or VSS.

Key Management System

A Key Management System (KMS) will be used to store and track usage of all physical keys for controlled spaces such as the Security Asset Managers (SAMs) manufactured by Key Systems Inc. The system will include a hardened key cabinet and tamper-proof key rings located in the Storage Vault with the ability to:

- Control access as a stand-alone system or through an interface to the ACAM System to the cabinet and to individual keys or key rings (Sec. 21a-408-51 (6)).
- Identify and record the key(s) removed by the authorized user.
- Provide history reports on the time and date each key is removed and returned.
- Allow for emergency access through manual override for public safety officials.
- Provide a key management and tracking software.

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Two-Way Radio System

A two-way radio system will be installed using hand-held radios to facilitate two-way voice communications between site security and operations personnel as needed.

Knox Box

A secure Knox Box will be provided at the dispensary to house access credentials and keys to facilitate emergency access by the Public Safety Officials as required. The Knox Box will be fitted with the standard municipality master key, as well as with electronic tamper switches to detect when the box is opened or removed from the wall.

Uninterruptible Power Supply System

Uninterruptible Power Supply (UPS) System(s) will be installed for all security systems to ensure power for those systems are maintained during a power loss (Sec. 21a-408-62 (a)(12)), until such time as power can be restored from the primary utility feed or a generator service. Upon loss of power the ACAM System and IDS will produce an alarm to notify the Dispensary manager and the Central Station that power has been lost.

Physical/Architectural Security Elements

Physical / Architectural elements of the security program will be designed to support or work in conjunction with electronic security measures to deter, prevent, and detect diversion, theft or loss of marijuana and / or medical *Marijuana* at PalliaTech's dispensary. Such measures will include gates, doors, locks, lighting, and other elements that have been organized here based on their areas of deployment, starting at the site perimeter and working inward to the most secure areas of the operation. The physical construction elements for security at all dispensaries will generally include:

- Walls – Perimeter walls and interior demising walls will be constructed from the base slab / floor to the underside of the deck above to preclude unauthorized access through plenum spaces from any adjoining space.
- Utility Openings – Any wall openings for utilities larger than 96 square inches will be fitted with security screens or bars to preclude bypass of the walled enclosures.

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- **Doors** – All perimeter and interior doors for rooms noted to require access controls (as depicted on the Security Systems Plan(s)) will be equipped with electric locking mechanisms, automatic door closers, and hinge pins (as required).
- **Main / Patient Entries** – The main entry of the dispensary will be configured to provide a secure 'lobby / vestibule' that will function as a 'man-trap' allowing only one of the doors to be opened for access or normal exiting at a time, however, all doors with electrified locking would function as required to support emergency egress.
- **Glazing** – All exterior walls and secure rooms with glazed openings will be fitted with glass-break detection units. No special glazing will be required unless otherwise noted. In addition, roll-down / coiling security grilles will be closed and locked at all periods when the dispensary operations are closed.
- **Lighting** – The outside perimeter and adjacent site areas will be well lit (Sec. 21a-408-62 (e)), but shall remain in compliance with local codes and ordinances. Where possible, lighting levels for all areas (interior and exterior) shall be consistent with safety and security lighting as recommended by the Illuminating Engineering Society of North America (IESNA).

Specialty Areas – Dispensary

The following specialty areas that will be included as part of the security program:

- **Dispensary Security Surveillance** – All security surveillance equipment located at the dispensary shall be maintained in a secure equipment rack, and have secure password protection for its operation to limit access solely to persons that are essential to surveillance operations, law enforcement agencies, security system service employees, the Commission or their authorized representative, and others when approved by the CT.
- **Security Equipment Spaces** – All security systems computers, controllers, recorders, power supplies and other security infrastructure equipment will be housed in secure dedicated closets or within secured enclosures and rack / cabinets within shared secure IT rooms.
- **"Check-In" / Reception Stations** – Similar to the Dispensaries will have a "Check-In" / Reception Station with a service window that allows them to interface with visitors and patients. This windows, walls and doors will also be constructed of Underwriters Laboratory (UL) approved Ballistic / Bullet Resistive (BR) Materials.

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Safes / Vaults

Marijuana Storage Safes / Vaults – As required by Sec(s). 21a-408-34 (q), 21a-408-36 (b), and 21a-408-51 (a)(2), all medical *Marijuana* products shall be stored in an approved safe or vault in such a manner as to prevent diversion, theft, or loss. While safe sizes and quantities will vary based on final architectural / spatial conditions at each facility, such vaults or safes will be compliant with 21a-262-1 of the Regulations of Connecticut State Agencies.

Cash Safes – While not required by regulation, all cash receipts at dispensaries shall be maintained in a safe unless otherwise in use for sale transactions or in transit for deposit to reduce risks associated with theft and robbery. Safes shall be depository type units to allow for cash deposits by personnel without access to the main storage compartment. Specifications shall be consistent with those of the AMSEC BWB series as follows:

- UL Listed Group II Combination Dial Lock - B-Rated Heavy Duty Depository Safe
- 1/2" Steel Door with 3-way locking mechanism consisting of five 1" diameter chromed steel locking bolts
- 4 pre-drilled anchor holes
- Anti-Fish baffle prevents theft through deposit door
- Door Contact for connection to the ACAM System and IDS

Signage – All entry ways into any area of the dispensary facility containing marijuana, including a room with an approved safe or approved vault shall have signage posted with a minimum of twelve inches in height and twelve inches in width which shall state: "Do Not Enter - Limited Access Area – Access Limited to Authorized Employees Only" in lettering no smaller than one-half inch in height (Sec. 21a-408-51 (9)).

Operational Security Measures – Policies and Procedures

Introduction

At the heart of PalliaTech's Operational Security Measures will be our comprehensive policies and procedures that will be incorporated throughout the overall security plan, and will perform in conjunction with the company's other practices, particularly as they relate to the board, officers, owners, and various departments. These policies and procedures will serve as the basis for the development of final *Standard*

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Operating Procedures and Post Orders, which will be developed, documented, and issued based on the operations at each facility. The final version will be issued in an outlined and tabbed format to facilitate ease of use and quick reference by the user. Policies and procedures shall be assessed on an annual basis to ensure their compliance with regulatory requirements and any changes in the security plan, operations, or personnel shall be reported to the Department of Consumer Protection (DoCP).

Scope

The policies and procedures herein will be applicable to all medical *Marijuana* dispensary facilities under the management and operation of PalliaTech, licensed by and residing in the state of Connecticut.

Mission

The PalliaTech security program shall be implemented and maintained to deter and detect diversion, theft, or loss of medical *Marijuana* at all of the Organization's facilities; protect our employees, assets, products, and operations, and; ensure the health, safety, and welfare of patients, caregivers, and the public at large.

References

The following documents will be referenced through the development, enforcement, maintenance, and update of these policies and procedures:

- Compliance
- Human Resources
- Network Security
- Operating Plan and SOP(s)
- Patient Information and Training
- Quality Assurance Plan
- Record Keeping
- Staffing Plan
- Safekeeping, Storage and Transport

Implementation, Administration, and Enforcement

The policies and procedures herein will be implemented by PalliaTech as part of their Connecticut State

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medical *Marijuana* operations, and remain in effect throughout their existence. It shall be incumbent upon the Board, officers, owners, operating staff, and security personnel to ensure these policies and procedures are administered and enforced at all times, unless otherwise deemed to be in conflict with the directives, laws, rules and regulations of the State of Connecticut and its Department of Consumer Protection (DoCP); or with the rules, regulations, and ordinances of local municipalities and the Local Authorities Having Jurisdiction (LAHJ) for a given area. Moreover, it should be noted that in certain instances Federal regulatory requirements must also be observed, and that personnel should consult with PalliaTech Senior Management and organizational policies to make certain the program meets those requirements.

All policies and procedures will be updated and maintained as needed to reflect the most current security program requirements defined by the operation. To guarantee full compliance, a procedure to log each version of this document will be maintained in both hard copy and electronic format. All changes to previously approved versions will be authorized by the PalliaTech Senior Management, and each version will be annotated to contain the following minimum information:

- Previous document title and date
- Document revision date
- Summary of revisions (noting section and subject)
- Revision author's name
- Approving PalliaTech managers name

A copy of this plan will be made available online to security personnel in electronic format; and hard copies of the most current version will be maintained in a secured location at each PalliaTech facility for reference by security and operations personnel. All security personnel will also be required to review and otherwise become familiar with these policies and procedures so as effectively to administer and enforce the planned security program.

In all cases where a change in policy or procedure is deemed to materially affect the security program's compliance with the regulations of Connecticut or any other overarching government agency, PalliaTech will seek to obtain written approval for such changes before enacting them; that is unless the company considers the changes essential to prevent and detect diversion, theft, or loss of medical *Marijuana* products at its facilities, or to otherwise maintain a safe and secure environment for its employees, patients, associates, and the greater public.

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Audit and Compliance

To ensure compliance with overarching regulatory requirements set forth by the State of Connecticut, PalliaTech will review and audit the processes, operations, and conditions at each facility, as well as the distribution and transport operations, no less than once annually to identify if any changes to the program are warranted. Notwithstanding, certain Connecticut State regulations and the policies and procedures herein require review, audit, and reporting of various security program conditions on a more frequent basis, and such audits and reporting will be completed as defined by those requirements. Where operational and security plan requirements are found or otherwise observed by responsible parties to be in conflict with these standards or any referenced program for the operation, they will immediately be reported through the PalliaTech chain of command, and if required, to the State of Connecticut - DoCP, and / or the LAHJ. The Security Team shall coordinate and cooperate with the PalliaTech Compliance Officer in the performance of these processes.

Security Awareness Program

PalliaTech's employees (including its officers, owners, operators, and staff), service providers and patients will play in integral role in the security and safety of the operations and will be made aware of certain aspects of the program pertaining to their responsibilities for its successful implementation and execution. As such, each new employee will be provided with training to familiarize them with the security program and their required participation during their employment orientation. Employees will also receive update briefs annually, along with more frequent internal company notices as changes, events, or incidents may dictate. Specific topic of this orientation will include, but may not be limited to:

- Overview of program and its regulatory requirement(s)
- Employee background screening requirements
- Access requirements / rights / privileges
- Company and patient information protection
- All security and safety policies
- Penalties for acts of diversion, theft or loss of marijuana and / or medical marijuana products
- Penalties for other acts of criminality
- Incident reporting and emergency contact information

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- Use of access credentials and systems
- Overview of and training for Emergency Action Plans (EAPs)

Service providers will also receive briefings by operations personnel on the regulatory requirements by which they are bound. These may include, but may not be limited to:

- Overview of program
- Background screening requirements
- Access requirements / rights / privileges / escorts
- Company and patient information protection
- Penalties for acts of diversion, theft or loss of marijuana and / or medical marijuana products
- Penalties for acts of criminality
- Incident reporting and emergency contact information

Topics in briefings to patients may include, but may not be limited to:

- Patient screening and qualifications requirements
- Access requirements / rights / privileges / escorts
- Incident reporting and emergency contact information

Partnering With Law Enforcement

Having a solid working relationship with law enforcement will be crucial to ensuring the safety and security of patients, employees, and members of the public. To that end, the Pharmacist, Facility Manager, and the Security Officer will be responsible for developing just such a partnership that includes periodically inviting authorities onsite to assist in evaluating potential risks and vulnerabilities. This will enable us to continually improve our security systems and programs. The Pharmacist and Security Officer will also make sure law enforcement has current contact information for all dispensary management so as to be able to quickly communicate any time of any day.

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Incident Management / Reporting

The organization will maintain an electronic *Incident Management and Reporting* database to record all events / incidents deemed to be in conflict with the policies and procedures herein, and / or any regulatory requirements. Incident reports will include the following information at a minimum (See current report format for more detail as required):

- Type of Incident – All incidents shall be classified using one of the following:
 - Alarm/False-Fire
 - Alarm/False-Security
 - Arrests by law enforcement
 - Assault, attack, molestation or threats of / to employees while on company property or in the performance of their work
 - Break & Enter-Building
 - Burglary or attempted burglary of PalliaTech buildings
 - Confrontations between staff and others
 - Damaged Property -malicious or extensive
 - Disturbance- Employee / Visitor / Contractor / Patients
 - Drug Abuse
 - Fire
 - Incidents which have a potential for receiving media coverage
 - Injuries to staff, contractors, visitors, clients
 - Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals
 - Missing Property-Facility/Personal

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- Misuse of company information and data processing where financial gain or damage to PalliaTech is involved
 - Reports of Substance abuse or sale of narcotics on property
 - Robbery-Armed / Unarmed, or attempted robbery committed on PalliaTech property, or of a PalliaTech employee in the course of company business, regardless of whether anything was taken
 - Sexual Incident – Harassment / Assault / Obscene Call / Other
 - Suspicious Person - Contacted
 - Suspicious Person-No Contact
 - Suspicious Circumstances - General
 - Theft or vandalism of PalliaTech property by an employee
 - Theft or loss of PalliaTech credit cards
 - Theft, forgery or alteration of PalliaTech checks
 - Theft or loss of PalliaTech cash
 - Theft, unauthorized disclosure, loss, malicious destruction of PalliaTech proprietary information, or physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same
 - Bomb Threat
 - Threat-Other, received by staff, visitors or contractors
 - Trespass
 - Vandalism-Facility / Personal / Vehicle
 - Violation of any other law on company premises
- Date and time of incident or event
 - Reporter's or recorder's name

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- Reporting party name
- Names of all persons identified with incident or event
- Reporting escalation actions (i.e. who was notified)
- Written details of event in chronological order
- Identification and description of associated evidentiary materials and data (including material type(s), file name, storage location, and other information as applicable)

Information and reports therein, as well as those generated by the Access Control and Alarm Monitoring System, Video Surveillance System, and Intrusion Detection System will be made available to state and local authorities in support of compliance audits and incident investigations as necessary, with approval and direction from PalliaTech Senior Management.

All incident reports and associated evidentiary material will be maintained in electronic and hard copy formats for a period of no less than five (5) years from the date of the incident, unless otherwise deemed to contain relevant information for a pending criminal, civil or administrative investigation, or legal proceeding. In such cases, the information will be retained until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the registered organization that it is no longer necessary to retain the information.

All reports and associated evidentiary materials will be maintained in a secure environment to be accessed by, or under the supervision of, only authorized personnel with no direct involvement to the incident or event, until such time as they are released to the LAHJ and / or destroyed. Should the incident involve marijuana, medical *Marijuana* product, or any associated byproducts or derivatives, such materials will be maintained in a suitable environment to maintain the integrity of the material as defined by a PalliaTech specialist and with security measures commensurate with those defined by the LAHJ.

Required Notifications / Reporting to DoCP

As required by regulation, the following represents a summary of changes in operations or staffing that must be reported to the Connecticut DoCP and the DoCP Drug Control Division (Sec(s). 21a-408-17, 21a-408-18, and 21a-408-63). *Note: Please consult the regulations for timeframes of notifications and processes for notification compliance.*

The DoCP must be notified of:

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- Changes in membership or ownership of PalliaTech
- Changes to facility name
- Change in dispensary location
- Changes to physical construction of the dispensary
- Changes in dispensary personnel, including:
 - Proposed Facility Manager Change
 - Any Other Personnel Changes
- Closing of a dispensary operation

The DoCP Drug Control Division and appropriate law enforcement authorities must be notified of:

- Discrepancies identified during inventory, diversion, theft, loss, or unauthorized destruction of any marijuana or of any loss or unauthorized alteration of records related to marijuana or qualifying patients.
- Alarm activations
- A breach of security
- Failure of the security systems anticipated to last longer than eight hours
- Corrective measures taken for any of the above

Contacts for Reporting

Security officers shall note that no incident shall be reported to an external entity without the consent of PalliaTech management personnel. A list of contact names and numbers will be maintained for the management and reporting incidents, and made available to all personnel at the facilities. **The immediate call for any emergency situation shall be via the 911 system.** The following represents a list of known contact numbers and addresses for the agencies and services most commonly required. Always report your name, the company name, your location, and the nature of the incident when calling in for emergency needs.

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Contacts for Stamford Dispensary – Location 9TBD)		
Name(s)	Location(s)	Phone Number(s)
Connecticut Department of Consumer Protection Medical Marijuana Program	165 Capitol Avenue Room 145 Hartford, CT 06106	(860) 713-6066
State and Municipal Law Enforcement	Emergency State Police Dept. 149 Prospect Street Bridgeport, CT 06604 Stamford Police Dept. 805 Bedford Street Stamford, CT 06901 Stamford Police Dept. 1137 High Ridge Road Stamford, CT 06901	911 (203) 696-2500 (203) 977-4681 (203) 977-6105
Municipal Fire Department	Emergency Stamford Fire Dept. 629 Main Street Stamford, CT 06901	911 (203) 977-4763
Emergency Medical Services and Hospitals	Emergency Nelson Ambulance Services Inc. 161 Jefferson Street Stamford, CT 06902 Stamford Hospital 30 Shelburne Avenue Stamford, CT 06902	911 (203) 359-4343 (203) 276-1000
Poison Control	CT State	1 (800) 222-1222

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Contacts for Stamford Dispensary – Location 9TBD)		
PalliaTech Officers / Managers / Ops Personnel	List Here	List Here

Non-Incident Reporting

The following should be reported within your shift unless supervisory personnel deem it necessary to report more expeditiously. Non-incident situations generally are reported on a Security Condition Report, which must be classified by one of the following:

- Any situation which may lead to litigation
- Conditions which threaten safety of buildings or personnel (life-safety)
- Computer Viruses
- Environmental conditions threatening property
- Information threatening the reputation of the Corporation
- Lights Left On / Off
- Labor disputes

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- Malfunction - Locks and Keys
- Maintenance problem - lights out, broken locks, water leaks, broken windows, etc.
- Potential fire hazards
- Open Doors and Windows
- Strange Odors
- Unlock Request(s)
- Unsafe Condition(s)

Duty / Activity Logs

The security team shall maintain daily logs of all duties and activities performed, and the times at which they were executed. Logs entries shall include, but may not necessarily be limited to the following:

- Incident response and reporting
- Facility tours
- System programming changes
- Unlock requests
- Key distribution / management
- Escort requests

Rights and Responsibilities of Dispensary

PalliaTech will register with the department to access the prescription monitoring program. A dispensary shall review a qualifying patient's controlled substance history report within the prescription monitoring program before dispensing any marijuana to the qualifying patient or the qualifying patient's primary caregiver.

A dispensary, or dispensary technician of PalliaTech will require the presentation of a registration certificate together with another valid photographic identification issued to a qualifying patient or primary caregiver, prior to selling marijuana to the qualifying patient or primary caregiver.

The qualifying patient's self-assessment of the effects of marijuana will be documented while treating the qualifying patient's debilitating medical condition or the symptoms thereof.

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This documentation will be electronically maintained 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.

Assignment of Serial Numbers and Maintenance and Transfer of Records to Another Facility

PalliaTech will 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.

Records created under this section will be maintained and made available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies.

Should PalliaTech close temporarily or permanently, they shall, in the interest of public health, safety and convenience, make 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.

Emergency Action Plans (EAPs)

Emergency Action Plans (EAPs) will be developed and issued to appropriate personnel within PalliaTech to ensure all responsible persons are fully informed about, and prepared to implement, such plans. PalliaTech will perform mock drills on an annual basis that will include municipal services personnel where appropriate, to ensure that all participants identified for inclusion in a plan are familiar with the policies, procedures, and actions required for successful execution. Upon completion of each drill, such plans will be amended, modified or otherwise changed to reflect current environment conditions and otherwise enhance the effectiveness of the plan as deemed necessary. PalliaTech will further develop and maintain plans and procedures for the following events based on the final operations program and conditions at each facility.

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Medical Emergency

When notified of a medical emergency in the building determine the following information:

- Nature of the emergency, including the cause of the medical emergency, if known.
- Exact location and name of the sick or injured person.
- Whether an ambulance or Paramedics has been notified.
- Whether someone will be standing by at the location where the sick or injured person is located. Paramedics need to be directed to the person requiring aid.
- If an ambulance or paramedics has not been notified, dial 911 and request medical assistance immediately.
- Give all known information on the medical emergency. Provide a callback phone number and wait until the Police or Fire Department hang-up. Immediately notify your supervisor and other Security Officer on duty, of the emergency and request the following:
 - Contact the Facility Manager.
 - That the Security Officer makes preparation for the arrival of the paramedics at the building.
 - That the Security Officer arranges to meet the paramedics.
- Inform the Facility manager of the actions taken. Do not release information to anyone else. Document all actions taken in the Daily Activity Log and an Incident Report.

Facility Fire

Specific procedures to follow in the event of a fire shall vary at each facility, and particularly at those locations where the operations are housed in a multitenant facility, and a detailed plan for response, evacuation and drills must be developed in concert with the landlord and other tenants. However,

In a fire, your first priorities are to protect your life, and call 911, in that order. Never put your life in jeopardy. Call 911 as soon as you are safe from danger.

- If you are not in the area of the fire:

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- If the fire is small, such as a fire in a waste paper can, and you have an extinguisher handy, you should try to extinguish the fire. Otherwise, do not try to put out the fire by yourself. Summon help.
- Actuate the nearest fire alarm and call the fire department.
- Get yourself out, and warn any other people in the office or building.
- Only if you have time, secure your work area, but do not close or lock doors leading to the fire area as this may hamper efforts to fight the fire.
- If you must evacuate the building (and are not in immediate danger)
 - Secure the work area; Have employees lock away your work.
 - Go to the predetermined evacuation point of the building that you have been instructed to in your office drills. Go calmly and quickly, listen to any instructions in case the fire has blocked the exit you would normally take. Do not panic, do not run.
 - Assemble at the evacuation point. Stay there and wait for your Fire Warden, do not wander off. Your supervisor will need to perform a head count to see if everyone has evacuated safely.
 - Remain outside the building at the evacuation point until you are told to reenter.
 - Do not go anywhere without first informing your Fire Warden.
- Infrastructure failure
- Communications technology failure
- Inappropriate conduct or violence by an employee, patient, or other visitor
- Active or attempted robbery
- Suspected mail or package bomb / suspicious package

Earthquake

In the event of an earthquake, protecting your own life and your personal safety are your first priority. Most earthquakes begin with very little advance warning. Low-frequency tremors or vibrations that

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can be felt through the floors are an indication of immediate danger, and will probably be your only warning. During a major earthquake, you may experience a gentle shaking that becomes more violent in a second or two and may knock you off your feet, or you may be jarred at first by a violent jolt (as though the building had been hit by a truck) followed by violent shaking. It may be impossible to move about. Aftershocks, which are tremors that follow the main shock, may occur any time after the initial earthquake. Aftershocks can be as strong as the initial quake and may cause additional damage and injuries. Here are some guidelines on protecting yourself:

- Take cover immediately.
- Move away from outside walls and windows and any glass objects that might shatter.
- Get under a sturdy desk or table and hold onto support legs. If no desks or tables are nearby, stand / crouch in the doorway of a load-bearing wall.
- Keep clear of filing cabinets, bookshelves, and any other interior objects or furniture that may fall or spill their contents.
- Do not stand near, in, or approach any stacked containers.
- Keep clear of any electrical equipment that appears damaged. Lighting fixtures and other equipment located in or above the false ceiling, panels may be dislocated and drop into your office space.
- Shield your head and eyes with a coat, cushion, or blanket, if available.
- Do not use elevators. In the event of structural damage to the building, you could be injured or trapped in an elevator.
- Do not use the telephone except to report fires or medical emergencies, or unless you are part of the building disaster response team. It is especially important that outside telephone circuits remain available for emergency use. If you notice telephone handsets that are off the hook because of the earthquake, put them back on the hook.
- Remain alert and be prepared to seek cover in the event of aftershocks.
- You may need to remain overnight or longer. Do not attempt to immediately leave the building area. You are essential to the recovery efforts of the job site. Furthermore, in the event of a major earthquake, many roads are likely to be impassable.

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Tornado

A tornado warning is issued by the weather service when an actual tornado has been sighted, or when weather radar equipment indicates that tornado activity is present in a specific area. A tornado watch is a notice that conditions favorable to the development of tornadoes are present, but no actual tornadoes have been observed or reported. A tornado warning is a dangerous situation requiring immediate action; a tornado watch is to alert people to be cautious and stay tuned in to the radio or television. *If you are advised of a tornado warning condition or see a tornado in your immediate vicinity, take shelter immediately. Tornadoes move rapidly, and the time available to protect yourself may be short.* Take the following actions and advise people around you to do the same:

- If you are outside the building, get inside the building and seek shelter as quickly as possible.
- If you are in a vehicle and have time, get inside. If you cannot reach the building safely, remain in your car, park safely off the road, and protect your head and eyes with your hands, coat, other clothing, or blankets if available.
- Move away from outside walls and windows. Take shelter in interior office areas within the facility where you will be protected from flying glass and debris in the event of a tornado strike. Ensure you are not under any skylights or other glass roof structures.
- Remain clear of atriums, which are outdoor patio areas enclosed by the building
- Close exterior doors and interior doors, drapes and blinds to reduce potential of injury from flying glass and debris.
- Seek shelter under heavy desks and tables. Sit or lie down facing the floor using your hands to shield you head and eyes from flying debris. If available, use coats, cushions, or blankets to shield your head and eyes.
- Do not enter or stand in between or near stacked containers.
- Do not use elevators.
- Remain calm and wait for the danger to pass.

Hurricane

It is the objective of this corporation to provide for the safety of its employees and the protection of its assets at the onset of, and prior to, the imminent threat of a hurricane striking within the area of any of

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our offices that might be affected. There is typically ample warning of Hurricane events and the emergency plan will not be activated until it is determined that the facility and / or surrounding residential areas where employees domicile will be effected. In such cases:

- Employees should secure all active work, product and materials
- All equipment should be turned "off"
- The facility should be closed and secured
- Employees shall evacuate the immediate area and return once the storm has passed and conditions at the facility are deemed safe by PalliaTech management.

Other Inclement Weather / Hazardous Conditions

Based on the geographic locations of PalliaTech NY facilities, it is anticipated that operations will be affected by inclement weather and associated hazardous conditions, which may include but may not be limited to heavy rains and flooding, snowstorms and blizzard conditions, high winds with downed trees and power lines, etc. Typically these conditions are accompanied by sufficient and timely reporting by the national and local weather services. PalliaTech management personnel shall typically monitor such conditions to determine their possible impact to the safety of its personnel and business operations, and shall notify employees and patients of actions to take, which may include:

- Suspending operations at a given location until such time that the conditions have improved
- Rescheduling appointments
- Delaying the required reporting time for employees
- Rescheduling / delaying deliveries until safe travel is possible

Bomb Threat

The majority of all bomb threats are made over the telephone; therefore, all personnel who handle incoming calls should be familiar with the Bomb Threat form (to be developed). In summary, and if possible, the individual receiving the telephonic bomb threat should remain calm and attempt to ask the caller the following questions:

- When is the bomb going to explode?

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- Where is the bomb right now?
- What does it look like?
- What kind of bomb is it?
- What will cause it to explode?
- Did you place the bomb?
- Why is there a bomb?
- What is your address?
- What is your name?

In addition, information such as the caller's possible sex, race, estimated age, and length of the call should be noted. Peculiarities in the caller's voice, possible accent origin, recognizable background sounds, and threat language should also be documented if possible.

Upon receipt of a telephone bomb threat, the recipient should immediately notify PalliaTech management and Security Director. This group will evaluate the bomb threat as to authenticity and determine the next course of action.

If a written threat is received and recognized, further handling should be avoided in order to preserve DNA, fingerprints, handwriting, typewriting, postmarks, and other markings for appropriate examination. Once recognized as a bomb threat, immediately notify PalliaTech management and Security Director. This group will evaluate the bomb threat as to authenticity and determine the next course of action.

Responding to a Threat

Instruct all personnel in what to do if a bomb threat call is received. It is always desirable that more than one person listens in on the call. A calm response to the bomb threat caller could result in obtaining additional information. This is especially true if the caller wishes to avoid injuries or death. If told that the building is occupied or cannot be evacuated in time, the bomber may be willing to give information that is more specific on the bomb's location.

The bomb threat caller is the best source of information about the bomb. When the bomb threat is called in:

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- Keep the caller on the line as long as possible. Ask him to repeat the message. Make notes, if you can.
- If the caller does not indicate the location of the bomb or the time of possible detonation, ask him or her for this information.
- Inform the caller that the building is occupied and the detonation of the bomb could result in death or serious injury to many innocent people.
- Pay particular attention to background noises, such as motors running, music playing and any other noise that may give a clue as to the location of the caller.
- Listen closely to the voice (male, female), voice quality (calm, excited), accents, and speech impediments. Immediately after the caller hangs up, report the threat to the person designated by management.
- Remain available, as law enforcement personnel will want to interview you.
- Signal a fellow employee to listen in on, or record the call if you have such equipment, as well as to notify a supervisor that such a call is ongoing.

In all cases, PalliaTech management personnel should consult with law enforcement personnel to determine the best course of action based on the information received, which may be to ignore the threat, evacuate, or search.

Suspicious Letter / Package

Employees shall be trained to recognize the characteristics of a suspicious letter /package, which may be delivered / placed in open spaces or through standard mail operations and may include letters, boxes, or bags. Do not immediately handle or touch a suspicious letter / package. Upon identification of a suspicious letter / package, immediately notify security personnel or a PalliaTech manager. Security personnel shall:

- Move personnel in close proximity to the package to a safer distance until the true nature of the package can be determined
- Perform a visual inspection of the package's appearance and the areas around the package
- Review video of the area (if available) to determine who may have placed the package

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- If the package is determined to represent a possible risk, security personnel shall evacuate all personnel to a safe distance and contact law enforcement officials
- If the package is determined to not represent risk to personnel, or upon its safe removal or detonation by law enforcement personnel, return to the facility.

Active Shooter

Should an active shooter / armed assailant be detected on the property your first priorities are protecting your life and your personal safety. The primary intent of this person is to harm targeted personnel and / or indiscriminately harm anyone who they encounter.

- It is advised that the best protection is to flee from the facility and contact law enforcement when it is safe to do so.
- If you are unable to flee the facility, find a safe place to shelter and stay there until such time that you can flee the facility, the event is over, or you have received assistance from law enforcement personnel.

Riot / Civil Unrest

A riot is a situation in which a crowd of people is behaving violently, often trying to destroy or steal property, break windows and attack people. A riot disrupts public protection the same way a violent natural disaster does. Police and Fire departments become severely overtaxed and frequently cannot respond to alarms because of a lack of equipment or blocked streets. During riot conditions, your first priorities are protecting your life and your personal safety.

- Stay indoors until the event is over if possible
- Ensure access to the facility is secure
- Following the riot, create an Incident Report

Demonstration

A demonstration is any gathering of people trying to protest a situation that they object to. They may protest peacefully in a location that is not private property. On the other hand, they may not have the right to try to disrupt or block normal business, harass or confront employees or clients, or occupy private property without permission. During demonstrations, your first priorities are protecting your life and your personal safety.

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- Alert PalliaTech management to the situation.
- Contact local law enforcement personnel and notify them of the situation.
- Do not approach the demonstrators. Do not attempt to break up or interfere with the demonstration.
- It is important that you remain calm and proceed in your normal assigned duties.
- If protesters are acting in violent manner and interfere with PalliaTech operations or personnel, immediately contact law enforcement via 911
- Do not make physical contact with demonstrators and do not to react to them in a hostile manner.
- Avoid actions that might increase tensions, add to the possibility of violence, or discredit PalliaTech

Robbery

Robbery is the theft or attempted theft of property by use of force or threat of use of force. Locations like dispensaries, similar to pharmacies, are an attractive target for robbers due to the presence of “drugs” and cash. Persons who typically try to commit a robbery at such places are typically looking for a “high”, alcohol impaired, deranged, desperate, paranoid, and / or otherwise highly unpredictable. Personnel should always remember that your safety comes first. Protection of the product, money, or other material goods comes second. Do not challenge the perpetrator, particularly if they are armed, and provide them with what they want.

Refrain from discussing procedures, inventory controls, cash handling, store layouts, security systems, etc. with any outsider, even family, other than law enforcement personnel and / or vendors with a legitimate interest in a particular system. Even if such conversations are required and permitted, do not discuss them in front of patients / clients.

All employees, at all times, should watch for suspicious behavior(s) by patients / clients, such as:

- Is the customer constantly looking behind, left or right, or above as if to see if anyone, or anything, is watching?
- Is a customer spending an inordinate amount of time observing behind the counter operations in the main dispensary or at payment locations?

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Make mental or, preferably, written notes, including descriptions, of any of the conditions noted above, and report any of the above conditions to PalliaTech management.

Procedures for Robbery at Facilities

- The objective is to get the perpetrator(s) out of the facility as quickly as possible
- Try to stay calm and do as you are told
- Activate a “hold-up” button if you can do so safely and without the perpetrator knowing.
- Inform the perpetrator(s) of any possible event or action you know is going to happen that may startle or upset them; like an audible alarm signal or that “the police are on their way” if a holdup button was activated
- Be observant, make a conscious effort to get a description of the perpetrator(s), BUT avoid making direct eye contact
- Do not make any sudden or quick movements. When it is necessary to move or reach to comply with demands, tell the perpetrator(s) what you are going to do and why
- Listen carefully to follow direction from and gather information about the perpetrator(s)
- Once the perpetrator(s) decides to leave the premises, give them adequate time to leave. **DO NOT give chase!**
- Note the direction of travel when they leave and try to get a description of any vehicle used in the getaway
- Secure the facility
- Call law enforcement / the police, even if the alarm has been triggered
- Cooperate with law enforcement personnel and file reports as necessary

Procedures for Robbery During Cash Transfers or Product Transport

- The objective is to end the event quickly as possible
- Try to stay calm and do as you are told

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- Be observant, make a conscious effort to get a description of the perpetrator(s), BUT avoid making direct eye contact
- Do not make any sudden or quick movements. When it is necessary to move or reach to comply with demands, tell the perpetrator(s) what you are going to do and why
- Listen carefully to follow direction from and gather information about the perpetrator(s)
- Once the perpetrator(s) decides to leave, give them adequate time to leave. **DO NOT give chase!**
- Note the direction of travel when they leave and try to get a description of any vehicle used
- Call law enforcement / the police when it is safe to do so
- Cooperate with law enforcement personnel and file reports as necessary.

Personnel and Posts

The PalliaTech security program will be managed and executed by security personnel positioned to staff fixed and roving posts as required under normal operating conditions.

Security Team

Security personnel and their general responsibilities shall include:

- The **Corporate Security Officer** shall be a corporate "officer" of the organization responsible for ensuring PalliaTech operations are consistent and compliant with the laws and regulations of the State. The Security Officer shall be the primary interface with PalliaTech Senior Management, Owner's and other Corporate Officers of the company.
- **Trained Security Officer(s)** will be responsible for implementing all required security functions at defined for fixed and mobile security posts in support of the PalliaTech operations.

Security Post

A security post will be established at the site to facilitate execution and enforcement of Operational and Security Policies, Procedures and Protocols as defined for the operation(s). Post orders and responsibilities, and staffing requirements will be assessed, developed, and adjusted on a regular basis to meet the specific needs of the operation. PalliaTech shall staff each of its dispensaries with

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no less than one unarmed contract security officer. This fixed and roving post position shall provide a physical security presence to otherwise deter and detect diversion, theft, or loss of medical *Marijuana*. This post will typically be located at the reception / check-in locations, but shall also be required to complete tours and inspections of the premises throughout their shift hours, respond to unauthorized activity, assist with the screening of persons requesting access to the facility, and / or escorting unauthorized personnel from the facility. These personnel shall also:

- Visually and physically inspect all areas of the facility to determine if any unauthorized activity or degraded systems conditions exist.
- Present their access credentials at predetermined access control readers while conducting tours of the dispensary facility, which will allow for the tracking and reporting of security personnel movements throughout in the Guard Tour program of the ACAM System.
- Assist DOCP personnel, their representatives and law enforcement while on site.
- Immediately notify the Facility Manager upon discovery of any condition determined to be outside of standard operating conditions, and file an incident report concerning the condition.
- Observe and manage delivery activity. This will include, but may not be limited to:
 - Coordinate with drivers for delivery and shipping activity to support increased security of secured materials handling.
 - Screening, verification and processing of service and delivery personnel, including the issuance of temporary credentials as may be required.
 - Open and close secured doors as necessary to support the operation.
- Respond to alarms on the premises to evaluate their operational conditions and report findings to the Facility Manager.
- Provide escorts for PalliaTech personnel after normal business hours as deemed appropriate.
- Provide escorts for cash receipts bank deposits by the Facility Manager or Pharmacist, which shall occur on a randomized basis.

Security Personnel Attire

Security personnel shall be required to wear distinguishable "uniforms". Security personnel shall

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maintain a clean and neat appearance, and maintain good personal hygiene at all times. While on PalliaTech's premises, all security personnel shall visibly display credentials (i.e. company ID or specialized badge) identifying you as a security officer of PalliaTech. Such credentials should be removed from display when off premises.

Policies & Procedures

The following section defined policies and related procedures associated with PalliaTech NY operations. These policies have been developed with the goal of maintaining a safe and secure environment for PalliaTech employees, patients, associates, visitors and other persons who may have personal or business related interaction on PalliaTech property or with PalliaTech personnel. PalliaTech will further develop and update these policies and any associated procedures based on the final operations program and conditions at each facility.

Theft, Diversion or Misuse of Product(s) or Materials Policy

Consistent with the requirements of Connecticut State regulations and all laws pertaining to the theft, diversion or misuse of PalliaTech assets, including but not limited to medical *Marijuana* products and raw materials, persons found to be engaged in any such activities shall be subject to immediate termination and possible prosecution by State, Local, and or Federal law enforcement.

Access and Identification Policies

All persons entering PalliaTech facilities will be granted access based on their association with the organization or their verified need. In any case, all persons will be required to receive appropriate authorization for their access from a managing entity of the operation based on its status as a Connecticut State or municipal authority. All such access will be recorded through verification of their government issued photo-identification credentials, and the recording of their pertinent information (i.e. name, organization, credential type, issuing authority, and unique number) via electronic systems logs (Access Control or Visitor Management Systems), which will provide for automated search and reporting information on each access, including the date, time, and location.

- All persons entering PalliaTech's premises will remain in designated waiting areas until authorized to enter by the appropriate PalliaTech facility personnel.
- Upon entering the dispensary all personnel shall be required to wear or otherwise visibly display a credential that has been issued by PalliaTech and establishes their access approval (Sec. 21a-408-34 (j)). Conversely, employees shall be discouraged from visibly displaying any credentials

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or badges that would allow them to be readily recognized as a PalliaTech employee outside of the PalliaTech premises.

- At no time will personnel be allowed to loan or share their credential, or otherwise permit the use of their credential by another person (authorized or unauthorized).
- Anyone who is not a PalliaTech employee will be escorted throughout secure areas at all times, and every time they enter a secure area, they must present their credentials to the access control reader for the purposes of tracking and reporting. Access credentials issued to non-employees will prohibit them from being in any secure areas unattended.
- All unauthorized access, multiple unauthorized access attempts (by cardholders), and events otherwise considered to be in violation of this policy will be reported as security incidents and escalated with PalliaTech Senior Management for actionable response.
- Two-Man Rule – In cases where it is deemed necessary (i.e. product storage locations) access may only be granted based on a 'two-man rule' whereby, at least two authorized personnel must present their access credential in order to gain access to the area / room.

Employee Access Policy

Access Credential and Records – All PalliaTech employees will receive a company access credential that will permit them to use the electronic access control readers for the areas in which they are authorized and required to present based on the following criteria:

- Completion of their employment screening (including fingerprinting in accordance with Connecticut State regulations),
- Confirmation from the HR team that all required documents have been executed (i.e. Confidentiality Agreement, Code of Ethics, etc.),
- Receipt of authorization of a PalliaTech officer or manager via a signed access form and a copy of a government-issued photo ID (hard copy or electronically transmitted)

Access credentials will be produced and programmed at, and issued from, the manufacturing facility using the Access Control and Alarm Monitoring (ACAM) System. Every credential will include a photo image of the person, their name, and a color coding for their position and department or area of responsibility (Sec. 21a-408-34 (j)). Such information will be captured and maintained in the ACAM System for reporting purposes.

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Biometric Access – Access to secure product vaults, cages or rooms will be highly restricted (Sec(s). 21a-408-51 (3) and (4)). In these cases, a biometric template (i.e. fingerprint) of the employee shall be required to operate specialized access control readers used at these locations. Depending on the final system selected for deployment, these templates may be programmed into the ACAM System or into a separate database and will be used to verify employee identification for access at these areas.

Access Audits and Changes – Access lists shall be generated weekly and reviewed by designated PalliaTech management personnel to verify all lists are current and that access is appropriate via written / email correspondence. PalliaTech shall make available to the DoCP and / or its representatives a current list of authorized employees and service employees that have access to the surveillance room and all other areas of the dispensary.

Access Termination

Upon separation from the Company, access credentials for all employees will be collected and destroyed, and all related access programming will be deleted. In addition, the cardholder record within the ACAM System will be configured to alert monitoring personnel if there is any attempt to use the credential after the employee's separation date.

Service Provider and Visitor (Non-Patient) Access Policy (Sec. 21a-408-35)

PalliaTech service providers, including contractors, equipment maintenance and service, infrastructure support, and delivery persons will be permitted within PalliaTech facilities on an 'as needed' basis. Other visitors, including job applicants, shall also be provided temporary access upon approval. Such visits will require written authorization by the PalliaTech department head before being allowed to enter the facility, and should be entered / "pre-registered" in the system at least one (1) day prior to their scheduled visit. All visitors will be issued temporary credentials consistent with the requirements for non-employee(s) in exchange for their government issued photo ID, which will be held in a secure location until such time that their temporary credentials are returned. Information about each person will be entered into the Visitor Management System (VMS) to allow for historical reporting on the day, date, time of entry, and time of departure for each person. The information will include the following (at a minimum):

- Name
- Company or organization name
- Reason for visit

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- PalliaTech sponsor's name

It is anticipated that certain service providers, including contractors, equipment maintenance and service, infrastructure support, and delivery persons will be permitted within PalliaTech facilities on a regular or frequent basis. They will receive permanent PalliaTech access credentials similar to those issued to employees. As with employee credential issuance processes, such credentials will be issued upon completion of their background screening and based upon the authorization of a PalliaTech officer or manager via a signed access form and a photocopy of a government issued photo ID (hard copy or electronically transmitted). Access credentials will be produced and programmed at, and issued from, the manufacturing facility using the Access Control and Alarm Monitoring (ACAM) System. Credentials will be pre-printed and clearly identify the bearer as a non-employee. The information will be captured and maintained in the ACAM System for reporting purposes.

Patient and Caregiver Dispensary Access Policy (Sec(s). 21a-408-35 (f), (g)(1), and (g)(2))

Certified patients visiting dispensaries will not be required to wear or otherwise present a temporary ID, and will not therefore be required to submit information for the ACAM System or VMS, provided all patient information and visit data are recorded in the sales and distribution system. However, all accompanying persons (i.e. Caregivers) will be required to submit their information and credentials and be issued a temporary access credential similar to all other visitors. At **no time** will patients or caregivers be allowed to enter secure areas beyond the entry, waiting area, and Point-of-Sale.

Use of Force Policy

It is the policy of PalliaTech that security personnel use only the force that reasonably appears necessary to effectively bring an incident under control, while protecting the lives and safety of patients, clients, employees, visitors, and others as is reasonably possible. Security personnel should attempt to de-escalate any situation before using any level of force upon a person. Should the use of physical force be deemed required, security personnel are to use only that amount of force necessary to overcome the opposing resistance. The use of force must be objectively reasonable. The security personnel must only use that force which a reasonably prudent person would use under similar circumstances.

Firearms on Premises Policy

The PalliaTech security policy restricts the use and possession of lethal weapons (e.g. firearms) at any time based on standard operating conditions and procedures. However, non-lethal weapons (i.e. mace, Tasers, etc.) shall be used as deemed necessary. It is incumbent upon PalliaTech Senior Management

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and the security team to assess this policy from time to time to determine if such weapons are warranted and / or if arming security personnel with firearms is necessary. All security personnel required to carry non-lethal and / or lethal weapons shall be adequately trained in the use of such weapons and shall meet all Federal and Connecticut State regulatory requirements to do so. *Note: It is anticipated that some municipalities and their law enforcement department(s) may require PalliaTech security guards at dispensaries to carry firearms, and such determinations shall be made at the time of occupancy and operation.*

PalliaTech policy establishes that only law enforcement personnel will be allowed to carry firearms on their premises under normal operating conditions or by authorized exception. Any employee, associate, visitor, or patient found in possession of a firearm on any PalliaTech premises without express authorization will be subject to possible termination of their employment, revocation of their access rights, or disqualification as a patient.

Workplace Violence Policy

PalliaTech seeks to provide a workplace environment free from violence or threats of violence against individuals, groups, or employees, or threats against company property-including partner violence that may occur on our property. This policy requires that all individuals on PalliaTech company premises or while representing the Company conduct themselves in a professional manner consistent with good business practices and in absolute conformity with non-violence principles and standards.

For purposes of this policy, workplace violence is defined as a single act or series of acts which constitute actual or potential assault, battery, harassment, intimidation, threats or similar actions, attempted destruction, or threats to PalliaTech, its personnel, or its property, or, the personal property of others; which occur in the workplace, while using PalliaTech resources, at any of its facilities, or while an individual is engaged in PalliaTech business.

PalliaTech strictly prohibits use of violence or threats of violence in the workplace and views such actions very seriously. The possession of weapons in the workplace, threats, threatening or menacing behavior, stalking, or acts of violence against employees, patients, visitors, guests, or other individuals by anyone on PalliaTech property will not be tolerated. Violations of this policy will lead to disciplinary actions up to and including termination of employment or disqualification as a patient and the involvement of appropriate law enforcement authorities as needed.

Any person who makes substantial threats, exhibits threatening behavior, or engages in violent acts on PalliaTech premises shall be removed from the property as quickly as safety permits, and may be asked

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to remain away from PalliaTech premises pending the outcome of an investigation into the incident. People who commit these acts outside the workplace but which impact the workplace are also violating this policy and will be dealt with appropriately. PalliaTech reserves the right to respond to any actual or perceived acts of violence in a manner we see fit according to the particular facts and circumstances.

Contraband Policy (Sec. 21a-408-34 (p))

PalliaTech policy expressly prohibits the possession of contraband by any employee, associate, visitor, or patient on its premises for personal use. Such items will include but may not be limited to:

- Controlled substances
- Drug paraphernalia
- Alcohol
- Lock picks and locksmith tools
- Firearms and other weapons
- Dynamite, gunpowder, ammunition and other explosives

The list of items will be updated from time to time by PalliaTech Senior Management and security. Any person suspected of having such materials on their person or within their assigned work spaces (i.e. lockers, desks, file cabinets, etc.) may be subject to search of their person and suspected storage locations. Any employee, associate, visitor, or patient found in possession of such material(s) on PalliaTech premises without express authorization will be subject to possible confiscation of the contraband, termination of their employment, revocation of their access rights, and disqualification as a patient.

Confidential Information Policy

During employment with PalliaTech, employees will learn, work with, and be entrusted with information and trade secrets that are confidential relating to PalliaTech's operations, proposed businesses, financial condition, sales, products and designs. This information is not known outside of the company or even known to all of Palliatech's employees. Examples include financial information, costs, business projections, marketing plans, customers, suppliers, designs, composites, sketches and any information that is marked confidential. Keeping this information confidential is necessary to ensure our success. Because this information has substantial value to PalliaTech, all employees must exercise the highest

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degree of care not to disclose any confidential information, even inadvertently (through conversations in elevators or restaurants), to any unauthorized persons in or outside the Company.

Employees, except within the scope of employment, cannot remove, make or cause to be made any copies of drawings, reports, correspondences or other writings or samples relating to the Company. Employees cannot use for their own gain or disclosure, except within the scope of employment, any trade secrets, other confidential information, data or knowledge relating to the Company.

Employees must surrender all documents, drawings and information to the Company upon termination or employment or at any time upon the request of their Supervisor.

Sometimes even the most innocent acts or requests can result in disclosure of confidential information. Employees should always think before discussing information with a third party, including any information regarding storage, transportation, or security of PalliaTech's products and premises. If an employee believes confidential information must be disclosed to a third party, they should consult with their Department Head. There is no excuse for disclosure of our confidential information and any violation may be subject to termination and possible prosecution.

The employee's obligations under this policy shall continue after termination of employment.

Camera Use Policy

No cameras, cell phone cameras, or smart phone cameras will be permitted to be used in or around PalliaTech premises without express consent of PalliaTech Senior Management. Use of cameras for any unauthorized purpose shall be considered contributory to a breach of the Confidential Information policy. Any person found to be using such devices to obtain photographic or digital images of PalliaTech property, processes, products, or personnel without express consent by PalliaTech Senior Management will be subject to possible confiscation of the device, termination of their employment, revocation of their access rights, or disqualification as a patient.

No Smoking Policy

Smoking of any kind (i.e. tobacco, controlled substances, electronic cigarettes) shall not be permitted within PalliaTech facilities in accordance with CT State Law. Smoking shall be limited to designated outdoor areas on PalliaTech premises. Security personnel shall create an incident report if anyone is found to be in violation of these regulations.

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Media Request Policy

All media requests (in any form) shall be directed to a PalliaTech Senior Manager. Security personnel shall not release, divulge, or otherwise discuss any information regarding PalliaTech operations at any time.

Receiving, Storage and Disposal of Medical Marijuana

To minimize security risks associated with the receiving, storage and disposal of medical *Marijuana* products received from third party producers at its dispensary location, we have provided the guidelines herein. *Note: These guidelines provide an overview of general security practices, which will continue to be refined as the process moves forward.*

Asset Protection

PalliaTech will establish and implement a set of controls and practices to ensure assets are secured from unauthorized access, misappropriation, diversion, theft, and pilferage. Safekeeping will incorporate physical security working in concert with administrative controls including: access control systems, video surveillance and intrusion detection as well as the development and implementation of workflow processes including: identity authentication, electronic signatures to ensure chain of custody tracking, audit reviews, etc. This program will be actively managed by a responsible individual or group to maintain governance and oversight of the overall program.

Storage – Safes / Vaults

As required by the DoCP, all medical *Marijuana* products will be stored in a DoCP approved safe or vault in such a manner as to prevent diversion, theft, or loss. Such safes or vaults will be compliant with Section 21a-262-1 of the Regulations of Connecticut State Agencies.

Receiving Medical Marijuana Products at the Dispensary

The dispensary Pharmacist shall provide all product requests to and receive all product shipping manifests from third party Producer(s). Delivery manifests from the Producer(s) shall be transmitted to the Pharmacist via secure means 24 hours prior to the transport of the anticipated shipment.

When the delivery arrives at the dispensary it will be directed to the rear door where the vehicle can park and unload without direct public view when possible. In locations where such unloading conditions are not available, PalliaTech may request the presence of a local law enforcement officer while product is being transferred in the public domain, depending on the assessed threat conditions at the time of the

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delivery.

All deliveries from producers shall be carried out under the direct supervision of a Pharmacist who shall be present to accept the delivery and inventory the delivery to verify its contents against the shipping manifest.

- The Pharmacist shall check the credentials of the delivery personnel and record their identification information.
- The Pharmacist will then verify each product as recorded on the shipping manifest and confirm type, quantities, and the amount delivered before signing off on the manifest. The Pharmacist will also maintain a copy of the manifest to keep on file and log products into the inventory tracking system.
- Once all product has been removed from the delivery vehicle and confirmed with the manifest, the Pharmacist shall immediately be placed in an approved safe or approved vault within the dispensary department where marijuana is stored.

The delivery area(s) and process shall be under surveillance by the Facility Manager and / or the Security Officer at the dispensary through the video surveillance system until such time that all products are secured in approved safes / vaults.

Workflow – Disposal of Marijuana

Products returned, expired or otherwise determined to be unusable shall be destroyed or disposed of in accordance with Section 21a-408-64 of the regulations. This shall require (1) 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.

The PalliaTech 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:

- The date and time of disposal;
- The manner of disposal;
- The brand name and quantity of marijuana disposed of; and

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- The signatures of the persons disposing of the marijuana, the authorized representative of the commissioner and any other persons present during the disposal.

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Operation of Technical Security

As defined by this PalliaTech *Security Plan*, the security program for all facilities operated under the Connecticut DoCP Regulations concerning palliative use of Marijuana will maintain an electronic Access Control and Alarm Monitoring System, a separate Intrusion Detection System, a Video Surveillance System, a Visitor Management System and an Intercom System (at a minimum), which will provide local and remote monitoring of the manufacturing and dispensary premises 24-hours a day. The policies and procedures defined herein will establish the minimum operating requirements for those systems.

Access Control and Alarm Monitoring System

The primary server and workstations for the Access Control and Monitoring (ACAM) System will be housed in the dispensary facility in a secured environment, and will provide for real-time and remote monitoring of all PalliaTech premise access and alarm activity. The system will be programmed to provide for the following minimum functionality and require the corresponding actions by responsible security operators and administrators:

- Scheduled Lock and Unlock

The system will be configured to have all doors in lock mode on a 24-hour basis. Security personnel will audit and verify programming on a regular basis, and when any doors are found to be unsecured will take corrective actions as necessary to return the system to its original operating state.

- Programmable Access

The system will be programmed to provide control for authorized access by individuals with credentials based on access privileges defined by responsibilities, work-flow, day, date, and time. Programming requirements will be determined as follows:

- Security representatives will coordinate with PalliaTech HR and Senior Management to identify when new hire and separation or termination programming will be completed.
- All PalliaTech cardholders will be encouraged to *immediately* report lost or stolen cards to Security. Upon notification, all access programming for that credential will be deleted and a new credential issued to the cardholder. In addition, the cardholder record within the ACAM System will be configured to alert security monitoring personnel if some has

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attempted to use the credential after the date the card was reported lost or stolen. If cards reported lost or stolen are found and returned, they should be destroyed.

- Security personnel will produce reports listing all persons with programmed access to each secure area of the facilities and those lists will be audited on a regular basis by the PalliaTech manager responsible for each space to ensure only authorized personnel are programmed for their areas. If there is any discrepancy in programmed access privileges, necessary programming changes will be made.
- Security personnel will produce reports listing all persons with programmed access for each secure area of the facilities for submission to the DOCP as required for audit and approval.

- Cardholder Activity Reporting

Security personnel will produce reports listing all access activity (granted or denied) by cardholders for each secure door as may be required by PalliaTech management and / or the DoCP for the purposes of investigation of incidents / events or other reasons as may be defined by those entities.

- Event Reporting

The system will be programmed to provide real-time monitoring and reporting of all access and alarm transactions throughout the facilities on a 24-hour basis, including but not limited to alarms generated by the ACAM System, Intrusion Detection System or Video Surveillance System analytics, which will be generated through the ACAM System based on the programmed interface(s) of the systems. In the event of any "alarm" condition, security personnel will investigate, via video images and/or in person, to determine the cause of such condition. If such alarm conditions and associated activity are determined to represent a degradation in the performance of, or breach in, security for the facility, the responding security representative will work to correct the issue through one or more of the following methods as deemed appropriate, or as directed by PalliaTech security management personnel:

- Notification of an event or incident to PalliaTech Senior Management
- Notification of an event or incident to DoCP or LAHJ (if required)
- Correct issue through a physical presence, repair of the condition, or temporary corrective measures

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- **Panic Alarms**

Panic alarms will facilitate notification of a life threatening or emergency situation requiring a law enforcement response when manually activated by an occupant. Upon activation, security monitoring personnel will immediately determine if such activation represents a situation requiring a law enforcement response and, if so, contact the local authorities as required.

- **Audit Trail Reporting**

Upon discovery of system malfunctions, access changes, or other variations from the defined programming, an Audit Trail Report from the system will be reviewed to determine who was responsible for the programming changes and under what authority such changes were made. All such changes deemed to be in conflict with the standard operating procedures defined herein will be reported as a security incident or event as appropriate.

Video Surveillance System

The Video Surveillance System (VSS) will be deployed at each facility to provide real-time monitoring and archived recording of all areas where marijuana is being stored, handled, or dispensed. The system will be maintained in good working order at all times and its operational condition will be assessed daily by monitoring personnel to ensure all surveillance images are usable and being recorded. The system will also be assessed daily to ensure sufficient recording capacity is available for the defined recording period of 90-days per camera. In addition:

- The VSS will be interfaced with the ACAM System to allow for automated image call-up of camera views where alarm activity is generated, so that monitoring personnel can assess the alarm condition(s). This interface will also provide for automated additional recording of event-based video, which will be archived and tagged as a searchable event.
- All VSS equipment and viewing locations will be locked and secured from general access, with access to the equipment and images limited to persons associated with surveillance operations, law enforcement agencies, security system services, the DOCP or their authorized representative(s), and other entities approved by the DOCP.
- Twenty-four hour recordings from all video cameras at the manufacturing facility or dispensing facilities will be made available for immediate viewing by the DOCP or their authorized representative(s) on request. The DOCP will also be provided with an unaltered copy of such recording(s). If PalliaTech is aware of a pending criminal, civil, or administrative investigation, or

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legal proceeding for which a recording may contain relevant information, it will retain an unaltered copy of the recording until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the company that it is no longer needed; at which time it will be deleted and destroyed.

- Recordings will also be made available to PalliaTech authorized Senior Management for the purposes of conducting internal audits and investigations.
- All persons requesting such recordings must provide verified credentials and documentation that establish their rights and privileges, and will be required to sign a release for such information if it is removed from the site via hard-copy media or electronic transmission.

Physical Media Distribution

In situations where video footage must be copied from the PalliaTech servers and transferred to physical media for transport or distribution, specific controls for the data must be met to ensure the integrity of this investigative footage.

- All video footage saved to a physical media device must be saved with the following naming convention:
 - Facility name
 - Matter name
 - Employee responsible
 - Date of save
 - Date of destruction.
- Video footage saved to a portable physical media device will be saved to said device for no longer than 120 days, after which time it will be deleted. If footage must be stored longer than 120 days, it must be reported to PalliaTech Senior Management for tracking and approval.

Digital Transmission of Video Footage

While the distribution of video footage via e-mail or web-based communication should be limited to the greatest extent possible, in those situations in which it must be used, certain guidelines

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apply:

- All video footage saved for distribution via e-mail must follow the digital storage naming conventions.
- All e-mails must be marked as Proprietary and Confidential in the subject line.
- All video recordings will be destroyed, deleted or erased prior to disposal or sale of any facility.

Intrusion Detection System

Intrusion Detection System(s) (IDS) will serve as back-up alarm systems to the ACAM System to detect unauthorized entry during times when no employees are present at the facilities. A separate IDS will be installed at each facility under the following circumstances:

General

The system(s) will be armed and active at all times when a facility is not occupied, and will be in working order with no identifiable "fault" or "trouble" messages or conditions. These systems will be actively monitored by a contracted, Connecticut State certified Central Station monitoring company that will:

- Notify responsible PalliaTech security and operational personnel and designated municipal law enforcement agencies of alarm conditions based on specific directions from PalliaTech; and in a prioritized manner as defined by a documented "Call Tree," which will list the sequence of calls to be made and the pertinent information of the persons to be notified (i.e. name, number, passcode, password as appropriate). Call trees will be reviewed and updated on a regular basis, but no less than annually, to ensure all contact information is correct. Moreover, PalliaTech personnel will be required to submit any updates or changes in a timely manner to ensure the information is current at all times.
- Furnish "open and closed" reports, user histories, and alarm activity reports with time and date stamps, upon request

Arming Station Keypads

Authorized PalliaTech employees responsible for the "opening" or "closing" facilities, and for the security of the facilities, will be trained on the operation of the IDS, which will be facilitated through the

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- Section L: Security Plan
(Regulations of Conn. State Agencies: Sec. 21a-408-62)

A: BUSINESS INFORMATION
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use of keypads at each site.

- Each authorized PalliaTech employee responsible for the “opening” or “closing” and security of the facilities will be issued a unique personal identification number (PIN) to facilitate control (i.e. arming, disarming, shunting, alarm acknowledgement) of the IDS at each facility based on their direct and authorized responsibility for the location.

Note: PIN information will be maintained in a secure location to prevent unauthorized use and employees will be prohibited from sharing / disclosing their PIN to any other individual.

Note: One or more employees with responsible charge of a facility will be designated for possible physical response to a site during non-operating hours due to security incidents on PalliaTech premises.

Duress Alarm(s)

Silent security alarm system signals will be generated by the entry of a designated code into a keypad or arming station to signal that the alarm user is being forced to turn off the system. These alarms will be active on a 24-hour basis regardless of the armed or unarmed status of the systems. Activating this alarm will require the immediate dispatch of law enforcement personnel by the Central Station monitoring company.

- Each authorized PalliaTech employee issued a PIN and listed within the Call Tree will also be provided with a password, which will allow the Central Station monitoring and dispatch to verify their identity during voice calls regarding alarm and reset conditions.

Holdup Alarm(s)

All personnel who will interface with patients, caregivers, and other visitors, or who handle monies at service points within PalliaTech facilities, will be provided with Hold-Up Alarm devices and the necessary training to operate them. Manual activation of these devices will generate a silent alarm to signal a robbery in progress. These alarms will be active on a 24-hour basis regardless of the armed or unarmed status of the IDS(s). Activation of this alarm will require the immediate dispatch of law enforcement personnel by the Central Station monitoring company.

Maintenance and Service

The systems will be installed, programmed, and maintained by experienced, authorized and certified resellers and contractors having no commercial business relationships with the company furnishing

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the ACAM System or VSS. PalliaTech will contract with such resellers and contractors to provide maintenance and service of the systems as defined in the Systems Service & Maintenance section herein.

Key Management

A Key Management System (KMS) consisting of a numbered Master and Sub-Master key, keyway protocol, an interchangeable keyway system, a key distribution and tracking software, an electronic key control cabinet (at the manufacturing facility), and secured key storage boxes (at dispensaries) will store and track use of all physical keys for all PalliaTech spaces as follows:

- Protocols for key distribution will follow those required for the issuance of access credentials and the programming of access for each employee, whereby:
 - Keys will be issued only upon verification that required HR processes have been completed and key assignment will be based on specific job responsibilities.
 - Key distribution will be tracked within the key management software, which will record the number of the key, the name of the person to whom the key was issued and the date the key was issued.
 - All employees will be required to return their key(s) to security personnel upon separation from the company.
- Keys for access controlled spaces will reside within the electronic key control cabinet at the cultivation center / manufacturing facility and within a secured key box at dispensaries. The keys will not be issued or used except to bypass malfunctioning electronic security access controls, which will register as a "forced open" alarm on the ACAM System. Key usage shall be governed as follows:
 - All copies of secure area keys within the electronic key control cabinet at the manufacturing facility will require the use of access controls to remove any key. The removal of the key and the duration of its removal will be tracked by the KMS system; and it will record the authorized user; the day, date and time of removal; and the day, date and time of return. Bypass of these controls will be recorded and reported as a security incident.
 - All copies of secure area keys within the secured key boxes in dispensary facilities will require the use of a separate key / combination to open the box. The opening of the box

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will generate a tamper alarm on the ACAM System notifying security of the cabinet's use. Therefore, the following protocols must be observed:

- Security personnel must be notified before the box is opened
 - Security personnel will record the name of the person requesting access and the day, date, and time the request was made, which will be recorded in the incident and event log.
 - Security personnel will identify which secure doors were opened without a credential while the keys were being accessed.
 - Security personnel will be notified when the keys were returned to the box and re-secured, which will be verified via video camera images.
 - Security personnel will inspect and audit key boxes to ensure all keys are in place each time they are on site at a dispensary. Upon discovery that any keys have been removed and not returned, an incident report will be filed.
 - Upon receipt of an unauthorized tamper alarm from a key box, security personnel will immediately begin an incident report and track any key usage.
- Upon request by PalliaTech Senior Management, the DoCP or its representatives, law enforcement, and security personnel will furnish reports of all key usage for secure areas.
- Any bypass of key control systems and protocols will be recorded and reported as a security incident or event.
 - All persons issued or having access to keys will immediately report if keys are lost or stolen. In the event that any key has been lost or stolen, security will place a service call to have affected keyways or cored changed or replaced; collect all affected keys; and issue new keys accordingly.
 - The electronic KMS will be maintained in good working order at all times and PalliaTech will contract with a qualified, authorized system vendor or contractor to provide service and maintenance of the system as required or recommended by the manufacturer.

Systems Service & Maintenance

All system will be maintained in good working order at all times PalliaTech will maintain annual service and maintenance contracts with certified system support contractors for the life of the facilities' operation.

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Systems shall be tested no less than monthly. Records of security tests must be maintained for five years and made available to the DoCP upon request. The contracts will include regular maintenance, on-call services and repairs (as applicable) to each system as follows:

- Schedule A - Annual Preventative Maintenance: Test and adjust all system sensors.
 - Semi-Annual Preventive Maintenance
 - Inspect, clean, and run diagnostics on ACAM System Servers.
 - Inspect, test, clean, and adjust UPS. Replace batteries as necessary.
 - Inspect and clean all ACP(s).
 - Inspect, test, and clean power supplies. Replace batteries as necessary.
 - Inspect, clean and vacuum all consoles and equipment racks.
 - Test and adjust all VSS PTZ Cameras and preset functions.
 - Inspect, clean, and run diagnostics on VSS Servers and NVR(s).
 - Visually observe all camera and monitor displays and adjust for optimal performance.
 - Quarterly Preventive Maintenance
 - Inspect, clean and adjust ACAM System and VSS printers and system workstations.
 - Run ACAMS diagnostics and perform file maintenance to insure optimal performance.
 - Clean all camera housing view panels.
 - Provide a written notification to the owner outlining any work performed and noting any foreseeable problems.
 - Provide a "loaner" for any equipment not field-repairable. Such a loaner will be in working order and the functional and technical equivalent of the item replaced.
 - Provide a loaner for any equipment not field-repairable and that is fully compatible with all associated equipment.

1. RFA (A)(1): BUSINESS INFORMATION

DISPENSARY FACILITY LICENSE INFORMATION FORM (APPENDIX A)

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- Loaner equipment for system components (example: badge printer, workstation, etc.) that must be shipped from the manufacture or distributor will be on site and operational within 48 hours of the component failure. Furnish lists of equipment that will require shipment from the manufacturer or distributor and lead times associated with that equipment.
- Repair or Replacement Service
 - Repair or replacement service for the second through fifth years after the warranty period has expired will be performed in accordance with the following schedule:
 - Schedule A - 7 days, 24 hour, two (2) hour response time.
 - Schedule B - 8:00 a.m. - 5:00 p.m. business days, excluding holidays, four (4) hour response time.
- Schedule A will apply for major system components including, but not limited to, the ACAM System and VSS file servers, ACAM System and VSS workstations, access control panels, power supplies, network switches, intercom server and stations, network video recorders, and the uninterruptible power system (UPS).
- Schedule B will apply for all other components and devices.
- Include an after-hours labor rate for any maintenance service required during hours not covered under Schedule B.

Two-Way Radio Communications

PalliaTech will develop and maintain a two-way radio communications protocol, testing protocols, and service and maintenance program based on the type of system deployed, number of channel licenses obtained, and number of hand-held radios issued to various users.

Because radio transmissions can be intentionally or inadvertently intercepted, all radio communications shall be limited to 'operational need' only and shall be conducted in a professional manner with appropriate language at all times. Details regarding security conditions, product shipping movements, and / or other sensitive or confidential information should not be communicated using radios unless necessary. As such, a set of radio "Call Codes" shall be developed that provide users with alerts to specific conditions, but that would not be readily recognizable to casual listeners. For example; "Code Silver" is a common call code in hospitals used to signal the presence of a 'combative patient with a weapon' or an 'active

1. **RFA (A)(1): BUSINESS INFORMATION**

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shooter.' The security team shall develop and maintain these codes as necessary, and must be coordinated with additional set of codes developed and maintained by the facilities / operations staff.

1. RFA (A)(2): BUSINESS INFORMATION
QUALIFICATIONS STATEMENT

1. RFA (A)(2): BUSINESS INFORMATION QUALIFICATIONS STATEMENT

“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 dispensary facility.”

PalliaTech CT, LLC, a subsidiary of PalliaTech, Inc., seeks to bring its deep medical marijuana experience to a new level by joining Connecticut’s highly-evolved, pharmacist-led medical marijuana program.

The Company’s leadership will be directed by two long-time Connecticut residents. Christine Rigby, CEO, a former Wall Street executive whose passion for the medical marijuana industry is borne from her personal experience of caring for an ill family member and our Facility Dispensary Manager/Chief Pharmacist, Roy Ciarlo, a Connecticut-licensed pharmacist with over twenty years retail pharmacy management experience .

PalliaTech is a five year old, medical marijuana company, uniquely suited for Connecticut’s dispensary program in three main respects:

- 1- Track record in designing, building and managing state-of-the-art medical marijuana dispensaries;
- 2- Data sample collection program (currently >15,000 cannabis samples) that with physician consultation enables its dispensaries to make specific science-based recommendations based on individual medical conditions; and
- 3- Rollout of the Company’s lab-tested pharma/nutra-quality formulations that will help the State of Connecticut to continue to lead the nation in developing the most pharmaceutically-oriented medical marijuana program in the country.

TRACK RECORD

The PalliaTech team are dispensary design and operation experts. The Company is enthusiastic to leverage that deep experience to meet the new high bar set in Connecticut. The team has been responsible for the design and management of nine (9) medical marijuana dispensaries located in the States of New Jersey, Illinois, Montana and Maine.

Highlights:

- In June 2013, the Company was awarded its New Jersey State license to operate a state-of-the-art medical marijuana cultivation, manufacturing and retail dispensary in Bellmawr, New Jersey;
- In November 2014, the Company was awarded its Colorado State license to operate its testing lab in Denver, Colorado and has been operating since that time;
- In January 2015, PalliaTech was awarded its dispensary license in Elk Grove, Illinois and is preparing for its operation in 2016;

1. RFA (A)(2): BUSINESS INFORMATION QUALIFICATIONS STATEMENT

- Additionally, PalliaTech's Vice President of Operations, Michael Nelson, designed, built and was at the helm of three dispensaries in the State of Montana; and
- The Company's Dispensary Operations Manager, Gretchen McCarthy, was deployed to run the Maine Organics Therapy Dispensary in Ellsworth, Maine.

PalliaTech has adopted its best practices by borrowing from the retail and pharmacy industries. Through years of industry field-testing these procedures, PalliaTech has designed best-in-class human resource, inventory and data tracking, employee training and operating systems in the industry.

While the Company is proud of all of its operating policies and procedures, two unique programs keep PalliaTech at the industry's forefront.

- **Mentoring and Continuing Education.** All PalliaTech employees are required to participate in the Company's internal mentoring program and must complete a minimum of fifteen (15) external continuing educational hours per year, making PalliaTech's dispensary staff among the most effectual in the industry;
- **PalliaChat SM.** PalliaChat SM is a PalliaTech-branded live video conferencing platform that will establish a continuing dialogue between PalliaTech's medical marijuana patients and PalliaTech staff. PalliaChat SM objectives are to:
 - o Provide a follow up tool that makes possible a face-to-face communication with PalliaTech staff after a patient's physical visit (recommended within one week of each patient visit);
 - o For disabled patients who utilize caretakers for medicine pickup, it can make possible a deeper one-on-one, consultative relationship between patient and dispensary; and
 - o Serve as one of our deterrents against diversion.

DATA-BASED PATIENT RECOMMENDATIONS

Through its existing lab operations, PalliaTech dispensary employees can with physician consultation make superior, condition-specific medicine recommendations to its qualified dispensary patients.

The PalliaTech team has designed, built and operated two certified medical marijuana testing laboratories, both in Colorado. Since 2007, PalliaTech scientists have collected over 15,000 samples and tested each for twenty (20) various terpene compositions. This data has been catalogued and the results are used to develop specific profiles that

1. RFA (A)(2): BUSINESS INFORMATION QUALIFICATIONS STATEMENT

provide a profound understanding of how various medical conditions interact with various cannabis chemotypes. This scientific database is one of the main tools utilized by PalliaTech dispensary employees to make the very best product recommendations to its medical marijuana patients. Over 1,000 new samples a month are collected by PalliaTech's affiliated laboratory. This robust, proprietary database will form the foundation for future PalliaTech cannabis research.

LEADING THE WAY IN CONNECTICUT

PalliaTech has produced some of the most precise pharma/nutra standard formulations and delivery systems in the industry. As such, the Company has initiated discussions with one of the four Connecticut medical marijuana producers to license PalliaTech's proprietary dosing and drug delivery IP. Upon being awarded a license with approval of DCP, PalliaTech intends to seek similar relationships with all four of the State's licensed cultivators. Through its dispensary, PalliaTech will be able to advance the medical marijuana program for the entire state and help Connecticut to serve as an industry leader throughout the nation.

PalliaTech's current intellectual property includes:

- Laboratory-tested SOP's for single, metered dose mono-cannabinoid and blended product formulations;
- Laboratory-tested SOP's for the manufacturing of new products such as pellets and specific inhalers and for medical marijuana, pills, vape pens and tablets developed by our Novartis-trained manufacturing consultants for the purpose of maximizing healthy and effective medicine intake;
- Internationally-patented drug delivery system that can deliver a single-metered dose in a clinical setting; and
- A proprietary methodology of outcome tracking.

OUR TEAM

The PalliaTech team boasts professionalism and best-in-class industry expertise. Our team includes seasoned cancer researchers, experienced medical marijuana dispensary operators, cultivators, a biochemist, former pharma-executives and, for security and compliance matters, a national leader in law enforcement and regulations compliance. The team's competencies includes a combined twelve (12) years of medical marijuana dispensary operations experience, seven (7) years of medical marijuana research experience and the development of patent pending medical devices.

1. RFA (A)(2): BUSINESS INFORMATION QUALIFICATIONS STATEMENT

- **Christine Rigby, Chief Executive Officer**

Ms. Rigby is a Wall Street trained executive with over 20 years' experience in finance and investments. Ms. Rigby's mission for the Company is to apply her executive management skills to help sick Connecticut residents and to give back to the community.

- **Steven Patierno, PhD- Chief Science Officer and Board Member**

Dr. Patierno is a doctor of Pharmacology and a Director at the Duke Cancer Center, Durham, North Carolina. Dr. Patierno is also a Professor of Medicine and a Professor of Pharmacology and Cancer Biology at Duke.

- **John O'Brien, Chief Compliance Officer**

Serving under New Jersey Governor Chris Christie, Mr. O'Brien was the Executive Director for the NJ DOH Medicinal Marijuana Program from its inception in 2011 through April 2015. His prior experience includes over 25 years of distinguished law enforcement leadership, including Assistant Bureau Chief for the NJ State Police.

- **Roy Ciarlo, Facility Dispensary Manager/Chief Pharmacist**

Mr. Ciarlo, is a licensed Connecticut pharmacist with over 20 years retail and clinical pharmacy experience. Mr. Ciarlo gained a deep understanding of the complexities of non-traditional pharmaceuticals when holding a position as the Chief Pharmacist at Connecticut Counseling Clinic where he developed a deep commitment to the after-care of his pharmacy patients.

- **Gretchen McCarthy, VP, HR and Operations**

Ms. McCarthy brings nearly five years of dispensary operations experience to the Connecticut operation. Prior to joining PalliaTech, Ms. McCarthy was the Dispensary Operations Manager for Maine Organic Therapy Group, a medical marijuana dispensary in Ellsworth, Maine and is currently the Acting Dispensary Operations Manager in PalliaTech-managed Compassionate Sciences Alternative Treatment Center. Ms. McCarthy has a Bachelor of Science from Capella University in Business/Human Resources Management and a Human Resources Certification from the Human Resources Institute in Professional Human Resources.

- **Bob Winnicki, Chief Research Officer**

Mr. Winnicki attended University of Colorado medical school and is a PhD candidate in Micro-biology at the University of Wooster. Since 2008, Mr. Winnicki has been on the cutting edge of the industry's research in medical marijuana research in Canada, Ireland and the State of Colorado.

1. RFA (A)(2): BUSINESS INFORMATION QUALIFICATIONS STATEMENT

- **Stephen Goldman, Advisory Board Member**

Stephen Goldman is an analytical chemist with extensive industrial and academic laboratory experience. He is an expert in GC, HPLC, mass spectrometry, chemical and biochemical engineering, as well as project and business management.

PalliaTech stands ready to join the Connecticut business community and to contribute to the success and scientific advancement of Connecticut's medical marijuana industry.

1. RFA (A)(3): BUSINESS INFORMATION

FINANCIAL STATEMENT TRANSACTIONS RELATED TO APPLICATION

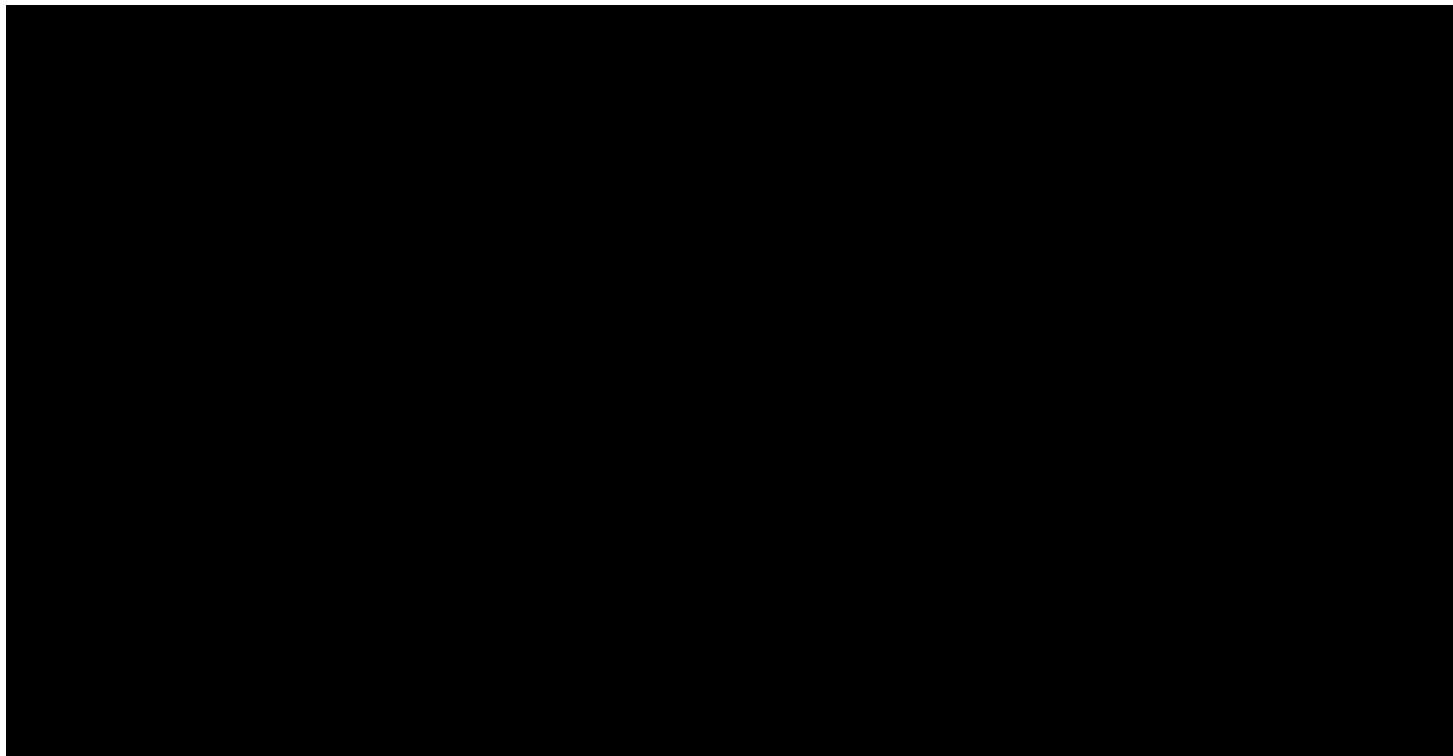
- Financial Commitment: \$1 Million

(NOTE: INCLUSIVE OF POST-AUDIT TRANSACTIONS)

1. RFA (A)(3): BUSINESS INFORMATION

FINANCIAL STATEMENT TRANSACTIONS RELATED TO APPLICATION
(NOTE: INCLUSIVE OF POST-AUDIT TRANSACTIONS)

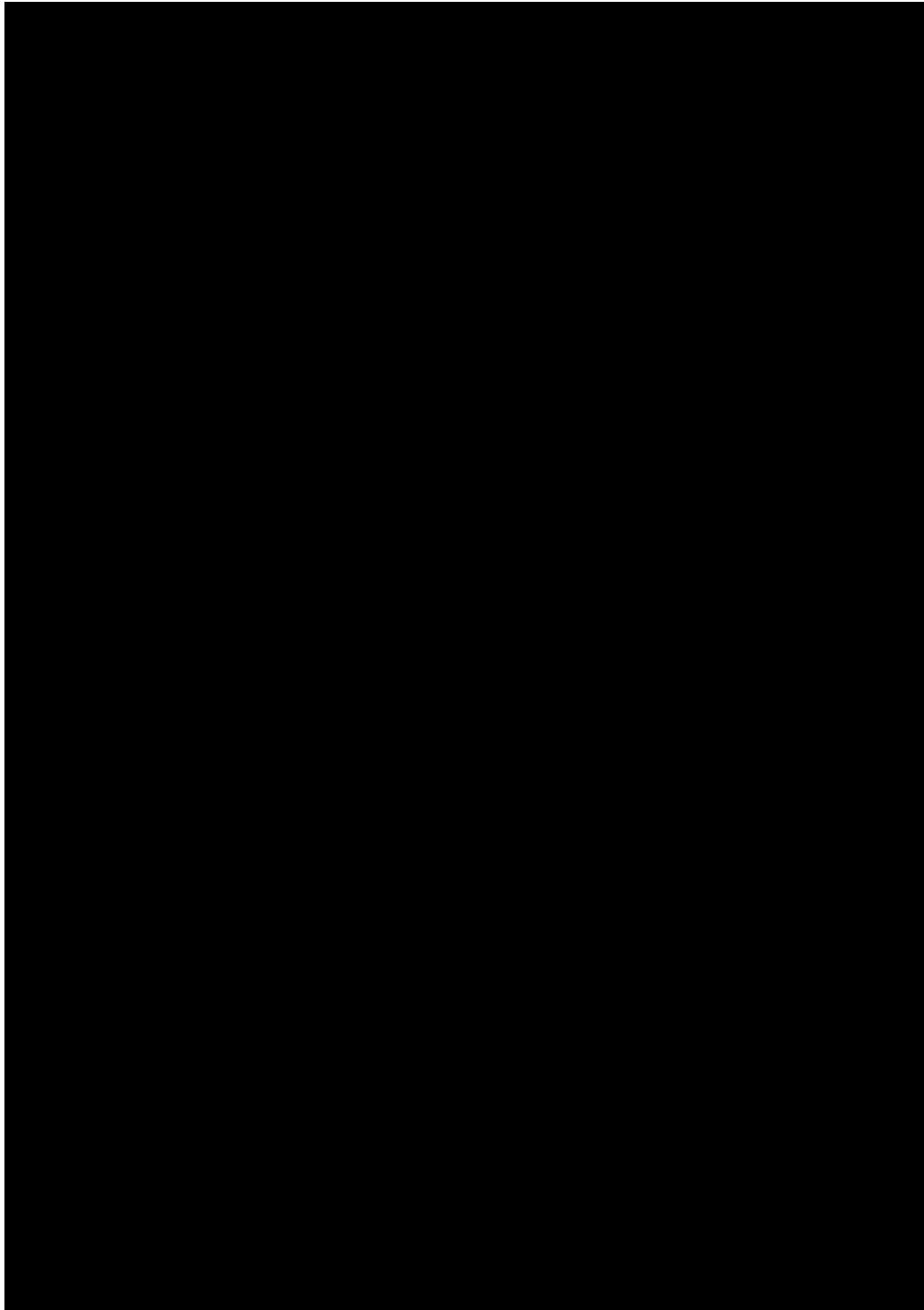
.....
"Provide a financial statement setting forth the elements and details of all business transactions connected with your application."
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1. RFA (A)(3): BUSINESS INFORMATION

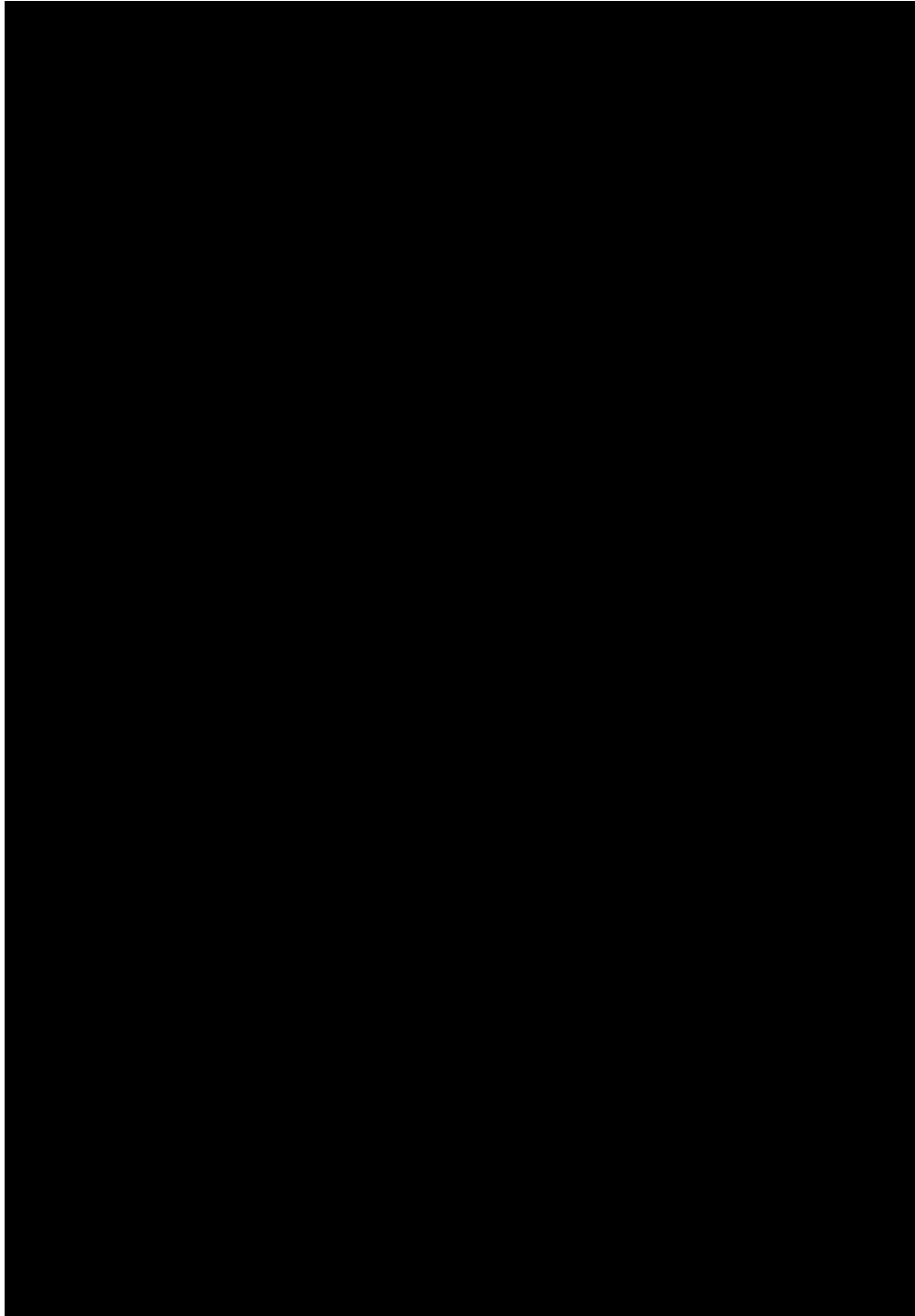
FINANCIAL STATEMENT TRANSACTIONS RELATED TO APPLICATION
(NOTE: INCLUSIVE OF POST-AUDIT TRANSACTIONS)



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1. RFA (A)(3): BUSINESS INFORMATION

FINANCIAL STATEMENT TRANSACTIONS RELATED TO APPLICATION
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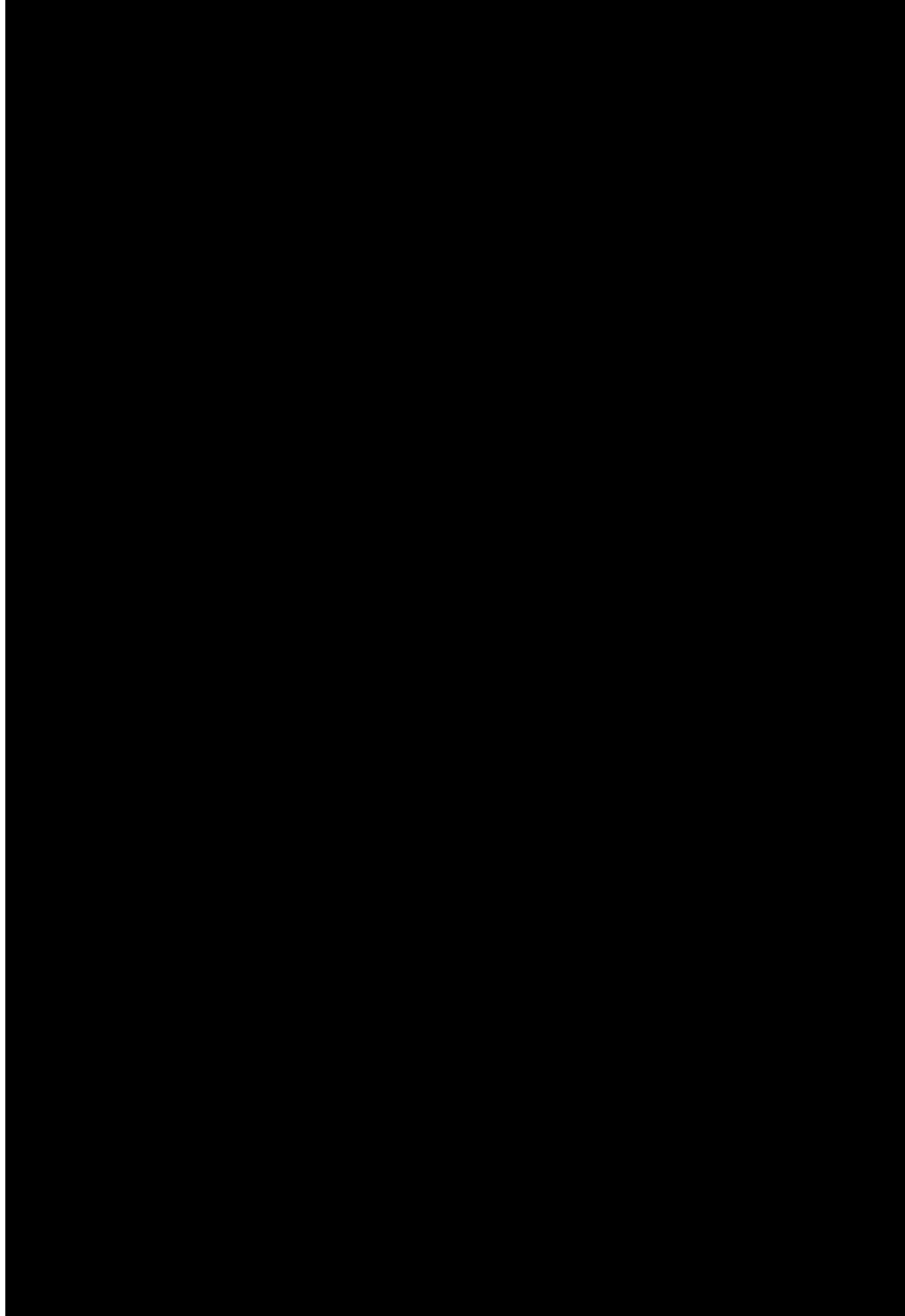
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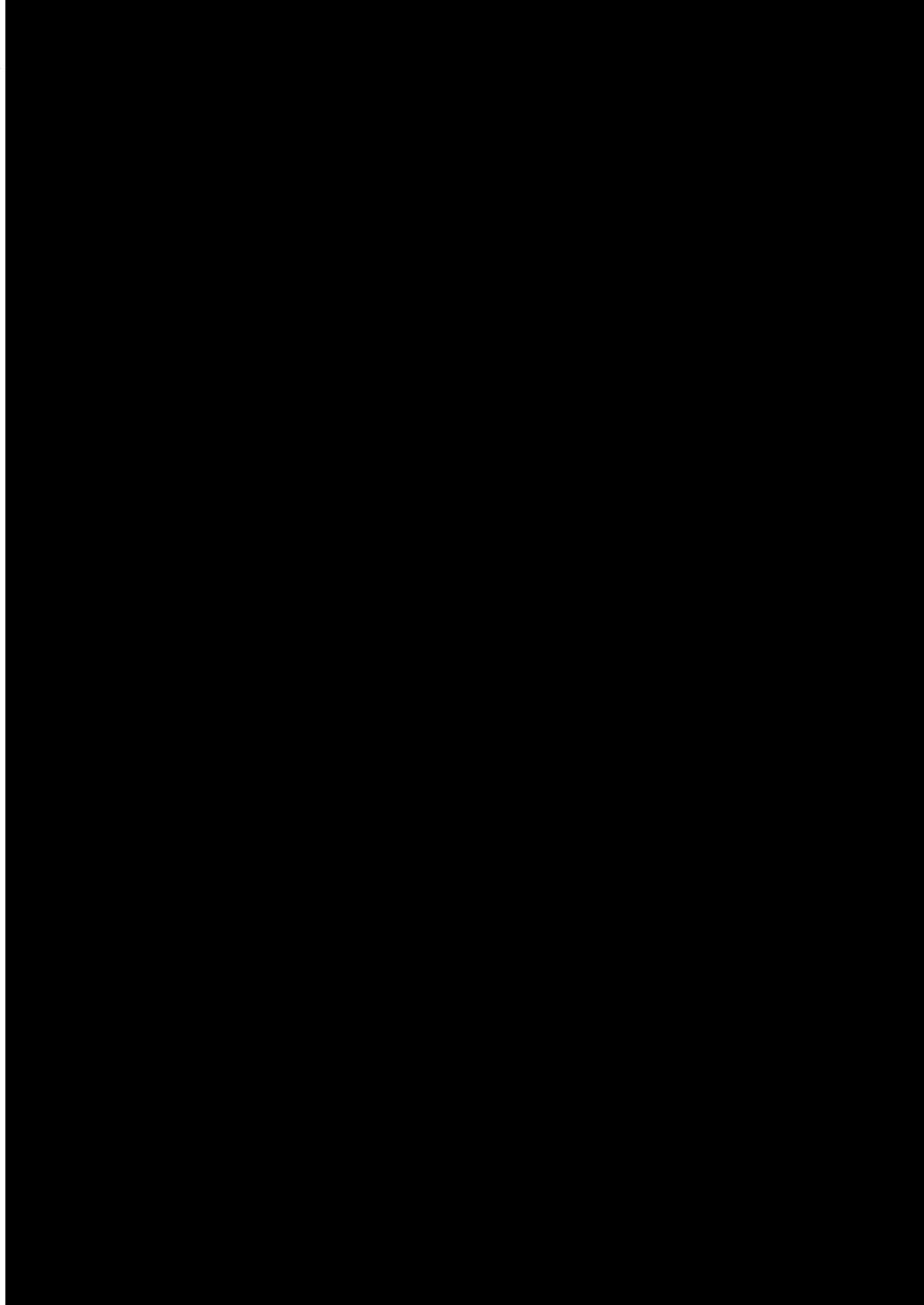
FINANCIAL STATEMENT TRANSACTIONS RELATED TO APPLICATION
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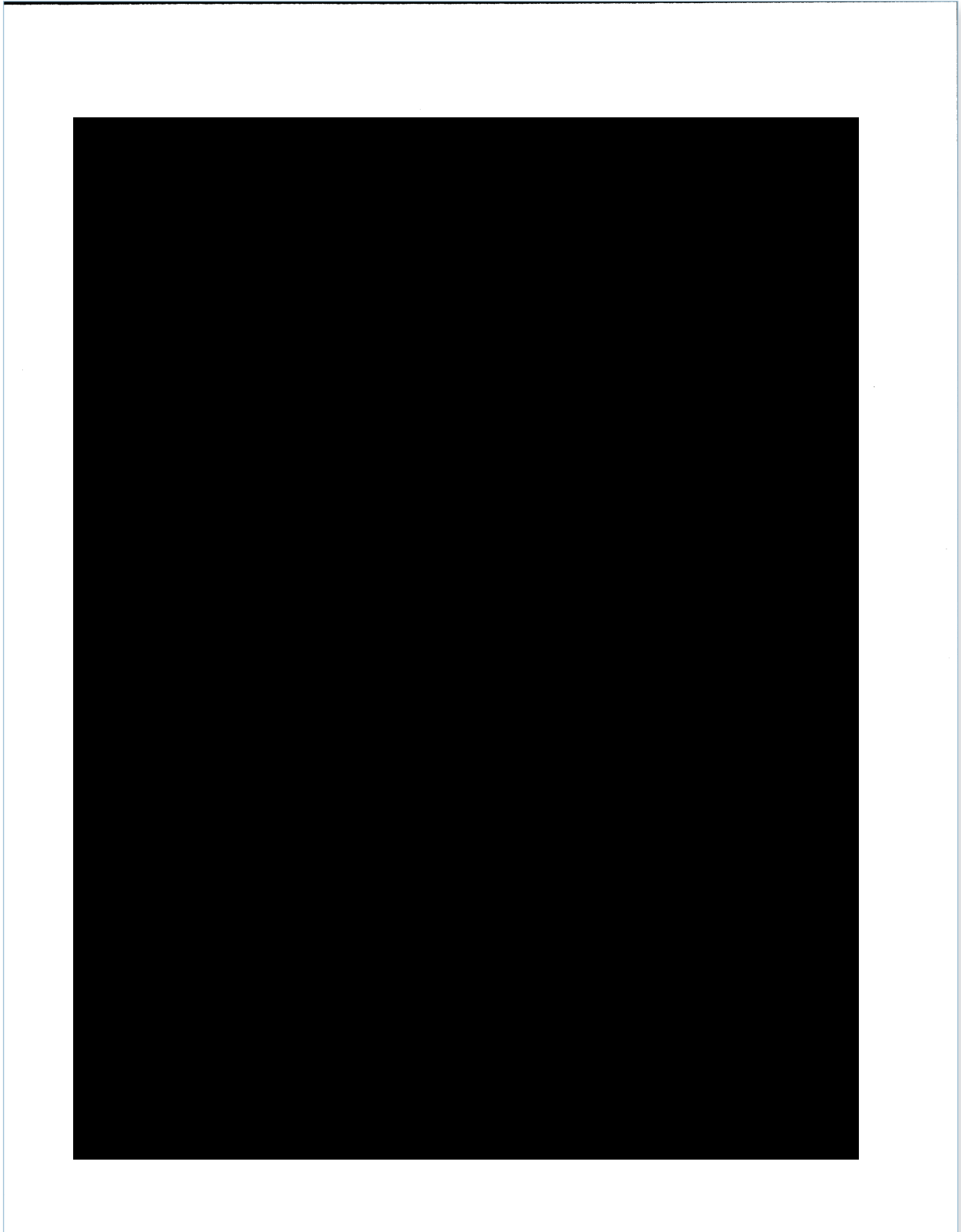
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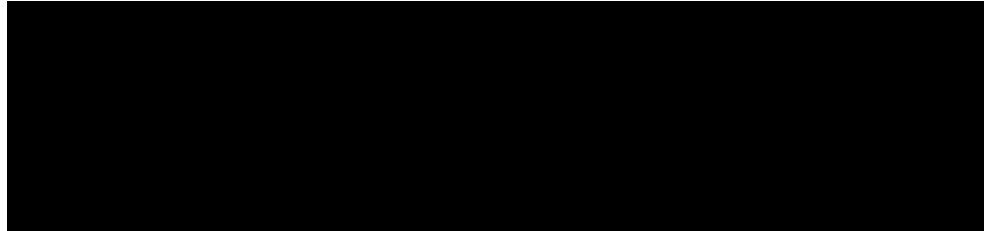
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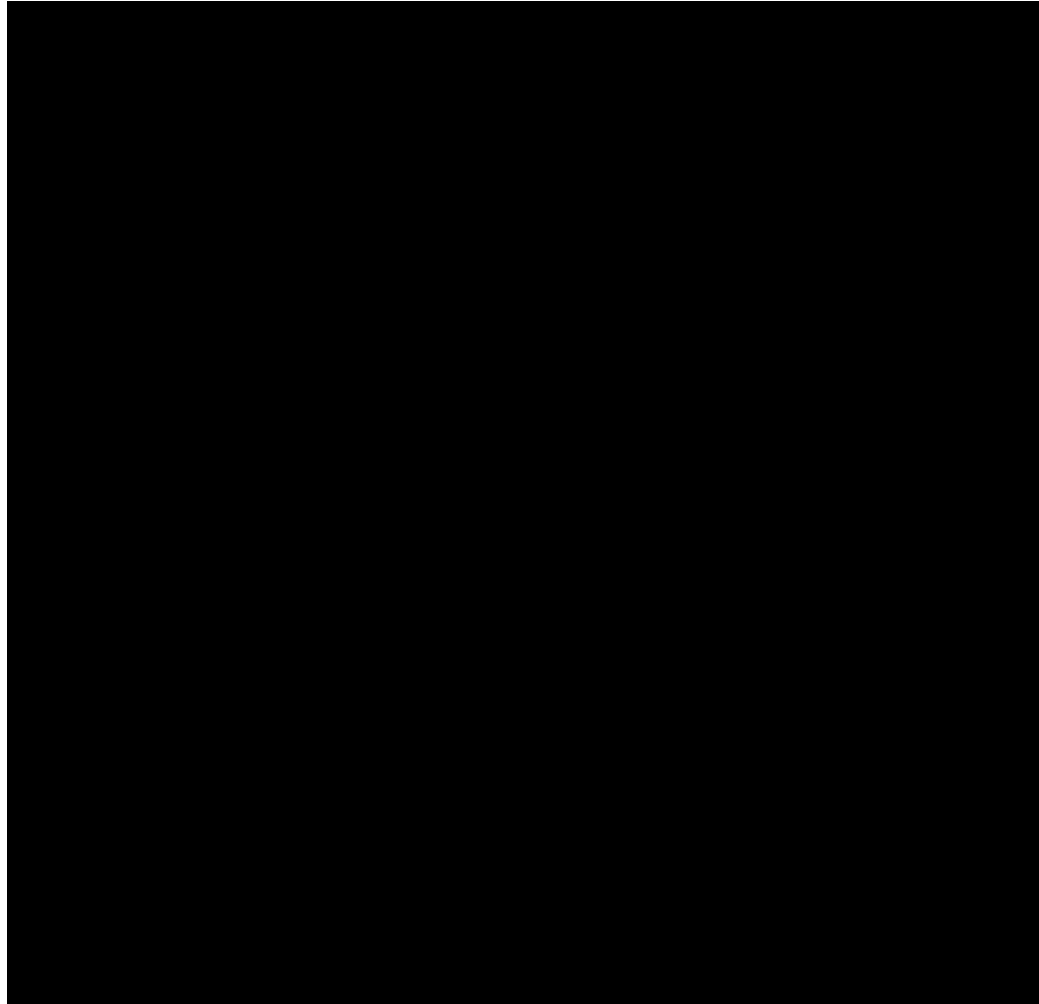
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4834-7654-1220.1.

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1. RFA (A)(3): BUSINESS INFORMATION
APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



Medical Marijuana Program

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

E-mail: dcp.mmp@ct.gov • Website: www.ct.gov/dcp/mmp



Appendix B

Dispensary Facility Backer Information Form

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

Section A: Backer Information

1. Backer business type:

<input type="checkbox"/> Sole Proprietorship	<input checked="" 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: _____
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2. Legal Name of Backer:

<div></div>

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 applicant; or
- Appendix E in all other instances.

11. Name (First, Middle, Last):

12. Percentage of ownership interest

<div></div>

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



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

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.

1. **RFA (A)(3): BUSINESS INFORMATION**

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



Medical Marijuana Program

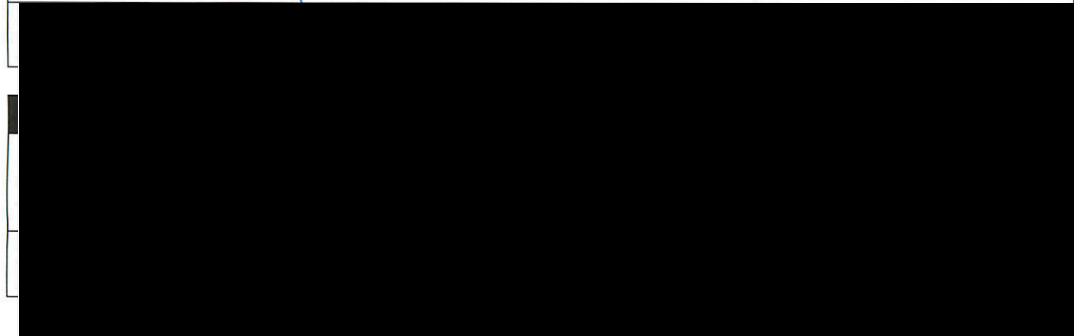
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E-mail: dcp.mmp@ct.gov • Website: www.ct.gov/dcp/mmp



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.



1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



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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 applicant; or
- Appendix E in all other instances.

11. Name (First, Middle, Last):	12. Percentage of ownership
---------------------------------	-----------------------------

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



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

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.

1. **RFA (A)(3): BUSINESS INFORMATION**

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



Medical Marijuana Program

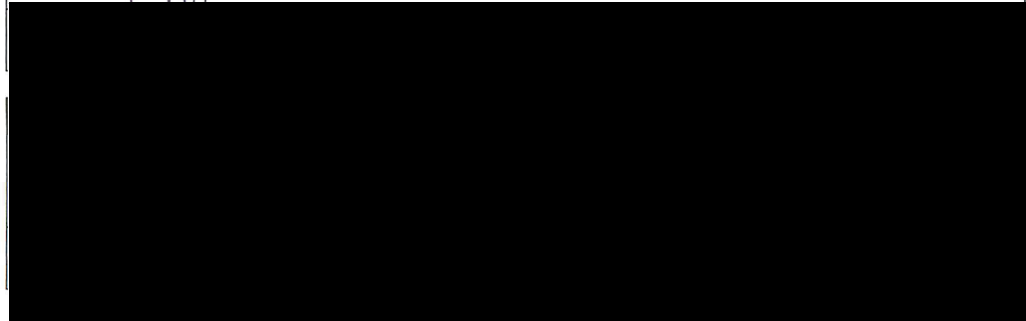
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Section F: Criminal Background Check

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.



1. RFA (A)(3): BUSINESS INFORMATION

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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): / 1980 15. Type: 16. 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.

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



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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.



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Appendix B

Dispensary Facility Backer Information Form

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

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: _____
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2. Legal Name of Backer:

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 applicant; or
- Appendix E in all other instances.

11. Name (First, Middle, Last):	12. Percentage of ownership interest

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



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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.

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.

1. **RFA (A)(3): BUSINESS INFORMATION**

APPENDIX B: DISPENSARY FACILITY BACKER INFORMATION FORM



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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.



1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
EMPLOYEES BACKGROUND INFORMATION

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL EMPLOYEES BACKGROUND INFORMATION



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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 J.

Section A: Personal Information

1. Name (First, Middle, Last):

[Redacted area for Section A, Question 1]

Section B: Employment Information

12. Current or Most Recent Employer:

13. Date of Employment:

[Redacted area for Section B, Questions 12 and 13]

Section C: Pharmacy Business Experience

21. Do you have any experience controlling, managing, operating or working for a pharmacy?

☒ Yes ☐ No

22. Are you currently associated with a pharmacy in any state?

☒ Yes ☐ No

23. If you answered "yes" to question 21 or 22, attach a statement setting forth, for each pharmacy with which you have been associated, the following information:

- The pharmacy name;
- The pharmacy's location;
- All titles and responsibilities held by you at the pharmacy, including the time frame for each;
- The dates of your association with the pharmacy;
- Whether you currently have a role at the pharmacy and, if not, when your involvement terminated and why; and
- Whether the pharmacy was ever alleged to have violated the laws or regulations of the state in which it operates during the time period when you were associated with the pharmacy and, if so, how those allegations were resolved.

1. **RFA (A)(3): BUSINESS INFORMATION**

APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
EMPLOYEES BACKGROUND INFORMATION

APPENDIX C
Question: #23



1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL EMPLOYEES BACKGROUND INFORMATION



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Section D: Marijuana Business Experience

24. Other than the applicant, do you have any experience controlling, managing, operating or working for a marijuana business?

☐ Yes ☒ No

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

☐ Yes ☒ No

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

- The business name;
- 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.

Section E: Other Relevant Business Experience

27. 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

28. If you answered “yes” to question 27, attach a statement setting forth the following information for each such business with which you have been associated:

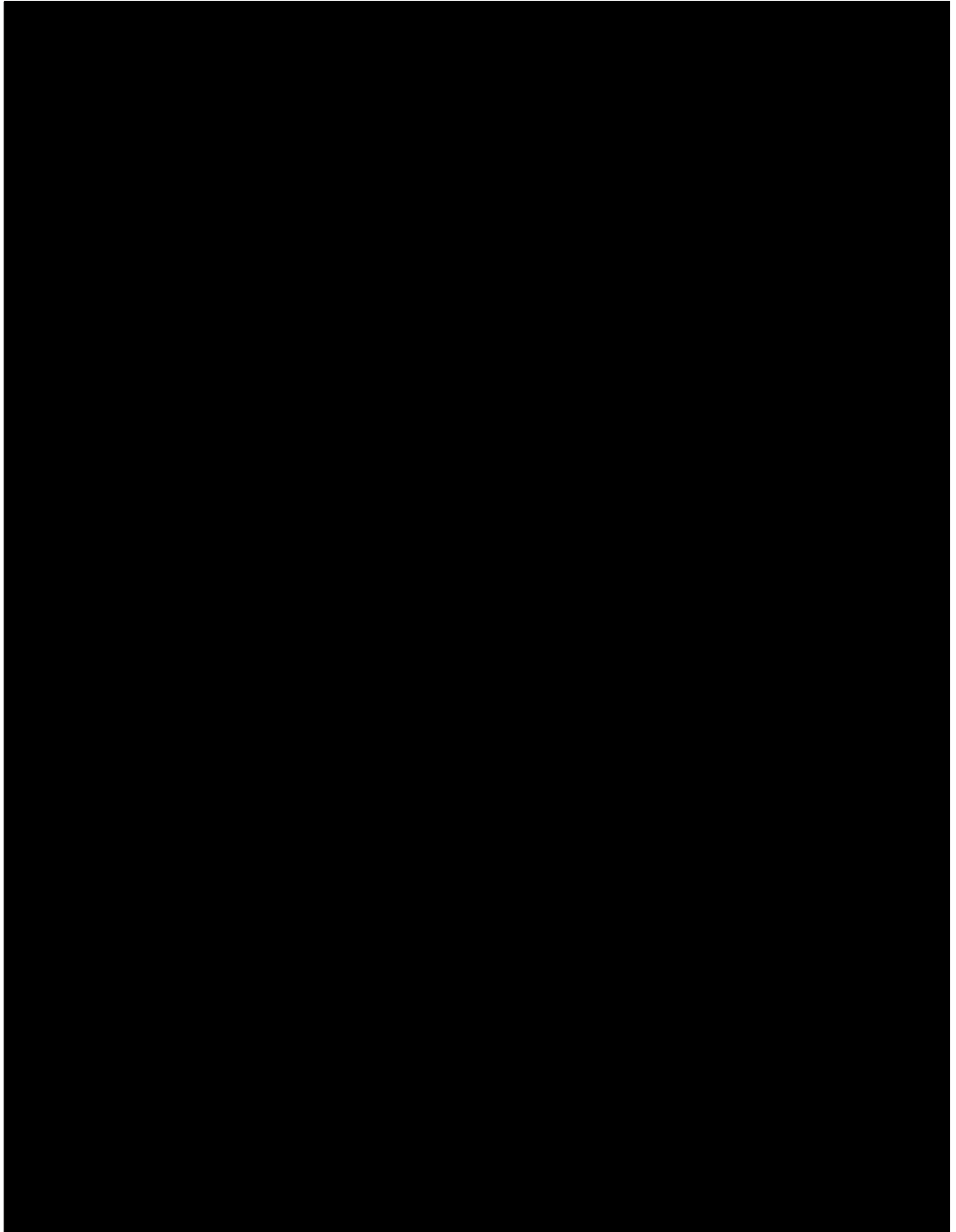
- The business name;
- Products or services offered;
- The business location;
- All titles and responsibilities held by you at the business, including the time frame for each;
- The dates of your association with the business;
- Whether you currently have a role at the business and, if not, when your 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 F: 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.

1. RFA (A)(3): BUSINESS INFORMATION

**APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
EMPLOYEES BACKGROUND INFORMATION**



1. **RFA (A)(3): BUSINESS INFORMATION**

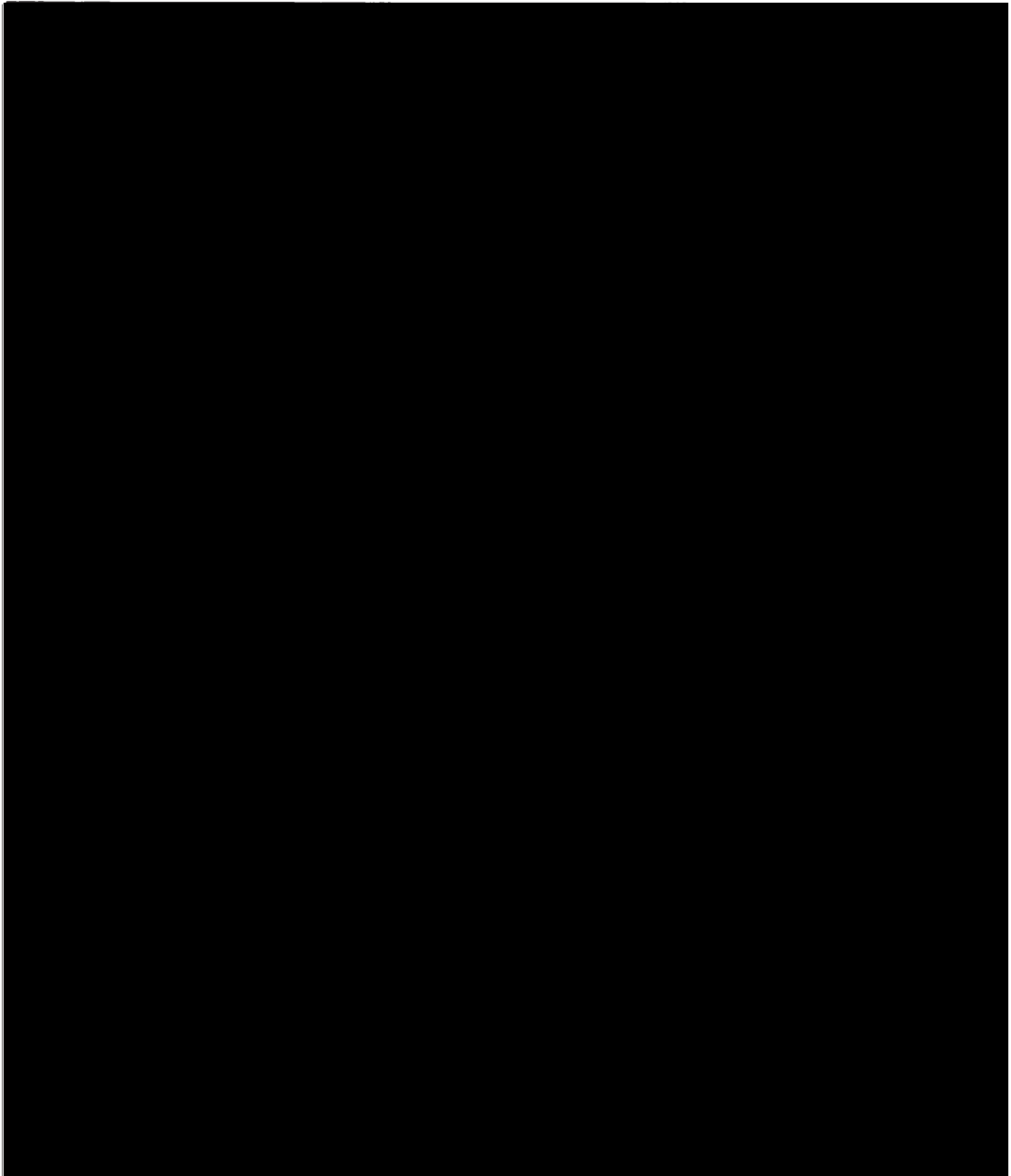
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1. **RFA (A)(3): BUSINESS INFORMATION**

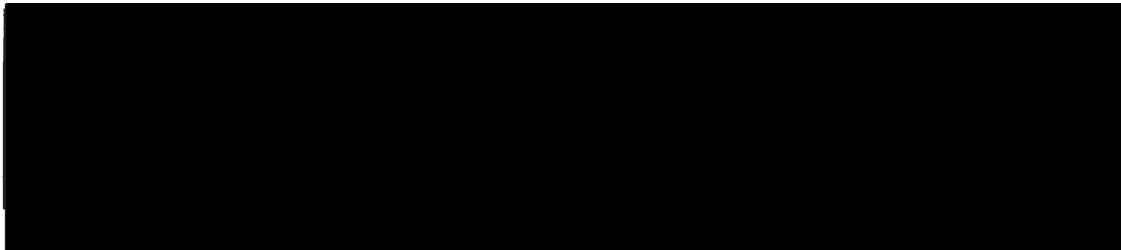
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Appendix C

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 J.

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1. **RFA (A)(3): BUSINESS INFORMATION**

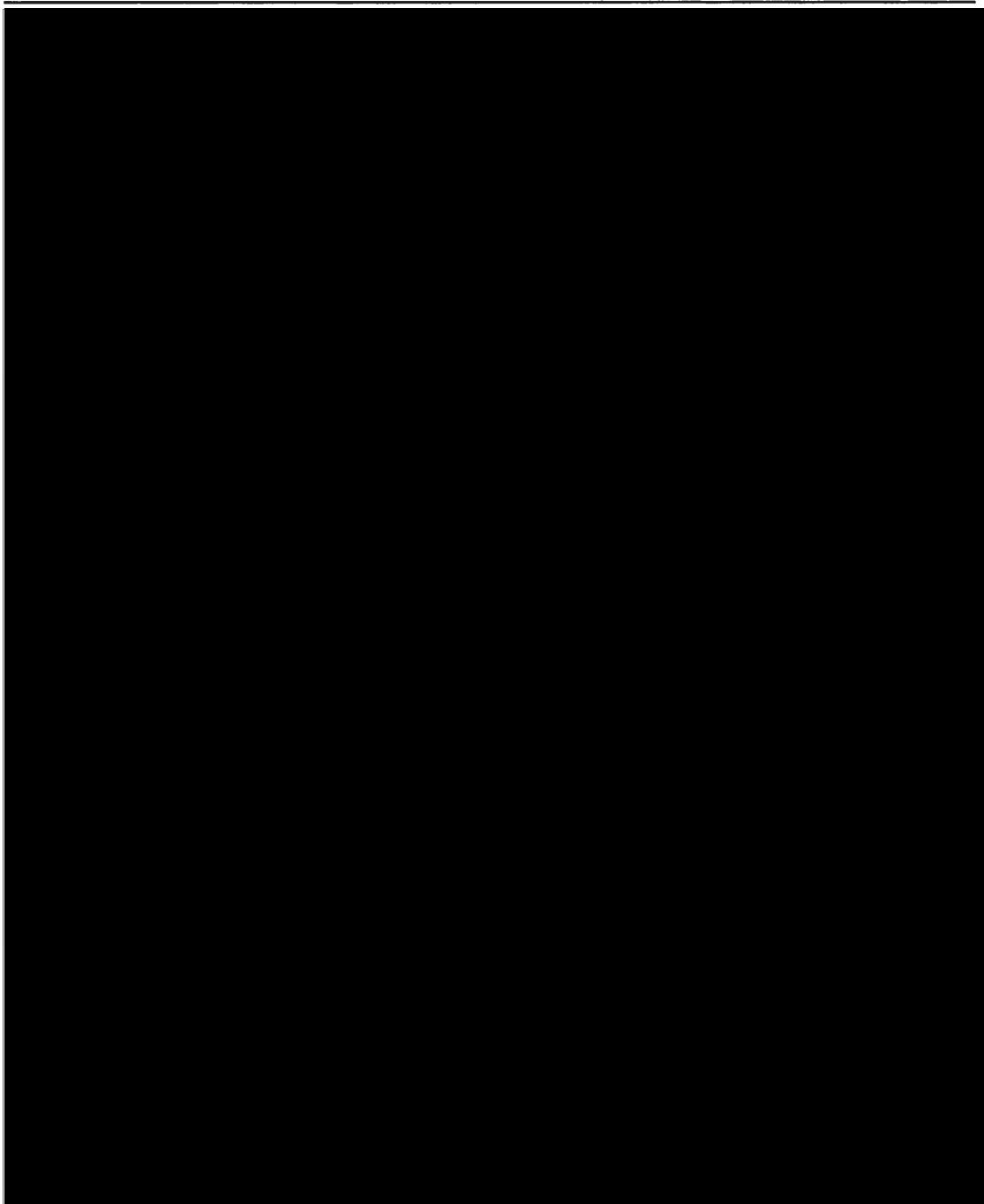
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EMPLOYEES BACKGROUND INFORMATION



Medical Marijuana Program

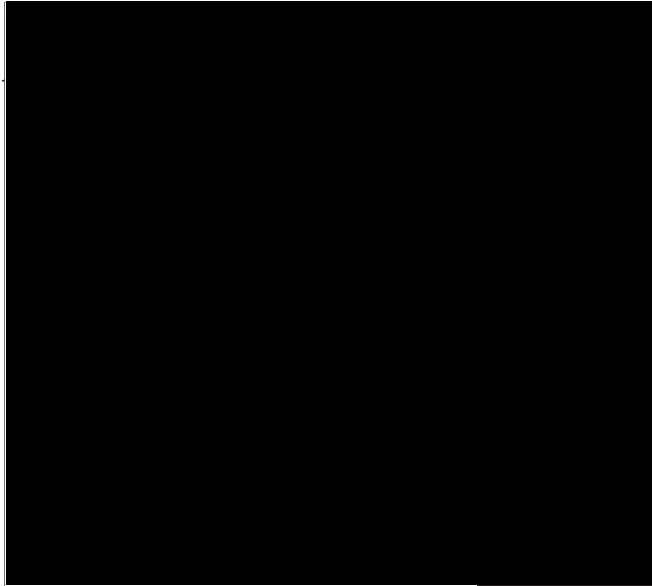
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1. RFA (A)(3): BUSINESS INFORMATION

**APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
EMPLOYEES BACKGROUND INFORMATION**



1. **RFA (A)(3): BUSINESS INFORMATION**

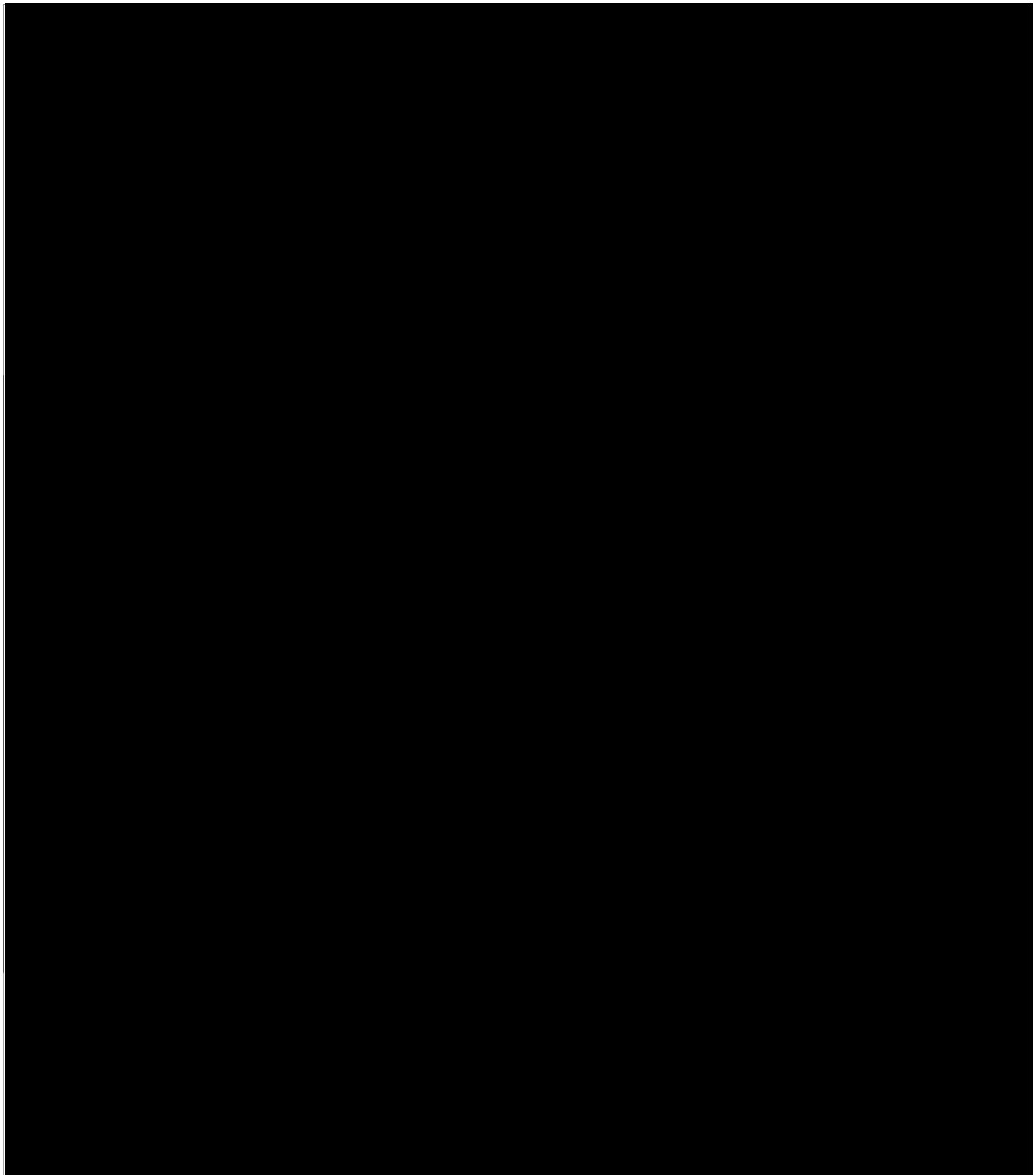
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1. **RFA (A)(3): BUSINESS INFORMATION**

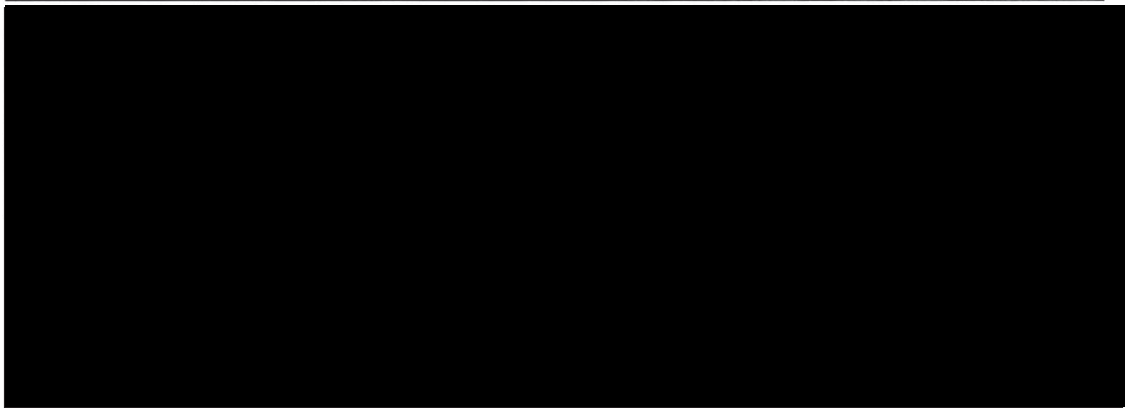
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Appendix C

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 J.

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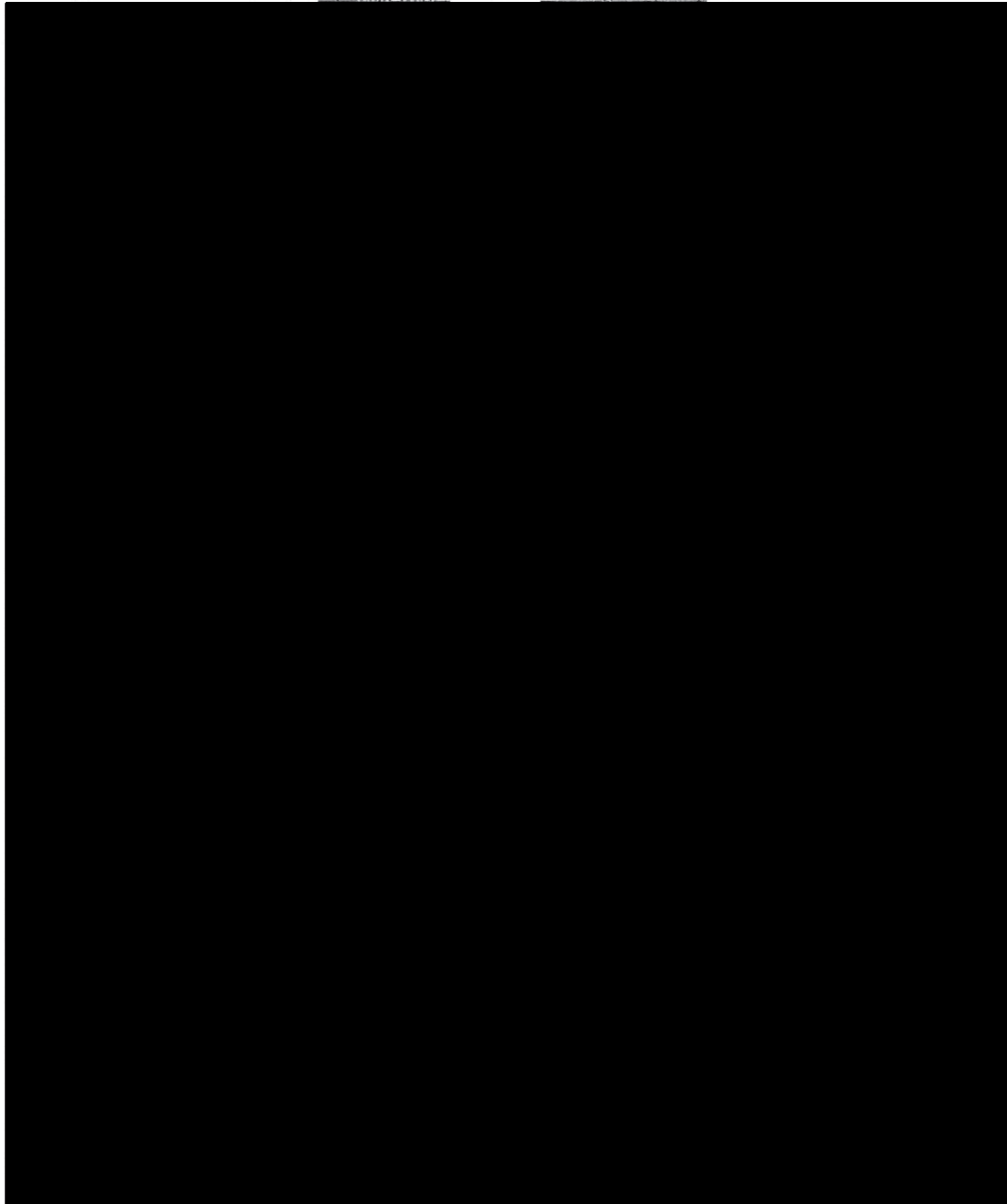
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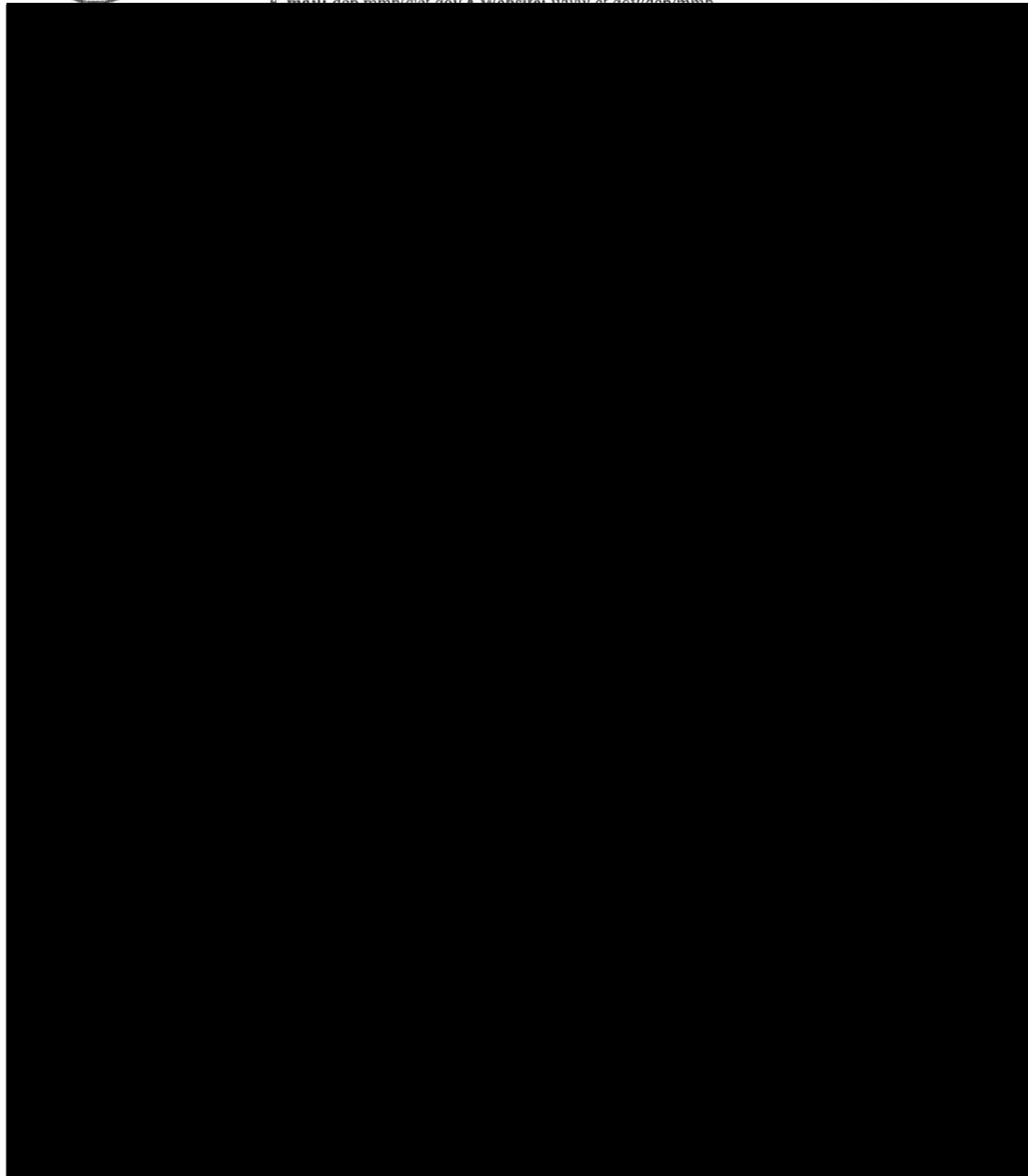
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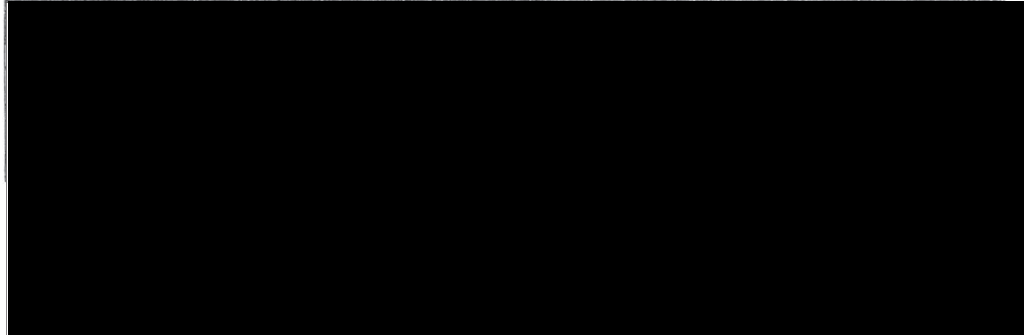
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Appendix C **Directors, Owners, Officers or Other High-Level Employees** **Background Information Form**

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

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1. **RFA (A)(3): BUSINESS INFORMATION**

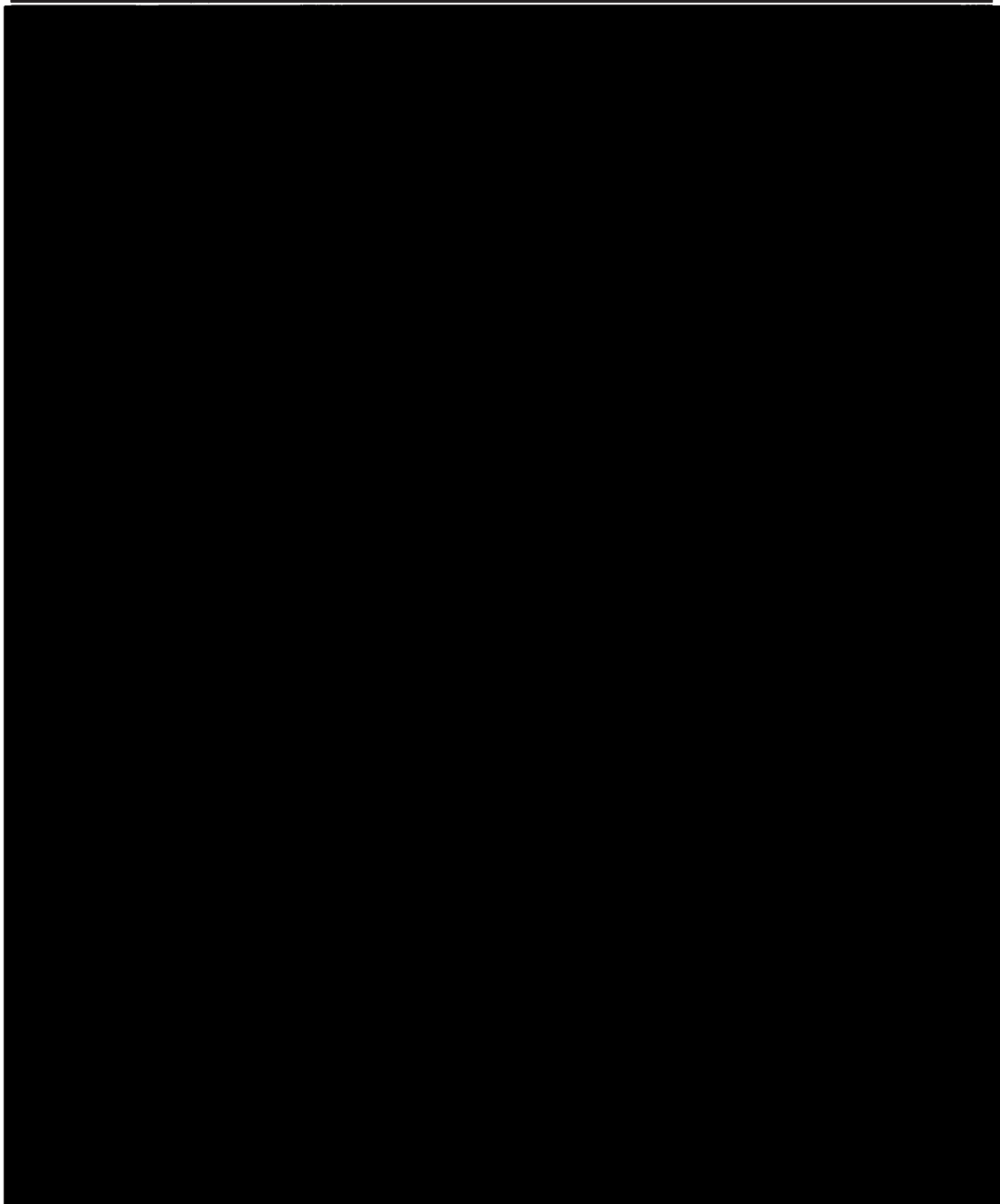
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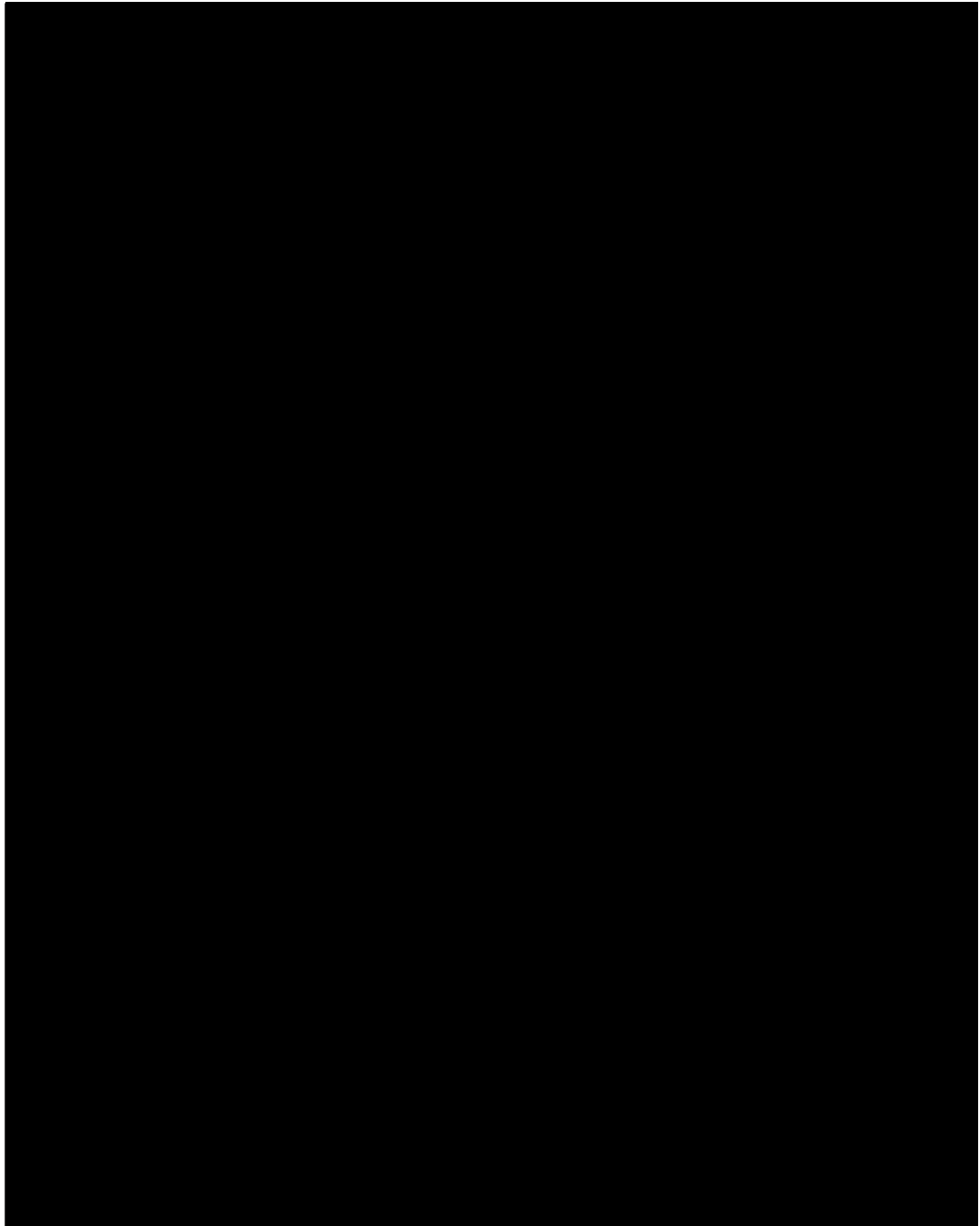
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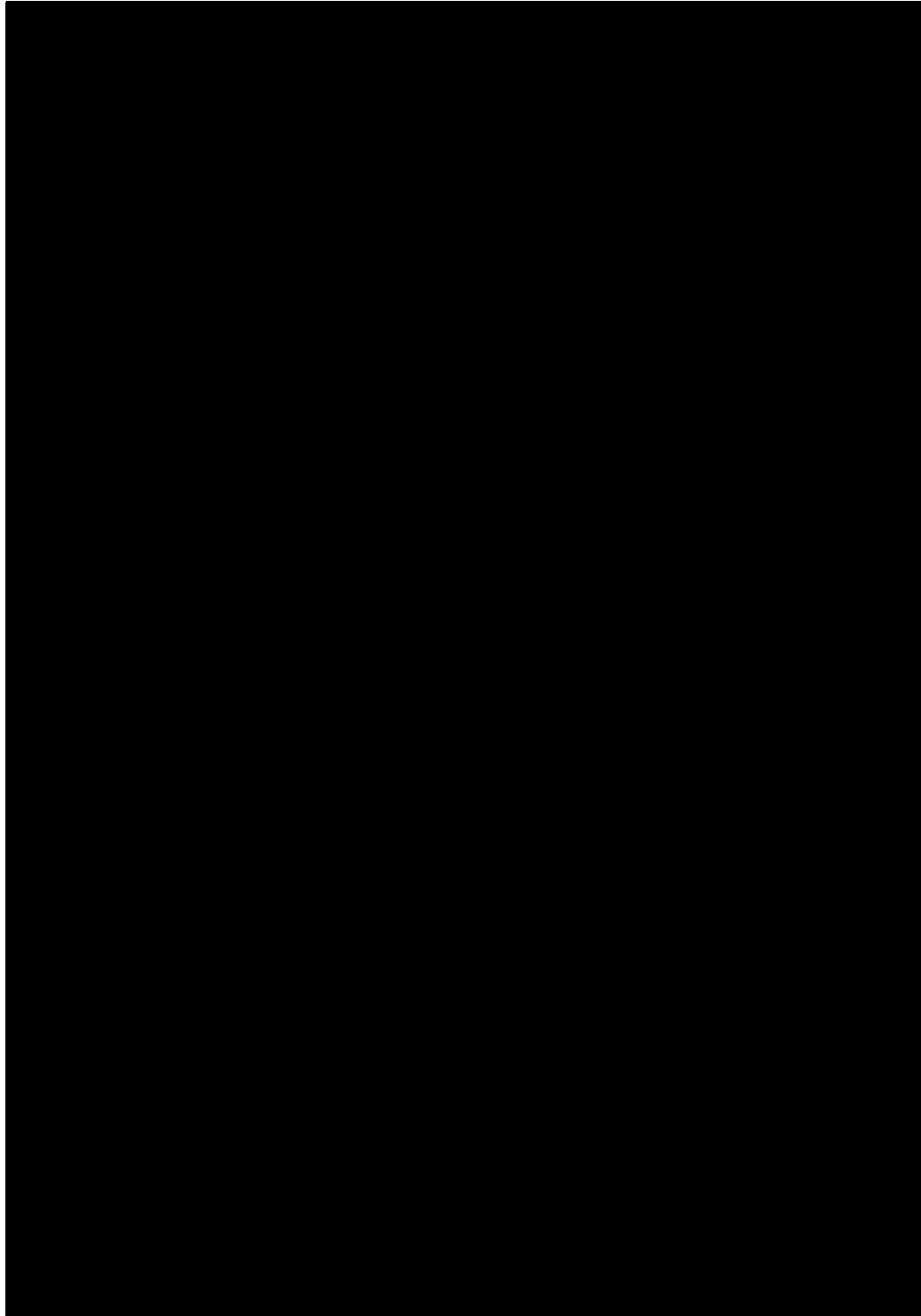
**APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
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APPENDIX C
Question: #26



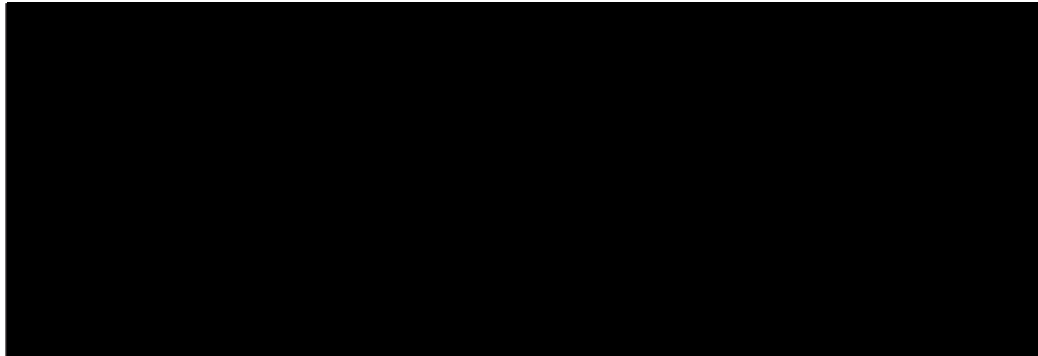
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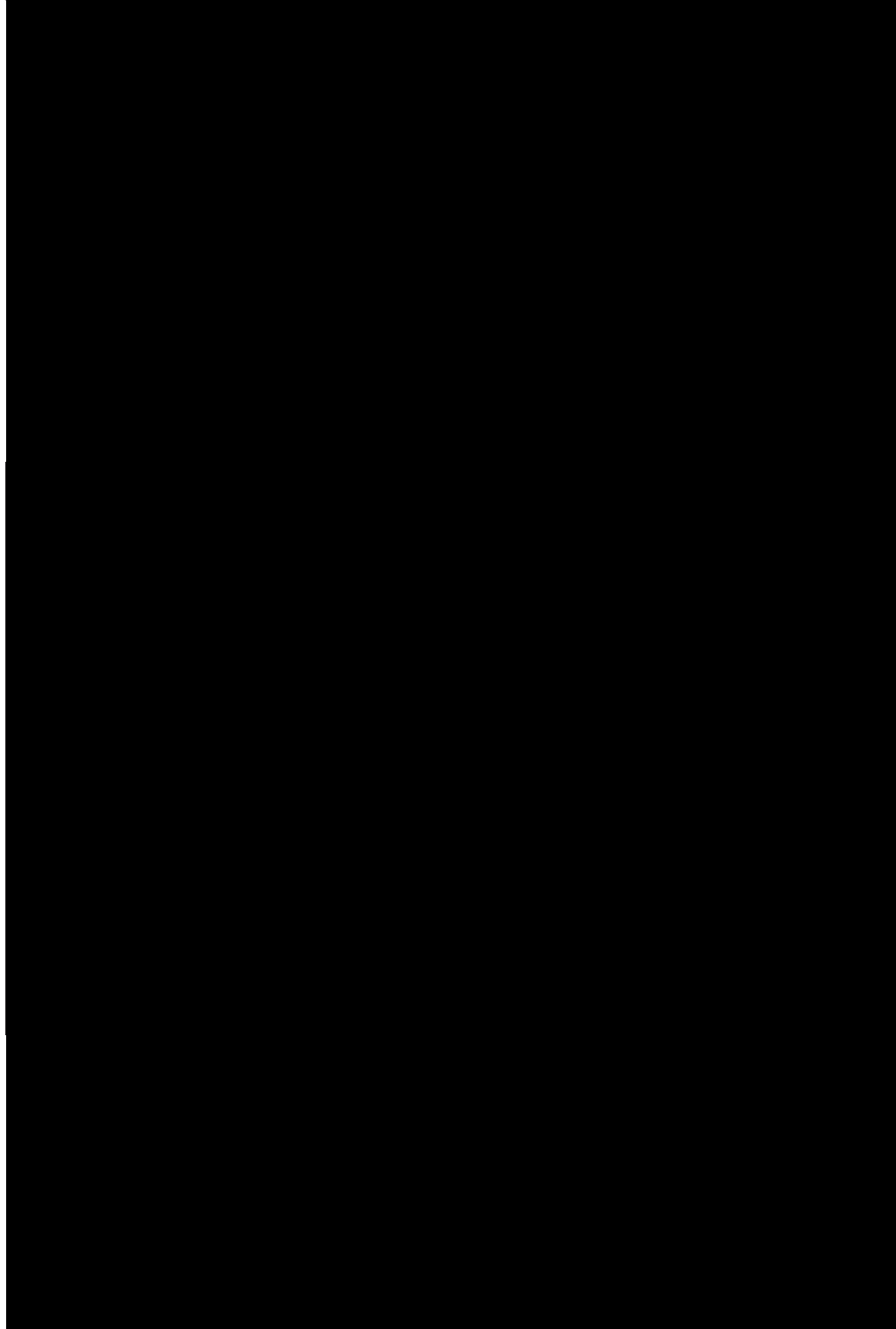
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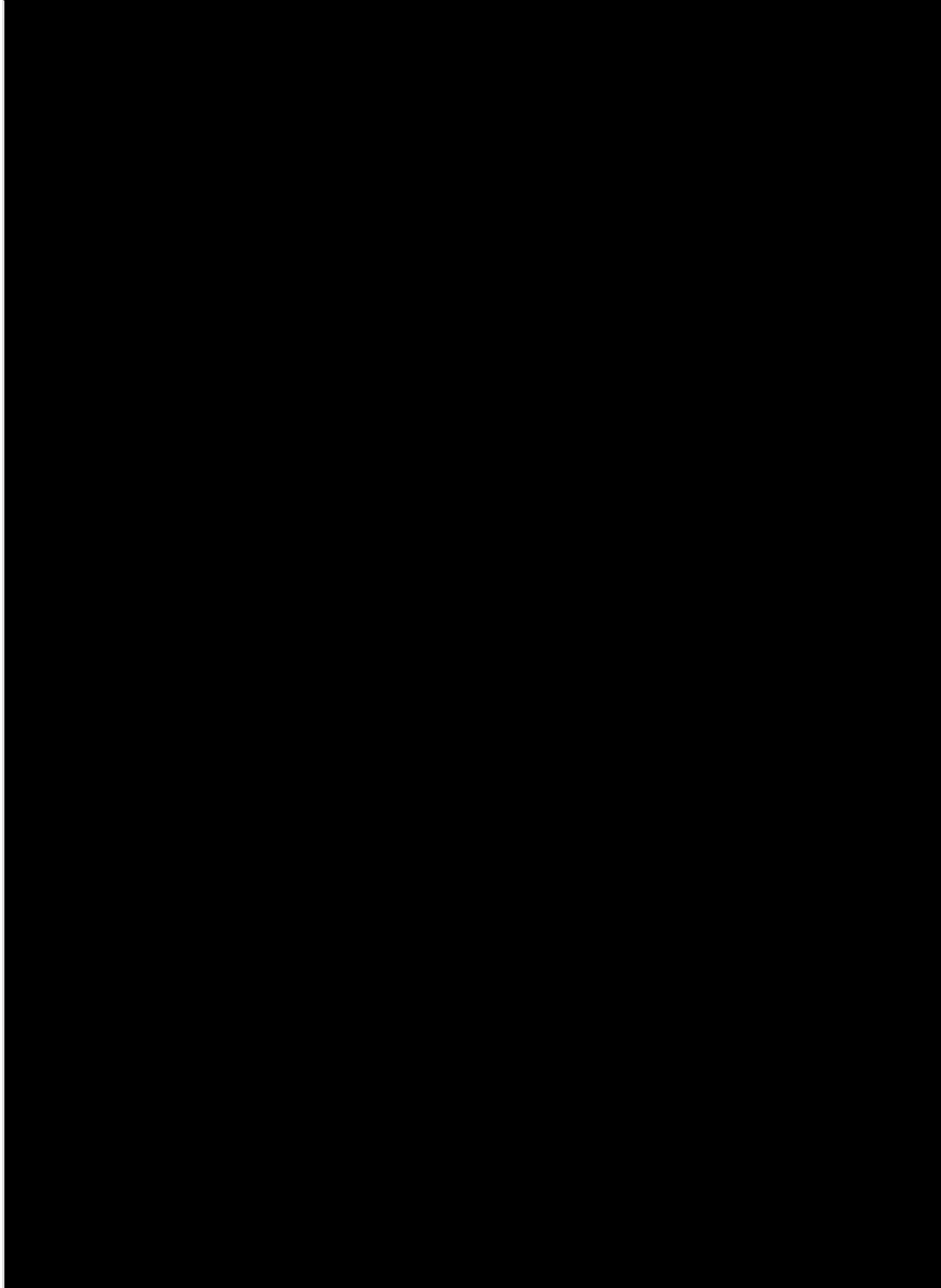
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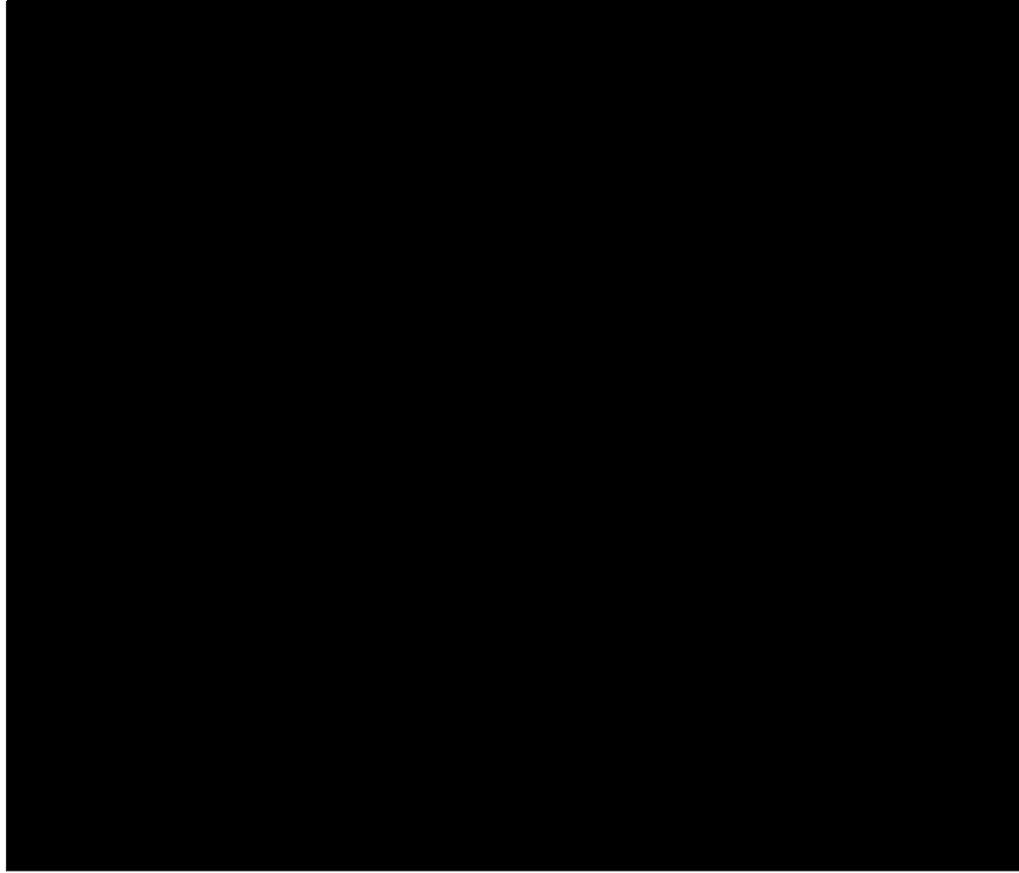
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**APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
EMPLOYEES BACKGROUND INFORMATION**



1. RFA (A)(3): BUSINESS INFORMATION

**APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
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1. RFA (A)(3): BUSINESS INFORMATION

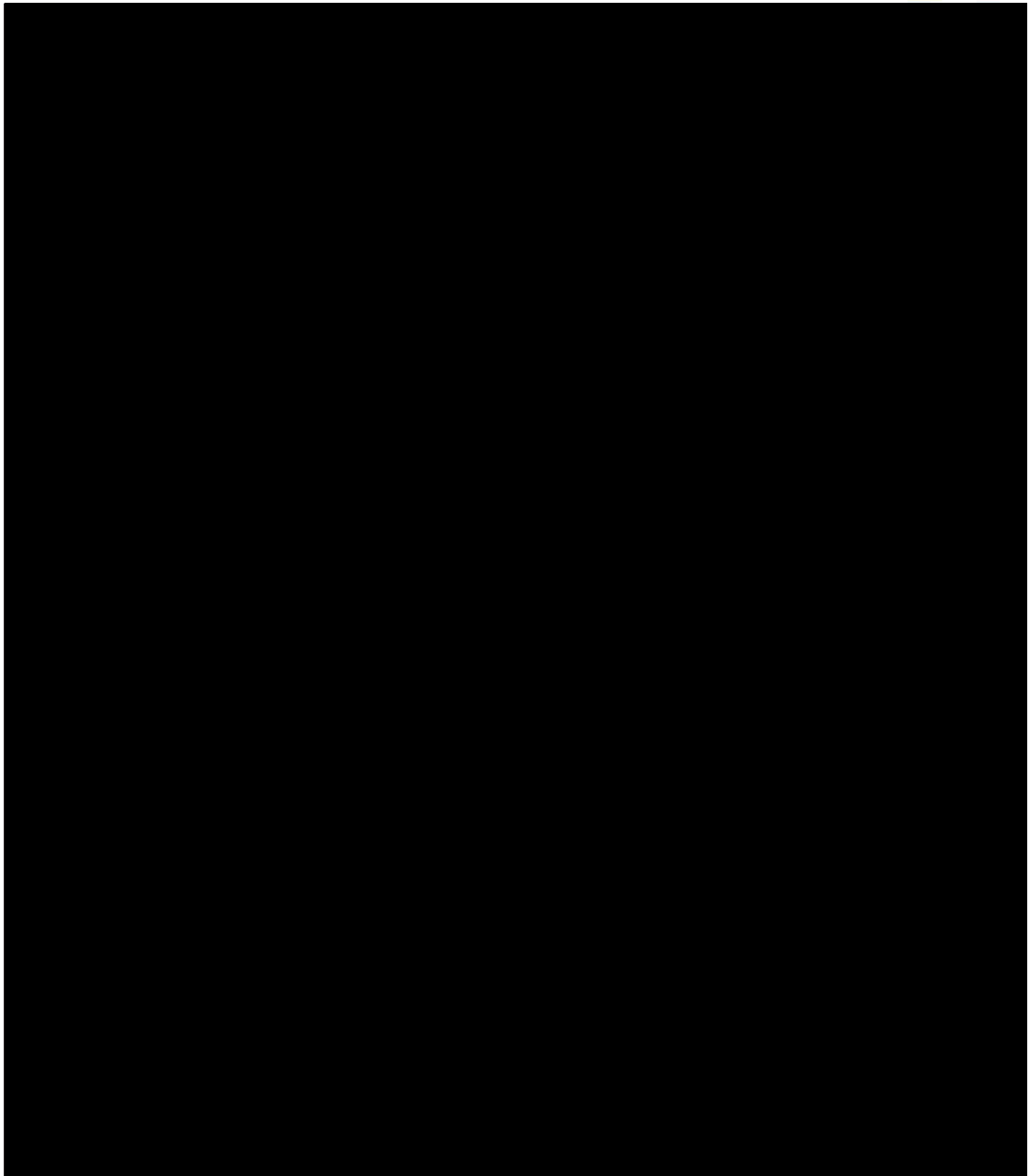
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1. RFA (A)(3): BUSINESS INFORMATION

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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 J.

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1. **RFA (A)(3): BUSINESS INFORMATION**

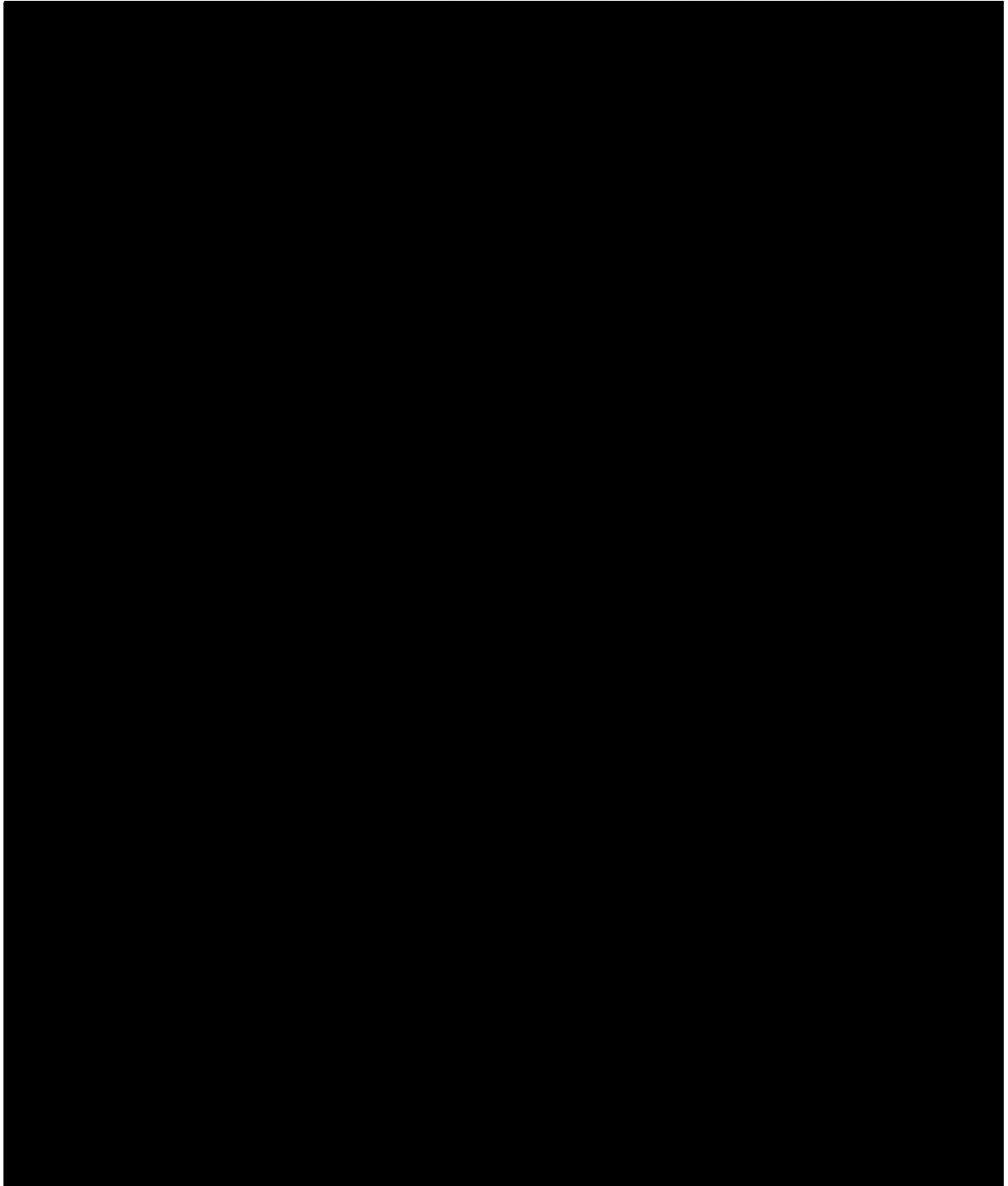
APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
EMPLOYEES BACKGROUND INFORMATION



Medical Marijuana Program

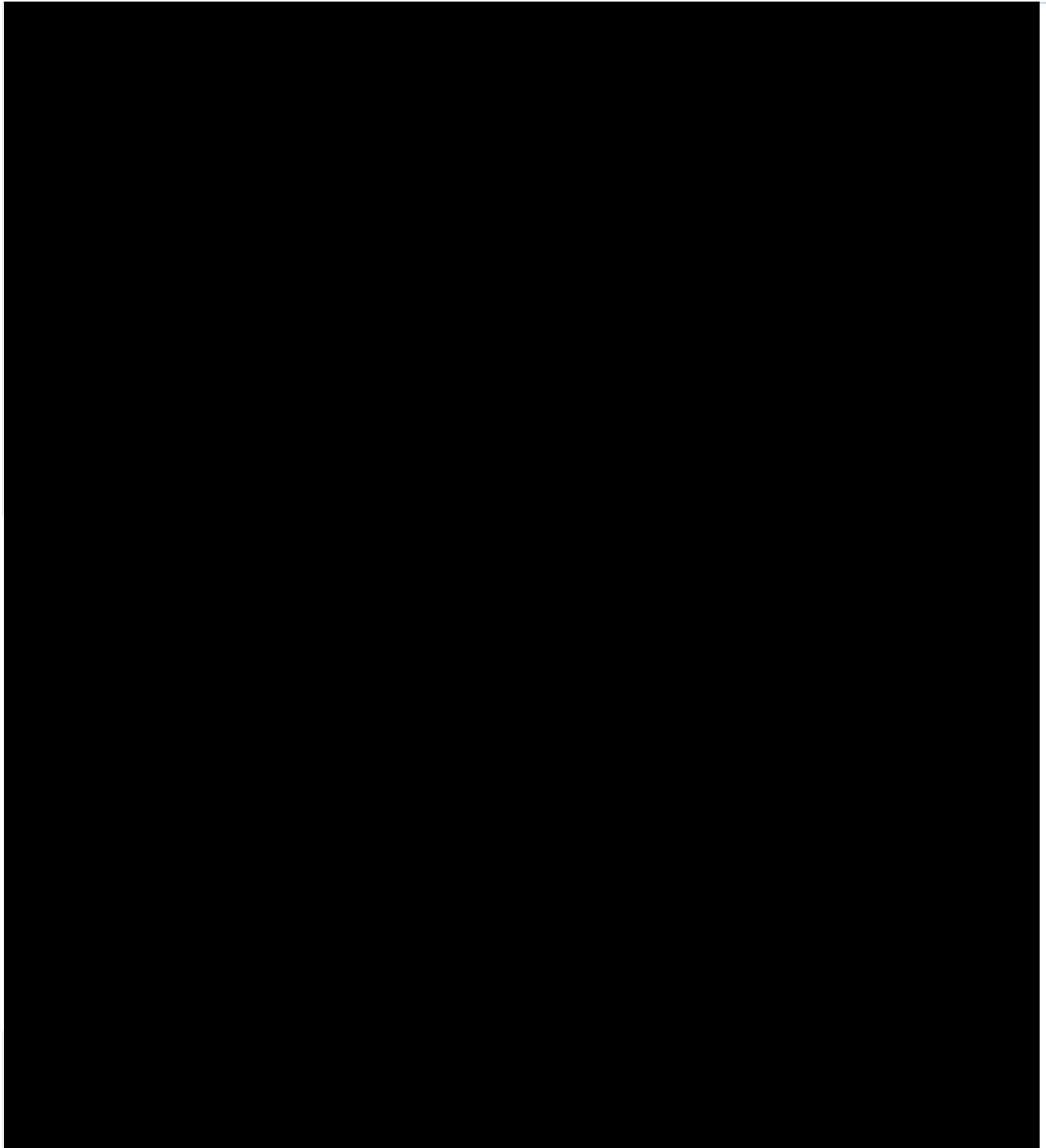
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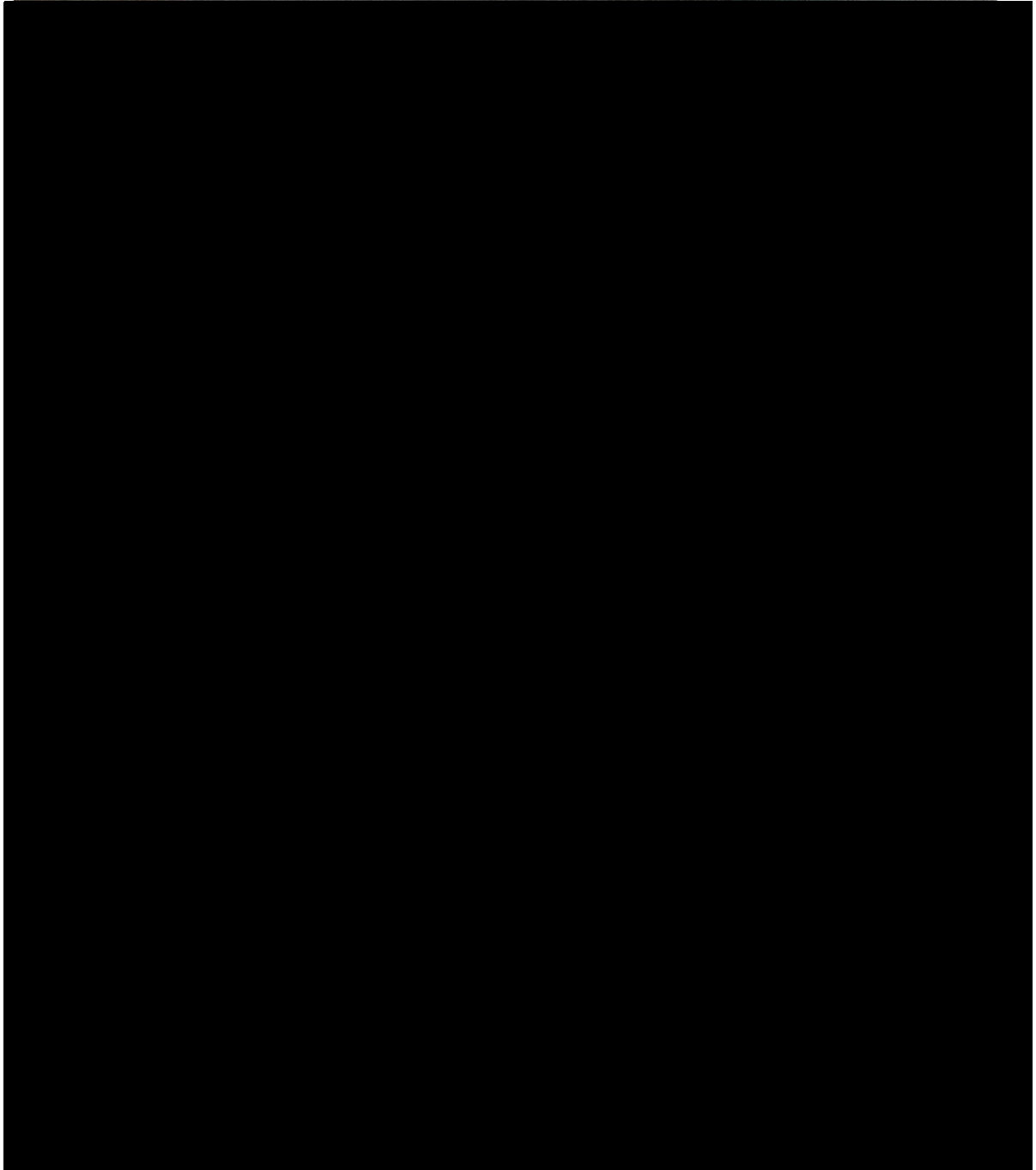
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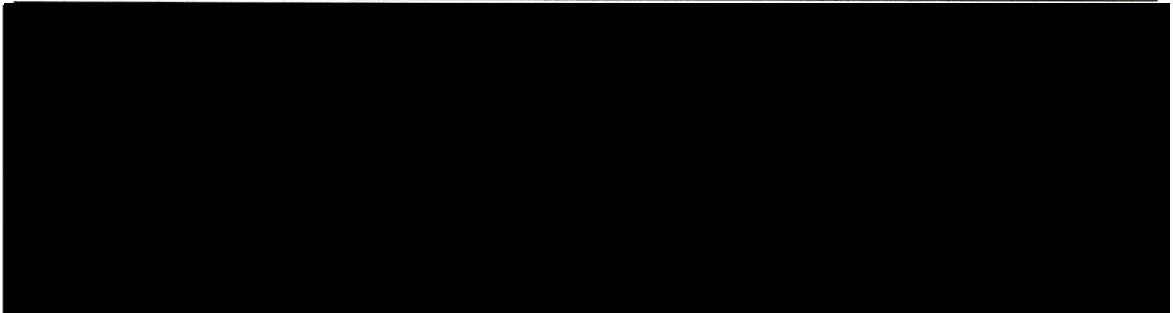
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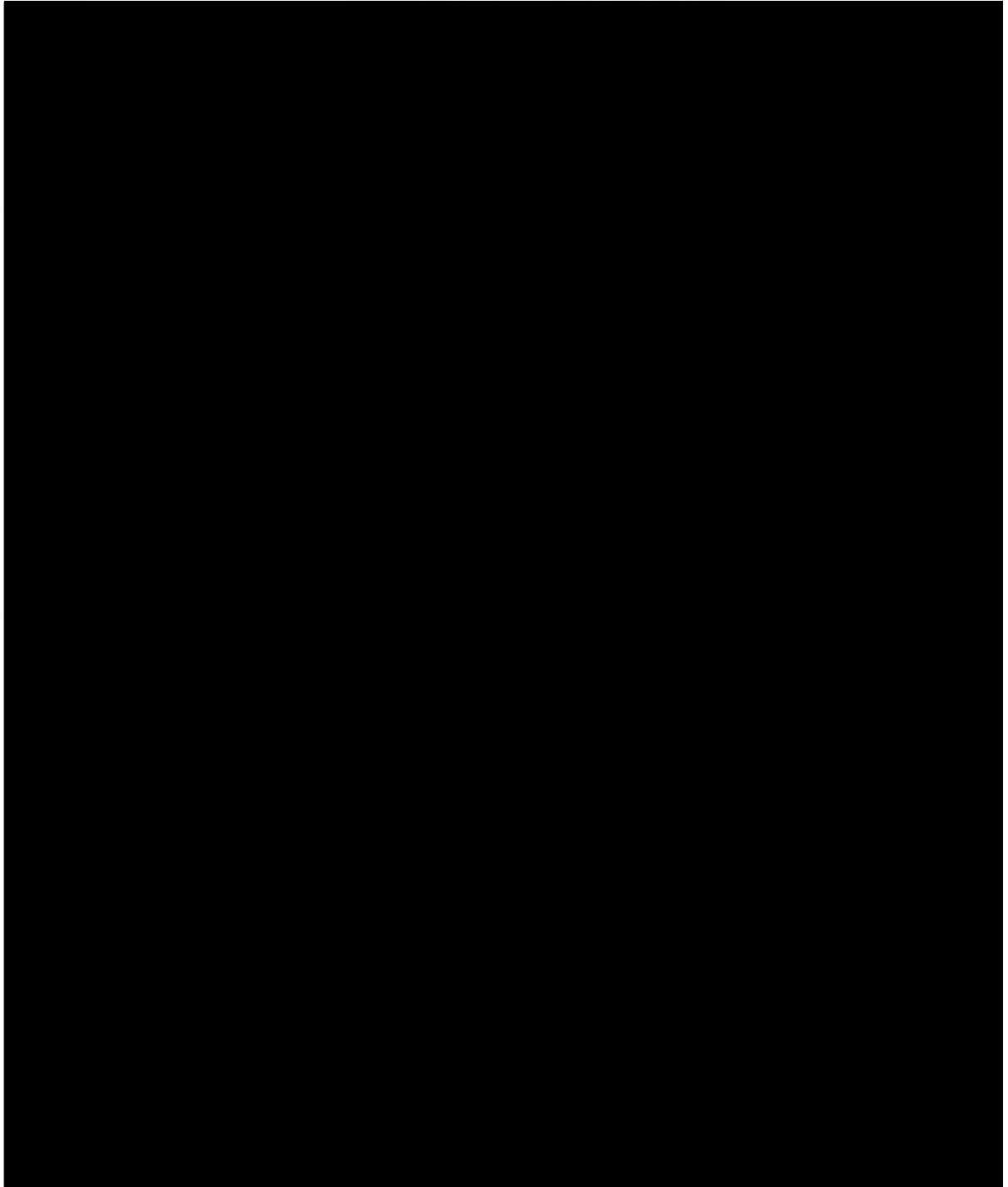
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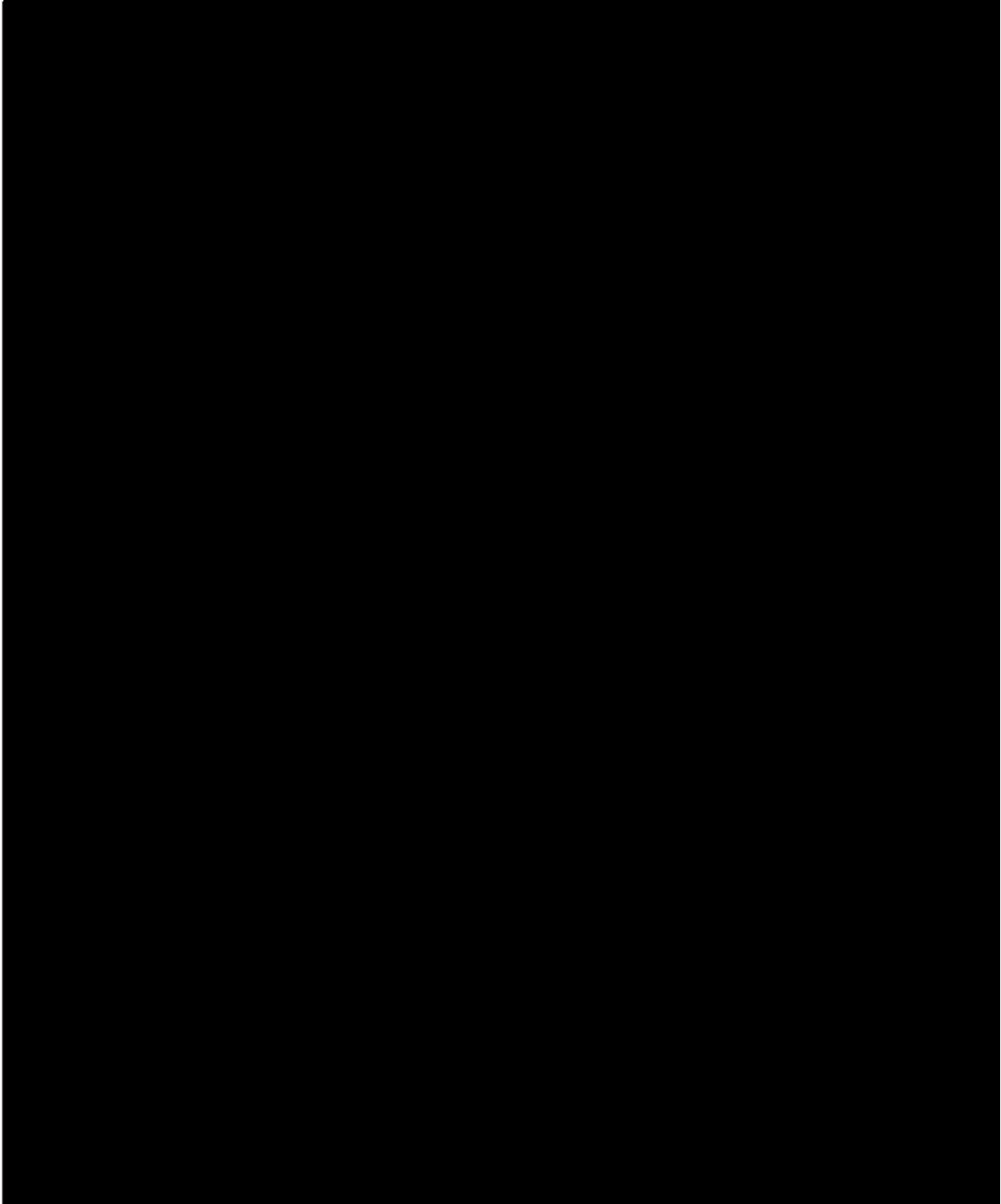
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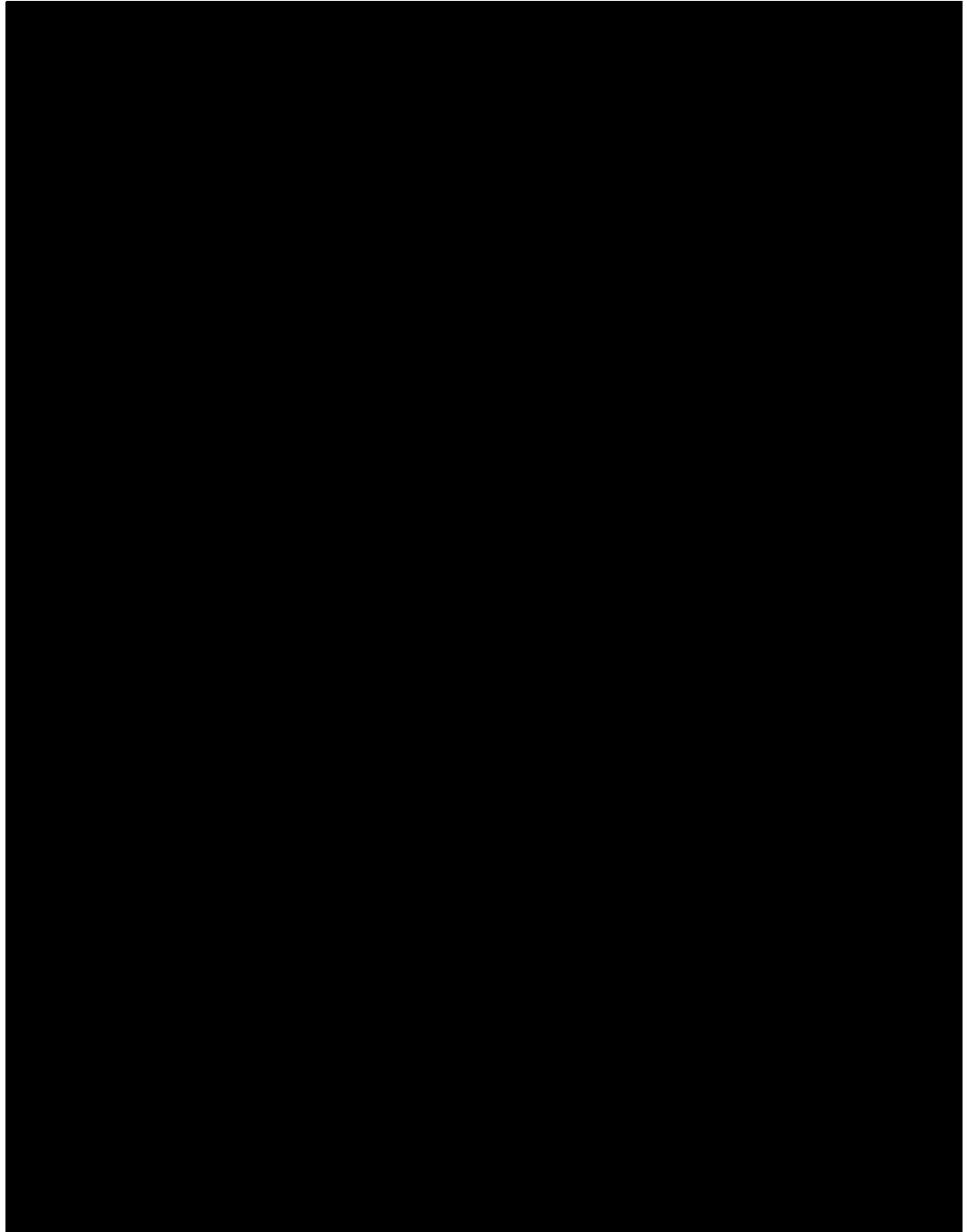


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Appendix C Directors, Owners, Officers or Other High-Level Employees Background Information Form

Section D and E Supplemental Information

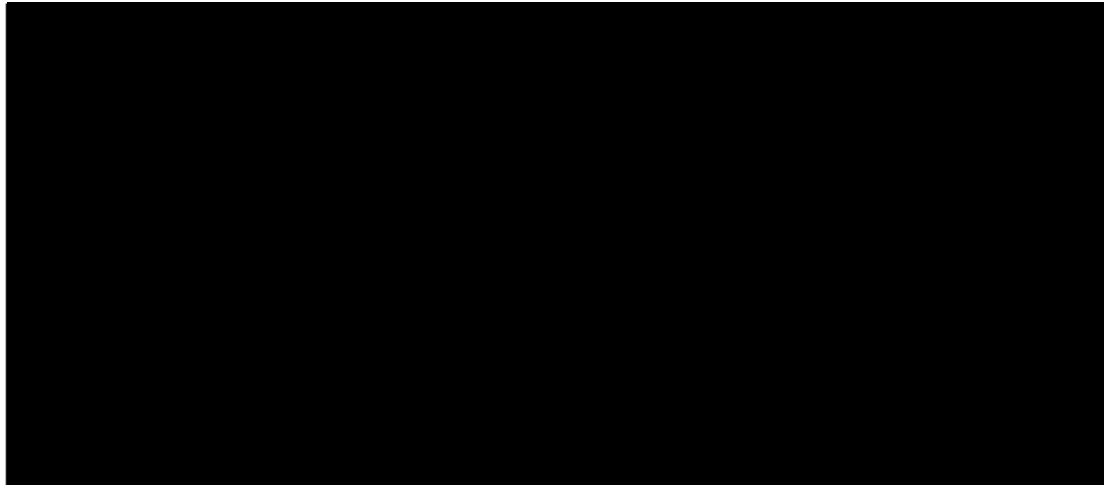


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Section D and E Supplemental Information



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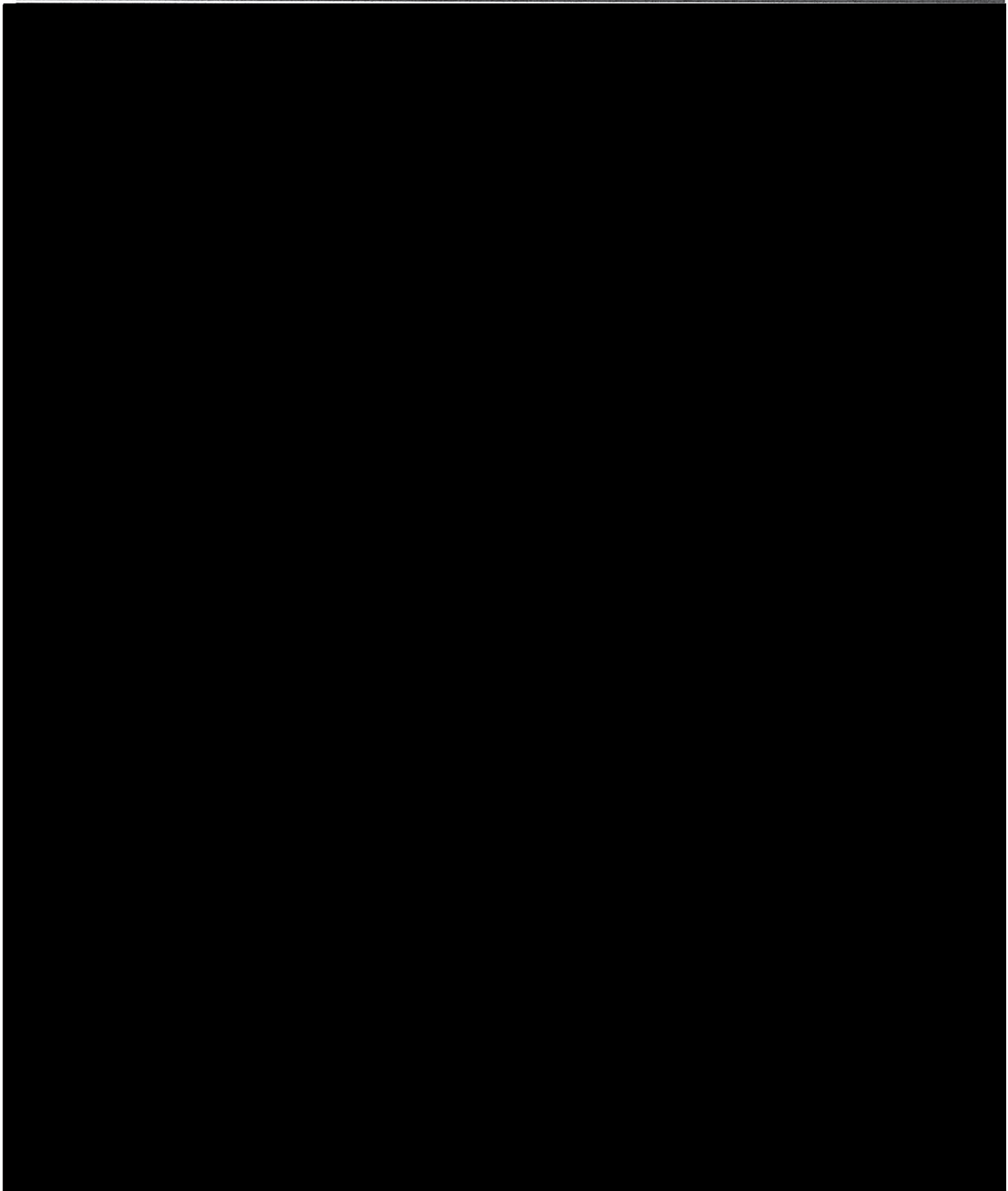
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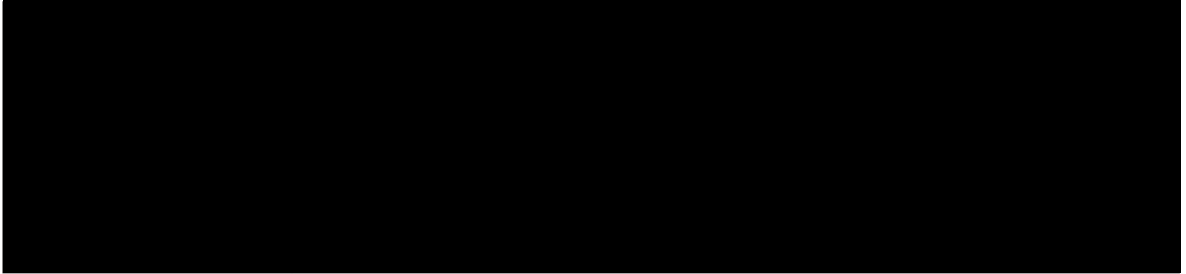
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Appendix C Directors, Owners, Officers or Other High-Level Employees Background Information Form

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

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1. **RFA (A)(3): BUSINESS INFORMATION**

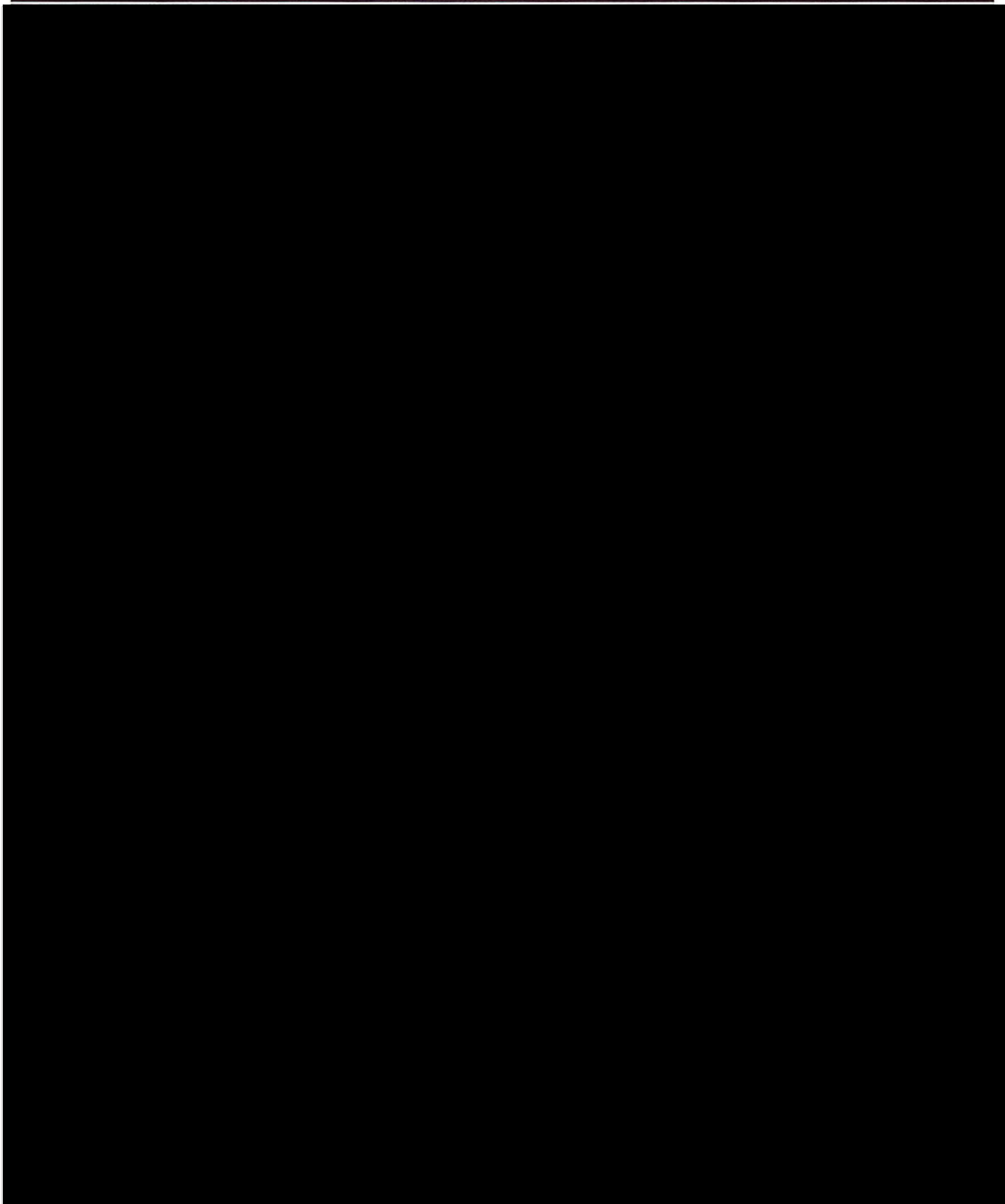
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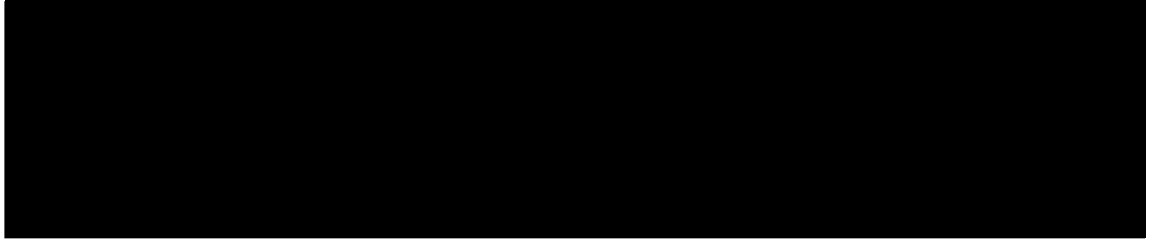


1. **RFA (A)(3): BUSINESS INFORMATION**

APPENDIX C: DIRECTORS, OWNERS, OFFICERS OR OTHER HIGH LEVEL
EMPLOYEES BACKGROUND INFORMATION

Appendix C- Michelle Bodner

Question 25



1. **RFA (A)(3): BUSINESS INFORMATION**

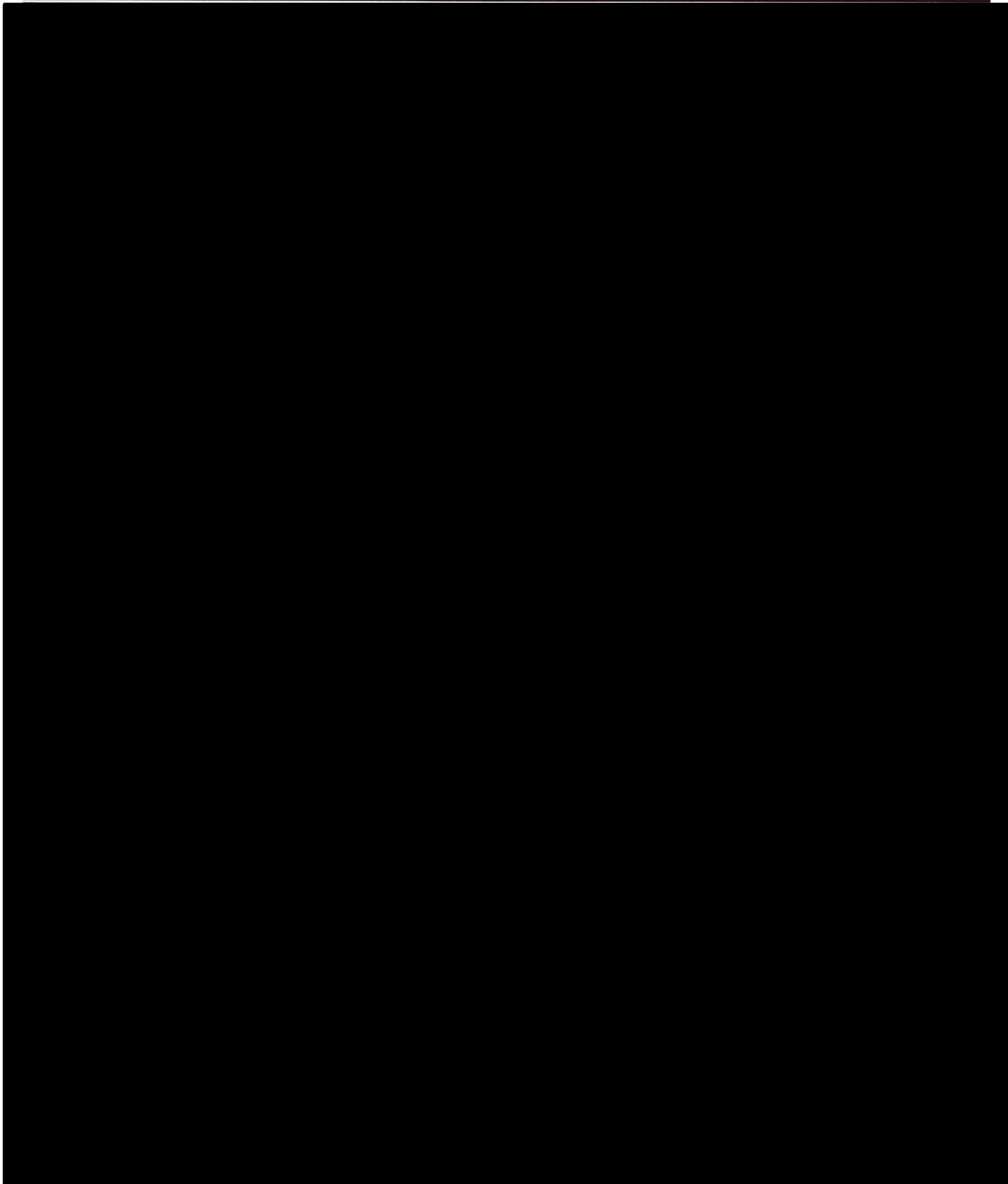
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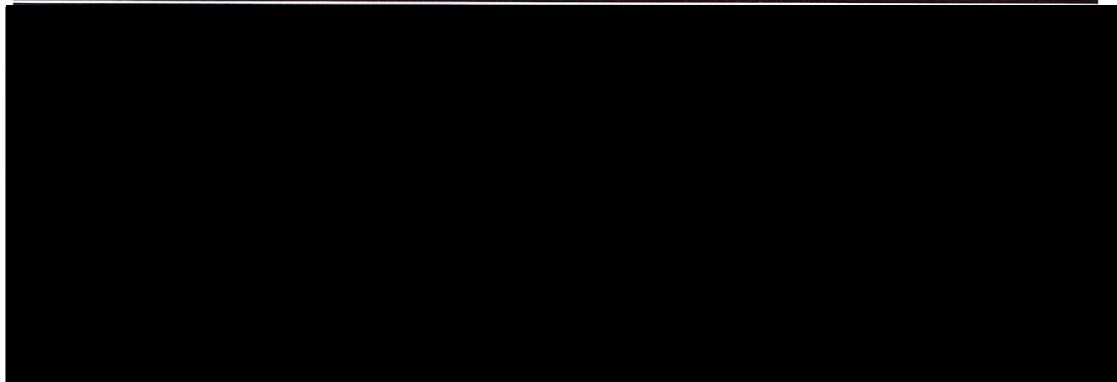
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Appendix C

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 J.

[Redacted content]

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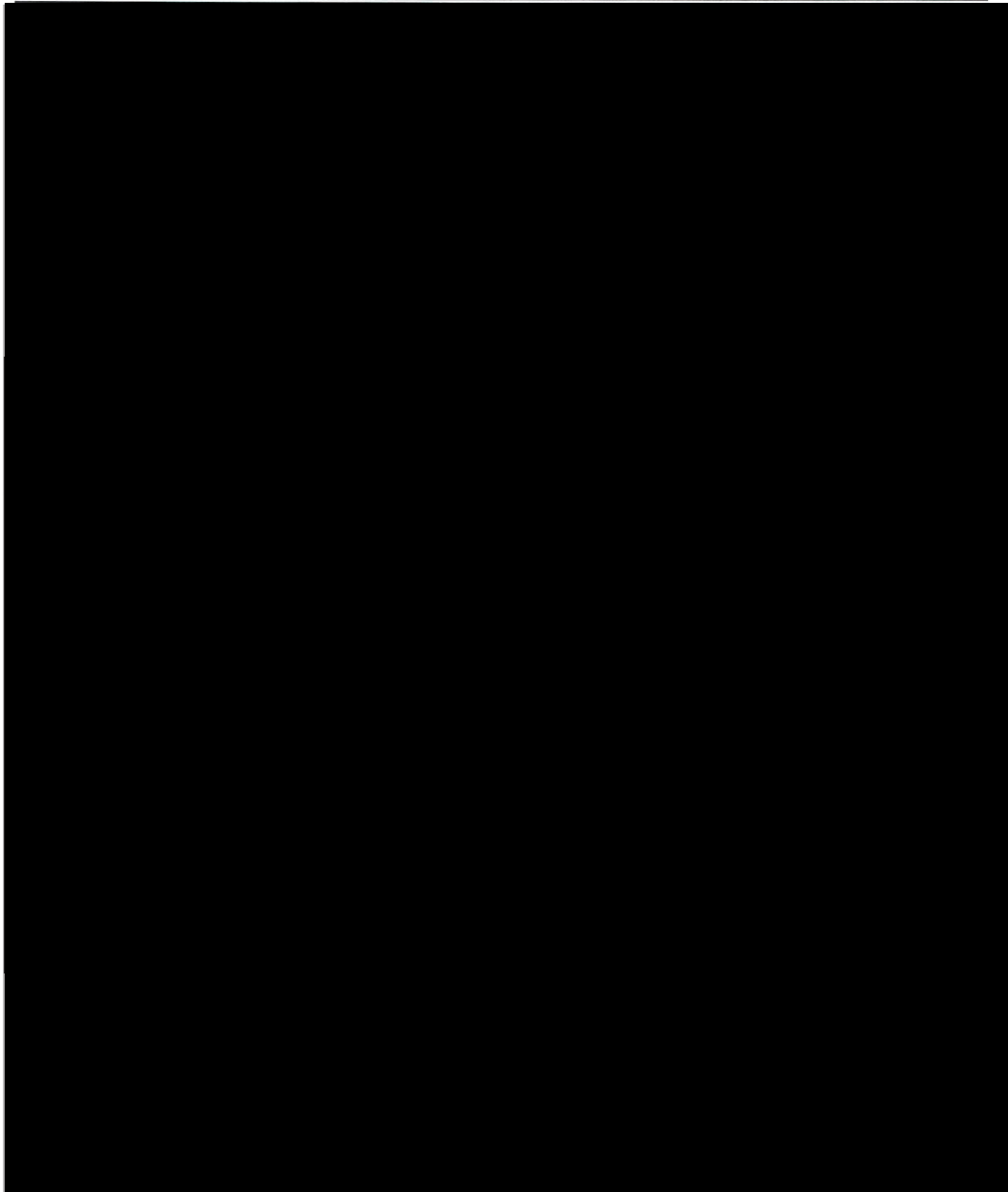
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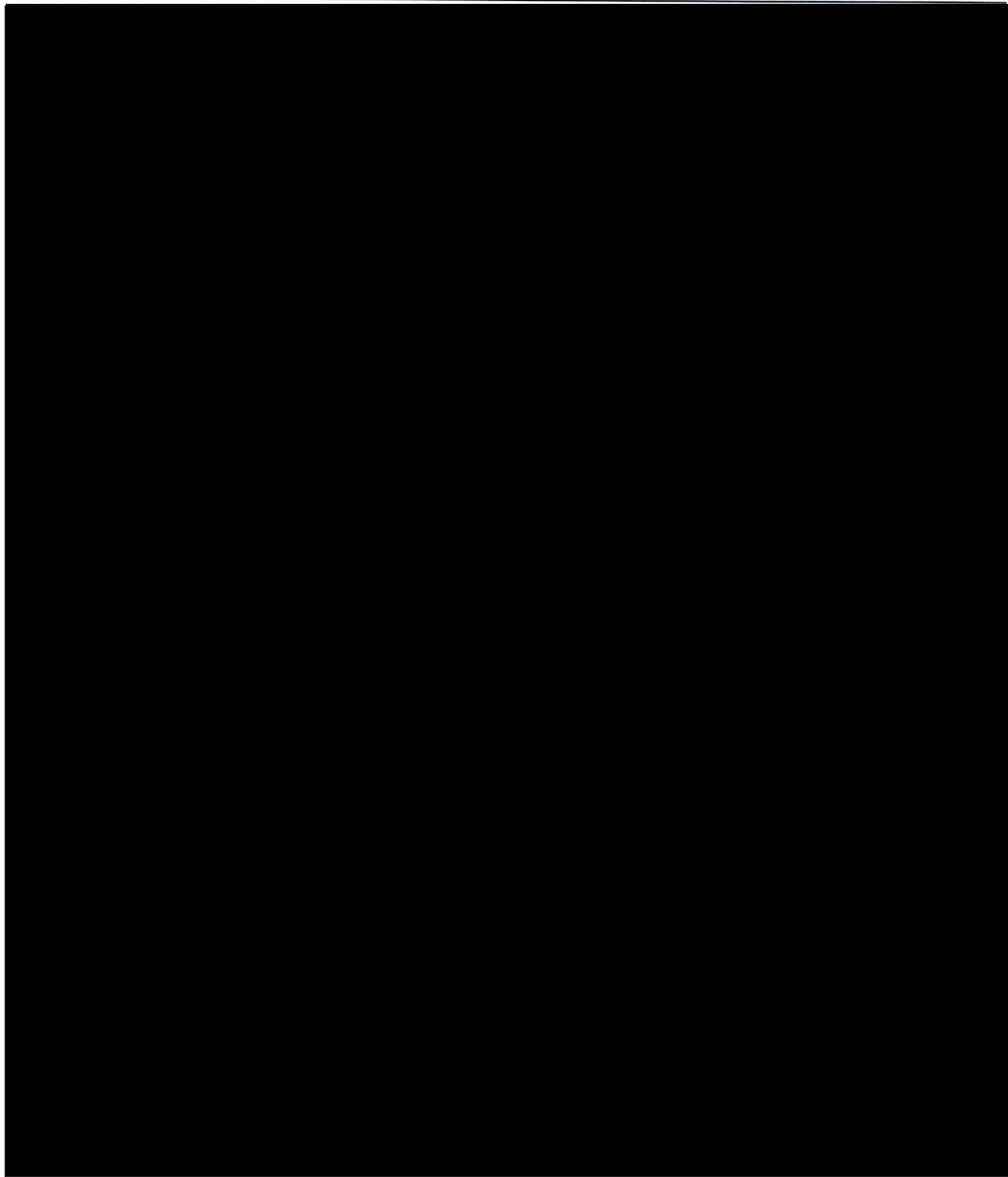
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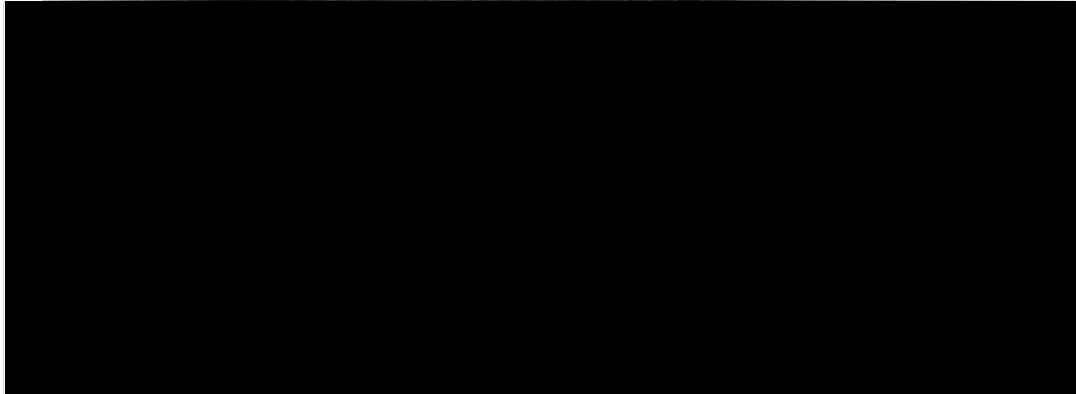
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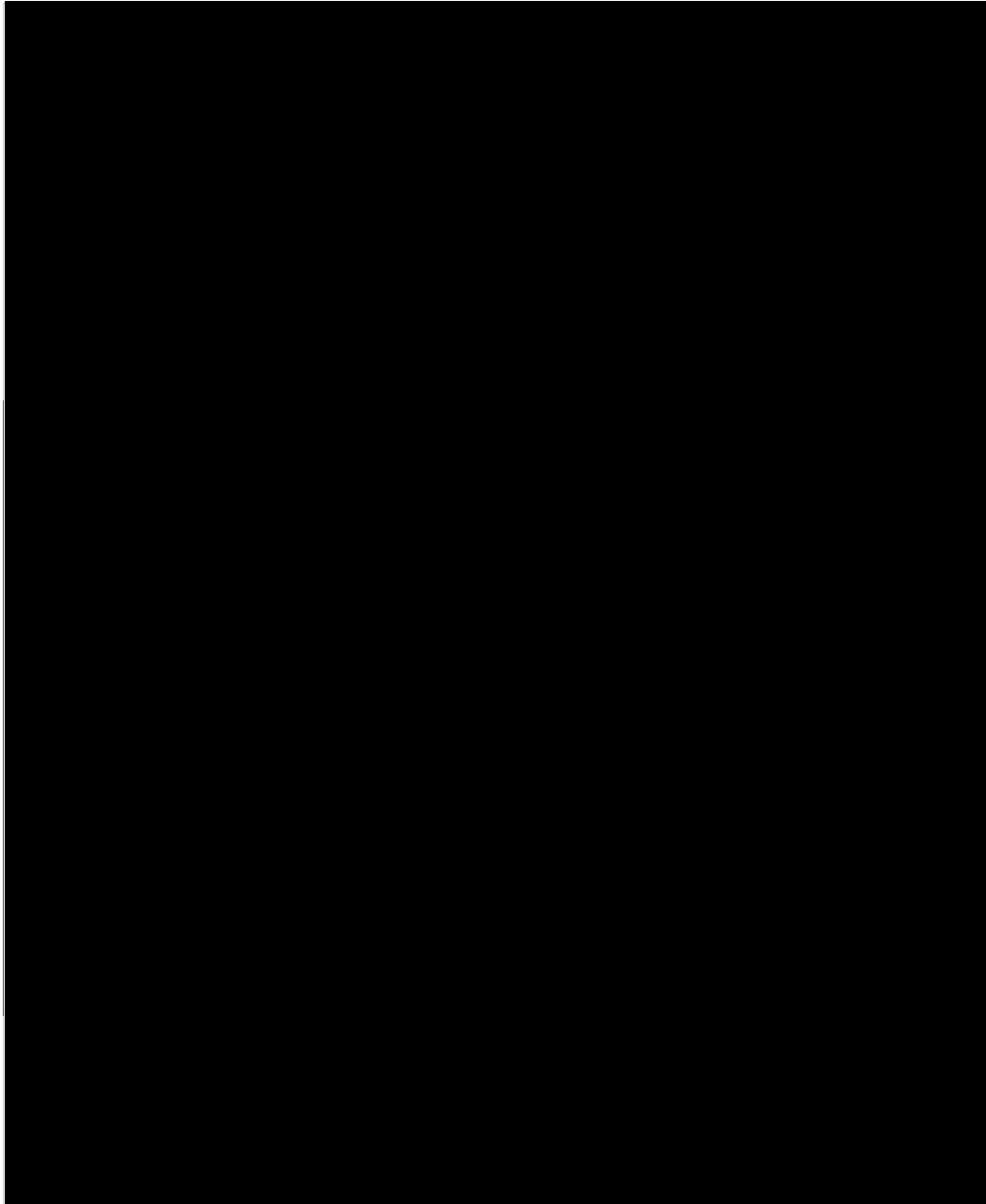
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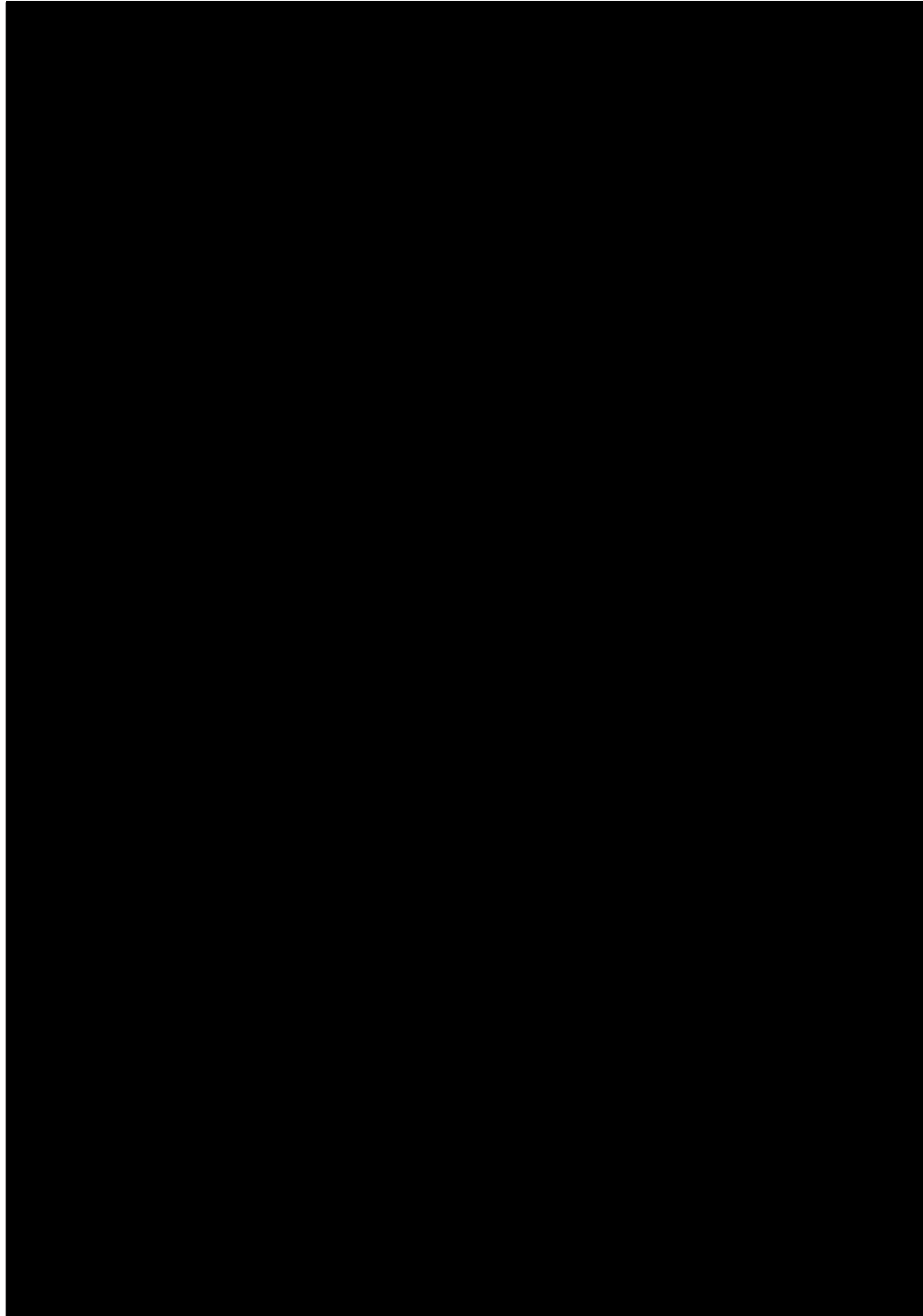
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APPENDIX C
Question: #26



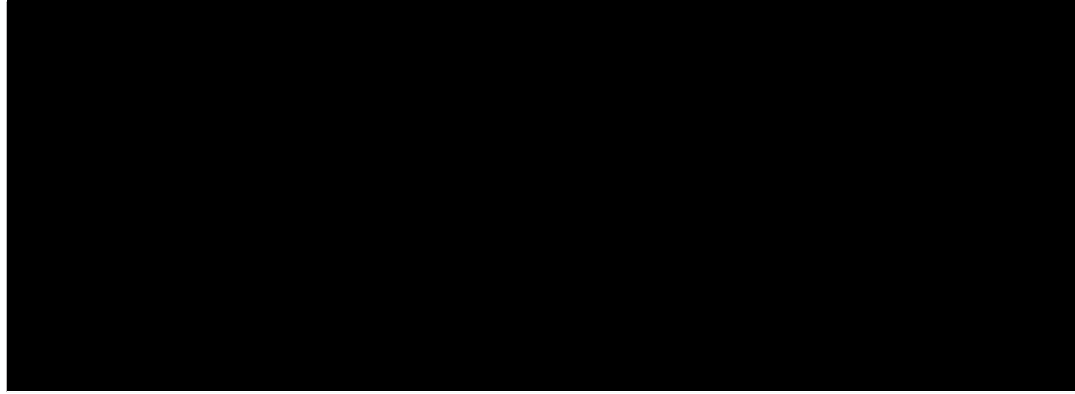
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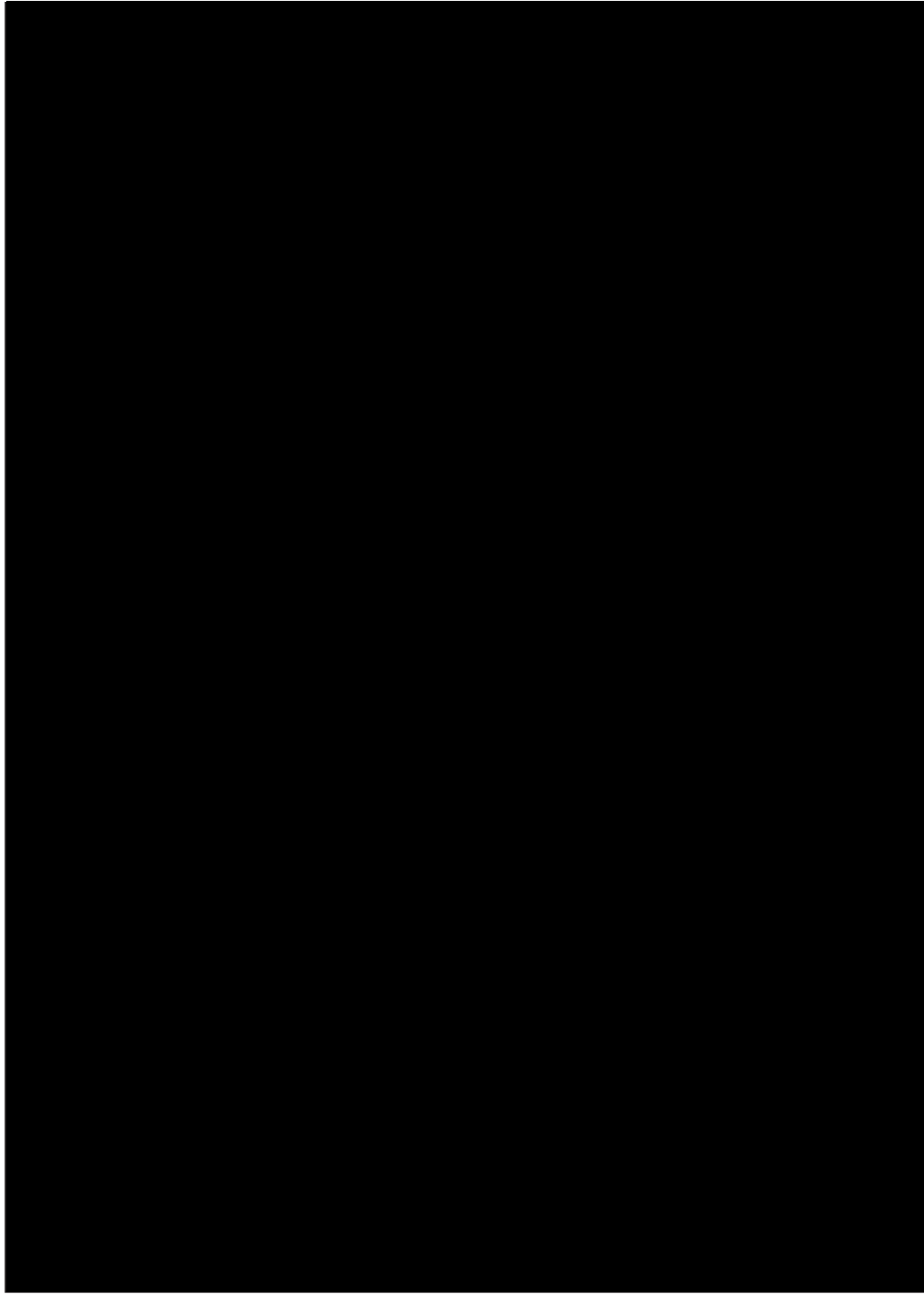
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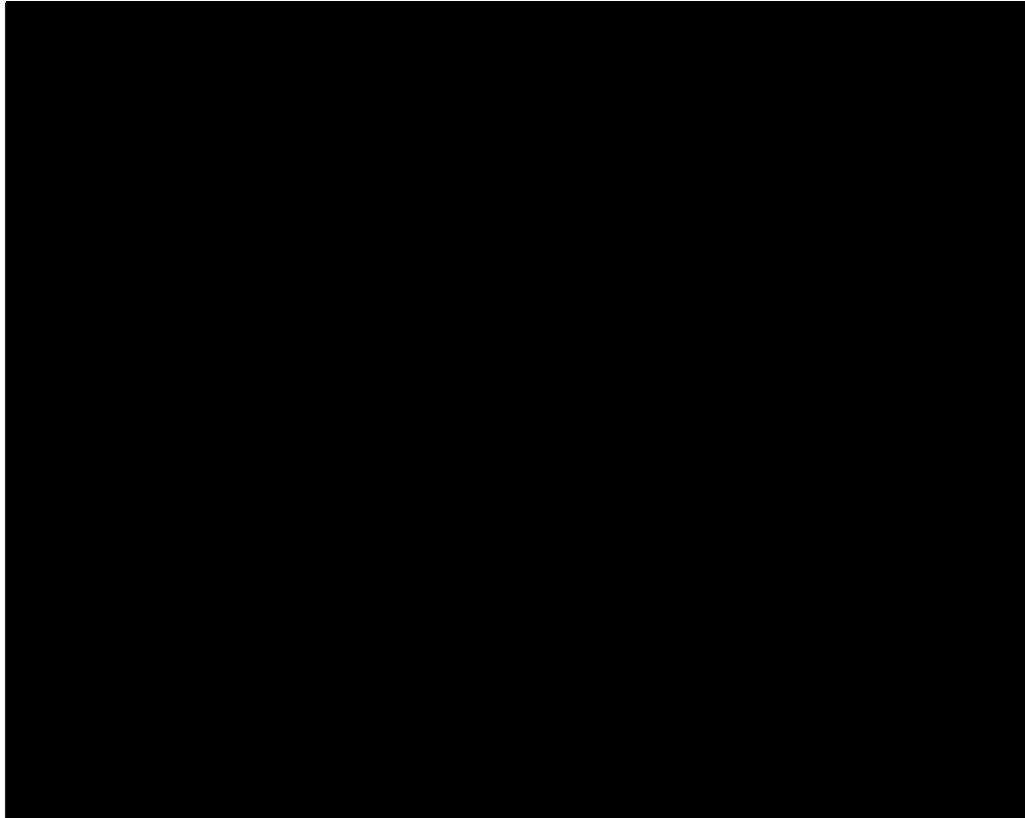
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1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX D: DISPENSARY FACILITY MANAGER INFORMATION FORMS

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX D: DISPENSARY FACILITY MANAGER INFORMATION FORMS



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Appendix D

Dispensary Facility Manager Information Form

This form must be completed and signed by the person who will serve as the dispensary facility manager if the applicant is awarded a dispensary facility license.

Section A: Dispensary Facility Manager Information

1. Name (First, Middle, Last): Roy Joseph Ciarlo			
2. Home Address (including Apartment or Suite #): 39 Mapleview Drive			3. City: Wolcott
4. State: CT	5. Zip Code: 06716	6. Date of Birth: [REDACTED]	7. Telephone Number: (203) 879-1777
8. Social Security Number: [REDACTED]			9. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female
10. E-mail Address: royjciarlo@gmail.com		11. Connecticut Pharmacist License Number: 7430	

Section B: Employment Information

12. Current or Most Recent Employer: Brass City Pharmacy		13. Date of Employment: Start Date: 9 /15 /14 End Date: : / /	
14. Employer Address (including Apartment or Suite #): 558 Chase Ave			
15. City: Waterbury		16. State: CT	17. Zip Code: 06704
18. Daytime Telephone Number: (203) 759-5000	19. Fax Number: (203) 759-5002		20. E-mail Address:

Section C: Pharmacy Business Experience

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

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX D: DISPENSARY FACILITY MANAGER INFORMATION FORMS

APPENDIX D

Question: #23

"If you answered "yes" to question 21 or 22, attach a statement setting forth, for each pharmacy with which you have been associated, the following information"

The pharmacy name;

The pharmacy location;

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

The dates of your association with the pharmacy;

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

I have been employed as a Pharmacist at the Brass City Pharmacy in Waterbury, CT since September of 2014. My previous pharmacy experience includes:

PHARMACY MANAGER

2001 – 2012

CVS Pharmacy

Terryville, CT

Directed operations, purchasing, inventory and team performance within customer-facing setting.

Oversaw prescription fulfillment, dispensing, logging and organization in line with loss prevention and safety standards. Ensured operational alignment with HIPAA regulations and corporate expectations.

PHARMACY MANAGER

1998 – 2001

Rite Aid

Waterbury, CT

Led daily activities and prescription filling in compliance with Drug Utilization Review and Final Quality Assurance requirements. Delivered customized customer counseling on wide array of pharmaceutical care topics. Complied with all state and federal regulations. Mentored, coached and directed team of pharmacy technicians and support staff. Scheduled and managed execution of cycle counts and will-calls.

CHIEF PHARMACIST

1998 – 2005

CT Counseling Centers, Inc. Methadone Clinic

Waterbury, CT

Responsible for all operations in the Rx Department. Ensured that methadone was prepared in advance. Completed all paperwork and made sure it was up to date. Wrote numerous protocols.

Whether the pharmacy 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.

No. None of the pharmacies I have ever been employed by have violated the laws or regulations of the state or country in which they operate during the time period when I was associated with them.

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX E: BACKER MEMBERS AUTHORIZATION FOR RELEASE OF
PERSONAL HISTORY FORMS

1. RFA (A)(3): BUSINESS INFORMATION

APPENDIX E: BACKER MEMBERS AUTHORIZATION FOR RELEASE OF PERSONAL HISTORY FORMS



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Appendix E 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): William Walker Todd		
2. Street Address (including Apartment or Suite #): 335 Prospect Ave		
3. City: Sea Cliff	4. State: NY	5. Zip Code: 11579
6. Daytime Phone Number: 406-223-0382	7. Fax Number:	8. E-mail Address: tteneagles@aol.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: 	11. Date Signed: 9/4/2015
---	------------------------------

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: 	13. Date Signed: 9/4/2015
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MEDICAL MARIJUANA DISPENSARY FACILITY LICENSE APPLICATION
STATE OF CONNECTICUT- DEPARTMENT OF CONSUMER PROTECTION

B

B. LOCATION AND SITE PLAN 211

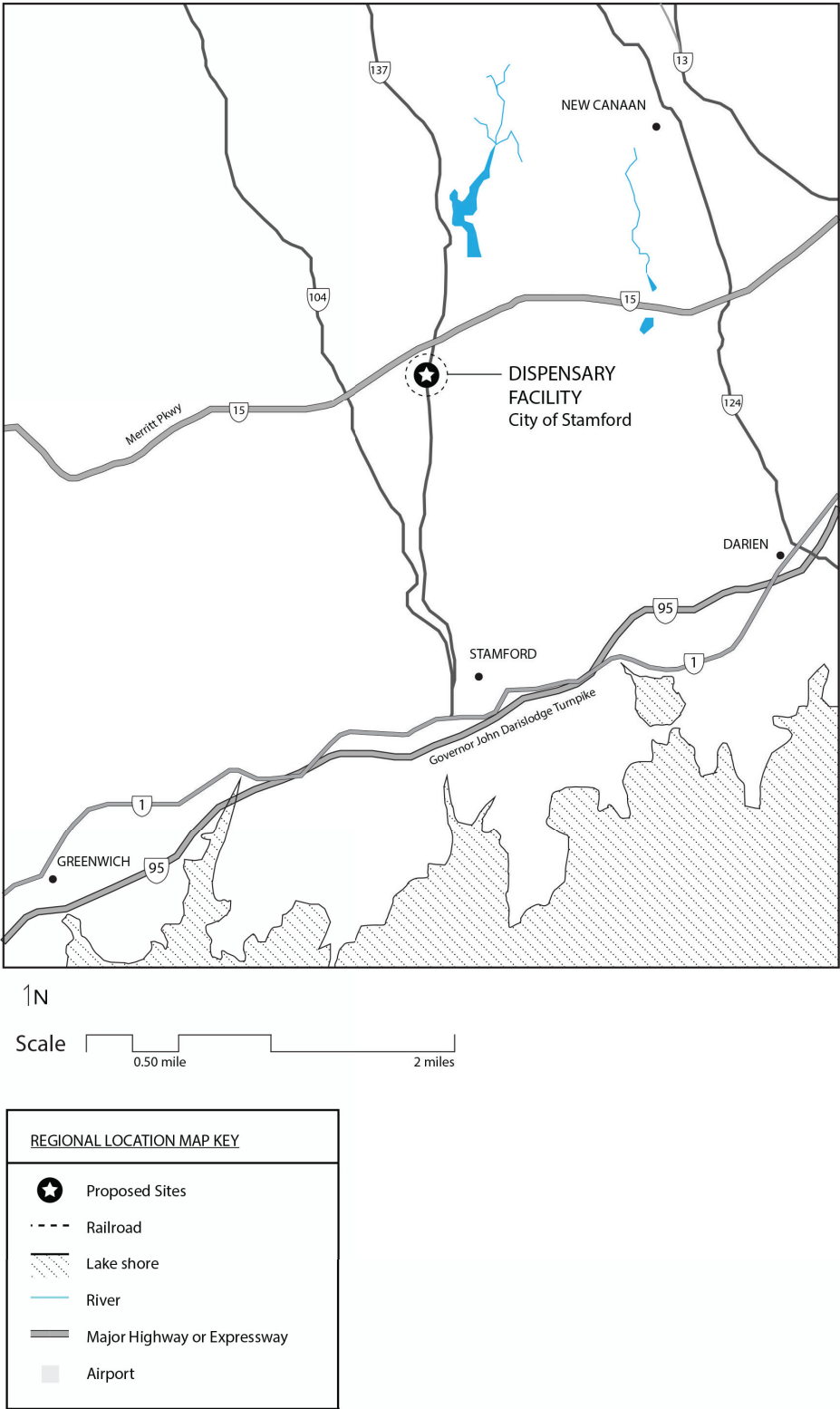
- o RFA (B)(1): LOCATION SUMMARY and **APPROVED ZONING** 212
- o RFA (B)(2): AUTHORITY TO DO BUSINESS IN CONNECTICUT 242
 - Compliance of State and Local Building, Fire and Zoning
 - Life Safety Plan
- o RFA (B)(3): LANDLORD CONSENT OF USE 246
- o RFA (B)(4): EXTERIOR SIGNAGE RENDERINGS 248
- o RFA (B)(5): SURROUNDING COMMUNITY PHOTOGRAPHS 253
- o RFA (B)(6): SITE PLAN 256
- o RFA (B)(7): 1,000 SF RADIUS MAP 259
- o RFA (B)(8): DISPENSARY FLOOR PLAN 261

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY AND **APPROVED ZONING**

2. RFA (B)(1): LOCATION AND SITE PLAN
LOCATION SUMMARY AND APPROVED ZONING

“Provide the location of the proposed dispensary facility.”



2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

Landlord:	Ameliane Realty Company, LLC
Address:	1034 High Ridge Road, Stamford, CT 06905, Fairfield County
Cross Street:	Olga Drive
Property Type:	Neighborhood Strip Center
Demised Space:	End Cap
Square Footage:	Approx. 2,500 sf
Term of Lease:	Six (6) years with two six (6) year options
Zoning:	C-N Zone (Approved with Special Exception)
Other:	Medical marijuana dispensary ALLOWED by special exception

Attachments:

- Opinion Letter, Robinson and Cole
- Zoning Analysis, Curioso Architects
- Completed Zoning Application for Special Exception
- Exhibit A, B-1, B-2, C and D
- City of Stamford APPL. 215-11 Notice

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

DRAFT

September 16, 2015

Mr. Richard Taney
PalliaTech CT, LLC
19 Morgan Avenue
Monroe, CT 06468

Re: City of Stamford zoning requirements for use of certain property located at 1034 High Ridge Road, Stamford, Connecticut (“Property”) as a medical marijuana dispensary facility.

Dear Mr. Taney:

You have requested that, on behalf of PalliaTech CT, LLC (“PalliaTech”), we review local zoning requirements in connection with the proposed medical marijuana dispensary facility at the Property. The proposed use is permitted at the Property subject to the issuance of Special Exception and Site Plan approvals by the City of Stamford Zoning Board (the “Zoning Board”). Although no zoning approval is ever guaranteed, based on available information, it appears that the use of the Property as a medical marijuana dispensary facility could comply with all applicable requirements of the City of Stamford Zoning Regulations (“Zoning Regulations”). At your direction, we will file the necessary applications on September 28, 2015, the first business day after the date on which the relevant Zoning Regulation becomes effective. Please note that the Zoning Regulations require a state license for a medical marijuana dispensary facility, but we believe it will be possible to receive an approval subject to a condition that the state license be issued.

I. BACKGROUND

The Property consists of a building footprint of 2,645 square feet (per the Sumac site plan, noted below) and is part of a larger shopping center (“Shopping Center”). The Property is situated in the City of Stamford’s C-N (Neighborhood-Business District) (“C-N Zone”). Other uses in the Shopping Center include a hair salon, restaurant and dry cleaners. The Property was most recently operated as a retail camera store by Camera Wholesalers. The Property is located on a major City arterial (CT Route 137).

On September 10, 2015, the Zoning Board of the City of Stamford, Connecticut (“Zoning Board”) approved a text amendment to the Zoning Regulations to allow by special exception “medical marijuana dispensaries” within certain commercial and manufacturing zoning districts in the City of Stamford (“Text Amendment”). A copy of the approved Text Amendment is attached hereto as **Exhibit A**.

The C-N Zone is one of the zoning districts in which medical marijuana dispensary facilities are allowed by special exception. We understand that PalliaTech will submit special exception and site plan applications once the Text Amendment becomes effective (September 26, 2015).

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2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

II. USE OF THE PROPERTY AS A MEDICAL MARIJUANA DISPENSARY

In preparing this analysis, we reviewed and relied on the following materials.

- a) The Zoning Regulations of the City of Stamford, amended to December 31, 2014 (online version);
- b) Amendments to the Zoning Regulations, as stated in the Zoning Board published legal notice, attached hereto as **EXHIBIT A**;
- c) City of Stamford's official zoning map, amended to December 31, 2014 (online version);
- d) City of Stamford Tax Assessor's property card for the Property, of record as of September 15, 2015;
- e) Connecticut General Statutes ("C.G.S.") Chapter 124, Zoning, as amended to January 1, 2015, as applicable;
- f) C.G.S. Chapter 126, Municipal Planning Commissions, as amended to January 1, 2015, as applicable;
- g) Plans prepared by Sumac design consultants for your state license application, entitled: "Location Area Map (1,000 and 2,550-foot radius), Dispensary Site Plan, Dispensary Ground Floor Enlarged Plan, and, Dispensary First Floor Enlarged Plan."

In addition, we have consulted with the following individuals regarding the proposed use of the Property and the requirements of the Zoning Regulations:

- a) Norman F. Cole, AICP, Land Use Bureau Chief, City of Stamford, and
- b) Representatives of PalliaTech.

We have assumed without independent inquiry and verification that the information received through oral communications with the representatives of the City and of PalliaTech is complete and accurate. We have made no independent investigation as to the accuracy of information contained in such discussions or any documents or materials reviewed, but we have no reason to believe that such information is other than as reflected therein or as represented to us. No other review or investigation should be inferred.

A. *Scope of Review of Special Exception and Site Plan Applications*

A land use agency sits in an administrative capacity when deciding whether to approve or disapprove a special exception application. *Zimnoch v. Planning & Zoning Comm'n*, 302 Conn. 535, 552 n.18 (2011). Similarly, review of a site plan application is an administrative function of a land use agency. *Norwich v. Norwalk Wilbert Vault Co.*, 208 Conn. 1, 12 (1988). An agency acting in an administrative capacity has no discretion or choice but to approve an application if it conforms to the applicable zoning regulations. *Pansy Road, LLC v. Town Plan and Zoning Comm'n*, 283 Conn. 369, 375-75 (2007). Thus, the City's Zoning Board must approve special exception and site plan application so long as they comply with the applicable Zoning Regulations.

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

B. Use of the Property as a medical marijuana dispensary facility complies with the applicable Zoning Regulations

1. Applicable Zoning Regulations

The zoning and use of the Premises is governed by the Zoning Regulations, as amended from time to time, inclusive of Sections 3, 7-U, 7.2, 12, 19, and Appendix A-Table II for a medical marijuana dispensary facility use. Any applicant such as PalliaTech may operate a dispensary facility subject to its securing all necessary approvals from the Zoning Board.

Per Section 3.A of the Zoning Regulations, a “Medical Marijuana Dispensary Facility” is defined as follows:

[Definition 67.1] Medical marijuana dispensary facility means a place of business where marijuana may be dispensed or sold at retail to qualifying patients and primary caregivers, and for which the CT Department of Consumer Protect has issued a dispensary facility permit to an applicant in accordance with Section 21a-408-14 of the Regulations of Connecticut State Agencies.

Pursuant to Section 7 U – MEDICAL MARIJUANA DISPENSARIES AND PRODUCERS, and APPENDIX A – Table II of the Regulations as amended on September 10, 2015, effective September 26, 2015, a medical marijuana dispensary facility is permitted in the C-N Zone, subject to special exception and site plan review and approval by the Zoning Board (“Applications”). Copies of the salient sections of the Regulations listing submission requirements for the Applications are attached hereto as **Exhibits B-1 and B-2**.

Pursuant the Regulations, the submitted Applications will be referred to the City of Stamford’s Planning Board, Bureau of Engineering and Department of Traffic and Parking for advisory review and comment. Pursuant to C.G.S. Section 8-7d, and the Zoning Regulations, the Zoning Board will then hold a duly-noticed public hearing, and will render its decision at a public meeting.

The Zoning Board’s decision is based on the compliance of the Applications with all applicable sections of the Regulations, including:

- a) Section 7.2 SITE PLAN REVIEW, Subsection D – STANDARDS FOR REVIEW,¹ which focus on compliance with the goals of the City’s Master Plan, the Zoning Regulations, public health, safety and general welfare and convenience of the general public, and compatibility use and scale with the surrounding neighborhood to maintain property values. The effects of traffic and environmental impacts, if any, as well as adequacy of on-site parking are reviewed. The Zoning Board has the authority to modify a site plan or condition an approval to the extent necessary for the proposal to meet applicable standards;

¹ Attached hereto as Exhibit C.

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

- b) Section 19 VARIANCES AND SPECIAL EXCEPTIONS, Subsection 3.2 Standards and Conditions² which are similar to Site Plan Review standards, and include evaluation of “the nature and intensity of the proposed use in relation to its site and the surrounding area;” and
- c) Additional, specific standards provided in Section 7 – U as follows:
 - 1. Medical Marijuana Dispensaries must possess a current license from the State of Connecticut Department of Consumer Protection and comply with the Regulations of the State of Connecticut Department of Consumer Protection Concerning the Palliative Use of Marijuana, per CGS Section 21a-408-1 to 21a-408-70, inclusive, as may be amended from time to time, and proper licensure must be maintained at all times;
 - 2. No Medical Marijuana Dispensary shall be located within a 3,000 foot radius of any other Dispensary;
 - 3. Signage for Dispensaries shall be limited to one (1) sign not exceeding 16 inches in height x 18 inches in width. Further, illumination of any sign advertising a marijuana product is prohibited; no signage that advertising marijuana brand names or utilizes graphics related to marijuana or paraphernalia on the exterior of the Dispensary or the building in which it is located is permitted. Further, signage advertising the price of marijuana is prohibited;
 - 4. Display of marijuana or paraphernalia within the Dispensary that is clearly visible from the exterior of the Dispensary is prohibited; and
 - 5. Parking for the Dispensary shall be provided at the same standard as for a Retail Store, which is four (4) parking spaces per 1,000 square feet of gross floor area.³
- 2. Compliance with all applicable Zoning Regulations

As noted above, so long as the proposed use complies with all applicable Zoning Regulations, the Zoning Board must approve the special exception and site plan applications. While we have not reviewed detailed project plans (e.g. proposed signage and interior displays), the information provided to date indicates that PalliaTech’s proposed use of the Property as a medical marijuana dispensary facility is consistent with the intent of the Zoning Regulations for such uses. The plans provided by Sumac listed above indicate no significant exterior building or site changes, suggesting that the proposed use can be accommodated on this site, subject to review and approval of more detailed plans and project information by the Zoning Board.

² Attached hereto as Exhibit D.

³ Reference: Section 12 – AUTOMOBILE PARKING AND LOADING SPACE, Subsection D.9., Zoning Regulations.

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

C. *Limitations*

We do not hold ourselves out as having training or expertise in any technical areas, such as engineering, surveying, or architecture. We offer no opinion in this letter as to the proposed use's compliance with federal law, any environmental or other laws, whether federal, state or local, Occupational Safety and Health Administration laws and regulations, the requirements of the Americans with Disabilities Act, building codes, fire and life safety codes, local and/or state health department requirements, or other similar requirements incidental to the use of those facilities unless specifically discussed in this letter.

Except as specifically set forth herein, no analysis is offered as to title to, or ownership of, any real or personal property related to the proposed use, or otherwise. This analysis is rendered as of the date hereof, and we disclaim any undertaking to advise you hereafter of developments, factual or legal, hereafter occurring or coming to our attention, whether or not the same would, if now existing or known to us, cause any change or modification herein. This analysis is solely as of the date hereof and we have no obligation to advise you with respect to matters hereafter arising. This opinion is rendered solely for the benefit of the addressees named herein.

III. CONCLUSION

Subject to the foregoing limits on the scope of this analysis, PalliaTech's proposed use of the Property as a medical marijuana dispensary should comply with all applicable requirements of the Zoning Regulations.

Very truly yours,

Dwight H. Merriam

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP



City of Stamford
Zoning Board · Land Use Bureau
Government Center · 888 Washington Boulevard · Stamford, CT 06904-2152
Phone: 203.977.4719 · Fax: 203.977.4100

APPLICATION FOR SPECIAL EXCEPTION

Complete, notarize, and forward twelve (12) copies to Clerk of the Zoning Board with a **\$500.00 Public Hearing Fee** and the required application filing fee (**see Fee Schedule below**), payable to the City of Stamford. **NOTE:** Cost of required advertisements are payable by the Applicant and performance of required mailing to surrounding property owners is the sole responsibility of the applicant.

Fee Schedule

Commercial Projects under 20,000 s.f. or Residential Projects under 10 dwelling units.	\$380.00
Commercial Projects 20,000 s.f. to 50,000 s.f. or Residential Projects 10 to 50 dwelling units.	\$730.00
Commercial Projects over 50,000 s.f. or Residential Projects over 50 dwelling units.	\$1080.00

APPLICANT NAME (S): PalliaTech CT, LLC ATTN: Richard Tancy

APPLICANT ADDRESS: 19 Morgan Lane, Monroe, CT 06468

APPLICANT PHONE #: (516) 220-0030

IS APPLICANT AN OWNER OF PROPERTY IN THE CITY OF STAMFORD? No

LOCATION OF PROPERTY IN STAMFORD OWNED BY APPLICANT (S): N/A

ADDRESS OF SUBJECT PROPERTY: 1034 High Ridge Road, Stamford, CT 06905

PRESENT ZONING DISTRICT: C-N (Neighborhood-Business District)

TITLE OF SITE PLANS & ARCHITECTURAL PLANS: _____

REQUESTED SPECIAL EXCEPTION: (Attach written statement describing request)

Medical marijuana dispensary facility, as permitted per Article III, Section 7-U and APPENDIX A-Table II, Stamford Zoning Regulations.

LOCATION: (Give boundaries of land affected, distance from nearest intersecting streets, lot depths and Town Clerk's Block Number)

Easterly by High Ridge Road, northerly by Olga Drive, and southerly & westerly by commercial buildings and parking.

NAME AND ADDRESS OF OWNERS OF ALL PROPERTY INVOLVED IN REQUEST:

NAME & ADDRESS

Amelaine Realty Company, LLC
79 High Ridge Road
Stamford, CT 06905

LOCATION

1026 High Ridge Road
Stamford, CT 06905

DOES ANY PORTION OF THE PREMISES AFFECTED BY THIS APPLICATION LIE WITHIN 500 FEET OF THE BORDER LINE WITH GREENWICH, DARIEN OR NEW CANAAN? No (If yes, notification must be sent to Town Clerk of neighboring community by registered mail within 7 days of receipt of application – PA 87-307).

DATED AT STAMFORD, CONNECTICUT, THIS _____ DAY OF September 2015
PalliaTech, CT LLC

SIGNED: _____

NOTE: If applicant wishes to withdraw application, please notify the Zoning Board at least three (3) working days prior to Public Hearing so that the Board may have sufficient time to publicize the withdrawal.

STATE OF CONNECTICUT

ss STAMFORD 20____

COUNTY OF FAIRFIELD

Personally appeared _____, signer of the foregoing application, who made oath to the truth of the contents thereof, before me.

Notary Public - Commissioner of the Superior Court

FOR OFFICE USE ONLY

APPL. #: _____ Received in the office of the Zoning Board: Date: _____

By: _____

Revised 01/04/10

14152186v1

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP



City of Stamford
Zoning Board · Land Use Bureau
Government Center · 888 Washington Boulevard · Stamford, CT 06904-2152
Phone: 203.977.4719 · Fax: 203.977.4100

APPLICATION FOR APPROVAL OF SITE & ARCHITECTURAL PLANS AND / OR REQUESTED USES

Complete, notarize, and forward twelve (12) copies to Clerk of the Zoning Board with a **\$500.00 Public Hearing Fee** and the required application filing fee (**see Fee Schedule below**), payable to the City of Stamford. **NOTE:** Cost of required Public Hearing advertisements are payable by the Applicant and performance of required mailing to surrounding property owners is the sole responsibility of the applicant.

Fee Schedule

Commercial Projects under 20,000 s.f. or Residential Projects under 10 dwelling units.	\$380.00
Commercial Projects 20,000 s.f. to 50,000 s.f. or Residential Projects 10 to 50 dwelling units.	\$730.00
Commercial Projects over 50,000 s.f. or Residential Projects over 50 dwelling units.	\$1080.00

APPLICANT NAME (S): PalliaTech CT, LLC ATTN: Richard Taney

APPLICANT ADDRESS: 19 Morgan Lane, Monroe, CT 06468

APPLICANT PHONE #: (516) 220-0030

IS APPLICANT AN OWNER OF PROPERTY IN THE CITY OF STAMFORD? No

LOCATION OF PROPERTY IN STAMFORD OWNED BY APPLICANT (S): N/A

ADDRESS OF SUBJECT PROPERTY: 1034 High Ridge Road, Stamford, CT 06905

PRESENT ZONING DISTRICT: C-N (Neighborhood-Business District)

TITLE OF SITE PLANS & ARCHITECTURAL PLANS: _____

REQUESTED USE: _____

Medical marijuana dispensary facility, as permitted per Article III, Section 7-U and APPENDIX A-Table II, Stamford Zoning Regulations.

LOCATION: (Give boundaries of land affected, distance from nearest intersecting streets, lot depths and Town Clerk's Block Number)

Easterly by High Ridge Road, northerly by Olga Drive, and southerly & westerly by commercial buildings and parking.

NAME AND ADDRESS OF OWNERS OF ALL PROPERTY INVOLVED IN REQUEST:

NAME & ADDRESS

Amelaine Realty Company, LLC
79 High Ridge Road, Stamford, CT 06905

LOCATION

1026 High Ridge Road
Stamford, CT 06905

DOES ANY PORTION OF THE PREMISES AFFECTED BY THIS APPLICATION LIE WITHIN 500 FEET OF THE BORDER LINE WITH GREENWICH, DARIEN OR NEW CANAAN? _____ (If yes, notification must be sent to Town Clerk of neighboring community by registered mail within 7 days of receipt of application – PA 87-307).

DATED AT STAMFORD, CONNECTICUT, THIS _____ DAY OF September 2015
PalliaTech CT, LLC

SIGNED: _____

NOTE: If applicant wishes to withdraw application, please notify the Zoning Board at least three (3) working days prior to Public Hearing so that the Board may have sufficient time to publicize the withdrawal.

STATE OF CONNECTICUT ss STAMFORD _____ 20____

COUNTY OF FAIRFIELD

Personally appeared _____, signer of the foregoing application, who made oath to the truth of the contents thereof, before me.

Notary Public - Commissioner of the Superior Court

FOR OFFICE USE ONLY

APPL. #: _____ Received in the office of the Zoning Board: Date: _____

By: _____

14152260v1

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

EXHIBIT A

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

Public Notices

Page 1 of 1

LEGAL NOTICE ZONING BOARD - CITY OF STAMFORD APPL. 215-11

LEGAL NOTICE Zoning Board - City of Stamford APPL. 215-11 Notice is hereby given that the Zoning Board of the City of Stamford, CT at its regular meeting held on Thursday, September 10, 2015 APPROVED AS MODIFIED the application of the Stamford Zoning Board to Amend Article III, Section 7-U and to amend Appendix A, Table II of the Stamford Zoning Regulations, to establish the local regulatory framework for the palliative use of marijuana pursuant to Chapter 420f of the Connecticut General Statutes. The approved language will read as follows: Amendment to Article III, Section 7-U. U - Medical Marijuana Dispensaries Purpose: The Zoning Board acknowledges the enactment of Public Act #12-55 and adoption of regulations concerning the "Palliative Use of Marijuana". This Public Act and the associated regulations establish the local regulatory framework for the palliative use of marijuana pursuant to Chapter 420f of the Connecticut General Statutes. It helps to guide the appropriate location and operation of Medical Marijuana Dispensaries ("Dispensaries") in the City of Stamford. The purpose of this Section U is to minimize the impact of Dispensaries on neighbors, while at the same time recognizing the essential services these Dispensaries will provide to the citizens of Stamford. Standards: Medical Marijuana Dispensaries are allowed by Special Exception approval of the Zoning Board only within certain commercial and manufacturing Zoning Districts of the City of Stamford, as shown in Appendix A, Table II of these Regulations. Such uses must comply with the requirements of the Zoning Regulations and meet the following additional standards: 1. Medical Marijuana Dispensaries must possess a current license from the State of Connecticut Department of Consumer Protection and comply with the Regulations of the State of Connecticut Department of Consumer Protection Concerning the Palliative Use of Marijuana, per the Connecticut General Statutes, Section 21a-408-1 to 21a-408-70, inclusive, as may be amended from time to time. Failure to maintain proper licenses shall be deemed an immediate violation of the City of Stamford Zoning Regulations. 2. No Medical Marijuana Dispensaries shall be located within a 3,000 feet radius of any other Dispensary; 3. Signage for Dispensaries must comply with the following standards: a. Signage shall be limited to a single sign no larger than sixteen inches in height by eighteen inches in width; b. There shall be no illumination of a sign advertising a marijuana product at any time; c. There shall be no signage that advertises marijuana brand names or utilizes graphics related to marijuana or paraphernalia on the exterior of the Dispensary or the building in which the Dispensary is located; d. There shall be no display of marijuana or paraphernalia within the Dispensary which is clearly visible from the exterior of the Dispensary; and e. There shall be no signage which advertises the price of its marijuana. 4. Parking shall be provided according to Section 12 of the Zoning Regulations, as follows: a. A Dispensary shall meet the parking standard for Retail Store. Amendment to Appendix A, Table II (Permitted Uses in Commercial and Industrial Districts) Add Line #133.1, Medical Marijuana Dispensary Facility (67.1) and insert the letter "B" under the C-N, C-B, C-L, C-I, M-L and M-G Zoning Districts to indicate this use is permitted by Special Exception approval of the Zoning Board. For the C -N District only, place an asterisk and footnote stating "This use is expressly not permitted in other Districts that allow uses allowed in the C-N District." Effective date of this decision: September 26, 2015 ATTEST: THOMAS R. MILLS CHAIRMAN, ZONING BOARD

Appeared in: **StamfordAdvocate** on Tuesday, 09/15/2015

[Back](#)

<http://ct.mypublicnotices.com/PublicNotice.asp?Page=PublicNot...> 9/15/2015

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

EXHIBIT B-1

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014



SECTION 19 - VARIANCES AND SPECIAL EXCEPTIONS

1. BOARD OF APPEALS POWERS AND DUTIES

- 1.1 Establishment. The Zoning Board of Appeals shall operate under Chapter 56 of the Stamford Charter and any other applicable provision of such Charter or the General Statutes. It shall hear and decide all matters upon which it is required to pass by the specific terms of these regulations and all matters upon which it is directed to act under state statutes.

All powers and duties shall be exercised subject to appropriate conditions and safeguards, in harmony with the purpose and intent of these regulations and in accordance with the public interest and the most appropriate development of the neighborhood.

- 1.2 Review of Administrative Orders. Any person claiming to be aggrieved, or any officer, department, board or bureau of the municipality aggrieved by any order, requirement or decision made by the Zoning Enforcement Officer may appeal to the Zoning Board of Appeals as provided in Section 8-7 of the Connecticut General Statutes as amended. In order to be considered, such appeal shall be duly filed with the Zoning Board of Appeals within thirty (30) days of the effective date of the action of the Zoning Enforcement Officer. Said Board may reverse or affirm wholly or in part, or may modify any order, decision or requirement appealed from and shall make such order, requirement or decision, consistent with these Zoning Regulations, the Zoning Map, or other provisions of applicable law, as in its opinion should be made in the premises. In deciding on any such appeal the Zoning Board of Appeals shall notice and conduct a public hearing in the manner prescribed under Section 8-3c of the General Statutes, as amended.

- 1.3 Certificate of Approval of Location.

- a. Approval of Gasoline Station location. The Board of Appeals shall hear and decide upon these matters in accordance with the provisions of these regulations and Secs. 14-321 and 322 of the General Statutes, as amended.
- b. Dealers' and Repairers' Licenses. The Board of Appeals shall hear and decide upon these matters in accordance with the provisions of these regulations and Secs. 14-54 and 55 of the General Statutes, as amended.

- 1.4 Variations. The Board of Appeals shall have the power, after public noticed hearing, to determine and vary the application of these Regulations as provided under Section 8-7 of the General Statutes, as amended. Provided however:

(1) Density requirements for multiple family uses as outlined in APPENDIX B, SCHEDULE OF REQUIREMENTS FOR AREA, HEIGHT AND BULK OF BUILDINGS, under "Square Feet Per Family", shall be unalterable by a variance except when the request for a variance is for one (1) additional dwelling unit.

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014

- (1) requirement of front, side or rear yards greater than the minimum required by these regulations;
- (2) requirement of screening of parking areas or other parts of the premises from adjoining premises or from the street by walls, fences, planting or other devices, size, location and type to be specified by the Board;
- (3) modification of the exterior features or appearance of any structure where necessary to protect privacy and/or preserve property values;
- (4) limitation of size, number of occupants, method or time of operation, or extent of facilities;
- (5) regulation of the number, design and location of access drives or other traffic features.

c. Granting of a variance pursuant to the provisions hereof shall be deemed to authorize only the particular use, structure or feature shown on the application therefore and proper modifications, if any, in the Board's decision. Any change in the approved plans or any subsequent change of any use, structure or feature shown on the approved plans that materially affects an approved variance shall require the further approval of the Board. Conditions of approval, when specifically imposed by the Board, shall be binding on the applicant, and failure to comply with any such conditions shall constitute a violation of these regulations.

✓ 2.3 Application Requirements and Procedure. [see Subsection 3.3 b]

a. Before deciding on any variance application, the Board shall notice and conduct a public hearing, in the manner prescribed under Section 8-3c of the General Statutes, as amended.

✓ b. All applications for variances shall include, as a minimum, site plans showing property boundaries, the location and size of buildings, traffic access and circulation drives, and the extent of proposed construction, reconstruction or alteration. The Board of Appeals may require that such plans also show, where applicable, yards, parking areas, all proposed activity, landscaping, utility vaults, location of all waterways, streams, wetlands and flood hazard areas, contours at intervals of not less than 5 feet and any other pertinent information that may be necessary to determine whether all requirements of these regulations are met. In addition the applicant shall submit a written statement briefly describing the nature, size and intensity of operation proposed for the site. Such site plans shall be drawn to a scale of not less than 1 inch equals 30 feet, unless otherwise authorized by staff based on parcel size or unique circumstances. Such site plans shall be prepared and certified by a professional architect, landscape architect, land surveyor or engineer licensed by the State of Connecticut, provided that all property boundary, lot area, and existing conditions information shall be certified by a Registered Land Surveyor and prepared in accordance with the standards of a Class A-2 survey as defined by the Connecticut Association of Land Surveyors.

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014

2.4 Limitations.

a. Any variance granted by the Board shall automatically expire if a full Building Permit for work on the structure or feature for which the variance was granted is not issued within 12 months of the date of such approval. If no building permit is required, any use for which a variance has been granted shall be established within 12 months of the date of approval thereof or such variance shall be void. The time that elapses during any litigation challenging a granted variances, until final judgement or settlement, shall not count toward the time limits set out in this section. The Board of Appeals shall have the authority to grant no more than one 12 month extension of such time period.

b. Any variance which is granted by the Zoning Board of Appeals shall be placed by said Board upon the land records of the City by filing a record of the variance with the Town Clerk.

3. SPECIAL EXCEPTIONS

3.1 Statement of Purpose. The development and execution of comprehensive zoning regulations is based upon the division of the City into districts, within which the use of land and structures and the location of structures in relation to the land are substantially uniform. It is recognized, however, that there are certain uses and structures which, because of their unique characteristics, cannot be distinctly classified or regulated in a particular district or districts without consideration, in each case, of the impact of such uses and structures upon neighboring uses and the surrounding area, compared with the public need for them at particular locations. Such uses and structures are therefore treated as special exceptions. Where provided for elsewhere by these regulations, the Zoning Board of Appeals or the Zoning Board may, in appropriate cases, after public notice and hearing, grant certain special exceptions. Where an existing use or structure which is permitted only by special exception is proposed to be extended or altered in a manner which would in any way change the character or intensity of the use or feature, such proposed extension or alteration shall be treated as a special exception under this section.

3.2 Standards and Conditions.

a. Special Exceptions shall be granted by the reviewing board only upon a finding that the proposed use or structure or the proposed extension or alteration of an existing use or structure is in accord with the public convenience and welfare after taking into account, where appropriate:

- (1) the location and nature of the proposed site including its size and configuration, the proposed size, scale and arrangement of structures, drives and parking areas and the proximity of existing dwellings and other structures.
- (2) the nature and intensity of the proposed use in relation to its site and the surrounding area. Operations in connection with special exception uses shall not be injurious to the neighborhood, shall be in harmony with the general purpose and intent of these Regulations, and shall not be more objectionable to nearby properties by reason of noise, fumes, vibration, artificial lighting or other potential disturbances to the health, safety or peaceful enjoyment of property than the public necessity demands.

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014

- (6) Separation of Uses: In order to preserve the essential character of residential neighborhoods and avoid undue concentration of non-residential uses, no special exception application shall be approved authorizing a new nursing home (#69), church (#23), clinic (#23.1) or public charitable institution (#79) within 1000 feet of any other such uses. Existing uses authorized prior to the effective date of this regulation shall be exempt from this separation requirement and may be continued, altered, changed in use or expanded in conformance with applicable standards of these Regulations.
- (7) Staff Review: All applications for special exception within single family districts shall be referred to the Planning and Zoning Director for staff review of site and architectural plans at least thirty (30) days prior to the scheduling of a public hearing on such application. (93-013)

✓ 3.3 Application and Procedure.

a. Before deciding on any special exception the reviewing board shall hold a public hearing on each application. Notice of the time and place of such hearing shall be given in accord with the requirements of Section 8-3c of the General Statutes, as amended.

✓ b. All applications for special exception shall include as a minimum site plans prepared to the standards and specifications of Section 19,2.3,b. of these Regulations. The form of application, number of copies of plans to be submitted, and the filing fee shall be established by the reviewing board.

c. All applications for special exception shall be referred to the Planning Board for an advisory report and acted on in the same manner as provided under Section 19,2.3,d. of these Regulations. If the Planning Board recommends denial of an application for special exception, such special exception shall not be granted except by the affirmative vote of four members of the Zoning Board; the Zoning Board of Appeals must follow Section 8-6, CGS and vote by four affirmative votes whether or not the Planning Board recommends approval or denial. (91-019)

d. Referral to other Agencies

- (1) All applications for special exceptions shall be referred to the Bureau of Engineering and Department of Traffic and Parking for an advisory report at least thirty (30) days prior to the date assigned for a public hearing thereon.
- (2) All applications for special exceptions on a lot not served by a public sewer shall be referred to the Health Director and Environmental Protection Board thirty (30) days prior to the date assigned for a public hearing thereon. Failure of a referral agency to report within 30 days shall be construed as no response.

2. **RFA (B)(1): LOCATION AND SITE PLAN**

LOCATION SUMMARY WITH MAP

EXHIBIT B-2

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014



SECTION 7.2 - SITE PLAN REVIEW

A - PURPOSE

It is the purpose of this Section to establish uniform procedures and standards for the review of site and architectural plans required under Section 9 - Design Districts, Special Exceptions required under Section 7.5 "Review of Large Scale Development", as well as other site plan reviews as stipulated elsewhere in these Regulations to assure that such plans meet the stated objectives and standards of these Regulations, conform to the stated objectives of other agencies, provide for the safety and convenience of the general public as well as those using the subject site, and preserve important site features, identified conservation values, and landscaping where desirable. The goal of such review is to achieve attractive, functional and efficient development on the subject site while mitigating impacts to environmental and public infrastructure resources and protecting adjacent properties through appropriate design considerations and siting of buildings, structures, uses, access, parking, landscaping and other site development features. (204-40)

B - PROCEDURE

1. In all cases where these Regulations require review under this Section, no building permit shall be issued until after the required plans have been reviewed and approved by the Zoning Board and after a Zoning Permit has been issued by the Zoning Enforcement Officer. Building permits shall be issued only in conformity with such approved plans including any modifications or conditions imposed by the Zoning Board. No certificate of occupancy shall be approved until after certification by the Zoning Enforcement Officer that the completed project substantially conforms to the approved plans.
2. Pursuant to P.A. 87-533, site plan applications involving regulated inland wetlands or watercourses shall not receive final action by the Zoning Board until after a permit has been issued by the Stamford Environmental Protection Board. The Zoning Board, in its sole discretion, may refuse to accept for review any such application when a timely approval by the E.P.B. can not be reasonably anticipated.
3. The Board shall notify the Town Clerk of any adjoining municipality regarding any site plan proposal within five-hundred feet of the municipal boundary. Such notice shall be made by registered mail within seven days of the date of receipt of the application. Such notice shall also be provided for any site plan where a significant portion of the site generated traffic, sewer discharge or storm water discharge may impact an adjoining municipality, as more particularly defined by P.A. 87-307.
4. Upon application and submission of a site plan, the Zoning Enforcement Officer, after consultation with the Director of Planning and Zoning, may issue a Zoning Permit for minor changes of use or alterations of site and architectural plans or permitted signs, provided such modifications are in keeping with the Designed District approval issued by the Zoning Board.

7.2-1

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

✓ December 31, 2014

C - APPLICATION REQUIREMENTS: Unless otherwise authorized by the Zoning Board staff, eleven copies of all plans and documents, certified by an architect, landscape architect, engineer or surveyor, registered within the State of Connecticut, shall be submitted to the Zoning Board showing the following information:

1. An existing conditions site survey, drawn to a scale preferably of not less than 1 inch = 30 feet but in no case less than 1 inch = 60 feet, showing dimensions and area of the site, street and property lines, curbs, pavements, sidewalks, existing easements and rights-of-way, the location of existing structures, walls, fences, utility facilities, and trees of 8-inch caliper or more, and existing land contours at a maximum two-foot interval, said information to be certified by a Registered Land Surveyor and prepared in accordance with the standards of a Class A-2 survey as defined by the Connecticut Association of Land Surveyors.
2. The location of abutting streets, nearest cross streets, driveways on adjacent lots, and structures on adjacent lots within twenty feet of the property line.
3. The location and dimensions of all proposed buildings, structures, facilities, walls, fences, utility installations, site improvements, and finished land contours at maximum two-foot intervals.
4. Location of all existing watercourses, inland and tidal wetlands, flood hazard and encroachment lines, principal wooded areas and rock formations, slopes greater than 25%, and other significant natural features.
5. Zoning data including for all proposed structures: height, number of stories, yards, floor area ratio, building coverage, number of parking spaces, number of dwelling units, total building area and proposed uses.
6. The title of the development, date, revision dates, north arrow, scale, name and address of owner and name and address of applicant if different from owner.
7. Location, dimensions and surface treatment of existing and proposed off-street parking and loading spaces, traffic access, circulation drives and pedestrian walks.
8. Location, size and type of proposed landscaping and buffer planting and the designation of those areas of natural vegetation not to be disturbed, including any areas to be preserved as open space.
9. Location, type, design, shielding, power and hours of operation of all existing and proposed exterior and garage lighting.
10. Architectural elevations depicting the exterior designs and the color, materials and finishes of all proposed structures.
11. Location, type, size, design, color and illumination of all signs.
12. Plans for storm drainage, water supply, sewage disposal, and a Soil Erosion and Sediment Control Plan as defined within Section 15 B of these regulations.

7.2-2

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

December 31, 2014

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13. Properties located within regulated flood hazard areas shall submit preliminary architectural and engineering data demonstrating conformity with the standards of Section 7.1 of these Regulations.

14. Such other additional information as may be deemed reasonably necessary by the Zoning Board to properly evaluate the application.

15. A traffic impact and access study shall be submitted, prepared by a State of Connecticut Registered Professional Engineer qualified to prepare such studies, where required either by Section 12-A-9 of these Regulations or where considered necessary in the judgment of the City Traffic Engineer. At a minimum, the study shall include data and information on existing and projected average daily vehicle trips on nearby roads, peak hour traffic, distribution of such traffic to be generated, types of vehicles expected, existing and projected levels of service, adequacy of rights-of-way and travelways, existing roadway capacity, traffic accidents, traffic generation data, the location of existing roads within 300 feet of the development site, traffic lights and intersections, sight line conditions, and recommended improvements needed to avoid undue congestion and provide for safe pedestrian and vehicular circulation, including provisions for safe sidewalks and crosswalks for pedestrians. Where applicable, such study shall include the written findings and recommendations of the Connecticut Department of Transportation. (204-40)

16. A drainage impact report shall be submitted, prepared by a State of Connecticut Registered Professional Engineer qualified to prepare such studies, in accordance with design criteria and methodologies as approved by the City Engineer. (204-40)

D - STANDARDS FOR REVIEW: In reviewing site plans the Zoning Board shall take into consideration the purposes of these Regulations, including the purposes of the applicable zoning district and the goals and policies of the Stamford Master Plan, the public health, safety and general welfare and convenience of the general public and the maintenance of property values. In its review the Board may modify a site plan or condition an approval to the extent necessary to conform the site plan to the following standards and objectives:

1. Safe, adequate and convenient vehicular traffic circulation, operation, parking and loading, and pedestrian circulation, both within and without the site.

(a) The number, locations and dimensions of all vehicular and pedestrian access drives and walkways, parking spaces, drop-off and loadings areas, and provisions for handicapped access shall conform to the standards of Section 12 of these Regulations, to the adopted design criteria and engineering practices of the Dept. of Traffic and Parking, and all other applicable standards. Such areas shall be constructed of suitable hard surface materials and maintained in good condition.

(b) The number of vehicle access drives shall be minimized and shall be located and designed to provide safe and convenient turning movements and safe sightline as determined in accordance with the Geometric Highway Design Standards of the Conn. Dept. of Transportation.

7.2-3

2. **RFA (B)(1): LOCATION AND SITE PLAN**

LOCATION SUMMARY WITH MAP

EXHIBIT C

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014



SECTION 7.2 - SITE PLAN REVIEW



A - PURPOSE

It is the purpose of this Section to establish uniform procedures and standards for the review of site and architectural plans required under Section 9 - Design Districts, Special Exceptions required under Section 7.5 "Review of Large Scale Development", as well as other site plan reviews as stipulated elsewhere in these Regulations to assure that such plans meet the stated objectives and standards of these Regulations, conform to the stated objectives of other agencies, provide for the safety and convenience of the general public as well as those using the subject site, and preserve important site features, identified conservation values, and landscaping where desirable. The goal of such review is to achieve attractive, functional and efficient development on the subject site while mitigating impacts to environmental and public infrastructure resources and protecting adjacent properties through appropriate design considerations and siting of buildings, structures, uses, access, parking, landscaping and other site development features. (204-40)

B - PROCEDURE

1. In all cases where these Regulations require review under this Section, no building permit shall be issued until after the required plans have been reviewed and approved by the Zoning Board and after a Zoning Permit has been issued by the Zoning Enforcement Officer. Building permits shall be issued only in conformity with such approved plans including any modifications or conditions imposed by the Zoning Board. No certificate of occupancy shall be approved until after certification by the Zoning Enforcement Officer that the completed project substantially conforms to the approved plans.
2. Pursuant to P.A. 87-533, site plan applications involving regulated inland wetlands or watercourses shall not receive final action by the Zoning Board until after a permit has been issued by the Stamford Environmental Protection Board. The Zoning Board, in its sole discretion, may refuse to accept for review any such application when a timely approval by the E.P.B. can not be reasonably anticipated.
3. The Board shall notify the Town Clerk of any adjoining municipality regarding any site plan proposal within five-hundred feet of the municipal boundary. Such notice shall be made by registered mail within seven days of the date of receipt of the application. Such notice shall also be provided for any site plan where a significant portion of the site generated traffic, sewer discharge or storm water discharge may impact an adjoining municipality, as more particularly defined by P.A. 87-307.
4. Upon application and submission of a site plan, the Zoning Enforcement Officer, after consultation with the Director of Planning and Zoning, may issue a Zoning Permit for minor changes of use or alterations of site and architectural plans or permitted signs, provided such modifications are in keeping with the Designed District approval issued by the Zoning Board.

7.2-1

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

December 31, 2014

13. Properties located within regulated flood hazard areas shall submit preliminary architectural and engineering data demonstrating conformity with the standards of Section 7.1 of these Regulations.

14. Such other additional information as may be deemed reasonably necessary by the Zoning Board to properly evaluate the application.

15. A traffic impact and access study shall be submitted, prepared by a State of Connecticut Registered Professional Engineer qualified to prepare such studies, where required either by Section 12-A-9 of these Regulations or where considered necessary in the judgment of the City Traffic Engineer. At a minimum, the study shall include data and information on existing and projected average daily vehicle trips on nearby roads, peak hour traffic, distribution of such traffic to be generated, types of vehicles expected, existing and projected levels of service, adequacy of rights-of-way and travelways, existing roadway capacity, traffic accidents, traffic generation data, the location of existing roads within 300 feet of the development site, traffic lights and intersections, sight line conditions, and recommended improvements needed to avoid undue congestion and provide for safe pedestrian and vehicular circulation, including provisions for safe sidewalks and crosswalks for pedestrians. Where applicable, such study shall include the written findings and recommendations of the Connecticut Department of Transportation. (204-40)

16. A drainage impact report shall be submitted, prepared by a State of Connecticut Registered Professional Engineer qualified to prepare such studies, in accordance with design criteria and methodologies as approved by the City Engineer. (204-40)

✓
D - STANDARDS FOR REVIEW: In reviewing site plans the Zoning Board shall take into consideration the purposes of these Regulations, including the purposes of the applicable zoning district and the goals and policies of the Stamford Master Plan, the public health, safety and general welfare and convenience of the general public and the maintenance of property values. In its review the Board may modify a site plan or condition an approval to the extent necessary to conform the site plan to the following standards and objectives:

1. Safe, adequate and convenient vehicular traffic circulation, operation, parking and loading, and pedestrian circulation, both within and without the site.

(a) The number, locations and dimensions of all vehicular and pedestrian access drives and walkways, parking spaces, drop-off and loadings areas, and provisions for handicapped access shall conform to the standards of Section 12 of these Regulations, to the adopted design criteria and engineering practices of the Dept. of Traffic and Parking, and all other applicable standards. Such areas shall be constructed of suitable hard surface materials and maintained in good condition.

(b) The number of vehicle access drives shall be minimized and shall be located and designed to provide safe and convenient turning movements and safe sightline as determined in accordance with the Geometric Highway Design Standards of the Conn. Dept. of Transportation.

7.2-3

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

December 31, 2014

- (c) Area streets and traffic controls shall be determined to have adequate capacity to service the site without causing undue congestion or hazardous conditions.
- (2) The protection of environmental quality, landscaping of open space and harmony with existing development. The Board shall take into consideration the following features and standards:
- (a) The location, height, design and materials of walls, fences, hedges and plantings shall be appropriate to the vicinity and shall suitably screen parking, loading, garbage collection facilities, outside storage areas, accessway drives, utility installations and other such features; such landscaping shall be appropriate to the general character of the vicinity and consider the proximity and nature of abutting uses and the level of use of adjoining public streets and walkways.
- (b) All open space areas, exclusive of undisturbed natural areas, shall be suitably landscaped to the satisfaction of the Board. Site landscaping shall be performed at a minimum dollar value equivalent to one shade tree of 2.5 inch caliper for every two hundred (200) square feet of landscaped area. In multi-family developments, open space shall be designed to provide functional outdoor living and play areas meeting the needs of intended residents.
- (c) Soil erosion, sedimentation and the release of excessive dust shall be controlled through implementation of suitable short term and long term controls in accordance with the standards and procedures of Section 15 B.
- (d) Site development shall seek to preserve existing specimen trees, historic structures and other significant natural features of the site. Accordingly, the premature demolition and site clearance of prospective development sites is specifically discouraged and may be taken into consideration in subsequent site plan reviews.
- (e) Artificial lighting, and site generated noise, odors, particles and other disturbances shall be controlled to avoid interference with the use and enjoyment of neighboring properties. The location, height, design and arrangement of outside lighting shall be consistent with safety such as to avoid glare on any other lot and to avoid hazards to traffic on any street.
- (f) Available public utilities shall be adequate in capacity to safely service the requirements of the site. Surface water drainage facilities shall be adequate to safely drain the site while minimizing the risk of downstream flooding and erosion. Where infrastructure capacity is judged not to be adequate the Board may accept a binding agreement to perform suitable improvements.
- (g) Adequate provision shall be made for emergency vehicle access, fire lanes, and safe fire flows, upon the recommendation of the Fire Marshall and the public water utility.
- (h) The arrangement, location, apparent bulk, architectural features, materials, texture and color of proposed buildings and structures shall establish an architectural character and overall site design compatible with the scale and general character of the vicinity.

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

December 31, 2014

(i) Building setbacks and the configuration of open space shall be appropriate to existing structures on adjoining properties and established patterns of use of side and rear yard areas, and to the existing physical conditions of the site.

(j) No use shall be permitted that will cause or result in:

- dissemination of dust, smoke, observable gas or fumes, odor, noise or vibration beyond the immediate site of the building in which such use is conducted, or
- unusual hazard of fire or explosion or other physical hazard to any adjacent buildings, or
- harmful discharge of liquid materials, or
- unusual traffic hazard or congestion due to the type of vehicles required in the use or due to the manner in which traffic enters or leaves the site of the use.

k) All buildings and grounds and other structures shall be maintained in good repair and in safe, clean and sanitary condition. All landscaping required pursuant to an approved site plan shall be installed to the satisfaction of the Director of Parks and Recreation and shall thereafter be maintained in accordance with an agreement to be made part of the application of record, which agreement shall be enforced by the Zoning Enforcement Officer, upon advice of the Director. (88-025)

2. RFA (B)(1): LOCATION AND SITE PLAN

LOCATION SUMMARY WITH MAP

EXHIBIT D

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014



SECTION 19 - VARIANCES AND SPECIAL EXCEPTIONS



1. BOARD OF APPEALS POWERS AND DUTIES

- 1.1 Establishment. The Zoning Board of Appeals shall operate under Chapter 56 of the Stamford Charter and any other applicable provision of such Charter or the General Statutes. It shall hear and decide all matters upon which it is required to pass by the specific terms of these regulations and all matters upon which it is directed to act under state statutes.

All powers and duties shall be exercised subject to appropriate conditions and safeguards, in harmony with the purpose and intent of these regulations and in accordance with the public interest and the most appropriate development of the neighborhood.

- 1.2 Review of Administrative Orders. Any person claiming to be aggrieved, or any officer, department, board or bureau of the municipality aggrieved by any order, requirement or decision made by the Zoning Enforcement Officer may appeal to the Zoning Board of Appeals as provided in Section 8-7 of the Connecticut General Statutes as amended. In order to be considered, such appeal shall be duly filed with the Zoning Board of Appeals within thirty (30) days of the effective date of the action of the Zoning Enforcement Officer. Said Board may reverse or affirm wholly or in part, or may modify any order, decision or requirement appealed from and shall make such order, requirement or decision, consistent with these Zoning Regulations, the Zoning Map, or other provisions of applicable law, as in its opinion should be made in the premises. In deciding on any such appeal the Zoning Board of Appeals shall notice and conduct a public hearing in the manner prescribed under Section 8-3c of the General Statutes, as amended.

- 1.3 Certificate of Approval of Location.

- a. Approval of Gasoline Station location. The Board of Appeals shall hear and decide upon these matters in accordance with the provisions of these regulations and Secs. 14-321 and 322 of the General Statutes, as amended.
- b. Dealers' and Repairers' Licenses. The Board of Appeals shall hear and decide upon these matters in accordance with the provisions of these regulations and Secs. 14-54 and 55 of the General Statutes, as amended.

- 1.4 Variations. The Board of Appeals shall have the power, after public noticed hearing, to determine and vary the application of these Regulations as provided under Section 8-7 of the General Statutes, as amended. Provided however:

(1) Density requirements for multiple family uses as outlined in APPENDIX B, SCHEDULE OF REQUIREMENTS FOR AREA, HEIGHT AND BULK OF BUILDINGS, under "Square Feet Per Family", shall be unalterable by a variance except when the request for a variance is for one (1) additional dwelling unit.

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014

2.4 Limitations.

a. Any variance granted by the Board shall automatically expire if a full Building Permit for work on the structure or feature for which the variance was granted is not issued within 12 months of the date of such approval. If no building permit is required, any use for which a variance has been granted shall be established within 12 months of the date of approval thereof or such variance shall be void. The time that elapses during any litigation challenging a granted variances, until final judgement or settlement, shall not count toward the time limits set out in this section. The Board of Appeals shall have the authority to grant no more than one 12 month extension of such time period.

b. Any variance which is granted by the Zoning Board of Appeals shall be placed by said Board upon the land records of the City by filing a record of the variance with the Town Clerk.

3. SPECIAL EXCEPTIONS

3.1 Statement of Purpose. The development and execution of comprehensive zoning regulations is based upon the division of the City into districts, within which the use of land and structures and the location of structures in relation to the land are substantially uniform. It is recognized, however, that there are certain uses and structures which, because of their unique characteristics, cannot be distinctly classified or regulated in a particular district or districts without consideration, in each case, of the impact of such uses and structures upon neighboring uses and the surrounding area, compared with the public need for them at particular locations. Such uses and structures are therefore treated as special exceptions. Where provided for elsewhere by these regulations, the Zoning Board of Appeals or the Zoning Board may, in appropriate cases, after public notice and hearing, grant certain special exceptions. Where an existing use or structure which is permitted only by special exception is proposed to be extended or altered in a manner which would in any way change the character or intensity of the use or feature, such proposed extension or alteration shall be treated as a special exception under this section.


3.2 Standards and Conditions.

a. Special Exceptions shall be granted by the reviewing board only upon a finding that the proposed use or structure or the proposed extension or alteration of an existing use or structure is in accord with the public convenience and welfare after taking into account, where appropriate:

- (1) the location and nature of the proposed site including its size and configuration, the proposed size, scale and arrangement of structures, drives and parking areas and the proximity of existing dwellings and other structures.
- (2) the nature and intensity of the proposed use in relation to its site and the surrounding area. Operations in connection with special exception uses shall not be injurious to the neighborhood, shall be in harmony with the general purpose and intent of these Regulations, and shall not be more objectionable to nearby properties by reason of noise, fumes, vibration, artificial lighting or other potential disturbances to the health, safety or peaceful enjoyment of property than the public necessity demands.

2. RFA (B)(1): LOCATION AND SITE PLAN LOCATION SUMMARY WITH MAP

December 31, 2014

- 
- (3) the resulting traffic patterns, the adequacy of existing streets to accommodate the traffic associated with the proposed use, the adequacy of proposed off-street parking and loading, and the extent to which proposed driveways may cause a safety hazard, or traffic nuisance.
 - (4) the nature of the surrounding area and the extent to which the proposed use or feature might impair its present and future development.
 - (5) the Master Plan of the City of Stamford and all statements of the purpose and intent of these regulations.

b. In granting a Special Exception the reviewing board may attach reasonable conditions and safeguards as it deems necessary to protect the general health, safety, welfare and property values of the neighborhood. Failure to comply with any such conditions shall constitute a violation of these Regulations. At the discretion of the reviewing board, conditions may include but are not limited to those issues previously listed as well as the following:

- (1) Require shading of artificial light sources so that no direct rays fall on other than the subject property and to reduce glare from such sources.
- (2) Require screening of structure and/or parking areas of the premises or from streets by walls, fences, planting or other devices, size, type and location to be specified by the reviewing board.
- (3) Limit hours of operation.
- (4) Require rearrangement and re-design of buildings, structures, parking areas or driveways to minimize any adverse impact on the neighborhood.
- (5) Require landscaping of such type, number and size as necessary for sedimentation and erosion control, screening or enhancement of the property.
- (6) Provide that no Certificate of Occupancy shall be granted until certification is made to and approved by the reviewing board that the project has been completed and is in compliance with all conditions of approval.

c. Granting of a special exception pursuant to the provisions hereof, shall be deemed to authorize only the particular use, structure or feature shown on the application therefore and proper modifications, if any, in the reviewing board's decision. Any change in the plans for, enlargement in the size of, or change in the location of any structure, parking area or planned activity, or any enlargement in the size and intensity of the operation thereafter, shall require the further approval of the reviewing board.

N/A

d. Swim and/or Tennis Club Use. The Zoning Board of Appeals may by special exception permit the establishment of a swim and/or tennis club use not operated for profit in

2. RFA (B)(2): LOCATION AND SITE PLAN

AUTHORITY TO DO BUSINESS IN CONNECTICUT

- Compliance of State and Local Building, Fire and Zoning
- Life Safety Plan

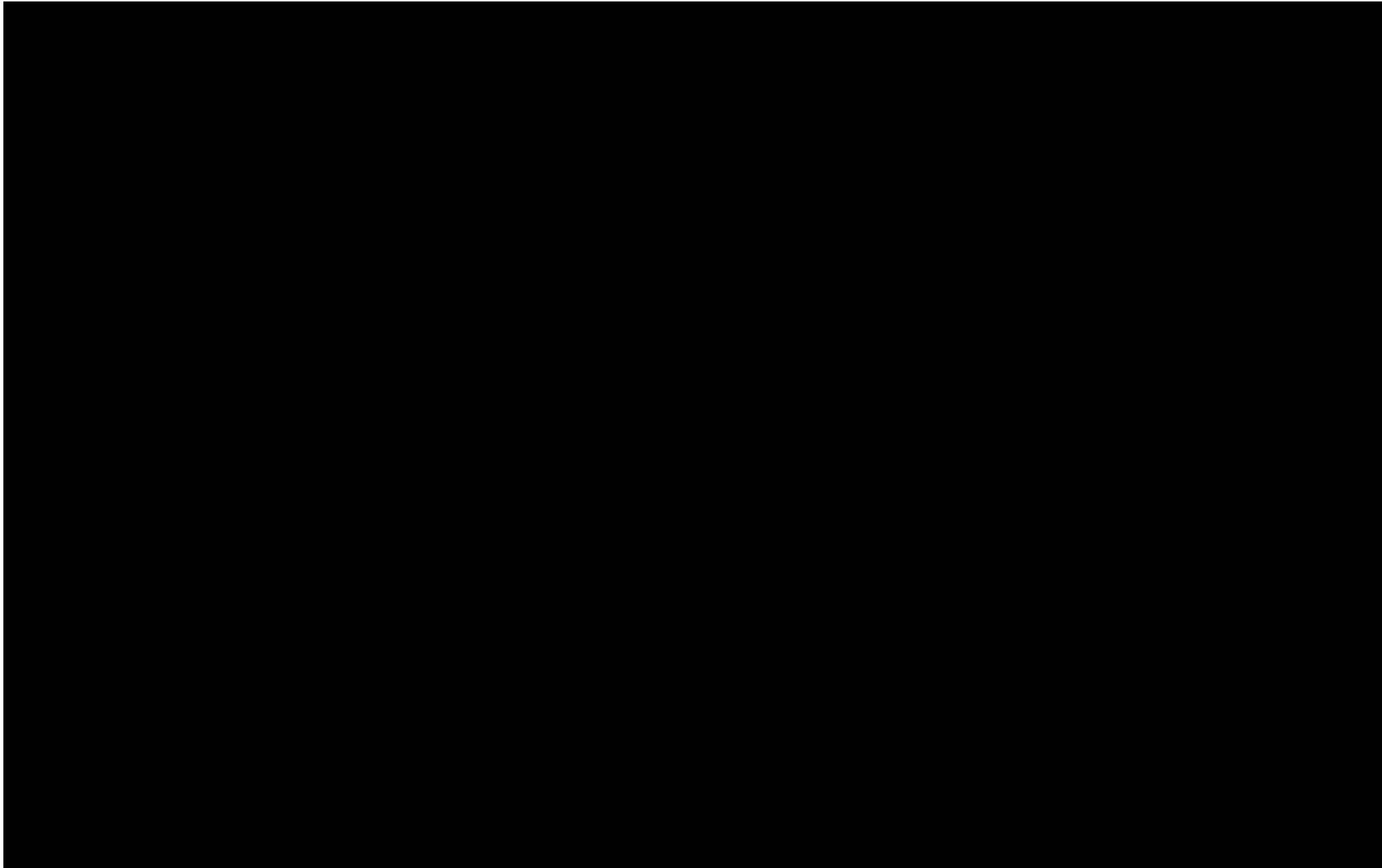
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“Provide documents sufficient to establish that the applicant is authorized to conduct business in Connecticut and that state and local building, fire and zoning requirements and local ordinances are met for the proposed location of the dispensary facility.”

.....

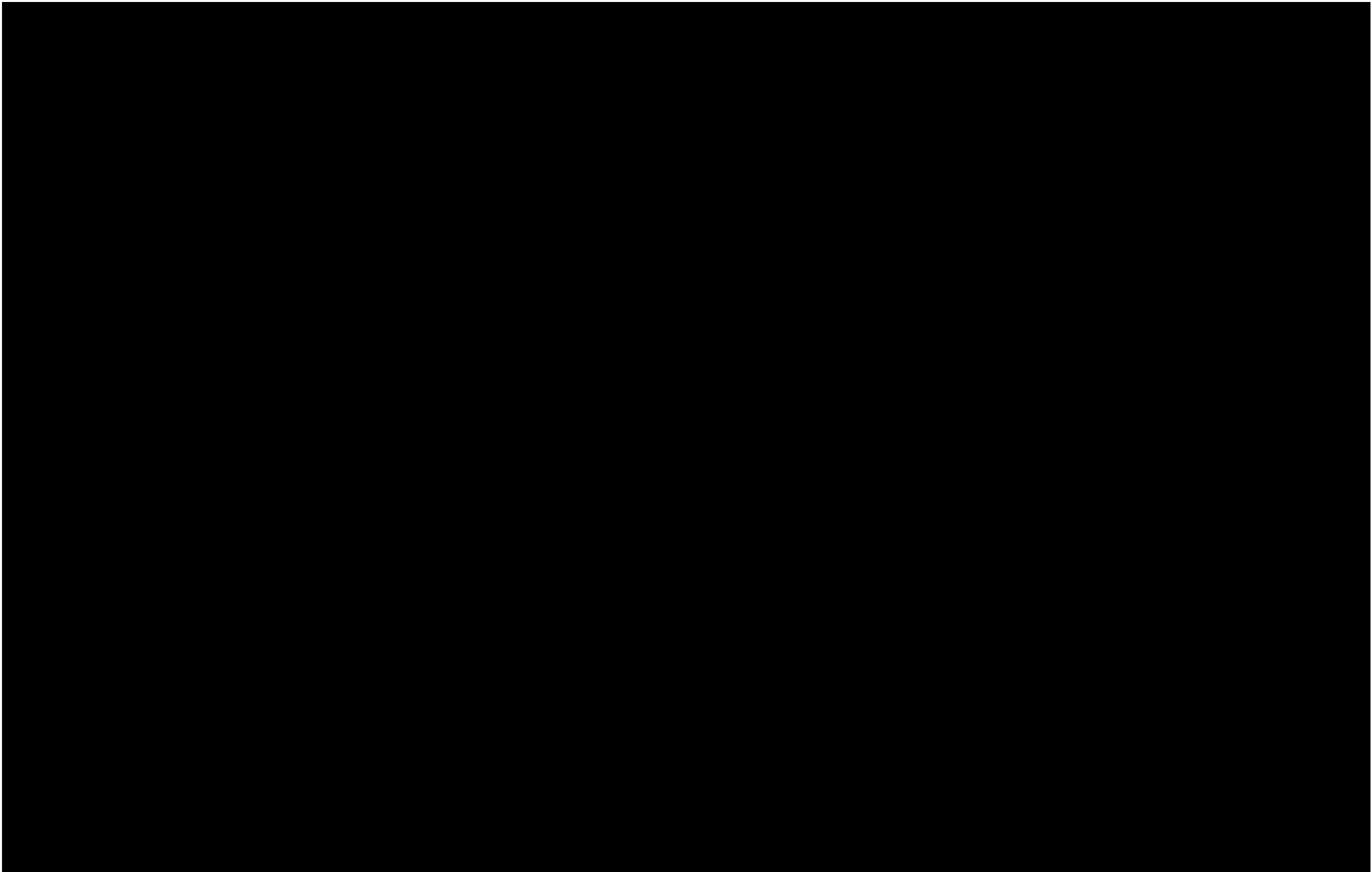
THIS PORTION OF THE RFA IS EXEMPT FROM DISCLOSURE UNDER THE FEDERAL FREEDOM OF INFORMATION ACT. FOR A FULL RATIONALE, PLEASE SEE COVER PAGE.

2. **RFA (B)(2): LOCATION AND SITE PLAN**
AUTHORITY TO DO BUSINESS IN CONNECTICUT
- Compliance of State and Local Building, Fire and Zoning



2. **RFA (B)(2): LOCATION AND SITE PLAN**
AUTHORITY TO DO BUSINESS IN CONNECTICUT

- Compliance of State and Local Building, Fire and Zoning
- Safety Plan Compliance



2. RFA (B)(3): LOCATION AND SITE PLAN

LANDLORD CONSENT OF USE

2. RFA (B)(3): LOCATION AND SITE PLAN

LANDLORD CONSENT OF USE

“Provide a written statement from the property owner and landlord certifying that they have consented to the applicant operating a dispensary facility on the premises.”

AMELAINE REALTY COMPANY, LLC
79 HIGH RIDGE ROAD
STAMFORD, CONNECTICUT 06905
203 324-5167
203 961-9207 (fax)

September 15, 2015

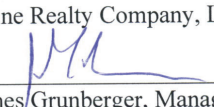
Connecticut Department of Consumer Protection
Drug Control Division
Medical Marijuana Program
165 Capitol Avenue, room 145
Hartford, CT 06106

RE: Application of Palliatech CT, LLC
Premises: 1034 High Ridge Road
Stamford, Connecticut 06905

Dear Sir or Madam:

Amelaine Realty Company, LLC is the owner of the real property known as 1034 High Ridge Road, Stamford, Connecticut 06905 (the “Property”). This letter will serve to confirm and certify to the Department of Consumer Protection (“DCP”) that in the event Palliatech CT, LLC is awarded a Medical Marijuana Dispensary Facility License for the Property, Amelaine Realty Company, LLC consents to Palliatech CT, LLC operating a medical marijuana dispensary facility on the Property in compliance with all statutes, laws and regulations governing such use.

Amelaine Realty Company, LLC,


By James Grunberger, Managing Member

2. RFA (B)(4): LOCATION AND SITE PLAN

EXTERIOR SIGNAGE RENDERINGS

2. RFA (B)(4): LOCATION AND SITE PLAN
EXTERIOR SIGNAGE RENDERINGS



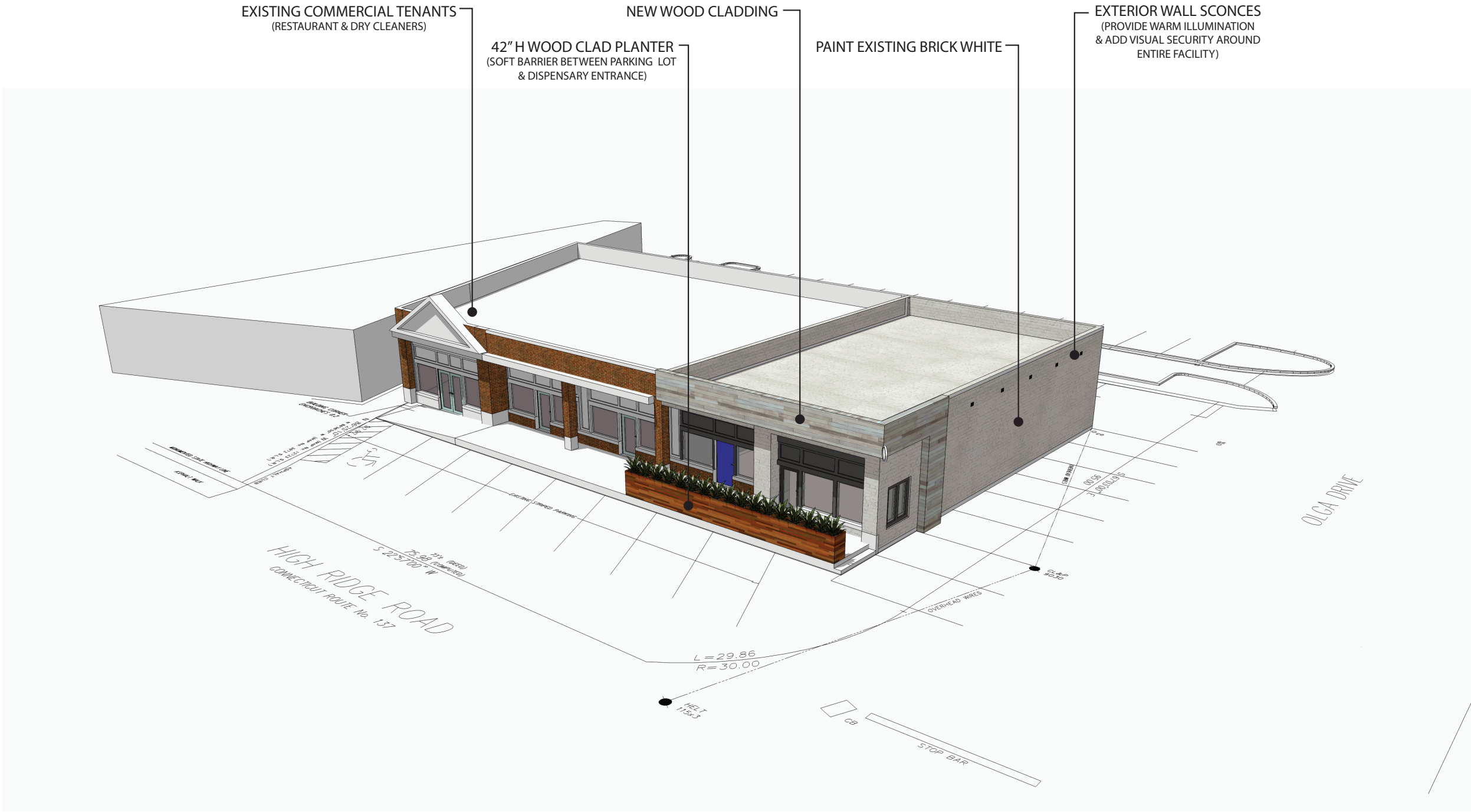
DISPENSARY EXTERIOR VIEW

2. RFA (B)(4): LOCATION AND SITE PLAN
EXTERIOR SIGNAGE RENDERINGS



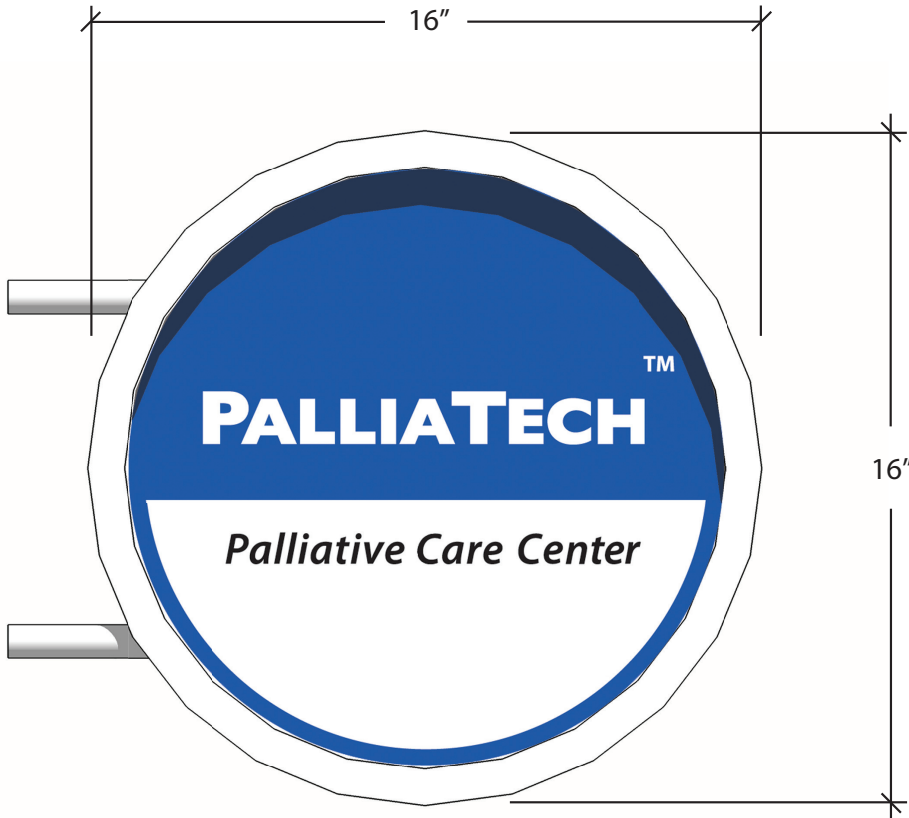
DISPENSARY EXTERIOR VIEW

2. RFA (B)(4): LOCATION AND SITE PLAN
EXTERIOR SIGNAGE RENDERINGS



DISPENSARY EXTERIOR VIEW

2. RFA (B)(6): LOCATION AND SITE PLAN
SITE PLAN



SIGNAGE FRONT VIEW
16" X 16"
(SIGNAGE IS NOT ILLUMINATED)



SIGNAGE AXON VIEW
4.5" THICKNESS
(SIGNAGE IS NOT ILLUMINATED)

EXTERIOR BUILDING SIGNAGE

Dispensary // 1034 High Ridge Rd., Stamford, CT 06905

2. RFA (B)(5): LOCATION AND SITE PLAN

SURROUNDING COMMUNITY PHOTOGRAPHS

2. RFA (B)(5): LOCATION AND SITE PLAN

SURROUNDING COMMUNITY PHOTOGRAPHS

“Provide photographs of the surrounding neighborhood and businesses sufficient to evaluate the proposed dispensary facility’s compatibility with commercial or residential structures already constructed, or under construction, within the immediate neighborhood.”



Other tenants at 1034 High Ridge Road



Southern view from Site



Property behind Site



Behind Site (adjacent)



Across street from Site (West)



Northern View

2. RFA (B)(5): LOCATION AND SITE PLAN

SURROUNDING COMMUNITY PHOTOGRAPHS



Southern view



Surrounding architecture



Surrounding architecture



Surrounding architecture



Surrounding architecture



Surrounding architecture



Surrounding architecture



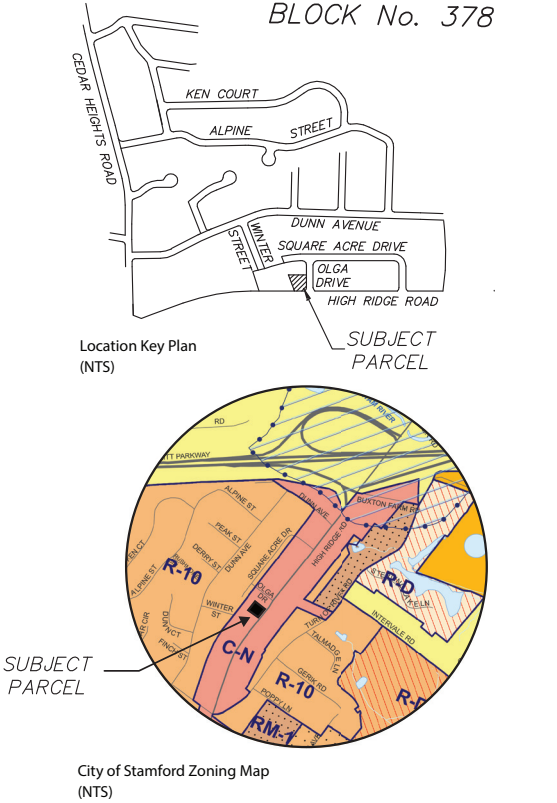
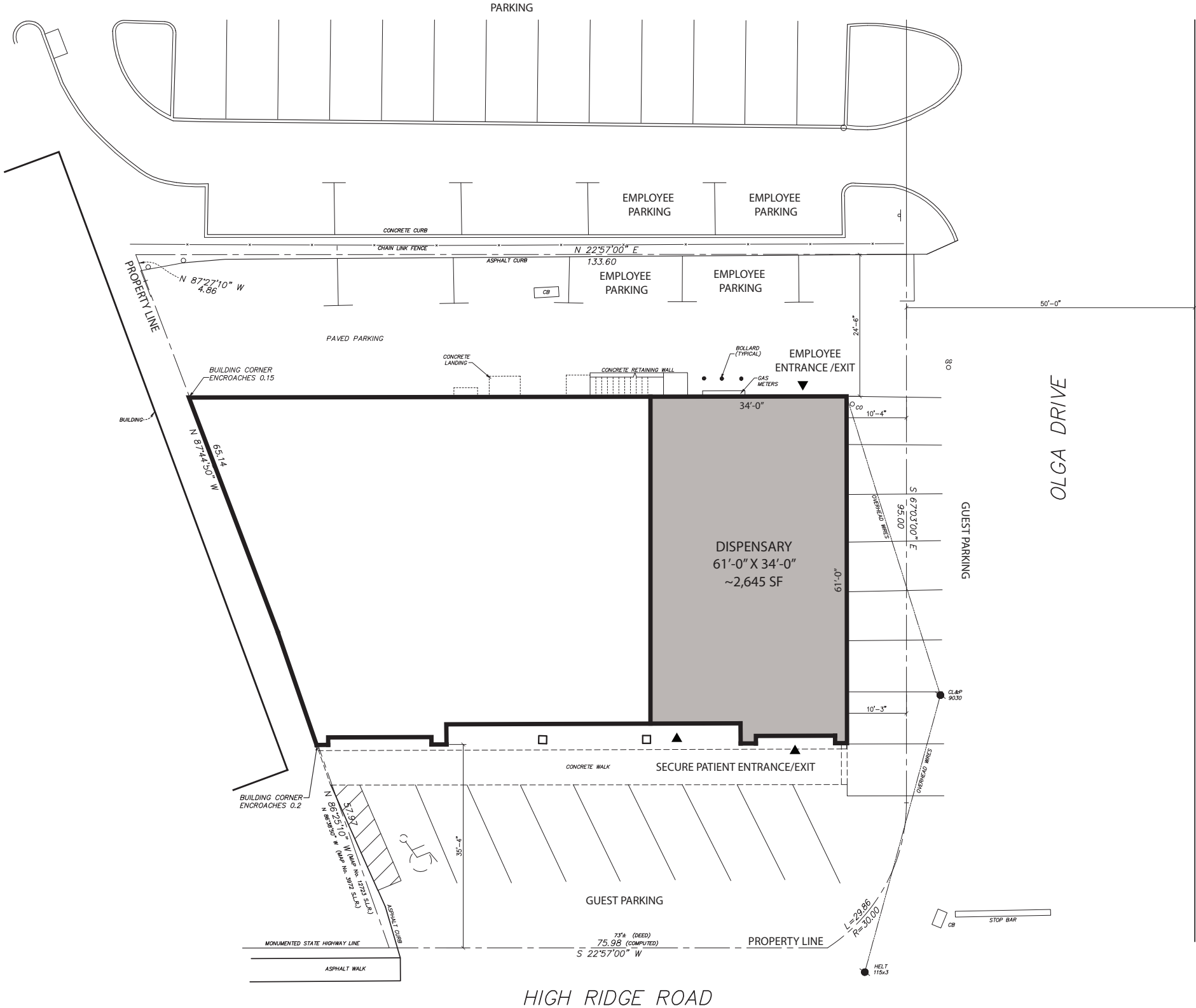
Surrounding architecture

2. RFA (B)(6): LOCATION AND SITE PLAN

SITE PLAN

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

2. RFA (B)(6): LOCATION AND SITE PLAN
SITE PLAN



SITE INFORMATION	
LOCATION	
Property Address	1034 High Ridge Rd., Stamford, CT 06905
Block Number:	378
Zoning District:	C-N Neighborhood Business
GENERAL	
Lot Area:	13,267 SF
Building Area:	5,961 SF
Building Eave:	311 SF
Total Area:	6,272 SF
Coverage:	47.3%
LEGEND	
	Dispensary
	Emergency Power Systems
	Exterior Fence
	Building Entrance / Exit

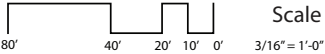


2. RFA (B)(6): LOCATION AND SITE PLAN
SITE PLAN



SITE INFORMATION	
LOCATION	
Property Address	1034 High Ridge Rd., Stamford, CT 06905
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Building Eave:	311 SF
Total Area:	6,272 SF
Coverage:	47.3%
LEGEND	
	Dispensary
	Emergency Power Systems
	Exterior Fence
	Building Entrance / Exit

DISPENSARY SITE PLAN



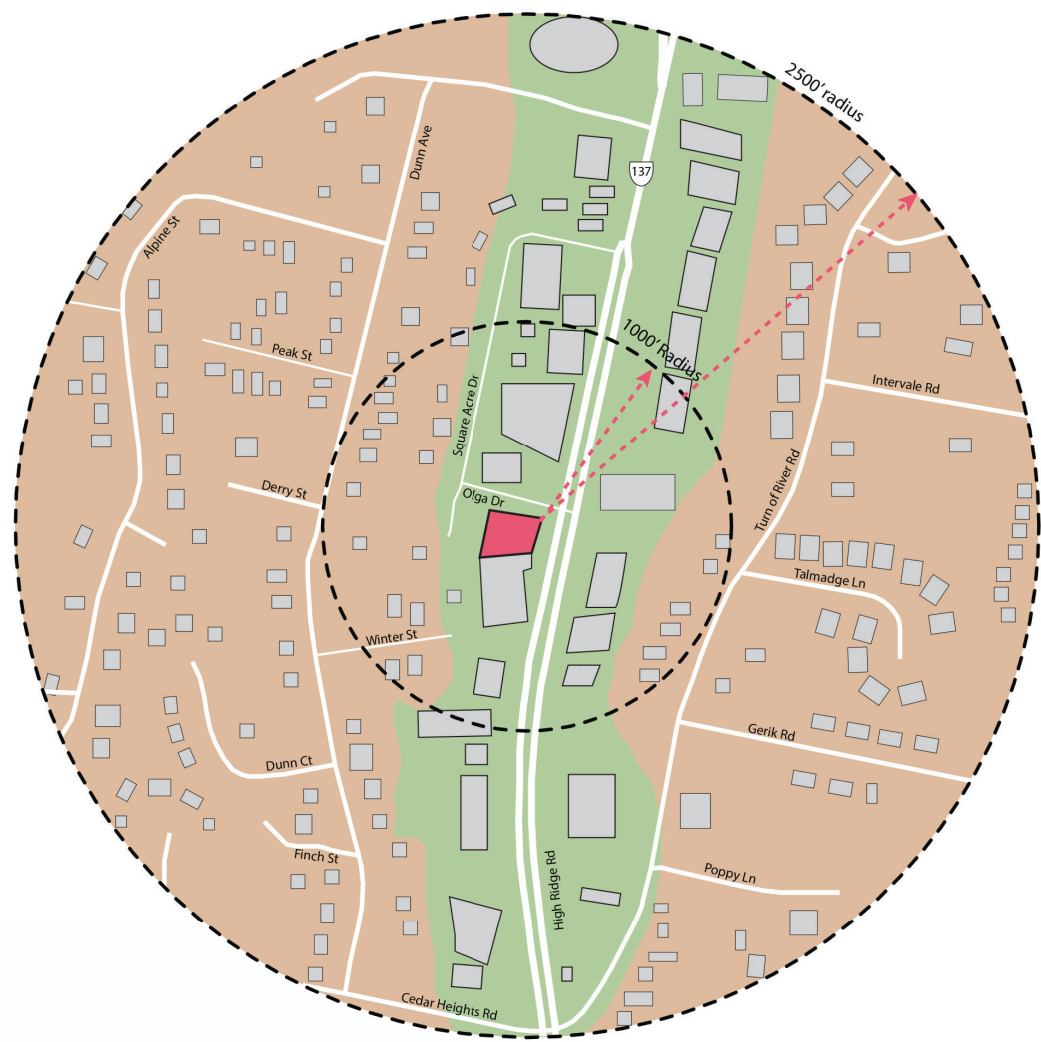
2. RFA (B)(7): LOCATION AND SITE PLAN

1,000 SF RADIUS MAP

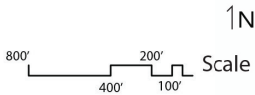
.....
"Provide a map that identifies all places used primarily for religious worship, public or private school, convent, charitable institution, whether supported by private or public funds, hospital or veterans' home or any camp or military establishment that are within 1000 feet of the proposed dispensary facility location."
.....

2. RFA (B)(7): LOCATION AND SITE PLAN
1,000 SF RADIUS MAP

There are **NO** 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 1034 High Ridge Road in Stamford.



LOCATION MAP KEY	
■	Proposed Site
■	Preschools (Public or Private)
■	Elementary Schools / Secondary Schools
■	Day Care Facilities
■	Residential (Zoned exclusively for Residential Use)
■	C-N Neighborhood Businesses Zoning District



2. RFA (B)(8): LOCATION AND SITE PLAN

DISPENSARY FLOOR PLAN

“ Provide a blueprint, or floor plan drawn to scale, of the proposed dispensary facility, which shall, at a minimum, show and identify the following:

MMP – Dispensary Facility RFA – June 2015 Page 6 of 12

- a. The location and square footage of the area which will constitute the dispensary department from which marijuana and marijuana products will be sold;
- b. The square footage of the overall dispensary facility;
- c. The square footage and location of areas used as storerooms or stockrooms within the dispensary department;
- d. The size of the counter that will be used for selling marijuana and marijuana products within the dispensary department;
- e. The location of the dispensary facility sink and refrigerator, if any;
- f. The location of all approved safes and approved vaults that will be used to store marijuana and marijuana products;
- g. The location of the toilet facilities;
- h. The location of a break room and location of personal belonging lockers;
- i. The location and size of patient counseling areas, if any;
- j. The locations where any other products or services, in addition to marijuana and marijuana products, will be offered, if any; and
- k. The location of all areas that may contain marijuana and marijuana products showing the location of walls, partitions, counters and all areas of ingress and egress.”

2. RFA (B)(8): LOCATION AND SITE PLAN
DISPENSARY FLOOR PLAN

DISPENSARY GROUND LEVEL

Building Information

Construction Type	Type I-B
Sprinklers	N/A
Building Height	Second Level: 10'-8" TOS
Building Area	2645SF
Use and Occupancy	Group M - Mercantile
Fire Resistive Ratings	
Structural Frame	2 HR
Bearing Walls - Exterior	2 HR
Bearing Walls - Interior	1 HR
Floor Construction	2 HR
Roof Construction	1 HR

* Roof supports: Fire resistance ratings of structural and bearing walls are permitted to be reduced by 1 HR where supporting the roof only.

Function of Space	Area	Area Per Occupant	Occupancy Classification	Occupancy Load
Retail Dispensary	2645 SF	60 SF	Mercantile	45
Total Occupant Load				45
Sprinkler Factor				0.15
Egress width Required				7"
Total Egress Provided				72"
Total # of Exits				2

Estimate of Code required number of Plumbing Fixtures

TABLE 403.1 MINIMUM NUMBER OF REQUIRED PLUMBING FIXTURES									
Mercantile (see Sections 403.2, 403.4, 403.4.1 and 403.4.2)	M	Retail stores, service stations, shops, bakeries, markets and shopping centers	1 per 500	1 per 300	1 per 750	1 per 750	—	1 per 1,000	1 service sink

* Separate facilities shall not be required in mercantile occupancies in which the maximum occupant load is 50 or less.

DOOR LEGEND

Main Entrance/Exit Door
Width: 3'-0"
Height: 6'-8"
Single Full Glass - Metal Frame
1 HR rating

2nd Entrance/Exit Door
Width: 6'-0" - (2) 3'-0" Doors
Height: 6'-8"
Double Flush / Metal Framing
1 HR rating

Interior Doors
Width: 3'-0"
Height: 6'-8"
Single Flush / Alumn. Framing
0 HR rating

LIFE SAFETY LEGEND

Exit Sign

2 HR Fire Wall / BLDG Separation

1 HR Fire Wall

Fire Extinguisher

5'-0" Radius

Existing Wall

New Wall

10'-0" Exterior Fence

Building Exit

The diagram is a detailed floor plan of the dispensary's first floor, focusing on life safety. It shows the following rooms and areas: MECH. (25 SF), two CONSULTATION rooms (110 SF each), a large OPEN AREA (250 SF), two ADA RESTROOMS (55 SF each), a CHECK IN area (60 SF), a DISPENSARY (228 SF), a PATIENT WAITING AREA (155 SF), an ENTRANCE FOYER (123 SF), and an ADA LIFT. The plan includes three fire exits, each with a 3'-0" wide door. Dashed lines indicate egress paths. A 5' radius circle is shown near the ADA lift. Stairs are labeled 'DN.' (down). A 3'-6" dimension is noted near the ADA restrooms. The plan also shows existing and new walls, and a 10'-0" exterior fence line.

DISPENSARY FIRST FLOOR LIFE SAFETY PLAN

Scale
10' 5' 1' 0' 3/16" = 1'-0"

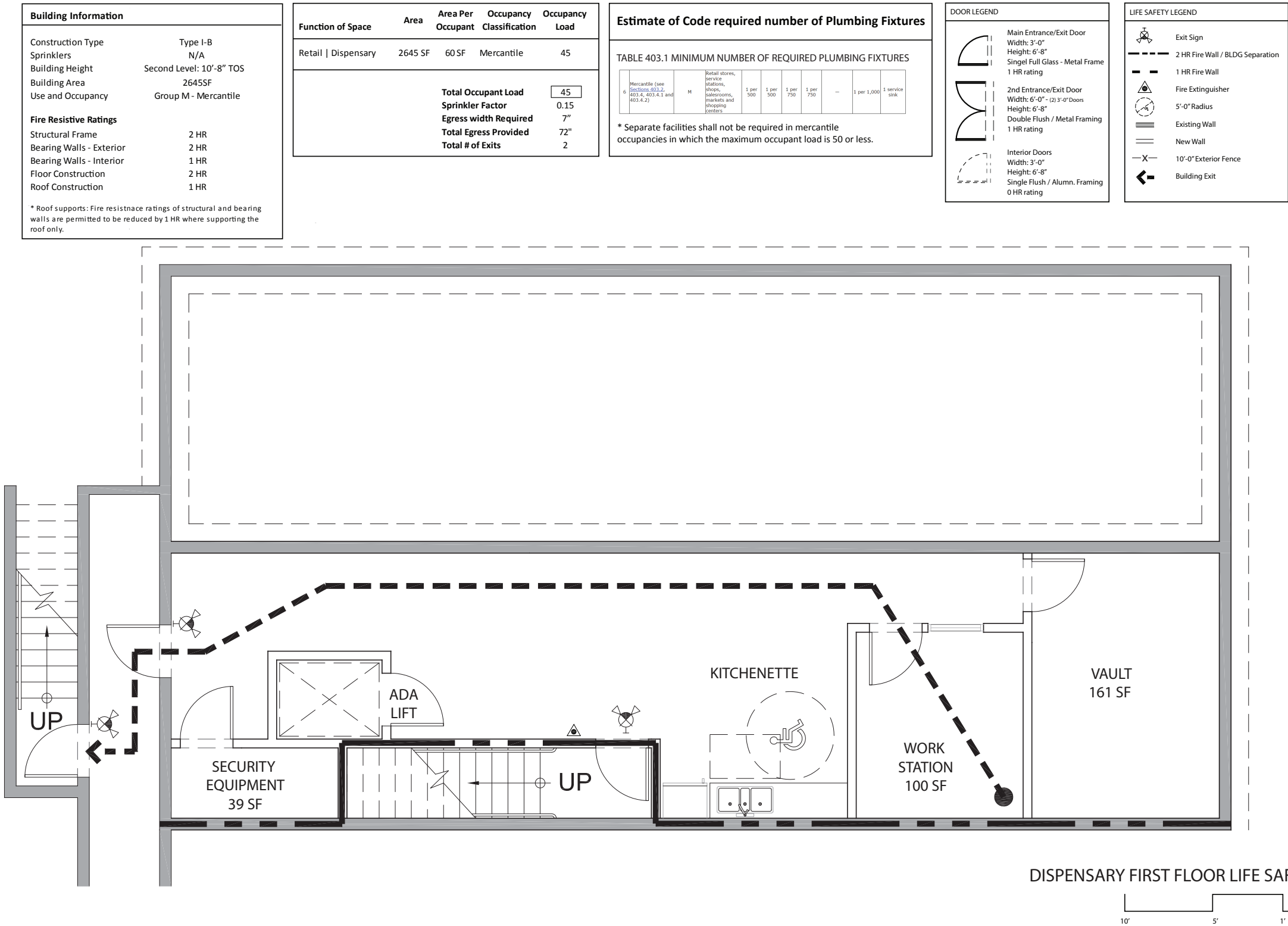
State of Connecticut - Medical Marijuana Dispensary Facility License Application

Dispensary // 1034 High Ridge Rd., Stamford, CT 06905

PALLIATECH | RFA Submission for Medical Marijuana Dispensary Facility License | 262

2. RFA (B)(8): LOCATION AND SITE PLAN
DISPENSARY FLOOR PLAN

DISPENSARY BASEMENT FLOOR PLAN



MEDICAL MARIJUANA DISPENSARY FACILITY LICENSE APPLICATION
STATE OF CONNECTICUT- DEPARTMENT OF CONSUMER PROTECTION



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3. PROPOSED BUSINESS PLAN

BUSINESS PLAN OVERVIEW

3. PROPOSED BUSINESS PLAN

BUSINESS PLAN OVERVIEW

When PalliaTech opens a dispensary, it makes a number of promises to its community of patients, neighbors and neighborhood. In addition to relying on field-tested standard operating procedures, the Company institutes various programs that assure that it delivers on the promise to its community.

1. PalliaTech will go the extra mile to assure that its medicines are available to all Connecticut qualified patients, regardless of their disability.
 - PalliaChatSM: By employing our branded, digital follow up conferencing tool, patients and their caregivers will have access to a fifteen minute digital appointment with a PalliaTech pharmacist, counselor or other medical marijuana professional. In addition to its other benefits, this will assist those patients relying on caregivers to develop a consultative, one-on-one relationship with a PalliaTech counselor.
 - PalliaTech will also offer curb-side assistance to any patient in need of additional help into our ADA-compliant facility.

(For further discussion, see section **“Description of Services”** in this section below)

2. Like all state-of-the-art medicine dispensaries, PalliaTech systems assure total control over who has access to sensitive areas. Those systems include:
 - A Visitor Management System (VMS) will be employed to ID each visitor and employee to track all their movements in the facility and restrict access to any area of the facility to which they should not have access;
 - We employ a digitally-tracked employee access key card system;
 - We have both a Master Vault (accessed only by the Pharmacist and Security Officer) and a Fulfillment Vault (accessed only by Dispensary Agents) to track and monitor sensitive areas;
 - The physical features of the dispensary require immediate check in at the door before allowing any access to the facility.

(For further discussion, see section **“Facility Access Plan”** in this section below)

3. PalliaTech understands that true palliative care includes treating the mind, body and spirit. We have developed a holistic approach to treatment that includes:
 - Free massage services;
 - Free yoga and meditation classes;
 - Access to an on-going medical marijuana seminar series aimed at patient wellness; and
 - Subsidized counseling services

(For further discussion, see section **“Description of Services”** in this section below)

4. Our training program is focused on delivering the very best patient care and that care includes the prevention of dispensing errors and protection against diversion and theft of medicine.
 - As part of their orientation, each employee receives multi-tiered training on the importance of accuracy and prevention of diversion
 - i. Access to our operating manual and internally-developed BioTrack Quick Guide and training videos;
 - ii. Two hour interactive vendor training on our tracking software, BiotrackTHC; and
 - iii. After-training, review and compliance testing with Director of HR.

(For further discussion, see section **“Training and Continuing Education”** in this section below)

3. PROPOSED BUSINESS PLAN

BUSINESS PLAN OVERVIEW

5. PalliaTech is mindful of both its internal and external physical environment. As such it employed the following systems to prevent off-site odors
- PalliaTech CT, LLC will install a commercial grade, activated carbon, air purification system in its Connecticut dispensary. Activated carbon is recognized as the safest and most efficient way to treat airborne chemicals, gaseous pollutants and fumes.
- (For further discussion, see section **"Description of Air Treatment Systems"** in this section below)

PalliaTech's operating plan is a plan to execute on good citizenship and patient-service.

3. RFA (C)(1): PROPOSED BUSINESS PLAN
DESCRIPTION OF NON-MARIJUANA PRODUCTS TO BE SOLD

3. RFA (C)(1): PROPOSED BUSINESS PLAN

DESCRIPTION OF NON-MARIJUANA PRODUCTS TO BE SOLD

“Provide a detailed description of all products, aside from marijuana and marijuana products, intended to be offered by the dispensary facility during the first year of operation.”

PALLIATECH

DELIVERY PRODUCTS

The following are detailed descriptions of the Products that will be offered.

VAPORIZERS		
	PT 1000 Medical Device: Safe, Effective <ul style="list-style-type: none"> A new vaporizer drug delivery system built to exacting medical standards Patented technology for smokeless, single-dose administration of cannabinoid medicines Metered, sterile dosing of plant material and cannabinoid oils High tech thermal and flow controls ensure medical-standard vaporization without combustion 	
	Volcano Digital The VOLCANO DIGIT Vaporizer with the EASY VALVE is the ultimate Vaporization System. The VOLCANO Vaporization System consists of a hot air generator - the vaporizer - and a valve system, the EASY VALVE or the SOLID VALVE.	Balloon & Whip Delivery
	Extreme Q The Extreme Q is the latest tabletop model released by Arizer. It has an improved, quieter fan, “midnight chrome” finish, three heat sensors, reinforced internals, and 50% more energy efficient, and THREE year warranty.	Balloon & Whip Delivery
	Firefly The Firefly portable vaporizer heats instantly using dynamic convection technology and delivers pure vapor and pure flavor, with no plastics in the airpath. Its sophisticated electronics ensure reliable digital temperature control to vaporization without burning. It is equipped with a swappable and fast-charging lithium-ion battery for continuous use.	Portable





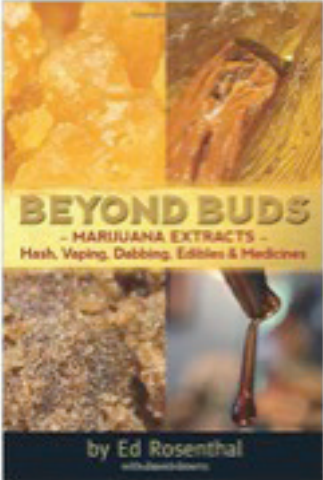

3. RFA (C)(1): PROPOSED BUSINESS PLAN

DESCRIPTION OF NON-MARIJUANA PRODUCTS TO BE SOLD

	<p>Pax</p> <p>Pax Vaporizer is a premium portable vaporizer that conveniently fits in your pocket and delivers pure, clean vapor. Small and lightweight, Pax is easily taken out and about and heats in under a minute. Its refined design is sleek, stylish, and durable, making Pax the ultimate choice for on-the-go vaporization.</p>	<p>Portable</p>
	<p>G Pen</p> <p>The G Pro Vaporizer features three variable temperature settings, enabling a uniquely-fitted vaping experience. Durable in design and sophisticated in aesthetic, the G Pro's internal structure is comprised of a heavy duty, stainless steel heating chamber that releases the active ingredients in botanicals without the harmful byproducts caused by traditional methods.</p>	<p>Pen Style Portable</p>
GRINDERS		
	<p>Groove by Aerospaced</p> <ul style="list-style-type: none"> • CNC milled from solid aluminum block • Lifetime warranty • Anodized coating on colors for extra durability • Razor sharp teeth • Pollen catcher • Includes pollen scraper • Carrying pouch 	<p>Portable</p>
	<p>1.6" 4-Piece Small Grinder & Sifter</p>	<p>Portable</p>
	<p>2" 4-Piece Medium Grinder & Sifter</p>	<p>Portable</p>
	<p>2.5" 4-Piece Large Grinder & Sifter</p>	<p>Portable</p>

3. RFA (C)(1): PROPOSED BUSINESS PLAN

DESCRIPTION OF NON-MARIJUANA PRODUCTS TO BE SOLD

			<p>We will be carrying an assortment of pipes and water pipes.</p>
			<p>We will carry a variety of educational books relevant to the medical marijuana industry.</p>

3. RFA (C)(2): PROPOSED BUSINESS PLAN
DESCRIPTION OF SERVICES TO BE OFFERED

3. RFA (C)(2): PROPOSED BUSINESS PLAN

DESCRIPTION OF SERVICES TO BE OFFERED

“Provide a detailed description of all services to be offered by the dispensary facility during the first year of operation.”

PALLIA TECH CONNECTICUT DISPENSARY SERVICES

PalliaTech understands that to truly improve the quality of life for its Connecticut patients, the dispensary must deliver a treatment that includes care for the mind, body and spirit. Total focus is on improving patient quality of life.

PalliaTech's Connecticut dispensary will offer a full range of services that address the pain and medicine side-effects of curative treatment as well as the emotional challenges associated with living with serious illness. All non-medical marijuana services will be available to not only PalliaTech's patients, but to their caretakers and loved ones as well.

In addition to offering an array of products (as described in the attached Product Sheet), PalliaTech Connecticut will also provide patients, physicians and Connecticut's medical marijuana industry four exciting PalliaTech programs:

- PalliaWellSM
- PalliaChatSM
- PalliaTech Seminar Series
- PalliaTech Connecticut's Compassionate Need Program

PALLIAWELLSM

The Company's PalliaWell program will include three primary services:

- Free Massage Services
- Free Yoga and Meditation Classes
- Subsidized Counseling Services

Free Massage Services

Massage therapy calms the mind and promotes an atmosphere of peace, harmony, and healing. All PalliaTech patients will be entitled to a free 10 minute chair massage each time they visit PalliaTech's Connecticut Dispensary.

Free Yoga Classes

Patients and their caregivers and loved ones endure the relentless stress of coping with serious illness. Breathing and stretching will help those in the PalliaTech patient-family better live with the tribulations associated with sickness.

PalliaTech will offer a variety of weekly classes for patients and their loved ones to relax and enjoy some quality of life time within the comforting four walls of the PalliaTech dispensary.

Subsidized Therapy and Counseling Services

PalliaTech Connecticut will offer subsidized medical office space for psychiatrists, psychologists, acupuncturists and other therapists who specialize in treating seriously ill patients. These therapists will be required to pass the PalliaTech subsidy along to Connecticut patients.

3. RFA (C)(2): PROPOSED BUSINESS PLAN

DESCRIPTION OF SERVICES TO BE OFFERED

PALLIACHATSM

The PalliaChatSM Program:

PalliaTech understands that there are numerous situations where a patient or caregiver may have a question or concern after they have left the dispensary. Our “PalliaChatSM” service will allow each patient the opportunity for that one-on-one conversation with a PalliaTech professional, even if they are physically unable to leave their home.

Using digital conferencing, the PalliaTech dispensary will utilize its PalliaChatSM service to foster a healthy, ongoing and healing relationship with its patients.

What is PalliaChatSM

Using either FaceTime or Skype platforms, patients will be encouraged to set up periodic digital conferencing.

- Each time a patient visits our PalliaTech dispensary, the patient will be asked to set up a one week follow up visit using (at the patient's option) FaceTime, Skype or phone conferencing.
- The approximately fifteen minute digital conference will be held with a PalliaTech pharmacist, counselor or other medical marijuana professional.
- Patients who pick up their medicine via caretakers will be asked to set up a conference within 24 hours of medicine pickup.
- Additionally, for more urgent matters, our Pharmacist will be available, free of charge, via live Video Chat to all patients registered at our Dispensary, as well as their caregivers.

PALLIATECH SEMINARS

PalliaTech will conduct a series of industry seminars to educate and promote the advancement of Connecticut's dialogue within Connecticut's medical marijuana industry. Speakers will include law enforcement and security professionals, pharmacists, physicians scientists and industry experts.

Sample Seminars:

- **Connecticut Medical Marijuana Law Overview/ How To Register as a Connecticut Patient:** Overview of Connecticut General Statutes, Chapter 420f, Section 21a-408.
- **The Pharmacology of Cannabis:** seminar focuses on the clinical pharmacology of cannabis, medicines containing cannabis extracts and some products containing synthetic cannabinoids. We will start off by describing the pharmacological effects of cannabis consumption on several different physiological systems.
- **The Doctor-MMJ Patient Relationship:** the necessity of maintaining a bona fide doctor-to-patient relationship, the pros and cons of recommending cannabis as an alternative medicine, legalities and compliance surrounding medical marijuana in Massachusetts, and the process of writing a recommendation for a patient in the Commonwealth. Additionally, there was a brief segment that outlined the proper training a doctor would need to endure in order to become certified to issue authorizations for a patient suffering from a qualifying condition.
- **Connecticut and Federal Law Compliance in the Medical Marijuana Industry:** focuses on the clinical pharmacology of cannabis, medicines containing cannabis extracts and some products containing synthetic cannabinoids. We will start off by describing the pharmacological effects of cannabis consumption on several different physiological systems.
- **Cannabis Dosing Guidelines-THC and other Cannabinoids:** covers a variety of scientific and historical facts regarding the medicinal use of cannabis and the endocannabinoid system. A method that can be used to approximate THC consumption will be addressed.

3. **RFA (C)(2): PROPOSED BUSINESS PLAN**

DESCRIPTION OF SERVICES TO BE OFFERED

- **Compliance, HIPAA and the Medical Marijuana Industry:** seminar discusses writing recommendations, HIPAA rules, privacy, consent forms and other physician compliance with respect to the medical marijuana industry.
- **Diversion and Other Operational Challenges in the Medical Marijuana Industry:** seminar discusses the relationship between Connecticut dispensaries and patient monitoring, follow up substance abuse issues and other developing challenges in the medical marijuana industry. The seminar concludes with a problem-solving dialogue between physicians and dispensary operators.

COMPASSIONATE NEED PROGRAM

PalliaTech's Compassionate Need Program will provide financial assistance to its neediest patients. Patients whose income is at or below the poverty line will receive subsidized medicine, and patients whose income is 25% below the poverty line will be eligible to receive FREE medicine. (Please see Bonus Points TAB F for a more detailed description of the plan.

3. RFA (C)(3): PROPOSED BUSINESS PLAN
FACILITY ACCESS PLAN

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3. RFA (C)(3): PROPOSED BUSINESS PLAN FACILITY ACCESS PLAN

“Provide a detailed description of the process that a dispensary facility will take to ensure that access to the dispensary facility premises will be limited only to employees, qualifying patients and primary caregivers”.

[illegible]

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3. RFA (C)(4): PROPOSED BUSINESS PLAN
ACCESSIBILITY FEATURES BEYOND ADA REQUIREMENTS

3. RFA (C)(4): PROPOSED BUSINESS PLAN

ACCESSIBILITY FEATURES BEYOND ADA REQUIREMENTS

“A detailed description of the features, if any, that will provide accessibility to qualifying patients and primary caregivers beyond what is required by the Americans with Disabilities Act.”

PalliaTech will go the extra mile to assure that its medicines are available to all Connecticut qualified patients, regardless of their disability. Toward that end, PalliaTech has created two programs aimed at the disabled to help these patients benefit from a full range of PalliaTech services.

They are:

- PalliaChatSM: By employing our branded, digital follow up conferencing tool, patients and their caregivers will have access to a fifteen minute digital appointment with a PalliaTech pharmacist, counselor or other medical marijuana professional. In addition to its other benefits, this will assist those patients relying on caregivers to develop a consultative, one-on-one relationship with a PalliaTech counselor. PalliaChatsm is also a follow-up tool especially designed for patients who have difficulty leaving their home. Via PalliaChatsm, consultants and patients can easily communicate and eliminate any barriers to follow-up that might be associated with a severely disabled patient making repeated trips to a dispensary.
- PalliaTech will have an automatic door system, allowing the dispensary staff to open the door from inside with the touch of a button for patients who have difficulty doing so themselves.
- PalliaTech will also offer curbside assistance to any ambulatory patient in need of additional help entering our ADA-compliant facility. At their orientation, patients are given a phone number and email address from which to contact the dispensary. If the patient requires additional assistance from their vehicle into the dispensary, they need only call the dispensary and a PalliaTech employee will assist.

3. RFA (C)(5): PROPOSED BUSINESS PLAN
DESCRIPTION OF AIR TREATMENT SYSTEMS

3. RFA (C)(5): PROPOSED BUSINESS PLAN

DESCRIPTION OF AIR TREATMENT SYSTEMS

.....

“Provide a detailed description of any air treatment or other system that will be installed and used to reduce off-site odors.”

.....

PalliaTech’s Connecticut dispensary will install a commercial grade, activated carbon, air purification system. Activated carbon is recognized as the safest and most efficient way to treat airborne chemicals, gaseous pollutants, fumes, etc. In this application, for a medical dispensary environment, the filtration system would remove mold spores and strong odors from the air. Similar systems are used airports, hospitals, research facilities, nursing homes and health care facilities.

3. RFA (C)(6): PROPOSED BUSINESS PLAN
MARIJUANA DELIVERY PROCEDURES

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3. RFA (C)(6): PROPOSED BUSINESS PLAN MARIJUANA DELIVERY PROCEDURES

.....
"A detailed description of the process by which marijuana and marijuana products
will be delivered to a dispensary facility from the producer"
.....

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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3. RFA (C)(7): PROPOSED BUSINESS PLAN
EMPLOYEE TRAINING AND CONTINUING EDUCATION

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THE FEDERAL FREEDOM OF INFORMATION ACT**

3. RFA (C)(7): PROPOSED BUSINESS PLAN

Sec. 21a-408-44. Dispensary technician training

Sec. 21a-408-45. Dispensary facility employee training. Employee records

“Provide a detailed description of the training and continuing education opportunities that will be provided to dispensary facility employees.”

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

- | Category | Percentage |
|------------|------------|
| Category 1 | 100% |
| Category 2 | 75% |
| Category 3 | 90% |

- _____

-
- | Service | Percentage |
|----------------|------------|
| Online banking | 95% |
| Mobile banking | 85% |
| ATM | 75% |
| Branch | 65% |
| Phone banking | 55% |
| Social media | 45% |
| Mobile app | 35% |

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3. RFA (C)(7): PROPOSED BUSINESS PLAN

EMPLOYEE TRAINING AND CONTINUING EDUCATION

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

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3. RFA (C)(7): PROPOSED BUSINESS PLAN

- Horizontal bar chart showing the percentage of respondents by age group who believe the U.S. should take more action to address climate change. The Y-axis lists age groups, and the X-axis shows percentages from 0% to 100%.

Age Group	Percentage
18-29	90%
30-49	85%
50-64	75%
65+	60%

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3. RFA (C)(7): PROPOSED BUSINESS PLAN

EMPLOYEE TRAINING AND CONTINUING EDUCATION

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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3. RFA (C)(7): PROPOSED BUSINESS PLAN

EMPLOYEE TRAINING AND CONTINUING EDUCATION

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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3. RFA (C)(8): PROPOSED BUSINESS PLAN
SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES

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3. RFA (C)(8): PROPOSED BUSINESS PLAN

SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES

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

[illegible]

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3.

SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES

[illegible]

3. RFA (C)(8): PROPOSED BUSINESS PLAN

SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

3. RFA (C)(8): PROPOSED BUSINESS PLAN
SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES



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3. RFA (C)(8): PROPOSED BUSINESS PLAN

SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES

Row	Bar Length (approx. % of total width)
1	75
2	98
3	95
4	98
5	95
6	95
7	10
8	10
9	10
10	55
11	95
12	15
13	10
14	15
15	65
16	60
17	70
18	25
19	5
20	55
21	60

[REDACTED]

[REDACTED]

3.

SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES

[REDACTED]

[REDACTED]

3. RFA (C)(8): PROPOSED BUSINESS PLAN

SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES

[REDACTED]

[REDACTED]

-
- | Government | Percentage |
|---------------------|------------|
| Current government | 45% |
| Previous government | 55% |

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 36. *Journal of Management Studies*, 1996, 33(1), 559-574.
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3. RFA (C)(8): PROPOSED BUSINESS PLAN

SUMMARY OF DIVERSION AND THEFT PREVENTION PROCEDURES

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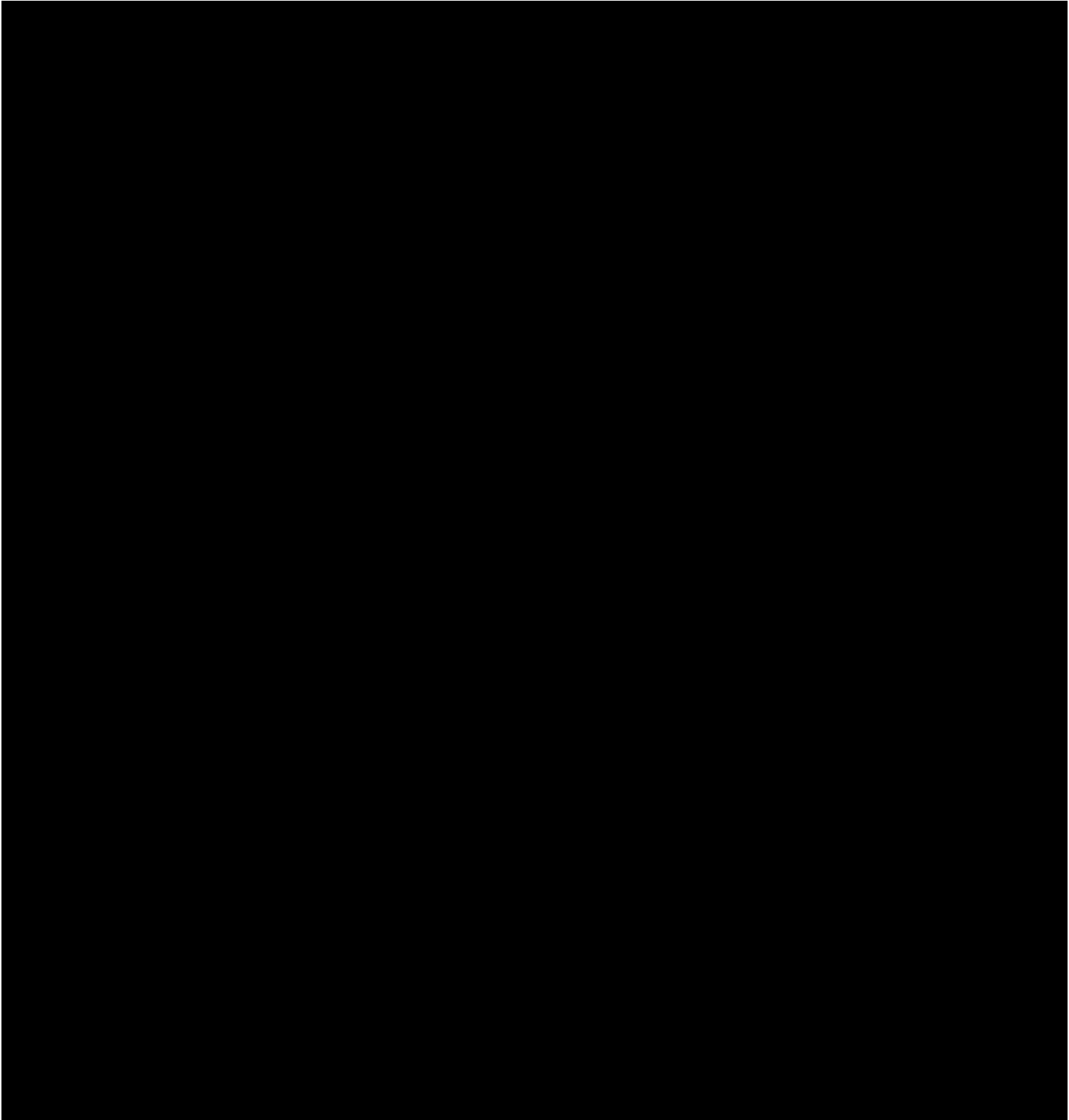
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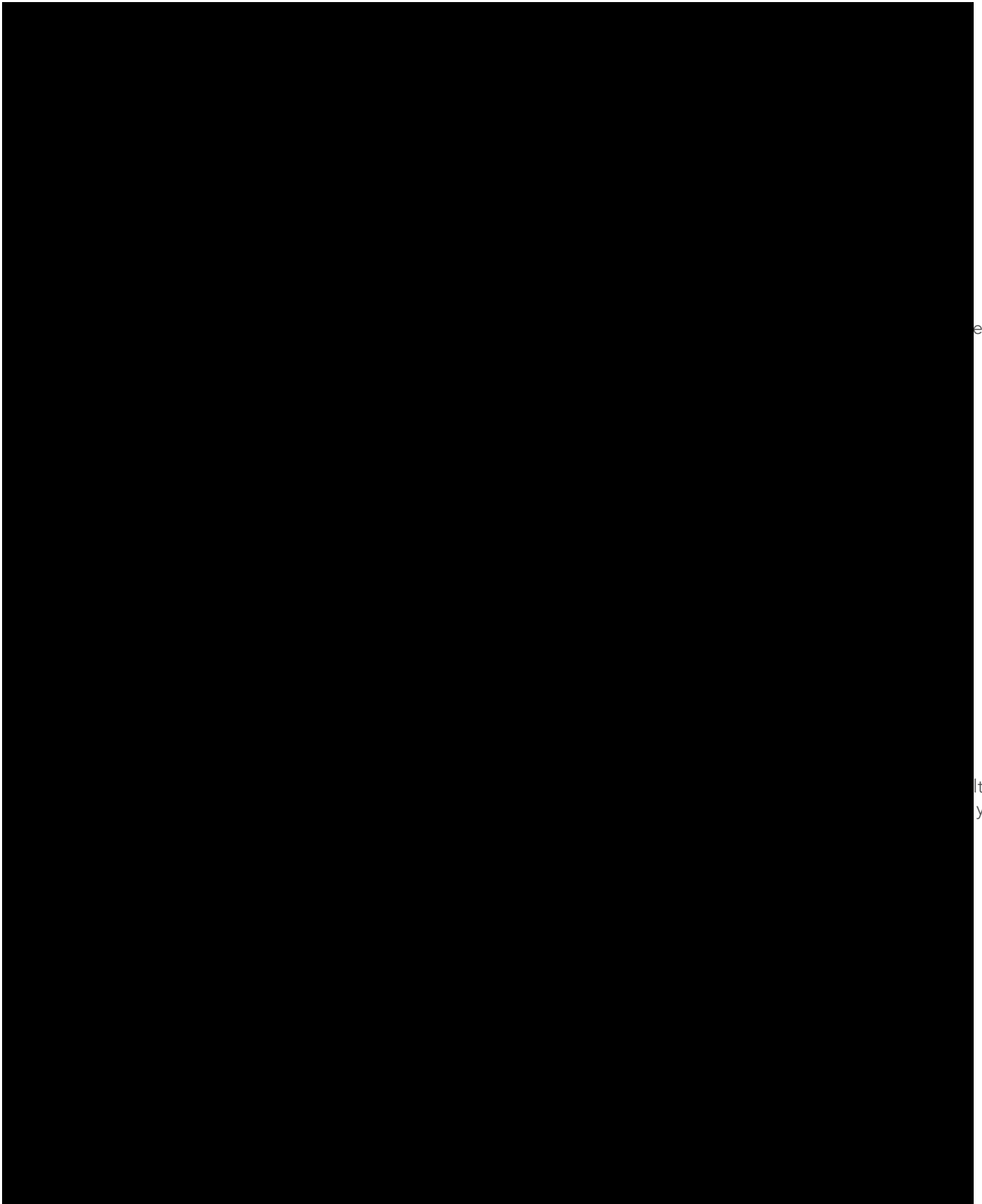
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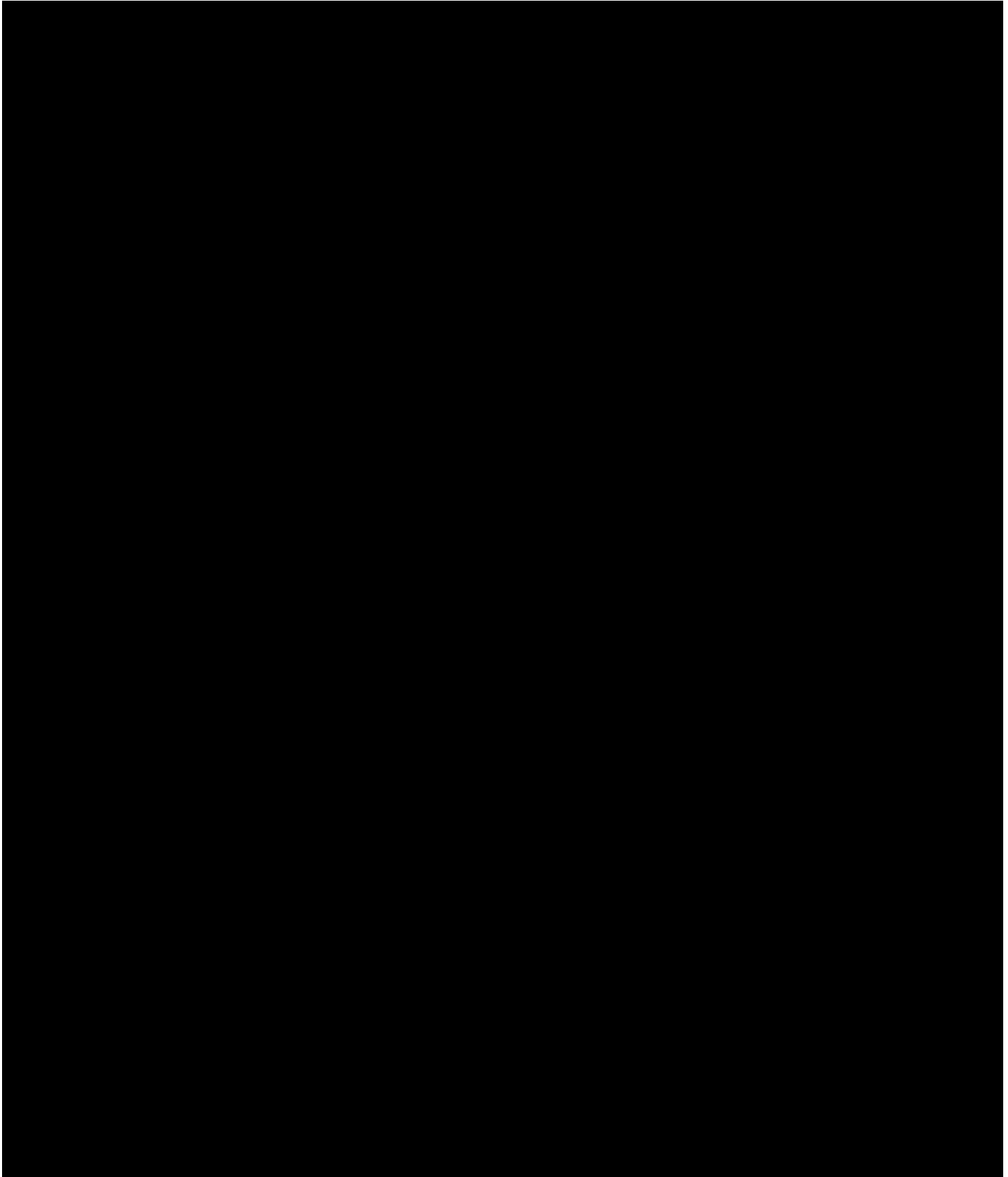
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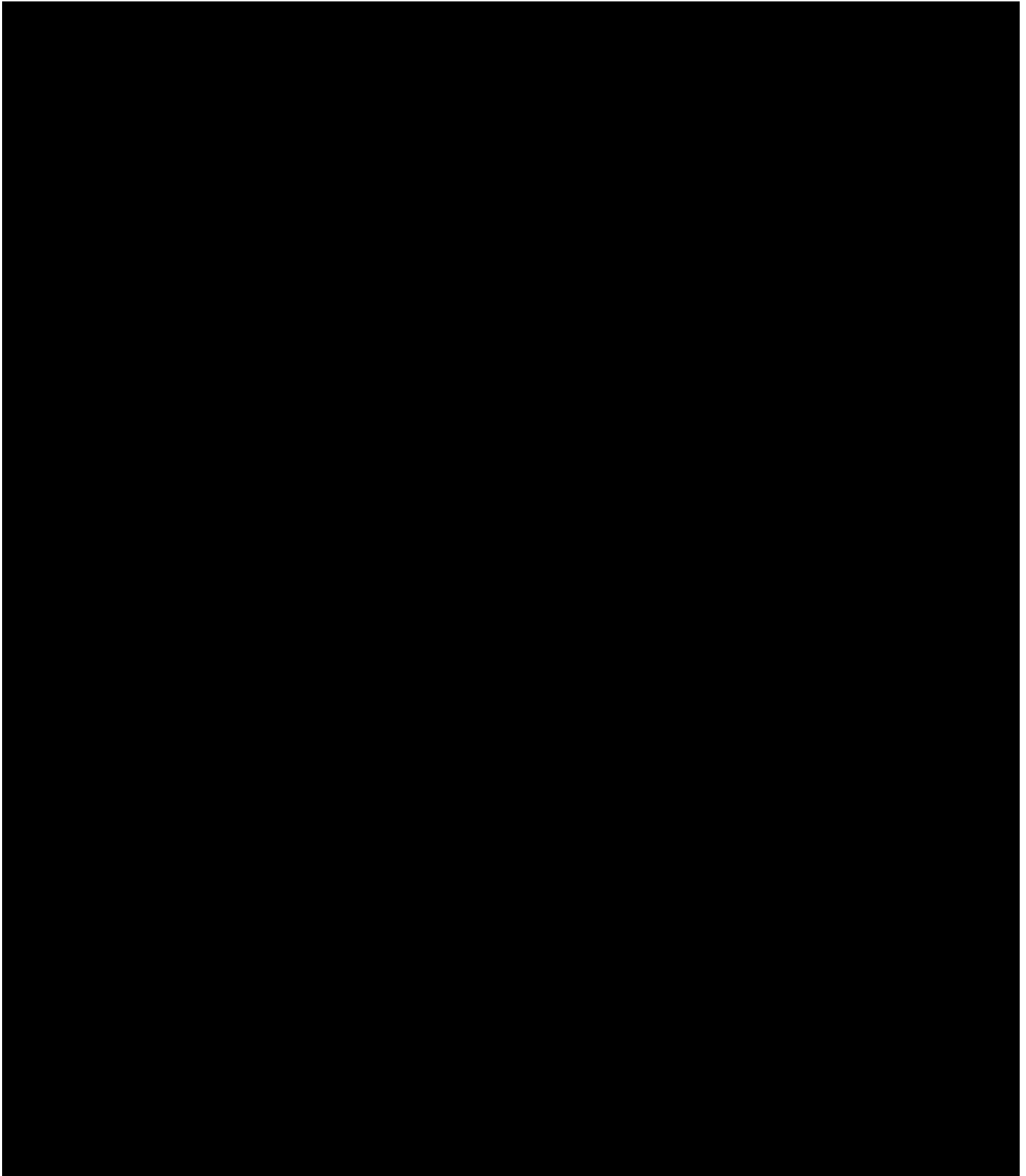
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3. RFA: PROPOSED BUSINESS PLAN

MISCELLANEOUS OPERATING PROCEDURES

3. RFA: PROPOSED BUSINESS PLAN

MISCELLANEOUS OPERATING PROCEDURES

In addition to the policies and procedures as outlined through this application, we would like to call out several additional procedures that are crucial to the successful management of a medical marijuana dispensary:

1. Closure Procedures: safety and security are a priority 24/7/365, not just when the dispensary is open.
2. Facility Manager Notifications: we have implemented strict procedures around extended facility manager absence and state reporting requirements.
3. Patient Onboarding and Management: from the time we have our initial meeting with a new patient, throughout the onboarding and patient management process, we have numerous safeguards in place to ensure patient and community safety.

SEC. 21A-408-36. PROCEDURES WHEN DISPENSARY DEPARTMENT IS CLOSED

When the dispensary department is closed, it will be securely locked and equipped with an alarm system. The alarm will be able to immediately detect entrance into the dispensary at any time it is closed. Only authorized dispensary facility employees will have access to the dispensary department, and only a dispensary will have the authority to deactivate the alarm.

We will store marijuana in an approved vault, and will only sell marijuana products during normal business hours.

SEC. 21A-408-46. DISPENSARY FACILITY MANAGER NOTIFICATIONS

PalliaTech will immediately notify the department whenever the dispensary facility manager ceases such management and shall immediately designate with the department the name, address and license number of the dispensary who assumes management of the dispensary facility.

We will file the notice of change in management of a dispensary on a form prescribed by the commissioner and pay the filing fee required in section 21a-408-28 of the Regulations of Connecticut State Agencies. As part of our initial onboarding, we will inform all dispensaries that they are required to immediately notify the department should they cease to manage the dispensary facility.

If a dispensary facility manager is absent from the dispensary facility for any reason for more than sixteen consecutive days, we will immediately report the absence to the department. Additionally we will provide the department with the name of the dispensary designated to be the acting dispensary facility manager no later than five days after the sixteenth consecutive day of the original dispensary facility manager's absence.

If the absence of the dispensary facility manager exceeds forty-two consecutive days, such person shall be deemed to have ceased to be the dispensary facility manager for our dispensary facility – and we will immediately notify the department of the name, address and license number of the dispensary who is assuming management responsibilities. As part of our initial onboarding we will inform all dispensaries that they are to immediately notify department under the same circumstances.

PATIENT ONBOARDING AND MANAGEMENT

We take patient and community safety very seriously. Our staff will meet with every new patient and caregiver individually to explain how the dispensary works, give them a tour and answer any questions they may have. As for new patients, they will be handled by appointment and assigned to a Patient Consultant who will take them through the set-up process, during which time they will complete the necessary paperwork required by Connecticut State Law. Using BioTrackTHC™, we will scan the paperwork – such as the physician recommendation, state identification and other pertinent documents – directly into each new patient's record. The patient will then go through an extensive orientation process that will include the following materials:

- Rules and regulations that the patient will need to abide by from state and local laws
- Information on tolerance, dependency and withdrawal
- Facts regarding substance abuse signs, symptoms and referral information regarding treatment facilities.
- Strain journal for patients to use to track the strains and their effects

3. RFA: PROPOSED BUSINESS PLAN

MISCELLANEOUS OPERATING PROCEDURES

- Research studies on the benefits of using cannabis for certain ailments
- Information discussing potency and determining proper dosage
- Various forms and routes of administration of medicine
- Strain information regarding the differences between sativa, indica and hybrid strains.

We require that dispensary management operates and maintains a system to verify patient identification; record purchases and denials of sale; and protect their confidentiality. Our comprehensive inventory control system, BioTrackTHC™, is a secure and fully backed up electronic patient database to create and safely store a record for each qualifying patient who purchases Cannabis from the dispensary.

Whenever a current patient or caregiver comes into the dispensary, our Admissions Clerk will greet them and verify their identity by reviewing their valid Physician Certification and state identification such as a driver's license. When verified and cleared, the patient will be "checked in" through the BioTrackTHC™ POS and will meet with the Pharmacist.

Working one-on-one with the Pharmacist, the patient will have the opportunity to ask any questions they have. Once the Pharmacist fulfills the recommendation, he/she will log the purchase into the POS system and the order – including product name and details, patient/caregiver name and registration – will be routed to the Cashier, and to the Dispensing Agents for fulfillment.

At that point, the patient will pay the Cashier, then go to the dispensary where the valid Physician Certification and state identification will again be verified before the Dispensary Agent passes the product through a secure vault window in a tamper- and child-proof container that is sealed in an opaque bag that will not indicate its contents or the dispensary.

In addition to system wide limits, BioTrackTHC™'s limit enforcement feature enables licensed producers to set client-specific limits based on the client's medical documentation. When creating a sales ticket, the system will issue a "block sale" directive should the client exceed his or her rolling 30-times daily limit with the current in-process sale, preventing the sale. The system will remove the block when the quantity of the current purchase is reduced to comply with the rolling 30-times daily limit.

MEDICAL MARIJUANA DISPENSARY FACILITY LICENSE APPLICATION
STATE OF CONNECTICUT- DEPARTMENT OF CONSUMER PROTECTION



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D. PROPOSED MARKETING
PLAN

4. PROPOSED MARKETING PLAN OVERVIEW

4. PROPOSED MARKETING PLAN OVERVIEW

“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.”

PalliaTech does not purchase advertisement. Instead, the Company develops its brand exclusively through education and community outreach. In that way, we are targeting only an appropriate audience (medical patients and adults) and can better focus our message to the needs of specific audiences.

Our seminars focus on patients, physicians and the medical community. Physicians are the Connecticut program’s gate keepers and PalliaTech will become an information source for that community.

Topics will include:

- Connecticut Medical Marijuana Law Overview/How To Register as a Connecticut Patient;
- The Pharmacology of Cannabis;
- Cannabis Dosing Guidelines- THC and other Cannabinoids; and
- The Doctor- MMJ Patient Relationship.

We are reaching out to such audiences as the Breast Cancer Survival Center, Stamford Cancer Institute, Fairfield County Medical Association, Epilepsy Foundation of Connecticut, the Connecticut Chapter of the Multiple Sclerosis Society and Stamford Veterans Administration Outpatient Clinic and look forward to developing a robust seminar program in the State of Connecticut.

4. RFA (D)(1): PROPOSED MARKETING PLAN
WEB TEMPLATES AND SAMPLES OF EDUCATIONAL BROCHURES



4. RFA (D)(1): PROPOSED MARKETING PLAN WEB TEMPLATES

“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.”

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Symptom relief
for you...for your loved one










NOTICE: This website is intended for persons 21 years or older.

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Our Services - Connecticut Medical Marijuana Dispensary

Top-Quality Medical Marijuana:

- Select therapeutic strains
- Advanced cultivation to exacting quality standards
- Laboratory-tested for purity and consistency

Outstanding Patient Service:

- Pharmacist-led team
- Friendly, knowledgeable staff
- Easy-to-use products and resources
- A safe and private environment

Medicinal Products:

- Laboratory-tested cannabinoid medicines
- Products for administration

Wellness Services by PalliWell ™ :

- Free Massage Services
- Free Yoga and Meditation Services
- Subsidized Counseling Services

Gretchen McCarthy
VP Human Resources & Operations

"Every day is a gift –
an opportunity to help
our patients relieve their suffering,
manage their symptoms
and get back their lives."

– Gretchen McCarthy

Our Mission

...To support the best treatment outcome for you.

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The Compassionate Sciences Team



Christine Rigby, *Chief Executive Officer*

Ms. Rigby is a former Senior Vice President at CitiGroup and is currently involved in multiple Connecticut-based businesses. Her personal experience of watching loved ones suffer from the medical conditions that can now be treated in Connecticut thanks to its medical marijuana laws spurred her to join as Chief of PalliaTech. Ms. Rigby has been a Connecticut resident for over 20 years and has a track record of business success and community involvement. She is actively involved in a number of charitable organizations.


Roy Ciarlo, *Facility Dispensary Manager/Chief Pharmacist*


Mr. Ciarlo, is a licensed Connecticut pharmacist with over 20 years retail and clinical pharmacy experience. He gained a deep understanding of the complexities of non-traditional pharmaceuticals when holding a position as the Chief Pharmacist at Connecticut Counseling Clinic where he developed a deep commitment to the after-care of his pharmacy patients.


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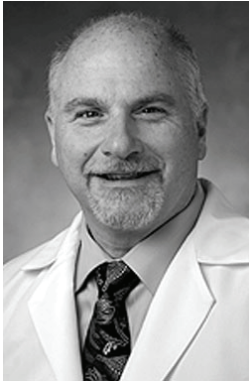
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The Compassionate Sciences Team



Dr. Steven Patierno, PhD, *Chief Science Officer and Board Member*

Deputy Director, Duke Cancer Institute
Director, Cancer Population Sciences and Supportive Health Services
Professor of Medicine
Professor of Pharmacology and Cancer Biology
Professor of Community and Family Medicine

Scientific Vision Statement

The promise of medical Cannabis is vast. States have approved cannabinoid medicines to treat diseases that are prevalent in over 20% of the U.S. population and many millions worldwide. Cannabinoids have been proven to help in managing the most debilitating aspects of cancer and cancer therapy by mitigating pain, stimulating appetite and suppressing nausea. And medical Cannabis is also being used to treat epilepsy,

cachexia, Crohn's Disease, multiple sclerosis and a range of other conditions.

Today, the science and clinical practice of cannabinoid medicine is on the way to catching up with other modern medications. As with aspirin and many other drugs, the historical use of Cannabis in crude botanical preparations such as teas and tinctures is giving way to new, standardized formulations. New York has mandated the first medical model of Cannabis care requiring the isolation and purification of monocannabinoids and their formulation to exactly standards in metered doses coupled with medicinal forms of administration. In the emerging field of cannabinoid medicine, the era of the Palliaceutical™ has begun.



Michael Nelson, *Senior Consultant, Operations*

Mr. Nelson is the founder of a successful international outfitting business who is also the owner and operator of one of the largest and most respected alternative treatment centers in Montana. Over the past six years as a grower-operator, he has developed expertise in building ATCs, systems design, employee orientation as well as training and management. Mr. Nelson's cultivation center and multiple-location dispensaries have set a standard of excellence in serving qualified patients in the Central and Western regions of the Montana. He brings to his work a background in sales, management, distribution and marketing of school products to universities and high schools across the American Northwest. Mr. Nelson is active in the Bozeman area business community and as a volunteer in a sports program for the disabled. He earned a BS in Business from the University of Colorado.

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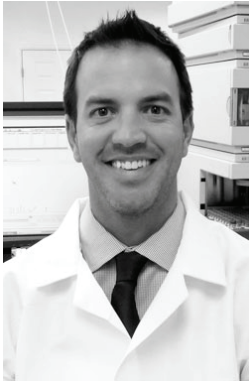
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The Compassionate Sciences Team



Stephen Goldman, *Advisory Board Member*

Stephen Goldman is an analytical chemist with extensive industrial and academic laboratory experience. He brings to PhytaTech expertise in GC, HPLC and mass spectrometry, chemical and biochemical engineering as well as project and business management. He brings his extensive experience to PalliaTech as well.

Prior to joining PhytaTech, Stephen served as an analytical chemist at the CLIA and CAP certified Forensic Laboratories, overseeing toxicology testing. Earlier, he was a scientist-chemist for Novartis (Sandoz), Kemin Industries, Genentech and served as a contract chemist. In that capacity, Stephen was involved in research into biocatalyst production and new chemistry products, nutraceuticals, antibody conjugate linkers, technical services, quality control, analytical method development and validation.

Before embarking on a career in the private sector, Stephen was a research assistant in academic laboratories at the University of Kansas and the University of Iowa. There, he engaged in research into the intracellular trafficking, cellular localization and stability of small molecules as well as the purification and quantification of heparin oligosaccharides. He has published a number of research papers in the fields of biological and analytical chemistry and is a member of the American Institute of Chemical Engineers, American Association of Pharmaceutical Scientists and the American Chemical Society. Stephen has a Master of Science in Pharmaceutical Chemistry with Honors from the University of Kansas and a Bachelor of Science in Chemical and Biochemical Engineering from the University of Iowa.



Gretchen McCarthy, *VP Human Resources & Operations*

Gretchen McCarthy is an experienced human resources executive and medical *Cannabis* operations manager. Before joining Compassionate Sciences, Gretchen was the Manager of Dispensary Operations at one of the leading alternative treatment centers in Maine. In this capacity, she set the standard in patient services, staffing, inventory controls, compliance, safety and security as well as relationships with the community, law enforcement and regulators. Earlier, Gretchen established a career as a human resources executive in the cable television, software and venture capital industries. In these positions, she focused on employment and labor law, benefits administration, employee relations, staffing and recruiting as well as training and development. Gretchen earned a Bachelors of Science in Business - Human Resources Management from Capella University. She holds a Professional Human Resources Certification (PHR) from the HR Certification Institute.

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Connecticut Medicinal Marijuana Program - Patient Program Summary

Qualifying Diseases and Conditions:

- Cancer
- Glaucoma
- Positive Status for Human Immunodeficiency Virus or Acquired Immune Deficiency Syndrome
- 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
- Post-Traumatic Stress Disorder

6. You must have a bona fide relationship with your certifying physician.

Bona Fide Doctor-Patient Relationship:

Physicians must also have a bona fide relationship with the patient in order to register them with the program. A bona fide physician-patient relationship means a relationship in which the physician has ongoing responsibility for the assessment, care and treatment of a patient's debilitating medical condition or a symptom of the patient's debilitating medical condition whereby the physician has:

- Completed a medically reasonable assessment of the patient's medical history and current medical condition
- Diagnosed the patient as having a debilitating medical condition
- Prescribed, or determined it is not in the best interest to prescribe, prescription drugs to address the symptoms or effects for which the certification is being issued
- Concluded that, in the physician's medical opinion, the potential benefits of the palliative use of marijuana would likely outweigh the health risks to the patient
- Explained the potential risks and benefits of the palliative use of marijuana to the patient or, where the patient lacks legal capacity, to the parent, guardian or other person having legal custody of the patient.

In addition, the physician should be reasonably available to provide follow-up care and treatment for the patient, including any examinations necessary to determine the efficacy of marijuana for treating the patient's debilitating medical condition, or a symptom thereof.

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Information and Checklists
New Jersey Medicinal Marijuana Program



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Cannabis as Medicine
How Cannabis Works
Cannabinoids
Terpenes
What You Should Know

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To Be Symptom Free



Connecticut Medicinal Marijuana Program - Patient Program Summary

7. Your doctor must be registered in the program and must begin your registration.


About Your Primary Caregiver:
You may also designate a primary caregiver. Among other restrictions, the primary caregiver cannot serve in the same role for another patient and cannot be the patient's physician. Primary caregivers must register with the Department. See [Primary Caregiver Registration & Information](#).

For Official Program Information Please Contact:
Connecticut Medicinal Marijuana Program (CTMMP) Department of Consumer Protection
Phone: (860) 706-5361
Email: dcp.mmp@ct.gov
Website: www.ct.gov/dcp/mmp

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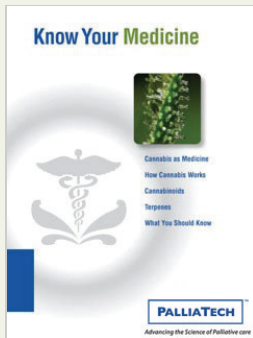
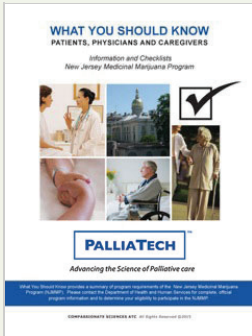
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How To Register in Connecticut - Patients

If your physician decides to certify you for a medical marijuana registration certificate, he or she will ask you for a number of things.

What Do I Need?

-  **A valid e-mail address:** This should be an email address that you are comfortable using in connection with your medical marijuana registration, as it will be the primary method the Department will use to communicate with you. Therefore, please be careful before providing an email address that others can access or that belongs to your employer. If you do not have a valid e-mail address, the system will provide a temporary e-mail address to your physician, which he or she will provide to you for purposes of completing your registration application. The temporary e-mail address will not otherwise be functional and the Department will communicate with you through other means.
-  **A primary telephone number:** This should be a personal telephone number that the Department can use to contact you about your medical marijuana registration.



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Cannabis in Medicine

How Cannabis Works

Cannabinoids

Terpenes


What You Should Know



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How To Register in Connecticut - Patients

What Else Do I Need?

Your Document Checklist:

☒ Proof of identity

☒ Proof of Connecticut residency

☒ Current passport size photograph

Acceptable documents and additional requirements can be found within the Patient Registration Process.

You will be able to upload these documents and pay the fee when you submit your registration application online, or you can mail them to the Department.

What Does it Cost?

Registration Fee:

The State will charge a registration fee of \$100.00 (checks/money orders should be made payable to "Treasurer, State of CT")

For Official Program Information Please Contact:

Connecticut Medicinal Marijuana Program (CTMMP) Department of Consumer Protection

Phone: (860) 706-5361

Email: dcp.mmp@ct.gov

Website: www.ct.gov/dcp/mmp

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Connecticut Medicinal Marijuana Program - Doctor Program Summary

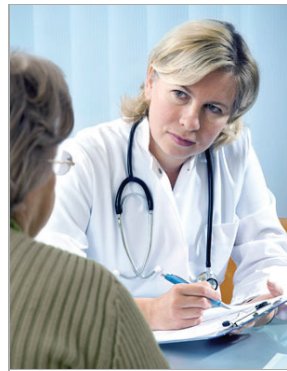
To participate, you must Create a DAS Business Network Account so you can access the online registration system.

Your Qualifications:


- Possess an active Connecticut medical license issued by the Connecticut Department of Public Health.
- Practice within the State of Connecticut.
- Possess an active controlled substance registration issued by the Connecticut Department of Consumer Protection that is not subject to limitation.
- Possess an active Drug Enforcement Administration (DEA) controlled substance registration that is not subject to limitation.
- Be registered with, and able to access, the Connecticut Prescription Monitoring Program.


Your Patient's Qualifications:


1. Must be a Connecticut resident.
2. Must be at least 21 years of age.
3. Cannot be an inmate confined in a correctional institution or facility under the supervision of the Connecticut Department of Corrections.
4. You must certify that they have a qualifying disease or condition.










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Connecticut Medicinal Marijuana Program - Doctor Program Summary

Qualifying Diseases and Conditions:

- Cancer
- Glaucoma
- Positive Status for Human Immunodeficiency Virus or Acquired Immune Deficiency Syndrome
- 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
- Post-Traumatic Stress Disorder

5. Must have a bona fide relationship with you

Bona Fide Doctor-Patient Relationship:

Physicians must have a bona fide relationship with the patient in order to register them with the program. A bona fide physician-patient relationship means a relationship in which the physician has ongoing responsibility for the assessment, care and treatment of a patient's debilitating medical condition or a symptom of the patient's debilitating medical condition whereby the physician has:

- Completed a medically reasonable assessment of the patient's medical history and current medical condition
- Diagnosed the patient as having a debilitating medical condition
- Prescribed, or determined it is not in the best interest to prescribe, prescription drugs to address the symptoms or effects for which the certification is being issued
- Concluded that, in the physician's medical opinion, the potential benefits of the palliative use of marijuana would likely outweigh the health risks to the patient
- Explained the potential risks and benefits of the palliative use of marijuana to the patient or, where the patient lacks legal capacity, to the parent, guardian or other person having legal custody of the patient

In addition, you should be reasonably available to provide follow-up care and treatment for the patient, including any examinations necessary to determine the efficacy of marijuana for treating the patient's debilitating medical condition, or a symptom thereof.

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About Primary Caregivers:

Your patients may designate a primary caregiver to assist them. See [Primary Caregiver Registration & Information](#).

For Official Program Information Please Contact:

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How To Register in Connecticut - Doctors

Physicians who wish to recommend patients for the CTMMP are the gatekeepers to the medical marijuana registration system. No patient or caregiver can log in to the system until a physician initiates their application. Once you, the physician, conclude that your patient should be registered with the Department of Consumer Protection for the palliative use of marijuana, you can access our online registration system to certify your patient as meeting the medical pre-requisites for a registration certificate.

What Do I Need?
Your Registration Checklist:

- ☒ Your Connecticut medical and CDS license numbers
- ☒ You must certify in writing to your:
 - Professional license and good standing
 - CDS number
 - Patient's qualifying condition
 - Completion of addiction and pain management education in past 2 years
- ☒ Complete online registration forms, create your account user name and password
- ☒ Log-in to initiate patient applications and to create accounts for your office to use in updating patient records
- ☒ Sign a certification statement



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How To Register in Connecticut - Doctors

What Does My Patient Need?
Your Patient Checklist:








- ☒ Patient's name, address, date of birth and condition
- ☒ Secure patient ID, which is created once you submit patient information
- ☒ Provide secure ID to patient (patient completes their registration online)
- ☒ Or, give printed patient ID page to your patient to fill out and mail to **see address below*

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Department of Consumer Protection
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Email: dcp.mmp@ct.gov
Website: www.ct.gov/dcp/mmp

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Relief From Suffering

How To Register in Connecticut - Primary Caregivers

Patients may select a primary caregiver to assist them in the program.

Primary Caregiver Qualifications:

- Be 21 years old or older
- Must register with the CTMMP Program
- Must pass a criminal background check
- Agree to undertake responsibility for managing the well-being of the qualifying patient with respect to the palliative use of marijuana
- Have not been convicted of a violation of any law pertaining to the illegal manufacture, sale or distribution of a controlled substance
- Not be the qualifying patient's physician
- If the qualifying patient lacks legal capacity, you must be the patient's parent, guardian or other person having legal custody of the patient



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Relief From Suffering



How To Register in Connecticut - Primary Caregivers

What Do I Need?

Your Registration Checklist:

☒

Your full name, address, date of birth, telephone number and signature

☒

Written consent to submit to a criminal background check

☒

\$25.00 registration fee (checks/money orders should be made payable to "Treasurer, State of CT")

☒

Proof of Identity (one of the following):

• Connecticut or Out-of-State Issued Driver's License

• Connecticut Issued ID

• Connecticut pistol or firearm permit

• US Passport or Passport Card

• Permanent Resident Card

• Certificate of Naturalization

• Certificate of Citizenship

For Official Program Information Please Contact:

Connecticut Medicinal Marijuana Program (CTMMP) Department of Consumer Protection

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Cannabis plants can grow up to 15-25 feet tall. Cannabis is dioecious, having both male and female plants.

Female Cannabis plants have been cultivated for centuries for medical use.





Facts About Cannabis - Botany: What Kind of Plant is Cannabis?

“Marijuana” is slang for *Cannabis*, a genus of flowering plant that is a member of the hemp family. An annual, flowering herb, *Cannabis* is a native of Asia that has been naturalized and cultivated worldwide. Traditionally, three major classes have been recognized: *Cannabis sativa*, *Cannabis indica* and *Cannabis ruderalis*. However, the case is made that these may simply be the most common versions of almost 700 variations of the same species.

Cannabis sativa, which originates in equatorial areas of the world, can grow up to 15-20 feet tall. Indicas, which grow at higher altitudes, are shorter and have larger leaves than sativas. Ruderalis, the shortest and most fibrous of the three, is also less leafy and distinguished by the ability to **auto-flower**.

Cannabis may be one of the most recognized plants in the world due its distinctive leaf structure of serrate-edged leaflets radiating from the base in a **palmate Cannabis is dioecious**, having both male and female plants, although **monoecious** plants are not unusual. Both sexes flower but remain visually undifferentiated, except by size and shape, before flowering. Female plants tend to be shorter and have more branches while males are taller and less leafy.

Cannabis palmate leaf structure



Serrated edge

Female plant



Dense bud clusters

Female flower with pistils ♀



Male flower with pollen producing stamens ♂

Male plant



Loose bud clusters

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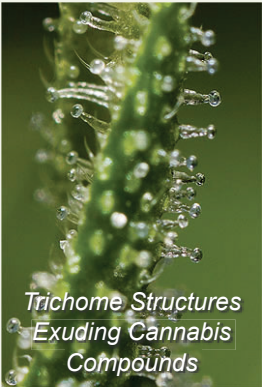
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Cannabis plants can grow up to 15-25 feet tall. Cannabis is dioecious, having both male and female plants.

Female Cannabis plants have been cultivated for centuries for medical use.



Trichome Structures
Exuding Cannabis
Compounds

Live With Dignity

Facts About Cannabis - Botany: What Kind of Plant is Cannabis?

Flowers develop as dense clusters or buds. Male flowers are less dense and hang loosely on sparsely-leaved flowering limbs. Female flowers, dense and bristling with leaflets, typically stand upright in thick leaf clusters along the flowering limb. Male plants are **staminate** and produce pollen. Female plants are **pistillate** and produce seeds. Seeds are fertilized by wind-driven pollen.








Seeds germinate in the spring over the course of 3-7 days. A spindly embryonic stem topped by “seed leaves” emerges and grows to approximately 10 centimeters, or 4 inches. In the next stage of growth -- the vegetative stage -- the plant is stimulated to sprout leaves and limbs by increasing exposure to light during the lengthening days of summer. In nature, the plant flowers in the fall, triggered by the light signals of shorter days and longer nights.

Female *Cannabis* plants have been cultivated for centuries for medical use and for producing a **psychotropic** effect. The chemical compounds that achieve these effects are produced in **trichomes** clustered on the flowers of female plants.

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Cannabinoids are primarily responsible for the plant's therapeutic and psychotropic properties.

Science has identified as many as 80 cannabinoids.

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Facts About Cannabis - Chemistry: Inside Cannabis








The word cannabinoid is often used as shorthand for a large class of similar compounds called **phytocannabinoids**. These compounds are produced as acidic versions which do not, without pretreatment, produce pharmacological or psychotropic effects. However, a growing body of research suggests that acidic compounds may have therapeutic value. Acidic cannabinoids are activated in a process known as **decarboxylation**.

When activated, acidic cannabinoids such as **THCA**, **CBDA**, **CBNA** are transformed into the biologically-active cannabinoids THC, CBD and CBN. Only in this form does the compound produce pharmacological or psychotropic effects in the body. However, while cannabinoids are very **lipid-soluble**, they are almost insoluble in water. As a result, the activated ingredients of *Cannabis* are typically inhaled as smoke or vapor, consumed in foods or absorbed through the skin in salves or **tinctures**.

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Facts About Cannabis - Cellular Biology: How Cannabis Works in the Body

Cannabinoids are delivered to the bloodstream through the lungs (when inhaled), the digestive system (when consumed) or the skin (when applied topically). Once in the bloodstream, they are available to the brain and central nervous system.

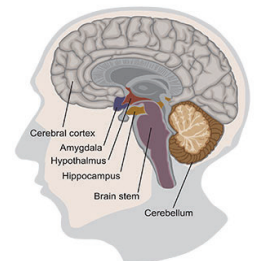
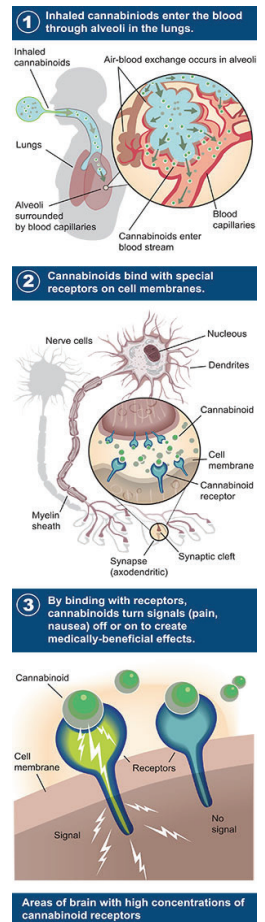
Inhalation is the fastest method, with peak blood levels achieved within 20 minutes. Oral ingestion is slower because the cannabinoids go through the gastrointestinal tract before entering the bloodstream – which takes more time. The **bioavailability** of cannabinoids in the body is an important area of ongoing research with implications for the medicinal use of *Cannabis*. Please see an example of cannabinoid bioavailability below.

Cannabinoid Bioavailability: Example, THC

Typical plasma levels of THC after smoking *Cannabis* are 70-160 nanograms per milliliter (ng/ml). Because THC is lipid-soluble, it rapidly leaves the bloodstream and goes into the fatty tissues of the body. When *Cannabis* is smoked or inhaled, only about 10-25% of THC is absorbed into the bloodstream from the lungs and about 1% of that reaches the brain rapidly. This is important because brain cells possess unique binding sites for cannabinoids called cannabinoid receptors. When cannabinoids bind to these receptors, they trigger the pharmacological effects such as pain mitigation, nausea suppression and appetite stimulation. After the patient stops ingesting *Cannabis*, plasma levels of THC typically decrease to less than 20 ng/ml within 30-45 minutes. Pharmacological activity peaks at about 20 minutes after inhalation and is gone within 3 hours. When ingested orally, the pharmacological effects of THC are delayed by 30-90 minutes, peak after 2-3 hours and last for 4-12 hours. Bioavailability by ingestion is affected by liver metabolism and varies greatly (4-12%), making oral treatments difficult to manage.

In 1988, a major breakthrough in our understanding of *Cannabis* took place when American scientist **Dr. Allyn Howlett** discovered cannabinoid receptors in the human brain. Basically, these receptors are protein molecules embedded in cellular surfaces that receive chemical signals from other cells. These signals result in a range of effects from pain to nausea and euphoria to depression. They can stimulate or suppress appetite or growth, while also impacting mood and perception. Cannabinoid receptors have also been discovered in mammals, birds, fish and reptiles.

There are two major types of cannabinoid receptors in our bodies, CB1 and CB2. The CB1 receptors are found in the central nervous system, on brain cells and in the **peripheral nervous system**. The CB2 receptors are generally found on **immune cells**. Humans have many thousands of receptors that we still have not identified or fully understood. A common characteristic is that receptors bind with naturally-occurring substances such as hormones (e.g., estrogen, testosterone) and growth factors (e.g., insulin) as well as with **exogenous** substances introduced into the body to mimic the effect of **endogenous** substances.



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Cannabinoids bind with special receptors on cell membranes.

When bound to receptors, cannabinoids mitigate pain, suppress nausea, decrease ocular pressure and enhance appetite.

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Facts About Cannabis - Cellular Biology: How Cannabis Works in the Body

Substances that activate receptors after binding with them are called **agonists**. Those that suppress the ability of the receptor to activate are called **antagonists**. Generally, agonists have the effect of turning receptors on while antagonists turn them off. As a result, the signal running along the neural **pathway** where the receptor is located is either enhanced or suppressed. Cannabinoids have been shown to stimulate the CB1 and CB2 receptors in a number of ways, serving as agonists, antagonists or as both.

Having discovered cannabinoid receptors, scientists began to search for the naturally-occurring **ligand** that binds with the receptors to achieve a biologic purpose. Their research uncovered two **endocannabinoids** and **2-AG**. Both are agonists that influence pain, appetite, motor learning and **synaptic plasticity**.

In the bloodstream, exogenous cannabinoids act like endocannabinoids, binding with receptors to mitigate pain, suppress nausea, decrease **ocular** pressure and enhance appetite. Thus, as far as we know, *Cannabis* does not cure anything. Instead, the plant's active ingredients can deliver important palliative effects. Note: the stimulation of the CB receptors by exogenous cannabinoids is complex, as not all cannabinoids interact with the receptors in the same way. Because of this, scientists are still trying to unravel the details of the system and its implications for medicine.

Currently, medical *Cannabis* is used to treat the symptoms – and the side-effects of treatments for – cancer, **Crohn's Disease**, epilepsy and other seizure disorders, glaucoma, multiple sclerosis, neuropathic pain, rheumatoid arthritis and **cachexia**. Medical studies are exploring the use of *Cannabis* to suppress muscle spasms and spasticity, relieve chronic pain, manage glaucoma and bronchial asthma.

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Enjoy Your Life




The Facts About Cannabis - Safety and Addiction

In practice, it is difficult and quite rare to overdose on *Cannabis* since its administration requires ongoing deliberate and complex actions such as smoking. Acute adverse reaction due to overdose include anxiety, panic attacks, increased heart rate and changes in blood pressure.

Regular use of *Cannabis* can lead to dependency and a mild withdrawal syndrome. Some authorities have considered illegal marijuana as a “gateway” drug that leads to the use of more dangerous and addictive substances. There is ongoing debate about possible long-term adverse effects on psyche and cognition, immune system, fertility and pregnancy.

The most common form of administering *Cannabis*, smoking, is harmful to health and safety. Smoking produces carcinogenic, toxic or irritating byproducts that are dangerous for all patients.

Notice: Medical *Cannabis* should be administered only in states that have legalized such use, under the care of a physician and in keeping with applicable laws.



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Today, 23 states and the District of Columbia allow medical use.

There is considerable misinformation about medical Cannabis.

Cannabis is an alternative to pharmaceuticals with debilitating, often devastating, side effects.

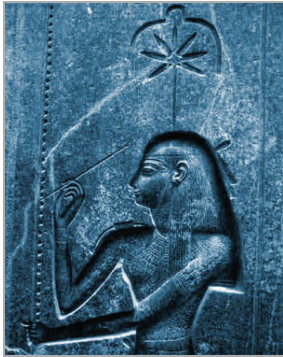
Manage Your Symptoms

The Facts About Cannabis - Medical Cannabis: Where We Stand

Cannabis has been used as a medicine for centuries, with the earliest record found in the Chinese Pharmacopeia of the 15th Century BC. The science of Cannabis was advanced during the 19th and 20th Centuries as more than 100 articles on the subject were published in medical journals. Cannabis was listed in the United States Pharmacopeia from 1850 until 1942 and used as a prescription for various conditions including labor pains, nausea and rheumatism.

Modern research conducted under FDA-approved protocols, including studies sponsored by federal and state governments, has documented the effectiveness of Cannabis as an antiemetic, anticonvulsant and as a treatment for glaucoma. When the federal government ended Cannabis research in 1992, it had nearly completed the requirements for new drug approval. Federal restrictions have limited subsequent Cannabis research in the United States.

Growing abuse of marijuana and an aggressive anti-marijuana campaign by the Federal Bureau of Narcotics led to federal prohibition of possession and transfer (but not medical and industrial use) in 1932. The Controlled Substances Act of 1970 ranked Cannabis, alongside heroin and LSD, as a Schedule 1 drug with the highest potential for abuse and no accepted medical uses. In 1996, California became the first state to legalize the use of medical Cannabis.



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Today, 23 states and the District of Columbia allow medical use.

There is considerable misinformation about medical Cannabis.

Cannabis is an alternative to pharmaceuticals with debilitating, often devastating, side effects.

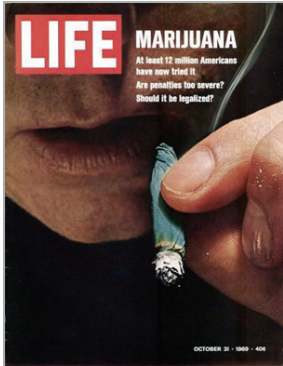
Manage Your Symptoms

The Facts About Cannabis - Medical Cannabis: Where We Stand

Today, 23 states and the District of Columbia allow medical use. However, the possession and use of Cannabis in any form remains illegal under federal law. Recent federal drug enforcement policy has been not to interfere with qualified patients who use medical Cannabis in compliance with the laws of states that have legalized medical use.

There is considerable misinformation about medical Cannabis. Further research is required and is being conducted in the United States and around the world. What we do know, however, is that Cannabis is recognized by science for its well-established palliative effects and is used to treat the symptoms of cancer, Crohn's Disease, epilepsy and other seizure disorders, glaucoma, multiple sclerosis, neuropathic pain, rheumatoid arthritis and .

The drug provides doctors with an alternative to pharmaceuticals with debilitating and often devastating side effects. As such, medical Cannabis is being used today in some parts of the country to provide critical palliative relief to patients suffering from a host of diseases and conditions. Ultimately, it has the potential to help millions of Americans.




LIFE Magazine, October 1969

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We welcome you to view our selection of research papers on Cannabis and Cannabis-related subjects.

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Scientific Research - PDF Downloads

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9. Endocannabinoids: Endogenous Cannabinoid Receptor Ligands with Neuromodulatory Action. Di Marzo et.al. 1998.
10. Smoked Medicinal Cannabis for Neuropathic Pain in HIV: A Randomized, Crossover Clinical Trial. Ellis et.al. 2008.
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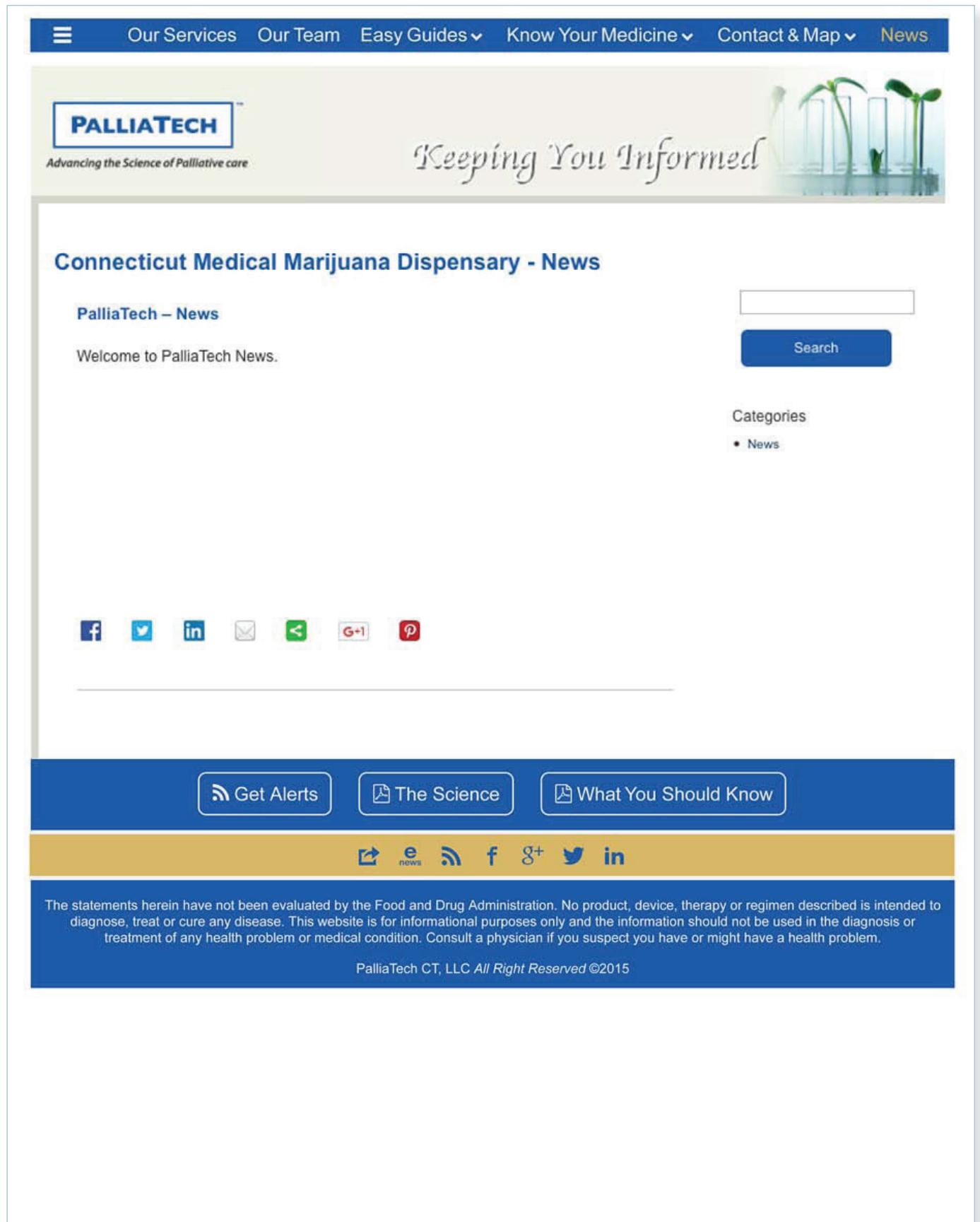
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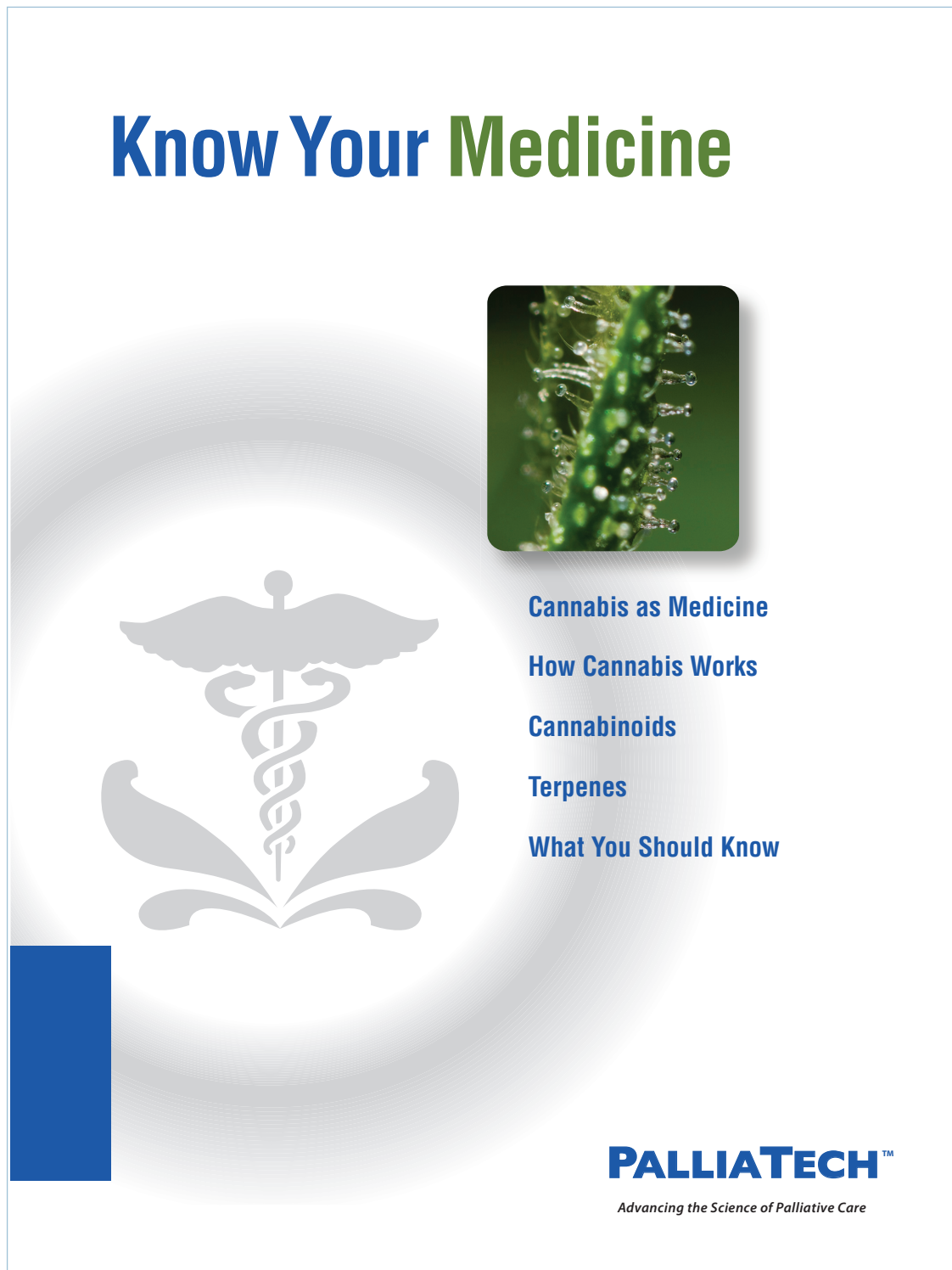
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Cannabis as Medicine



What You Should Know

Pal-li-ate: to reduce the violence of a disease; *also:* to ease symptoms without curing the underlying disease; *adjective*, palliative.

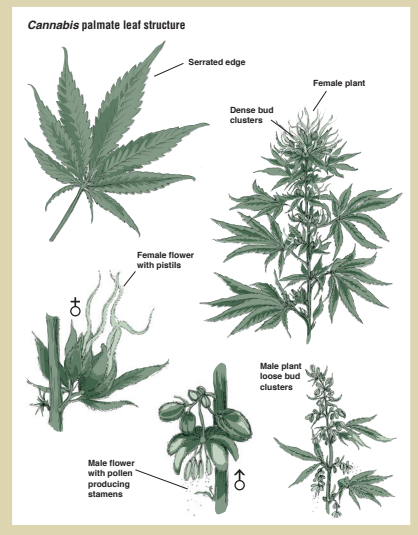


Medical science and history show that *Cannabis* is an effective palliative, a class of medicines that ease human suffering. Natural and gentle, *Cannabis* is used to treat symptoms of many diseases and conditions, and some of the side effects¹ of pharmaceutical drugs.

The science of medical *Cannabis* lags behind its use and more research is needed. Strong science supports the use of *Cannabis* as an analgesic painkiller, an anti-emetic for nausea and as an appetite stimulant. There is less scientific support for the use of *Cannabis* as an anti-inflammatory, despite significant anecdotal evidence. Scientists are also investigating whether it slows, or partially reverses, certain diseases such as cancer.

Cancer	Nervous Tissue of the Spinal Cord with Objective Neurological Indication of Intractable Spasticity
Glaucoma	Epilepsy
Positive Status for Human Immunodeficiency Virus or Acquired Immune Deficiency Syndrome	Cachexia
Parkinson's Disease	Wasting Syndrome
Multiple Sclerosis	Crohn's Disease
Damage to the	Post-Traumatic Stress Disorder

The medical benefits of *Cannabis* come from chemicals called cannabinoids and terpenes, which interact with the central nervous and immune systems. Best known is THC (delta-9 THC), the cannabinoid that produces the high, or the psychotropic effect. These calming and euphoric effects are therapeutic and THC has other medical benefits. However, the other cannabinoids and terpenes are also shown to play an important medicinal role and should be considered by patients.



Cannabis

is a genus of flowering plants in the hemp family. Native to Asia, it has been cultivated worldwide over thousands of years. Traditionally, there were three classes: *Cannabis sativa*, *Cannabis indica* and *Cannabis ruderalis*. But these may be the most common of almost 700 variations of the genus. *Sativas* tend to be rich in THC while *indicas* tend to also be abundant in other cannabinoids. However, the distinct characteristics of each vary with environment, growing method and curing.

¹ Adverse, late or long-term side effects of pharmaceuticals used to treat chronic debilitating diseases.

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How Cannabis Works

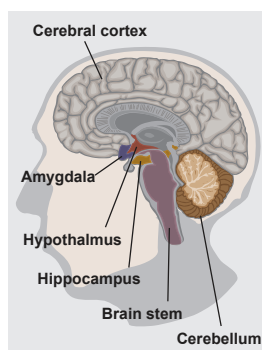
Biochemistry

The active ingredients in *Cannabis* – cannabinoids and terpenes – are delivered to the blood through the lungs (when inhaled), the digestive system (when consumed) or the skin (when applied topically). From the blood, they are available to the brain, central nervous system and immune system.

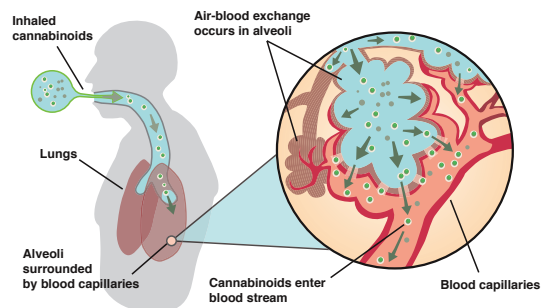
Humans are built to interact with cannabinoids, with endocannabinoid systems of special receptor molecules embedded in our brains and along neural pathways. The receptors influence the flow of chemical signals to the brain.

Cannabinoids bind with the endocannabinoid receptors, creating medicinal effects by suppressing signals such as pain, nausea and depression while boosting signals of appetite and euphoria.

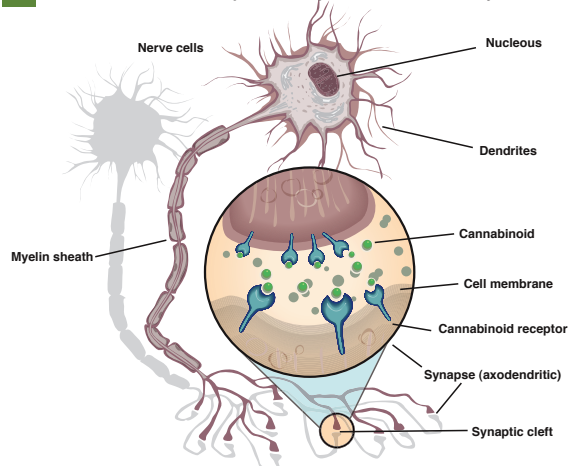
Areas of Brain with High Concentrations of Cannabinoid Receptors



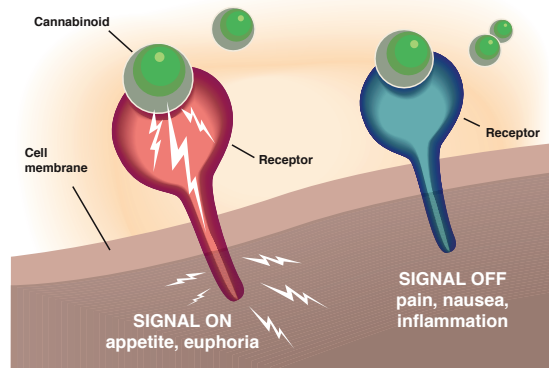
1 Inhaled Cannabinoids Enter Blood Through Alveoli in Lungs



2 Cannabinoids Bind with Special Receptors on Neural Pathways



3 By Binding with Receptors, Cannabinoids Turn Signals On or Off to Create Medically-Beneficial Effects

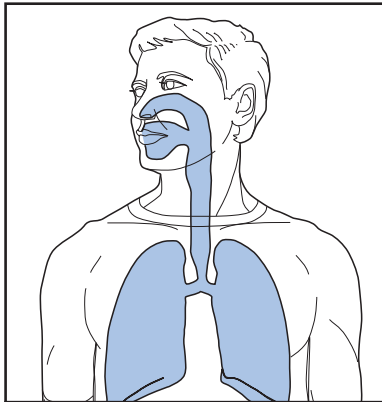


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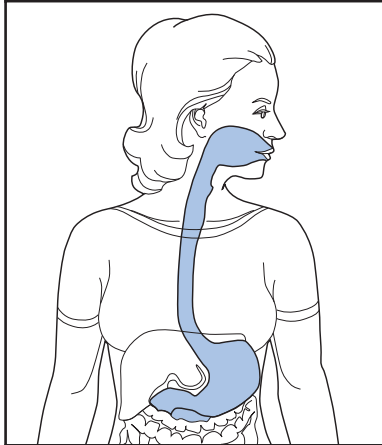
How Cannabis Works

Administration



Inhalation is the fastest method after intravenous administration, with peak blood levels achieved within 5-20 minutes. Most common is smoking, which provides rapid onset of relief, but is hazardous to health. Combustion also burns active ingredients while others are lost in smoke. Using water to filter harmful compounds from smoke is unproven and may actually reduce the availability of active ingredients.

Vaporization provides the rapid relief of inhalation without the toxic and carcinogenic by-products of smoking. Heated to a point below combustion (390° F or 200° C), the plant boils and releases a mild, smokeless vapor. This activates a higher percentage of therapeutic ingredients and loses fewer than smoking.



Ingestion takes time because the active ingredients go through the gastrointestinal tract before entering the blood. They are also chemically altered during “first pass” metabolism (digestion). THC reaches the blood in the form of 11-hydroxy THC, which is highly psychotropic. Edibles may have longer-lasting effects for some patients.



Tinctures are alcoholic extracts of the active ingredients applied as drops to the membranes of the mouth. There is little science around this method, with estimates of efficacy ranging from immediate to several hours.

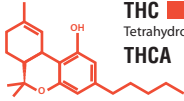
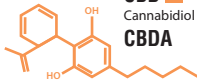
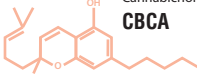
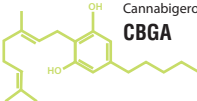
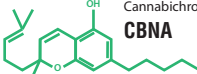
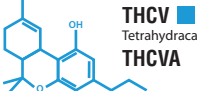
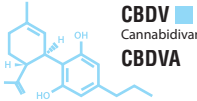
Topicals enter the blood relatively quickly through the skin. There is extensive anecdotal (not scientific) evidence that topical *Cannabis* has analgesic (painkilling) and anti-inflammatory effects, with psoriasis and skin tumor applications. More research needs to be done.

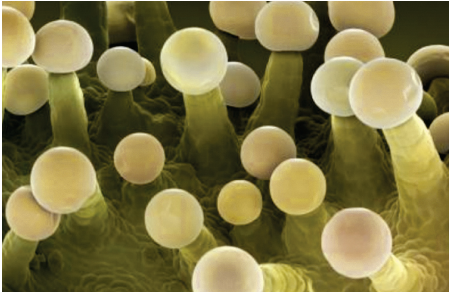
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Cannabinoids

What You Should Know

CANNABINOID	BENEFIT
 <p>THC ■ Tetrahydrocannabinol THCA</p>	<p>Psychotropic, painkiller, anti-inflammatory, anti-microbial</p>
 <p>CBD ■ Cannabidiol CBDA</p>	<p>Relieve anxiety, convulsions, depression, inflammation and nausea sedative, sleep aid and muscle relaxant</p>
 <p>CBC ■ Cannabichomene CBCA</p>	<p>Anti-inflammatory, painkiller, treats acid reflux, anti-anxiety, antidepressant</p>
 <p>CBG ■ Cannabigerol CBGA</p>	<p>Painkiller, muscle relaxant, anti-erythemal analgesic, digestive aid, stomachic (stomach function)</p>
 <p>CBN ■ Cannabichromene CBNA</p>	<p>Mild psychotropic, may stimulate bone growth, anesthetic, anti-convulsive, analgesic, anti-anxiety</p>
 <p>THCv ■ Tetrahydrocannabivarin THcVA</p>	<p>Anti-obesity, aids memory, calming aid, antibacterial, antiviral, immune system</p>
 <p>CBDV ■ Cannabidivarin CBDVA</p>	<p>Anti-inflammatory, analgesic, protects cells lining digestive tract</p>



While THC gets the attention, there are over 70 cannabinoids in *Cannabis*. The other cannabinoids – and terpenes – are believed to have therapeutic effects and must be considered by patients.

Among other effects, cannabinoids suppress pain and nausea while stimulating appetite, euphoria or calm. They are also thought to interact, with CBC enhancing the effects of THC, and CBD enhancing both THC and CBC.

Did you know that there is no THC in Cannabis?

Raw *Cannabis* contains the acidic compound THCA, not the neutral compound THC. THCA is converted into THC by the heat of combustion, vaporization or cooking in a process called decarboxylation. This rule applies to all cannabinoids: naturally occurring acidic CBDA converting to CBD, CBGA to CBG and etc.

The acidic versions have traditionally been considered biologically inactive. However, depending on the method of preparation and administration, not all of the acidic cannabinoids are converted during decarboxylation (particularly in edibles). Research suggests that these residual compounds may have medicinal effects. In edibles, they are psychotropic.

The presence of all the major cannabinoids should be taken into account by patients when evaluating a strain of medical *Cannabis*.

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Terpenes

What You Should Know










Do you use smell when choosing your medical Cannabis?

Then you are familiar with terpenes – aroma and taste molecules in the essential oils of plants. Terpenes provide each plant's distinctive scent, or essence, and are used to attract pollinators, repel pests and discourage herbivores. Humans have used them for therapeutic purposes and in a wide range of products – from perfumes to soaps and pharmaceuticals.

Like roses or spices, different strains of *Cannabis* have unique odors ranging from sweet to acrid and skunky to floral – the chemical signatures of terpenes. Terpenes are also building blocks of chemicals such as THCA, the acidic version of THC. They are major components of *Cannabis* resin and extracts produced from these resins. Up to 30% of the resin in *Cannabis* smoke consists of terpenes.

Scientists believe that terpenes account for some of the medical benefits of *Cannabis* including painkilling and anti-inflammatory effects. They also exhibit other useful effects. For example, terpene content is one of the biggest differences between *Cannabis sativa* and *Cannabis indica*. The general rule that patients often prefer *sativas* for daytime use and *indicas* for nighttime use suggests that the sedative effects of *Cannabis* are influenced by terpenes.

Patients should take into account the content of major terpenes when evaluating various strains of medical *Cannabis*. This information can help you select the best medicine, with your desired therapeutic effects.

TERPENE	BENEFIT	AROMA
 Pinene Also found in pine needles	Anti-inflammatory Anti-bacterial Bronchodilator Aids memory	Pine Earth
 Myrcene Also found in hops	Sedative Sleep aid Muscle relaxant	Flowers Pungent Earth
 Limonene Also found in citrus	Treats acid reflux Anti-anxiety Antidepressant	Citrus Fresh spice
 Terpinolene Also found in coriander	Analgesic Pain reduction Digestive aid Stomachic	Pine Herbal Anise Lime
 Linalool Also found in lavender	Anesthetic Anti-convulsive Analgesic Anti-anxiety	Flowers Lavender Citrus Fresh spice
 Terpineol Also found in mugwort	Calming aid Antibacterial Antiviral Immune system	Pleasant lilac Citrus Wood
 Caryophyllene Also found in black pepper	Anti-inflammatory Analgesic Protects cells lining Digestive tract	Citrus Spice
 Humulene Also found in basil	Anti-inflammatory	Robust Herbaceous Earth
 Ocimene Also found in thyme and alfalfa	Decongestant Antiseptic Antiviral Bactericidal	Citrusy green Wood Tropical fruit

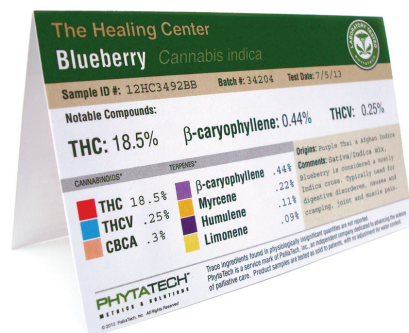


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What You Should Know

Safety and Efficacy



Risks

While relatively gentle, *Cannabis* has side effects -- anxiety, increased heart rate and changes in blood pressure. Regular use can lead to dependency and mild withdrawal syndrome. There is ongoing debate on possible long-term effects on psyche and cognition, immune system, fertility and pregnancy.

What's Inside

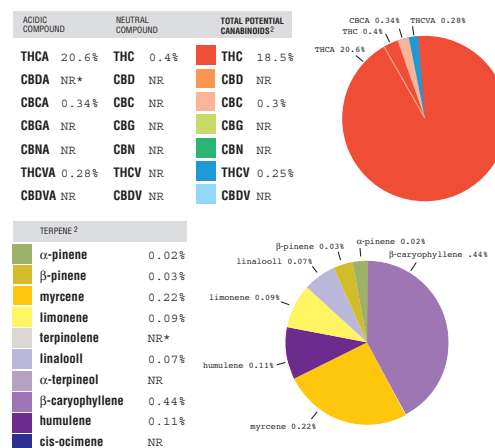
Look beyond THC potencies for all biologically relevant ingredients.

What's Not Inside

Cannabis should be free from dangerous levels of contaminants and pathogenic species – heavy metals, pesticides, herbicides, growth enhancers, microbes and fungi.

Chemical Fingerprint

Recognize the major cannabinoids and terpenes – the full chemical “fingerprint” that works for you.



* None Reported because the compound exists at or below the detection limit of the method.

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Medical *Cannabis* should be
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not medical advice. Talk to your
doctor about physician-guided
options available to you.

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PATIENT PAIN ASSESSMENT GUIDE

Patient Name _____ Date _____

1. Where is your pain? _____
2. Circle the words that describe your pain?

aching	sharp	penetrating	throbbing	tender
nagging	shooting	burning	numb	stabbing
exhausting	miserable	gnawing	tiring	unbearable
Circle One	occasional	continuous		

What time of day is your pain the worst? Circle one morning afternoon evening nighttime

3. Rate your pain by circling the number that best describes your pain at its worst in the last month.
No Pain 0 1 2 3 4 5 6 7 8 9 10 Pain as bad as you can imagine
4. Rate your pain by circling the number that best describes your pain at its least in the last month.
No Pain 0 1 2 3 4 5 6 7 8 9 10 Pain as bad as you can imagine
5. Rate your pain by circling the number that best describes your pain right now.
No Pain 0 1 2 3 4 5 6 7 8 9 10 Pain as bad as you can imagine
6. What makes your pain better? _____
7. What makes your pain worse? _____
8. What cannabis medicines are you receiving for your pain? Circle the number to describe the amount of relief the treatment or medicine provide(s) you
Medicine/dose _____ No Relief 0 1 2 3 4 5 6 7 8 9 10 Complete Relief
Medicine/dose _____ No Relief 0 1 2 3 4 5 6 7 8 9 10 Complete Relief
Medicine/dose _____ No Relief 0 1 2 3 4 5 6 7 8 9 10 Complete Relief

9. What side effects or symptoms are you having?

Circle the number that best describes your experience during the past week.

- | | | | |
|------------------------|-------------------|------------------------|--------|
| a. Nausea | Barely Noticeable | 0 1 2 3 4 5 6 7 8 9 10 | Severe |
| b. Vomiting | Barely Noticeable | 0 1 2 3 4 5 6 7 8 9 10 | Severe |
| c. Lack of appetite | Barely Noticeable | 0 1 2 3 4 5 6 7 8 9 10 | Severe |
| d. Fatigue | Barely Noticeable | 0 1 2 3 4 5 6 7 8 9 10 | Severe |
| e. Insomnia | Barely Noticeable | 0 1 2 3 4 5 6 7 8 9 10 | Severe |
| f. Dry mouth | Barely Noticeable | 0 1 2 3 4 5 6 7 8 9 10 | Severe |
| g. Other side effects: | _____ | | |

Comments: _____

Patient Signature _____ Dispensary Associate _____

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PALLIATECH

Date: _____ Time: _____	Date: _____ Time: _____
Reason for use/Symptoms: _____	Reason for use/Symptoms: _____
_____	_____
_____	_____
_____	_____
Strain: _____	Strain: _____
Amount Used: _____	Amount Used: _____
Method of Use: _____	Method of Use: _____
_____	_____
Pain: N/A 1 2 3 4 5 6 7 8 9 10	Pain: N/A 1 2 3 4 5 6 7 8 9 10
Cachexia: N/A 1 2 3 4 5 6 7 8 9 10	Cachexia: N/A 1 2 3 4 5 6 7 8 9 10
Nausea: N/A 1 2 3 4 5 6 7 8 9 10	Nausea: N/A 1 2 3 4 5 6 7 8 9 10
Seizures: N/A 1 2 3 4 5 6 7 8 9 10	Seizures: N/A 1 2 3 4 5 6 7 8 9 10
Muscle Spasms: N/A 1 2 3 4 5 6 7 8 9 10	Muscle Spasms: N/A 1 2 3 4 5 6 7 8 9 10
Agitation: N/A 1 2 3 4 5 6 7 8 9 10	Agitation: N/A 1 2 3 4 5 6 7 8 9 10

A daily log is the best way to evaluate the benefits and/or negative effects from Medical Cannabis use. Items to be recorded include: symptoms, amount and strain of medical cannabis or medical cannabis infused products used, positive effects and unwanted side effects.

MEDICAL MARIJUANA DISPENSARY FACILITY LICENSE APPLICATION
STATE OF CONNECTICUT- DEPARTMENT OF CONSUMER PROTECTION



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5. RFA: FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE OVERVIEW

5. RFA: FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE OVERVIEW

The PalliaTech team has been responsible for the design and management of nine medical marijuana dispensaries located in the States of New Jersey, Illinois, Montana and Maine. From the Company's branded PalliaChatSM and PalliaWellSM programs to its training and educational programs, led by twenty year Connecticut pharmacist, Roy Ciarlo, PalliaTech's experienced team is poised to contribute to Connecticut's medical marijuana industry.

PalliaTech CT, LLC's Board of Directors is committed to the success of its planned Connecticut operation and stands ready to support its management team to meet Connecticut's high industry standards.

GOVERNANCE

Boris Jordan- Chairman

Boris Jordan is an American businessman and entrepreneur. Among his non-profit activities, Mr. Jordan is a Member of the prestigious Council on Foreign Relations and is a member of The Board of Trustees of New York University. In the early 1990's as a Managing Director at Credit Suisse, Mr. Jordan was a senior manager in the CS Privatization and Corporate Finance divisions. Among his achievements, Mr. Jordan assisted in Russia's economic transition to capitalism, including assisting in the launch of the Russian stock market and the privatization of state assets. Since then, Mr. Jordan has been an investor and business operator engaged in the scaling emerging companies throughout North America, Europe and Asia.

Because of his deep belief in the palliative benefits of medical marijuana, Mr. Jordan has now turned his attention to the medical cannabis industry. Mr. Jordan is a 60% shareholder in PalliaTech, Inc., the applicant's parent company. As board member and the largest beneficial shareholder of PalliaTech, Mr. Jordan has guided the company to design, build and manage certified medical marijuana testing facilities, cultivation and manufacturing operations and dispensaries in three states. Mr. Jordan hopes to assist PalliaTech in contributing to Connecticut's pharmacologically-oriented medical marijuana industry.

Mr. Jordan shares in PalliaTech, Inc. (60% stakeholder in PalliaTech CT, LLC's parent) are held in Medtech International, LLC, a holding company that is wholly-owned by Mr. Jordan.

Richard Taney

Mr. Taney is a member of PalliaTech CT, LLC's Board of Directors and is CEO and President of its parent, PalliaTech, Inc. Mr. Taney has a track record of scaling young medical companies. From 2006-2010, Mr. Taney held the position of President and CEO of Delcath Systems, Inc., (NASDAQ: DCTH) where built a world-class Scientific Advisory Board and began enrolling the company in various clinical trials. Mr. Taney was also formerly with Salomon Brothers and Goldman Sachs Asset Management. He is an active alumni of Tufts University and holds a JD from Temple University.

Christine Rigby

Ms. Rigby is Chief Executive Officer of PalliaTech CT, LLC. She is a former Senior Vice President at CitiGroup and is currently involved in multiple Connecticut-based businesses. She has scaled organizations to a staff of 150 individuals over a short three year period. Her personal experience of watching loved ones suffer from the medical conditions that can now be treated in Connecticut thanks to its medical marijuana laws spurred her to join as Chief of PalliaTech. Ms. Rigby is actively involved in a many Connecticut non-profits.

5. RFA (E)(1): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE
ARTICLES OF INCORPORATION AND GOVERNANCE

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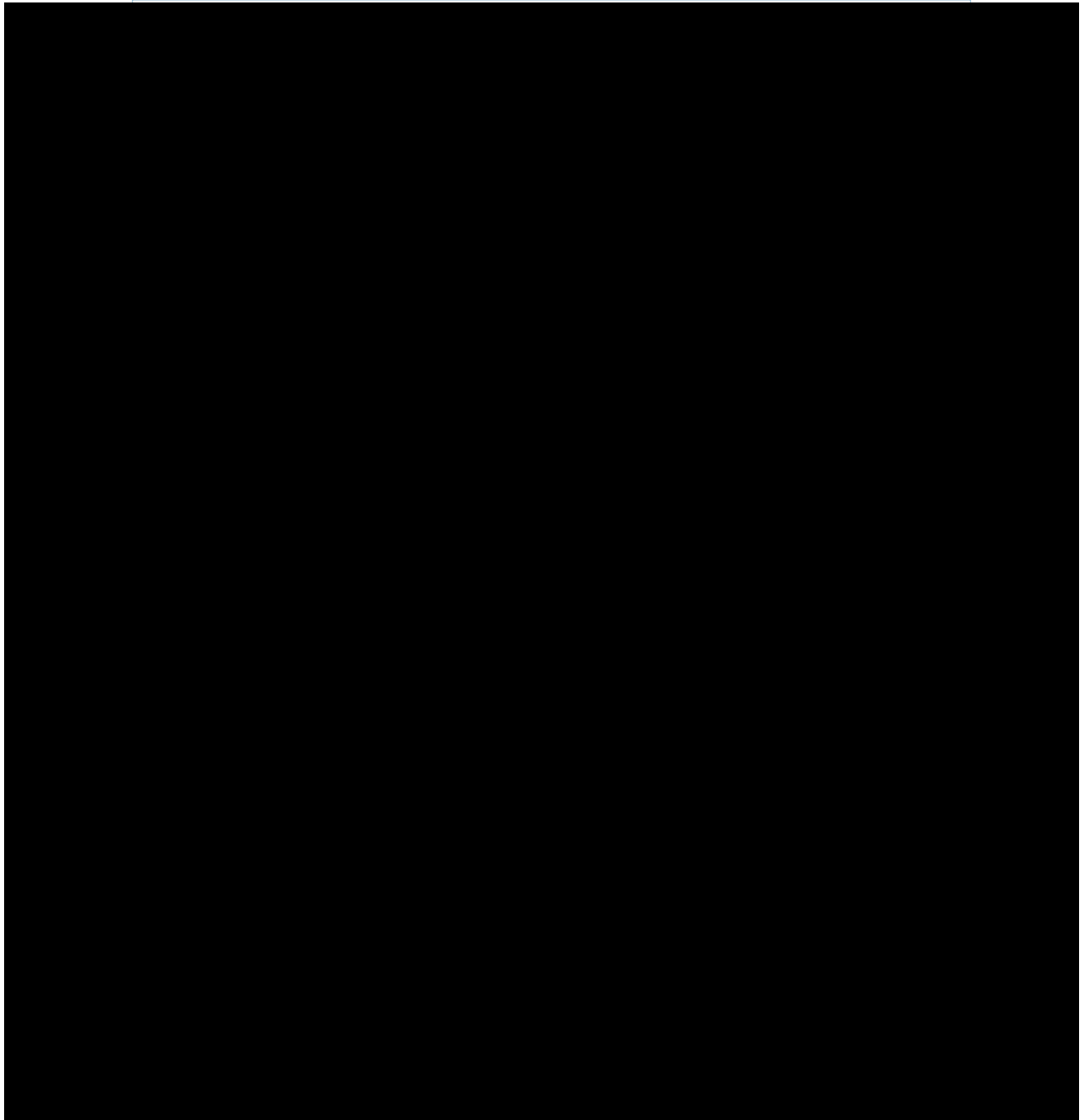
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ARTICLES OF INCORPORATION AND GOVERNANCE

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“Provide 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.”

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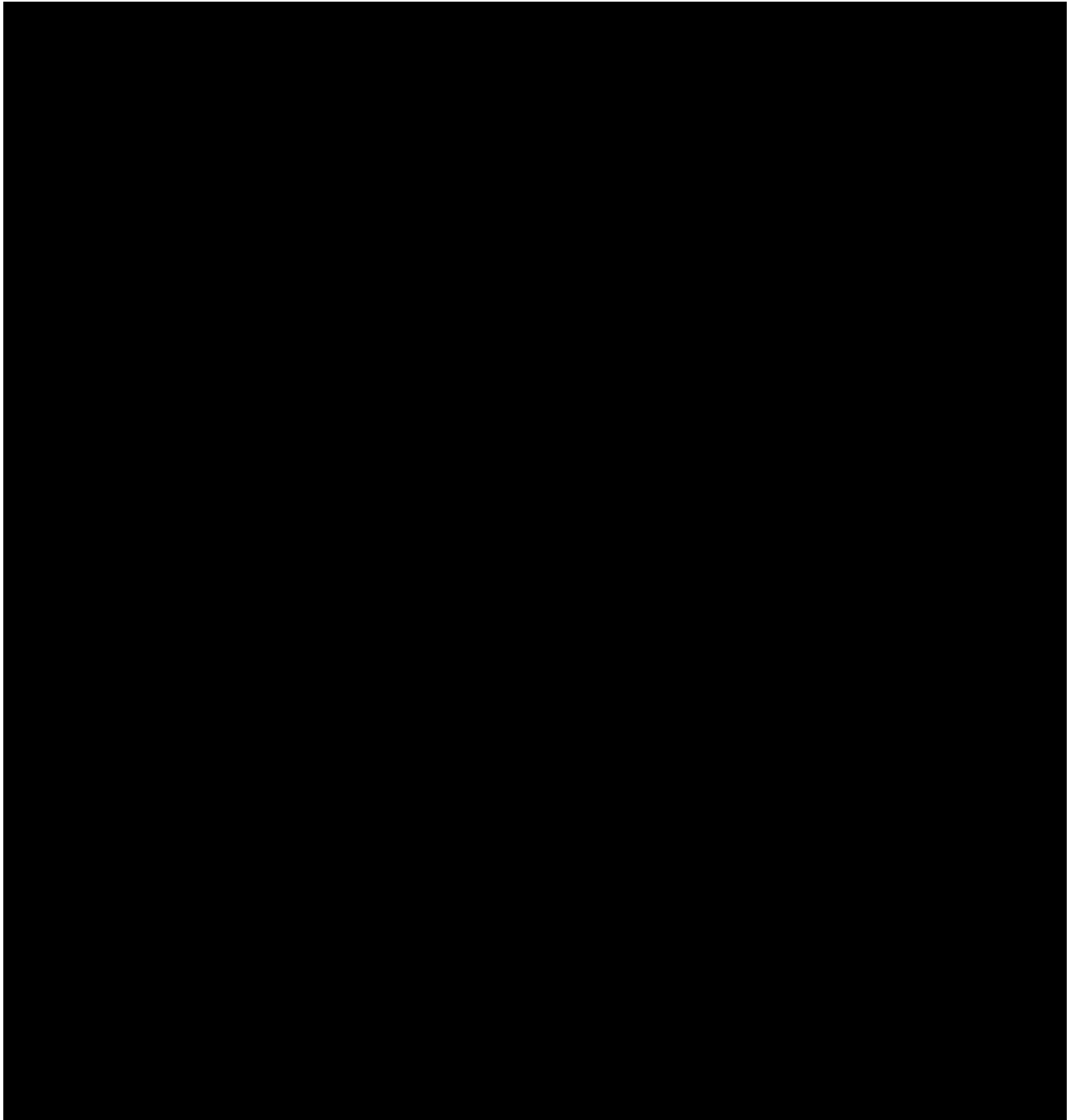
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ARTICLES OF INCORPORATION AND GOVERNANCE

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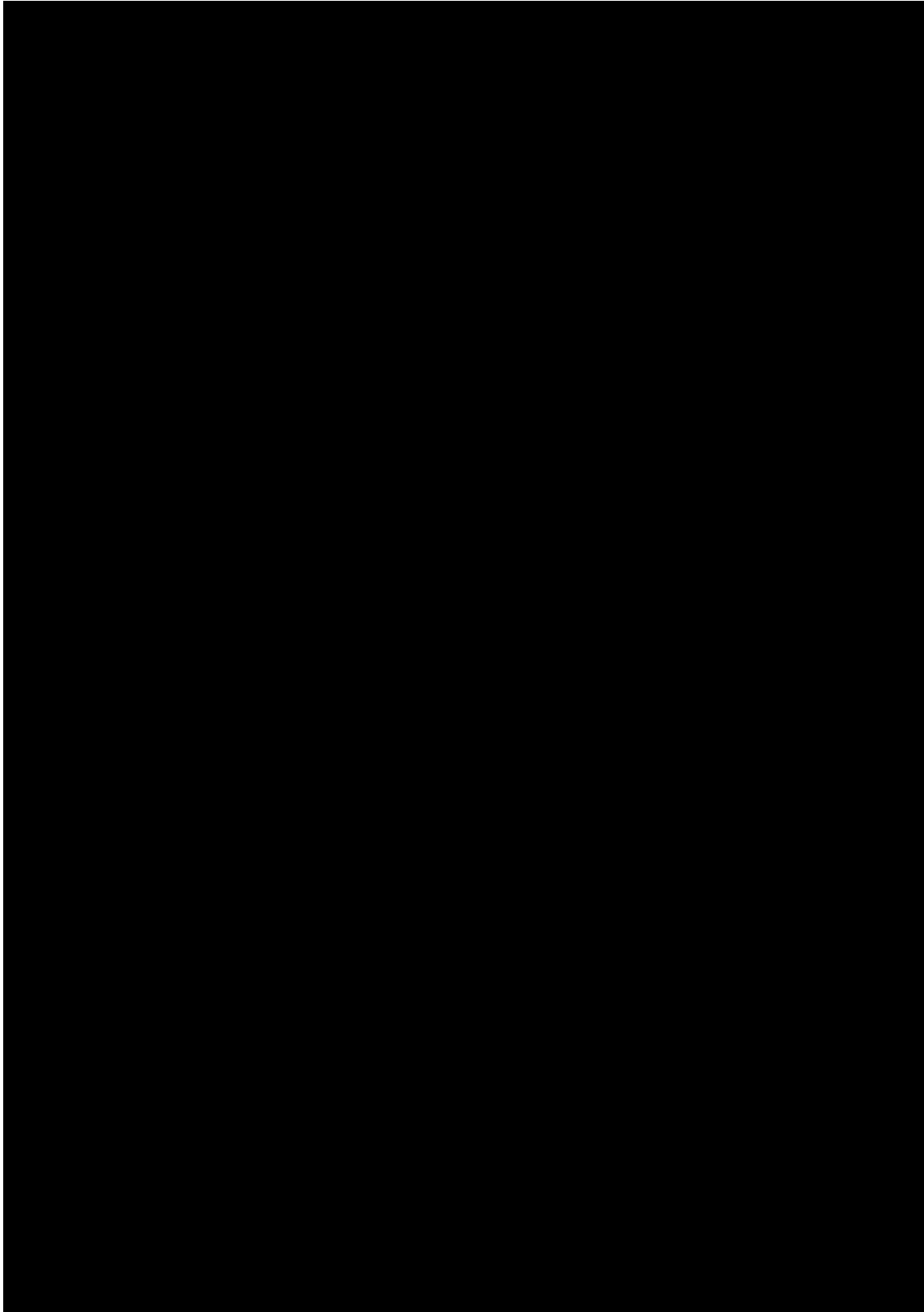
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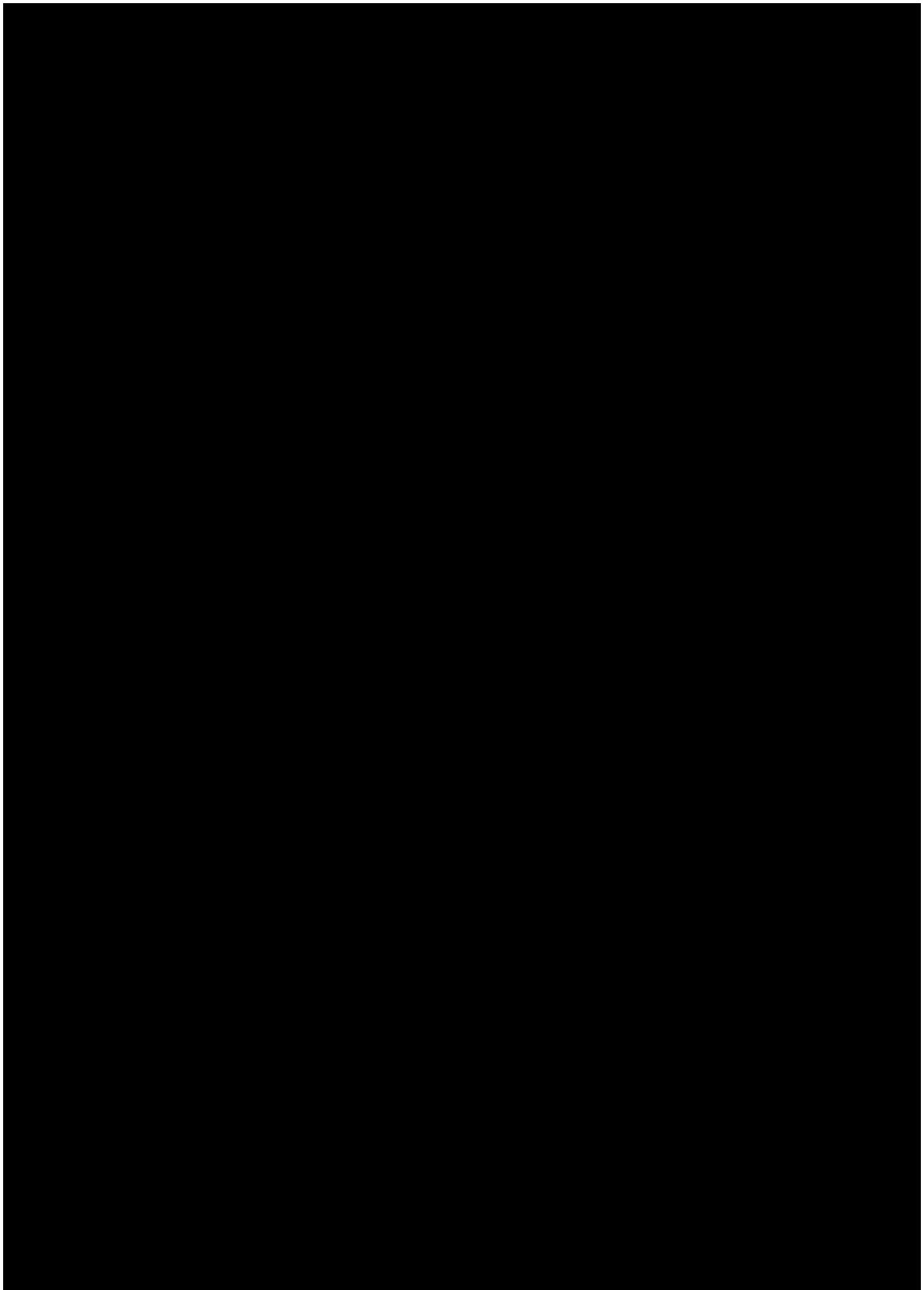
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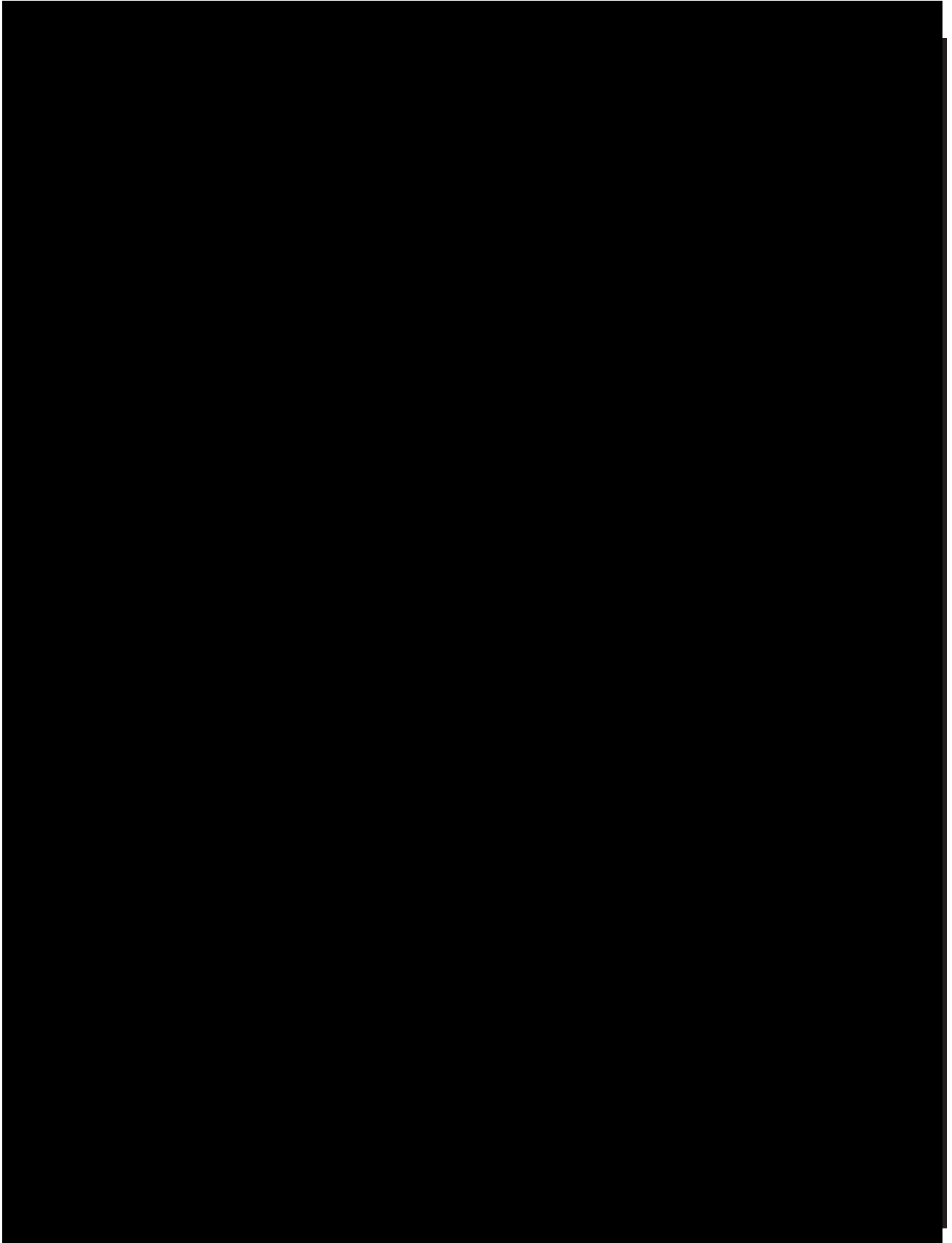
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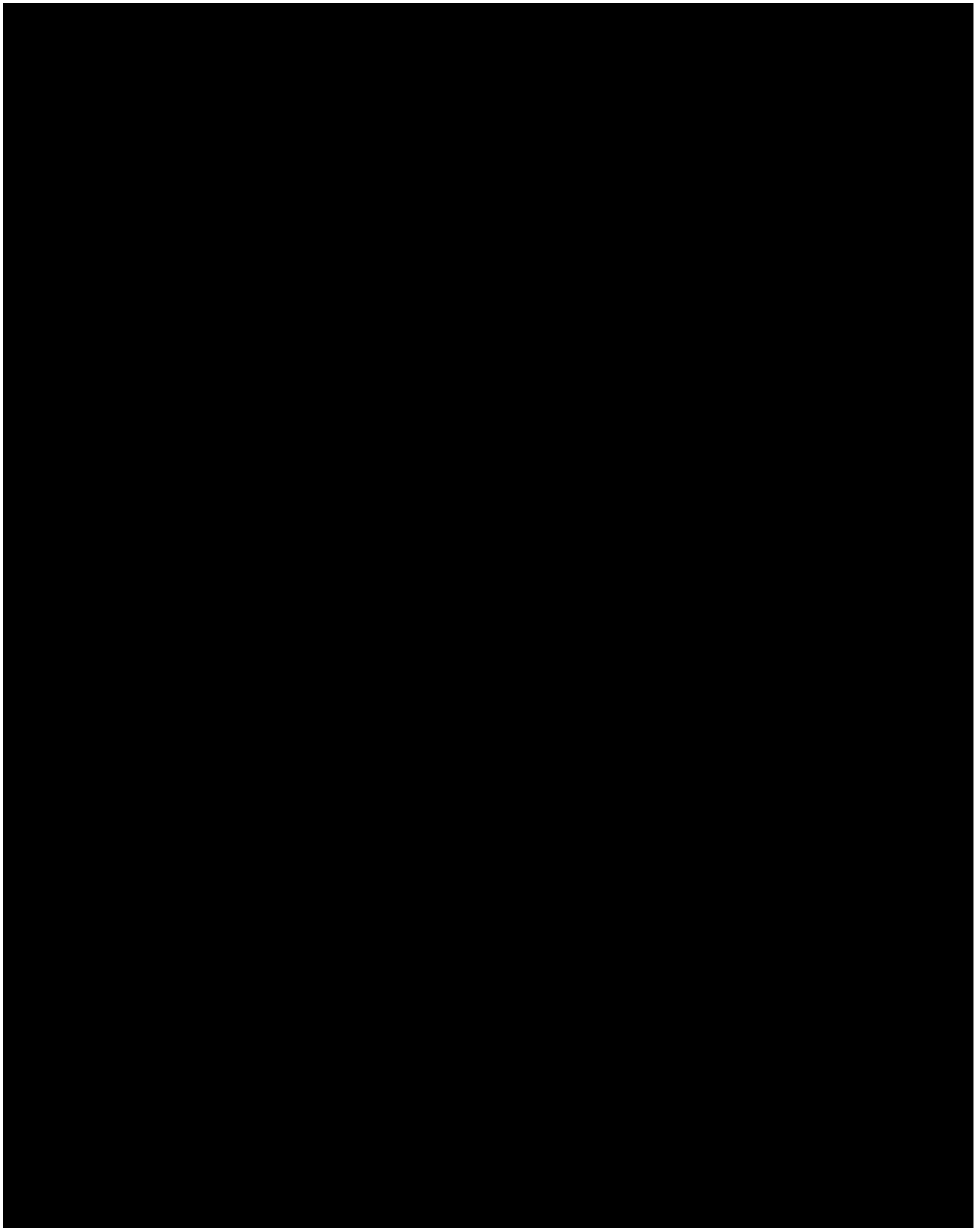
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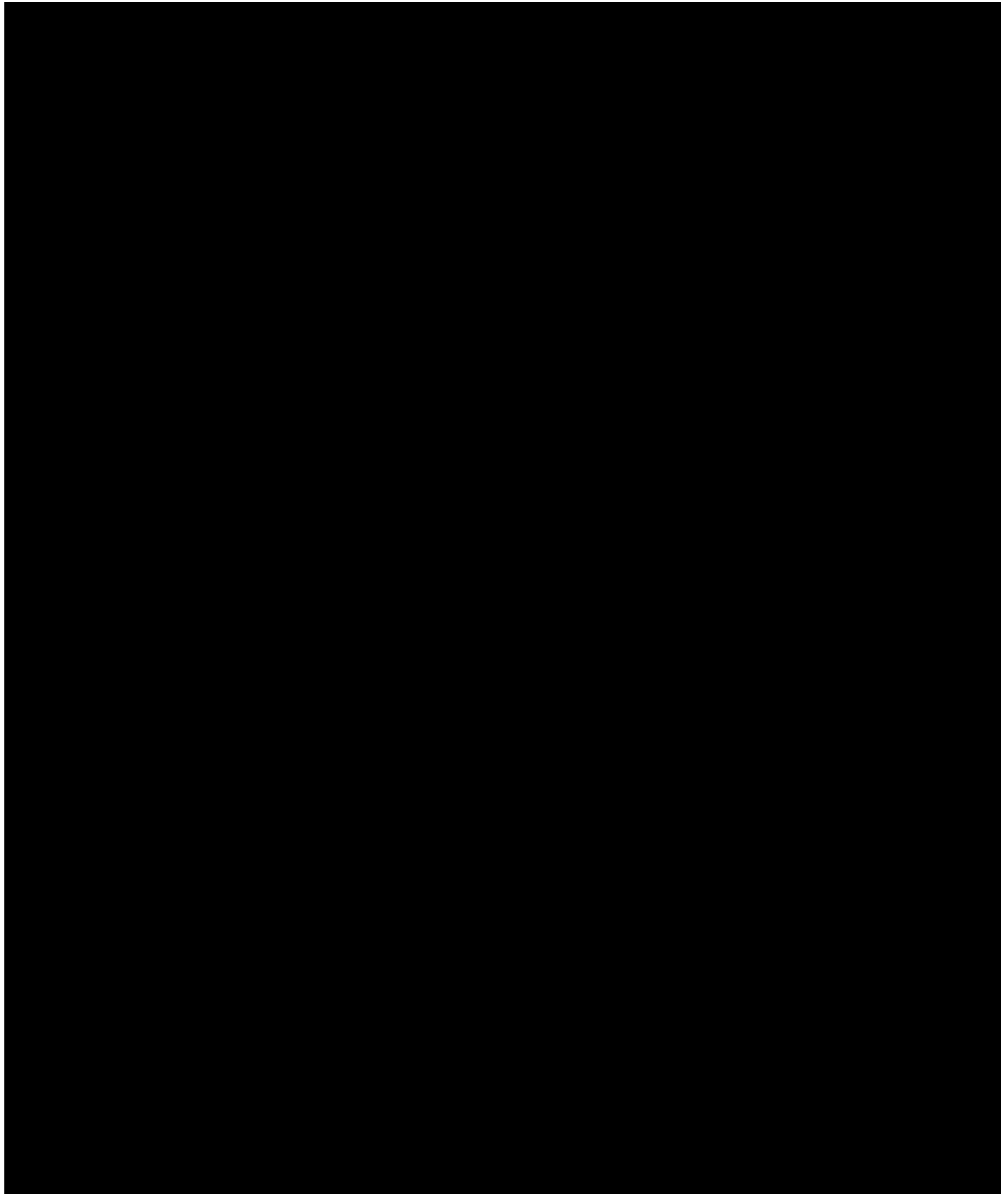
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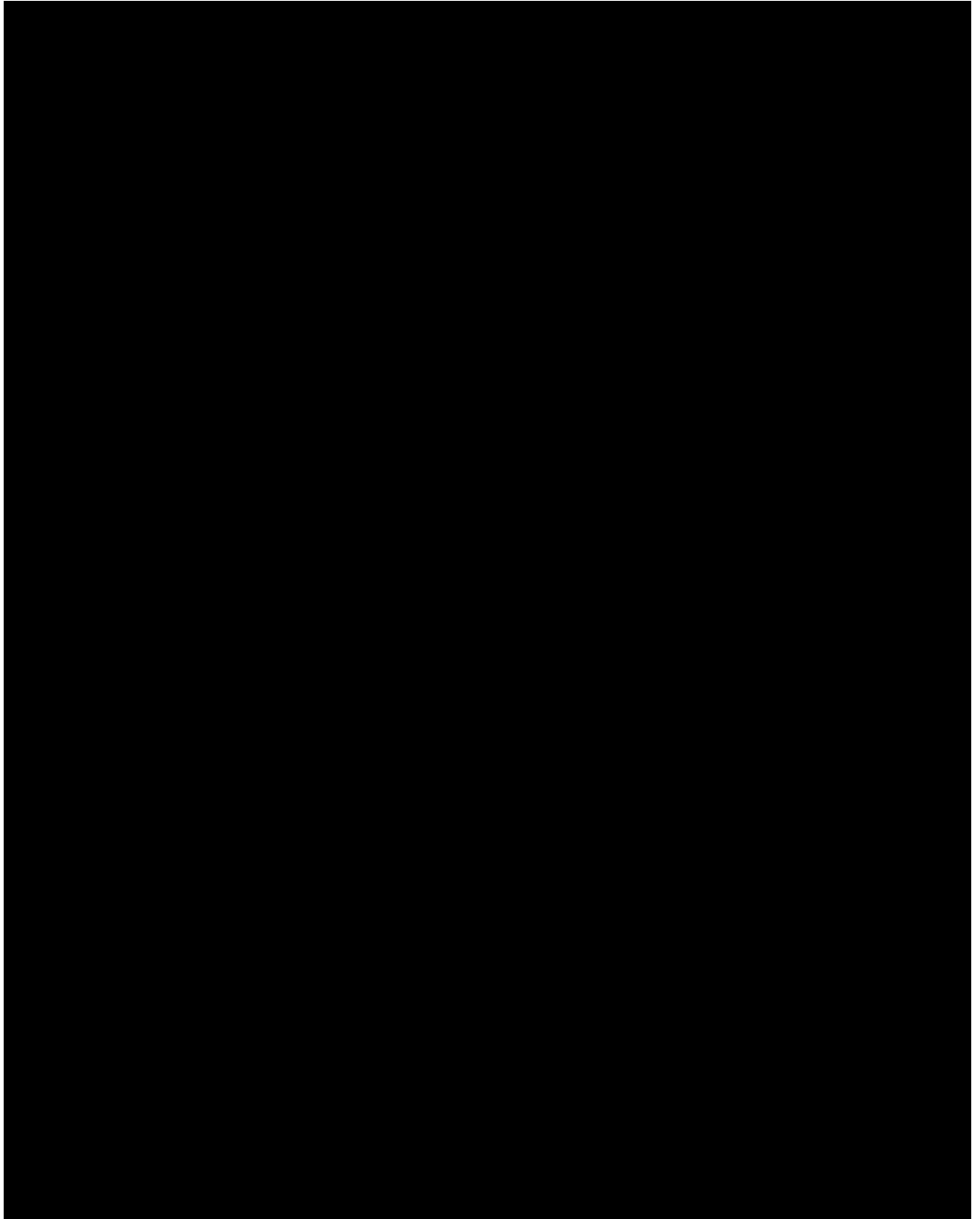
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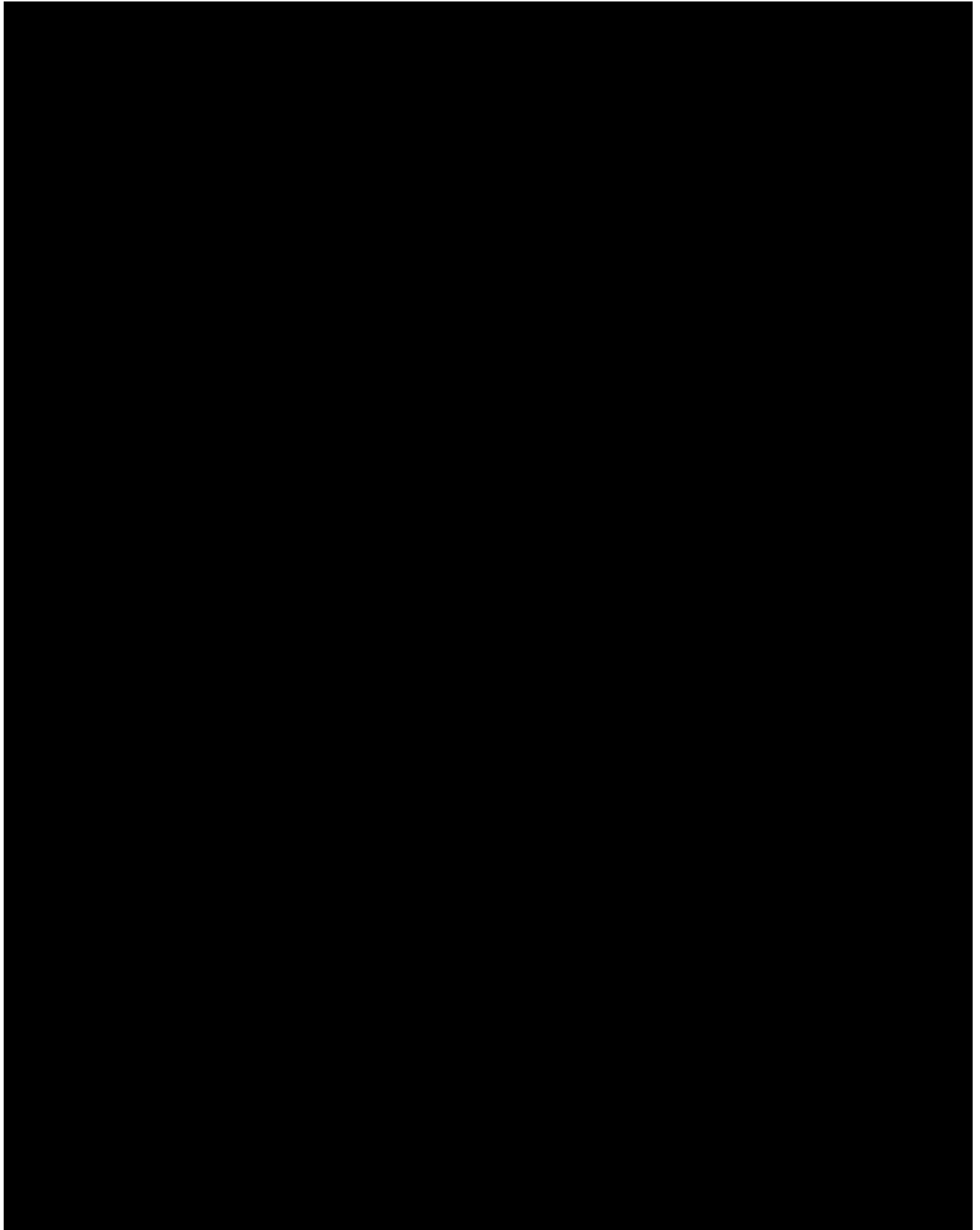
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5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

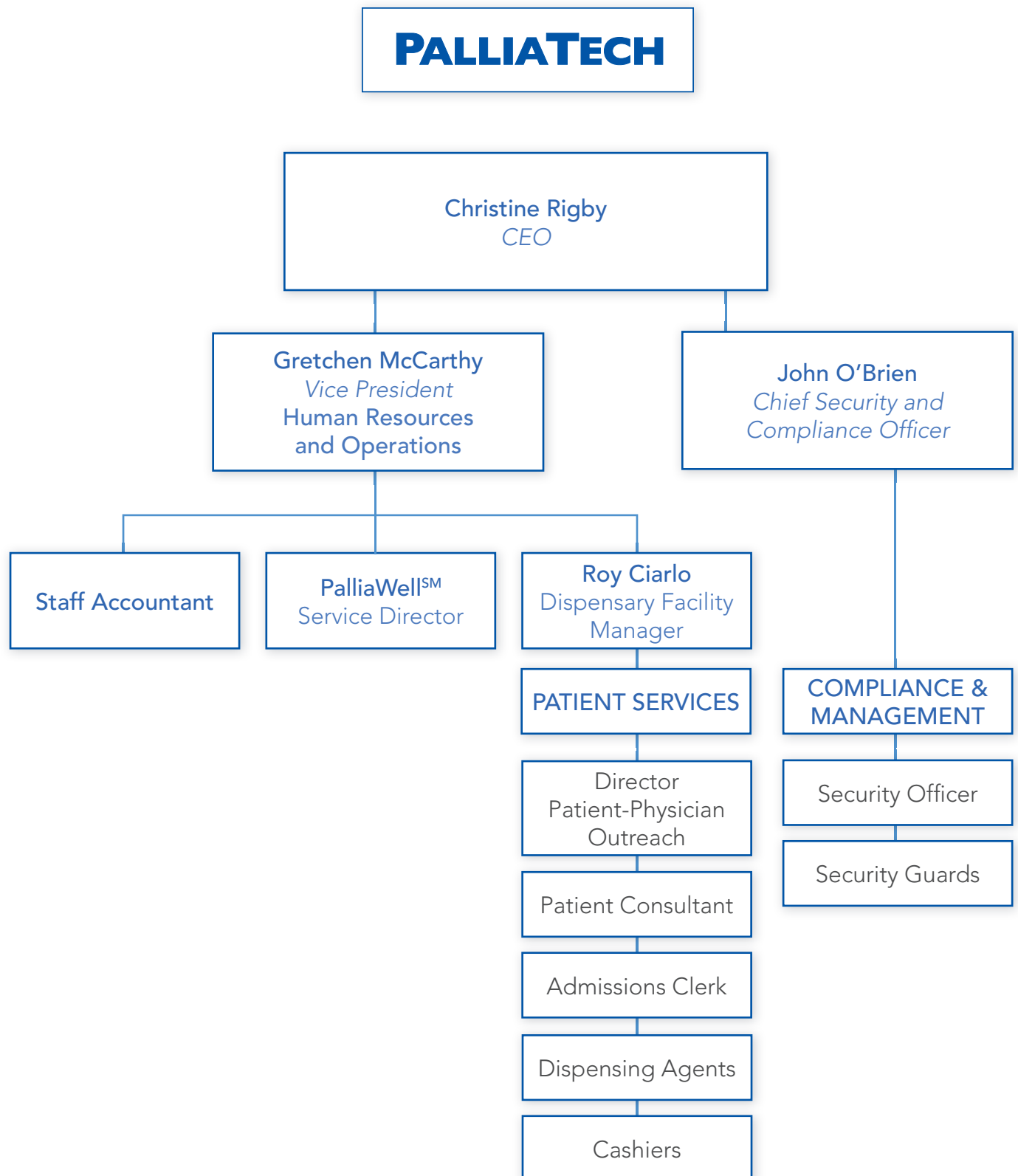
ORGANIZATIONAL CHART AND STAFFING

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“Provide 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 dispensary facility.”

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5. **RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE**
ORGANIZATIONAL CHART AND STAFFING



5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

“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 dispensary facility”

ORGANIZATIONAL STRUCTURE - STAFFING

PalliaTech is a national leader in the design, build-out, and launch of premier medical marijuana facilities. Just as important, the Company excels in staffing and operating such facilities with the highest measure of professionalism and compassionate care.

Our operations team brings broad expertise and a record of success in medical marijuana operations in Colorado, Montana, New Jersey, Illinois and Washington; and we are mutually committed to achieving the legislative intent of Connecticut’s Medical Marijuana Program by delivering incomparable levels of quality, service, safety, and security.

HIRING AND RECRUITMENT

Since we believe the quality of our dispensing operations are only as good as the people who handle them, we have made it a priority to hire staff with professional backgrounds or academic degrees in health related fields; or with experience in regulated retail sales. As an Equal Opportunity Employer, we are also committed to a diverse workforce across all aspects of our operations.

Accordingly, we will use a combination of networking, online job boards/postings, local job fairs, and professional recommendations to seek out the best candidates. We will partner with local Chambers of Commerce, community-based organizations, and veterans organizations to leverage their experience in attracting local talent and adding jobs in their communities.

What is more, we will reinforce our hiring practices by relying not only on the accuracy of data contained in employment applications, but also on other important factors such as criminal background checks and drug testing. All hiring will be contingent on the findings of these checks and tests, and any falsifications will result in elimination from further consideration or termination.

STAFFING PLAN OVERVIEW

Dispensary Management

- CEO with extensive business success and community contributions, as well as active involvement in multiple Connecticut based businesses.
- Dispensary Facility Manager who has an active Connecticut license and who has completed a state approved educational course on the proper use of medical Cannabis. The Pharmacist is required to be on-site at all times when the dispensary is open to oversee the day-to-day processes in accordance with state regulations, including hiring dispensary staff, inventory management, reconciling daily sales transactions, marketing, employee training, human resources, and performance management. Moreover, the Pharmacist will assist certified patients and their designated caregivers in the proper use of dispensing devices.
- Chief Security & Compliance Officer manages enforcement of local codes and state laws regarding medical marijuana compliance and mitigation activities.
- Director, Patient-Physician Outreach is responsible for planning and implementing outreach efforts to physicians, patients, community groups, and other appropriate parties in dispensary markets.

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

- PalliaWellSM Service Director is responsible for the planning, development, implementation and monitoring of all PalliaWellSM programs and initiatives.
- Security Officer implements security policies and procedures. Oversees onsite security guards and works with local law enforcement as needed.
- Staff Accountant provides management with financial information by researching and analyzing accounts; preparing financial statements.
- Vice-President, Human Resources and Operations with extensive dispensary operations and human resources experience to manage the day-to-day operations as well as human resource functions.

DISPENSARY STAFF

- **Admissions Clerks** greet patients, caregivers, and others upon arrival; determine the reason for the visit; verify identities and registration; allow secure access, and directs them to the appropriate point-of-sale (POS) location and personnel.
- **Patient Consultants** work one-on-one with patients and caregivers under the direct supervision and guidance of the Pharmacist. Patient Consultants provide the most up-to-date information and education on the types, applications, and accepted uses of available medical marijuana products as well as respond to patients' questions and concerns.
- **Dispensing Agents** fulfill orders from inside a secure vault and issue packaged products that have been purchased. Dispensing Agents are also be responsible for storing products and maintaining inventory.
- **Cashiers** confirm patient/caregiver identities, finalize all orders, and handle all transactions.
- **Security Guards** discretely monitor the entire premises and all visitors and personnel, always complying with dispensary rules of conduct and local regulations. The Guards are also available to escort patients to their vehicles if requested or required.

DETAILED POSITION DESCRIPTIONS

Chief Executive Officer (CEO) – Christine Rigby (Please refer to attached resume)

The president is responsible for providing strategic leadership for the dispensary by working with the Board and other management to establish long-range goals, strategies, plans and policies. Christine Rigby will be the CEO of our dispensary.

Ms. Rigby has a track record of business success and community involvement. She is a former Senior Vice President at CitiGroup and is currently involved in multiple Connecticut-based businesses. Ms. Rigby's personal experience of watching loved ones suffer from the medical conditions that can now be treated in Connecticut thanks to its medical marijuana laws spurred her to join as Chief of PalliaTech. Ms. Rigby has been a Connecticut resident for over 20 years and is actively involved in a number of charitable organizations.

The CEO's responsibilities include:

- Plan, develop, organize, implement, direct and evaluate the dispensary's fiscal function and performance.
- Participate in the development of the dispensary's plans and programs as a strategic partner.
- Evaluate and advise on the impact of long range planning, introduction of new programs/strategies and regulatory action.
- Provide timely and accurate analysis of budgets, financial reports and financial trends in order to assist the Board and senior executives in performing their responsibilities.
- Enhance and/or develop, implement and enforce policies and procedures of the dispensary by way of systems that will improve the overall operation and effectiveness of the corporation.
- Improve the budgeting process on a continual basis through education of department managers on financial issues impacting their budgets.

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

Vice President, Human Resources and Operations – Gretchen McCarthy (Please see attached resume)

The VP Human Resources is responsible for directing all of the people functions of the dispensary in accordance with the policies and practices of PalliaTech, the ethical and social consciences of business and society and the laws, regulations and administrative rulings of governmental organizations and other regulatory and advisory authorities and organizations. Gretchen McCarthy will be the Vice-President, Human Resources and Operations for the dispensary.

Ms. McCarthy will bring nearly five years of dispensary operations experience to the Connecticut operation. Prior to joining PalliaTech, Ms. McCarthy was the Dispensary Operations Manager for Maine Organic Therapy Group, a medical marijuana dispensary in Ellsworth, Maine and is currently the Acting Dispensary Operations Manager in PalliaTech-managed Compassionate Sciences Alternative Treatment Center. Ms. McCarthy has a Bachelor of Science from Capella University in Business/Human Resources Management and a Human Resources Certification from the Human Resources Institute in Professional Human Resources.

The Vice President, Human Resources and Operations responsibilities are:

- Plan, develop, organize, implement, direct and evaluate the dispensary's human resource function and performance.
- Participate in the development of PalliaTech's plans and programs as a strategic partner but particularly from the perspective of the impact on people.
- Translate the strategic and tactical business plans into HR strategic and operational plans.
- Evaluate and advise on the impact of long range planning of new programs/strategies and regulatory action as those items impact the attraction, motivation, development and retention of the people resources of the company.
- Develop staffing strategies and implementation plans and programs to identify talent within and outside the corporation for positions of responsibility.
- Identify appropriate and effective external sources for candidates for all levels within the dispensary.
- Develop progressive and proactive compensation and benefits programs to provide motivation, incentives and rewards for effective performance and to provide programs which utilize an employee and company partnership for the short and long-range health and welfare protection of the employees.
- Develop human resource planning models to identify competency, knowledge and talent gaps and develop specific programs for the filling of the gaps.
- Continually assess the competitiveness of all programs and practices against the relevant comparable companies, industries and markets.

Qualifications, Experience & Education

- At least 5 years' related experience and/or training; or equivalent combination of education and experience.
- Medical marijuana industry experience.

Dispensary Facility Manager – Roy Ciarlo (Please refer to attached resume)

The Dispensary Facility Manager is required to be on-site at all times when the dispensary is open to oversee the day-to-day processes in accordance with state regulations, including hiring dispensary staff, inventory management, reconciling daily sales transactions, marketing, employee training, human resources, and performance management. Moreover, the Pharmacist will assist certified patients and their designated caregivers in the proper use of dispensing devices. Roy Ciarlo will be our Dispensary Facility Manager.

Mr. Ciarlo, is a licensed Connecticut pharmacist with over 20 years retail and clinical pharmacy experience. Mr. Ciarlo gained a deep understanding of the complexities of non-traditional pharmaceuticals when holding a position as the Chief Pharmacist at Connecticut Counseling Clinic, a methadone clinic, where he developed a deep commitment to the after-care of his pharmacy patients.

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

The Dispensary Facility Manager's responsibilities include:

- Oversees the preparation of cannabis-based medications based on physician recommendations.
- Trains Dispensing Technicians and ensures they are properly trained.
- Completes dispensary operational requirements by organizing and directing Dispensing Agents work flow; verifying their preparation and labeling of medications; verifying order entries, charges, and inspections.
- Provides information by answering questions and requests of health care professionals; counseling patients on cannabis - based therapies.
- Complies with local, state and federal laws regarding medical marijuana.
- Maintain records; removing outdated and damaged cannabis-based medications from the dispensary inventory.
- Maintains pharmacological knowledge by attending educational workshops; reviewing professional publications; establishing personal networks; participating in professional societies.

Qualifications, Experience & Education

- Has an active Connecticut State license and who has completed a state-approved educational course on the proper use of medical Cannabis
- Graduate of an accredited Pharmacy School
- Must have at least 5 years retail pharmacy experience.

Director, Patient-Physician Outreach (To be hired)

The Patient/Doctor Outreach Director is responsible for planning and implementing outreach efforts to physicians, patients, community groups, and other appropriate parties in dispensary markets. The Patient/Doctor Outreach Director is also responsible for developing and implementing education, support and community outreach initiatives.

The Director, Patient-Physician Outreach responsibilities include:

- Responsible for building a strong patient educational platform by working within the community to educate patients and caregivers on the benefits and outcomes of these vital therapies.
- Responsible for effective physician outreach to educate on the benefit of cannabis therapy and assisting physicians in educating their patients on the benefits.
- Providing patient education and materials to help support their understanding of cannabis based therapy.
- Develop seminar and educational workshops addressing the identified needs of the community.

Qualifications, Experience & Education

- A Bachelor's Degree or equivalent
- 3+ years experience in marketing, communications, community development, or related fields.
- Knowledge and experience in community organizing. Familiarity with community development principles and tools that strengthen community participation.
- Experience planning and facilitating meetings, and identifying community needs

Chief Security & Compliance Officer – John O'Brien (Please refer to attached resume)

The Compliance Officer manages enforcement of local codes and state laws regarding medical marijuana compliance and mitigation activities. The Compliance Officer is also responsible for creating and directing regulatory compliance initiatives. John O'Brien will be our Chief Compliance Officer.

Serving under New Jersey Governor Chris Christie, Mr. O'Brien was the Executive Director for the NJ DOH Medicinal Marijuana Program from its inception in 2011 through April 2015. His prior experience includes over 25 years of distinguished law enforcement leadership, including Assistant Bureau Chief for the NJ State Police.

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

ORGANIZATIONAL CHART AND STAFFING

The Chief Compliance Officer responsibilities include:

- Responds to violations of rules, regulations, policies, procedures and standards of conduct by evaluating or recommending the initiation of investigative procedures. Develops and oversees a system for handling of such violations
- Acts as an independent review and evaluation to ensure compliance issues/concerns within the dispensary are being appropriately evaluated, investigated and resolved.
- Ensures proper reporting of violations to authorized enforcement agencies as appropriate/required.

Qualifications, Experience & Education

- Completion of two years of college equivalent required; bachelors degree preferred.
- Two years of work experience in internal audit, legal, internal controls or risk management preferred.

PalliaWell Service Director (To be hired)

The PalliaWellSM Service Director is responsible for the planning, development, implementation and monitoring of all PalliaWellSM programs and initiatives. The Service Director is also responsible for providing patient communications and customer service for all PalliaWellSM programs as per established policy.

The PalliaWell Service Director's responsibilities include:

- Develop, coordinate, manage, and maintain all aspects of PalliaWellSM program.
- Conduct benchmarking analysis and environmental and culture assessments to aid in program development
- Coordinate community seminars.
- Answer patient and caregiver questions regarding all PalliaWellSM programs.
- Assist in drafting patient communications with respect to PalliaWellSM programs.
- Develop ongoing relationships with patients and caregivers

Qualifications, Experience & Education

- Minimum 5-years experience developing and leading Wellness programs
- Medical marijuana industry experience preferred

Security Officer (To be hired)

The Security Officer implements security policies and procedures and oversees onsite security guards and works with local law enforcement as needed. The Security Officer is also responsible for ensuring patient, staff, and product security throughout the production and provisioning system.

The Security Officer's responsibilities include:

- Manages security guard staff with regard to hiring, discipline, and termination; conducts performance evaluations.
- Trains security guard staff in safety practices and methods used to detect fraudulent transactions.
- Leads and monitors emergency control program implementation; ensures that activities comply with policies, procedures and practices
- Monitors security and safety equipment; coordinates with equipment vendors on maintenance and upkeep

Qualifications, Experience & Education

- Three years prior experience in security, law enforcement or related field
- Previous training in non-violent communication, conflict de-escalation preferred

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

- Prior experience working with electronic monitoring systems required.
- Requires critical thinking skills to be able to quickly observe a situation and make the appropriate response

Staff Accountant (To be hired)

The Staff Accountant provides management with financial information by researching and analyzing accounts; preparing financial statements.

The Staff Account's responsibilities include:

- Prepares consolidated internal and external financial statements by gathering and analyzing information from the general ledger system and from departments.
- Maintains and balances an automated consolidation system by inputting data; scheduling required jobs; verifying data.
- Analyzes information and options by developing spreadsheet reports; verifying information.
- Prepares general ledger entries by maintaining records and files; reconciling accounts.
- Prepares payments by accruing expenses; assigning account numbers; requesting disbursements; reconciling accounts.
- Develops and implements accounting procedures by analyzing current procedures; recommending changes.
- Protects organization's value by keeping information confidential.
- Updates job knowledge by participating in educational opportunities; reading professional publications; maintaining personal networks; participating in professional organizations.

Qualifications, Experience & Education

- Bachelor's degree in related field
- Advanced mathematic skills, the ability to analyze figures, knowledge of accounting principles and excellent verbal and written skills

Admissions Clerk (To be hired)

The Admissions clerk is responsible for greeting patients, caregivers and others upon arrival and determining the reason for the visit and verifies identities and registration. The Admissions clerk allows secure access and directs patients to the appropriate point-of-sale (POS) location and personnel.

The Admission Clerk's responsibilities include:

- Provide excellent service and exceptional interactions with all visitors, patients and staff to achieve dispensary standards.
- Maintains security by following procedures; monitoring logbook; issuing visitor badges.
- Execute patient check in protocols and procedures and obtain proper documentation at each patient visit.
- Ensure new patient packets are stocked and ready for new patient arrivals.
- Promote a work environment that is positive, customer-service oriented, and compliant with established policies and procedures.
- Accountable for accurately utilizing front desk computer system, printers and scanning device.

Qualifications, Experience & Education

- Minimum two years of administrative customer relations/customer service experience; experience in the retail & health industry a plus.
- Requires excellent customer/patient service skills

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

- Must be computer proficient with good attention to detail
- A high school diploma or GED required

Patient Consultants (To be hired)

Patient Consultants work one-on-one with patients and caregivers under the direct supervision and guidance of the Pharmacist. Patient Consultants provide the most up-to-date information and education on the types, applications, and accepted uses of available Cannabis products as well as respond to patients' questions and concerns.

The Patient Consultants responsibilities include:

- Provides education consultations regarding medical cannabis strains and applications, effects and routes of delivery in the human system.
- Utilizes well-versed knowledge on all Cannabinoids and how they affect the body
- Retains thorough and comprehensive knowledge of patient and member benefits
- Maintains knowledge of the cannabis testing process, and why it benefits patient
- Executes excellent, compassionate, and accurate patient services
- Responsible for orderly maintaining transactions during interactions with patients
- Prepares products for display

Qualifications, Experience & Education

- Minimum two years of administrative customer relations/customer service experience; experience in the retail & health industry a plus.
- Requires excellent customer/patient service skills
- Must be computer proficient with good attention to detail
- A high school diploma or GED required

Dispensing Agents (To be hired)

The Dispensing Agents are responsible for fulfilling orders inside the limited access, secure vault and issue packaged products that have been purchased to the Cashiers. The Dispensing Agents must have a complete understanding of the use, side effects and medicine used to treat common disease states and must also demonstrate ethical conduct and maintain confidentiality of patient information. Dispensing Agents will be given the task of preparing, dispensing, distributing, and administering cannabis-based medications under the direct supervision of the pharmacist.

The Dispensing Agents responsibilities include:

- Organizes cannabis-based medications to dispense by reading medication orders; preparing labels; calculating quantities
- Stores and maintains inventory by checking stock to determine inventory level; anticipating needed medications and supplies; placing and expediting orders; verifying receipt; removing outdated products.
- Entering patient and order information into the point-of-sale system

Qualifications, Experience & Education

- Minimum two years of administrative customer relations/customer service experience; experience in the retail & health industry a plus.
- Requires excellent customer/patient service skills
- Must be computer proficient with good attention to detail
- A high school diploma or GED required

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

ORGANIZATIONAL CHART AND STAFFING

Cashiers (To be hired)

Cashiers are responsible for confirming patient/caregiver identities, finalizing all orders, and handling all patient/caregiver transactions.

The Cashiers responsibilities include:

- Responsible for taking money in the form of cash, or credit card from patients in exchange for their cannabis-based products.
- Scans product items using bar code scanning and ensures pricing and medicine content is correct.
- Balances cash drawer by counting cash at beginning and end of work shift; resolve amount discrepancies.
- Provides pricing information to patients by answering questions.
- Maintains checkout operations by following policies and procedures

Qualifications, Experience & Education

- Minimum two years of administrative customer relations/customer service experience; experience in the retail & health industry a plus.
- Requires excellent customer/patient service skills
- Must be computer proficient with good attention to detail
- A high school diploma or GED required

Security Guards (To be hired)

The Security Guards discretely monitors the entire premises and all visitors and personnel, always complying with dispensary rules of conduct and local regulations. The Security Guards are also available to escort patients to their vehicles if requested or required.

The Security Guard's responsibilities include:

- Assists in verifying identification including required documentation of dispensary agents, patients, caregivers, and visitors, before allowing entry to the dispensary
- Conduct routine foot patrols of dispensary and periphery
- Assist and escort patients with special needs as requested, including assistance in and out of vehicles where appropriate
- Ensure departmental and dispensary compliance to internal, local and state regulations
- Ensure compliance with occupational safety and health standards in the workplace; resolve any unsafe conditions in and around the dispensary
- Auditing of security issues as they arise

Qualifications, Experience & Education

- Two years prior experience in security, law enforcement or related field
- Experience working in the medical cannabis and/or health industry highly desirable
- Guard certification preferred
- Excellent customer service skills
- A high school diploma or GED required

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

EMPLOYMENT REQUIREMENTS / QUALIFICATIONS

It will be a requirement that all employees hired are 21 years of age or older and the company shall not employ anyone who has been convicted of any felony of sale or possession of drugs, narcotics or controlled substances. Any candidate who is being considered for hire will need to have a criminal background check conducted prior to employment and any offer given will be contingent on successfully clearing the background process.

If an applicant is found to have an arrest record which includes drug related offenses or felony convictions, they will not be considered and will be notified of the outcome and reasons for disqualification.

If hired, criminal background checks will be repeated annually at the time of renewing their registry identification card.

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

Christine Gargus Rigby

19 Morgan Lane, Monroe • Connecticut 06468
203.253.1222 • Crigby29@gmail.com

PROFESSIONAL SUMMARY

Highly resourceful, ambitious, and driven investment professional with expertise in international portfolio management and futures trading. Extensive knowledge in precious metals, currencies and bond and stock futures. Recognized for building relationships with global clients in Europe, Middle East and Emerging Markets as well as internal business partners. Comprehensive understanding of research, negotiations, and investment strategy development.

EXPERIENCE

Sputnik Group, Ltd., Connecticut • 2008 – present

Vice President and Head Trader

Main contact for all investment, private banking and Prime Broker relationships. Responsible for obtaining access to credit lines, trading limits, investment banking product areas, risk and relationship management; rate and commission negotiation.

- Work directly with CEO to provide extensive macro and micro economic analysis on global trends using proprietary and non-proprietary research, as well as technical and fundamental analysis.
- Manager of trading business
- Responsible for overall position, risk and profitability of business
- Analyze current and potentially new investments (fund of funds, property and venture capital opportunities) on behalf of CFO and Investment department.
- Provide daily set ups for equity index futures, foreign exchange and commodity products using extensive technical analysis to target profitability and risk.
- Ensure the regulatory and internal compliance of the trading operation (reconciliation, trade recap and margining of highly leveraged products)
- Developed a market timing model that tracks over 40 commodity, futures and forex markets using extensive technical analysis, Fibonacci studies, cycle work and ElliotWave studies to determine low risk parameters for initializing new trades as well as exit levels that maximize profit potential for short and intermediate term trading.
- Execute and trade \$1 billion notional on a daily basis.
- Reconcile and manage trade recap and margining.
- On boarding of all new traders, including training of technology and trading platform.
- On boarding of sub-accounts for entire treasury operation.

Citi Smith Barney, Greenwich, CT • 1994 - 2008

Senior Vice-President, Wealth Management (2001 – 2008)

Advised ultra-high net worth clients, family offices and middle market institutional clients.

- Identified potential opportunities in commodity, interest rate and equity index futures and options markets.
- Provided macro and micro analysis on global economic trends using both proprietary and non-proprietary research.

Christine Gargus Rigby – Page 1

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

ORGANIZATIONAL CHART AND STAFFING

- Grew assets under management from \$350M to over \$2B over the course of 4 years.
- Produced annual commission revenue of \$2.5M.
- Over a 4 year period lead effort to grow large relationships, bringing in an additional 15 institutional accounts
- Lead team of 5 associates.

During transition between Senior Registered Associate and Vice President, I served alongside a Senior Institutional International Salesperson/Broker advising on behalf of high profile government and large banking clients of the Middle East.

Senior Registered Associate (1994 – 2008)

Worked directly with senior wealth management advisors, institutional international salespeople in growing their businesses.

- Began career directly out of college as a Senior Registered Associate
- Worked with all levels of senior management and capital investment markets, pioneered the introduction of hedge funds during their infancy – ultimately shaping how Smith Barney conducted business at the time and laying the foundation for how they do business today.
- Recommended investment opportunities through research analysis and market intelligence.
- Executed and reported various market orders.
- Provided accurate, timely technical and economic news that affected the market.
- Client relationship management.
- Managed Operations/Compliance functions.
- Transaction processing.

EDUCATION

AAB – Associate of Applied Business

American Institute of Banking and Finance, Chicago, Illinois

VOLUNTEER ACTIVITIES

- **Fawn Hollow Elementary School**, Executive Board Member (past Treasurer and Director of Hospitality)
- **Jockey Hollow Middle School**, Executive Board Member, Cultural Events
- **Town of Monroe**, Board of Finance, Volunteer
- **Girl Scouts of Connecticut**, Troop Leader, Town of Monroe Troop organizer and designated point of contact for new troop leaders
- **Kids Helping Kids**, (Stamford & Monroe), Volunteer for Fundraising and Charitable Events
- **Mentor and Advisor**, Work with college students interested in Financial Services careers as both a mentor, and, through extending internships for more than 20 years

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE
ORGANIZATIONAL CHART AND STAFFING

Gretchen M. McCarthy

308 Kresson Gibbsboro Road, Voorhees, NJ 08043
(c) 781.831.1887 (e) gretter2002@yahoo.com

OBJECTIVE

Utilize all of the knowledge and experience I have gathered over the past four years in the Medical Cannabis industry coupled with my extensive Human Resources background, my strong compassion for patients and professionalism to help patients in need in emerging markets.

PROFESSIONAL EXPERIENCE

2015- Current	PalliaTech, Inc. <i>Director of Dispensary Operations & Human Resources</i> <ul style="list-style-type: none">• Director of Dispensary Operations for Compassionate Sciences Alternative Treatment Center in Bellmawr, New Jersey• Expertise is utilized with dispensary operations in other States where PalliaTech is or may become involved and in other appropriate capacities on behalf of the Company and its current or future subsidiaries and affiliates.• Handle the Human Resources function for PalliaTech as a whole.	Sea Cliff, NY
2011-2015	Maine Organic Therapy <i>Dispensary Operations Manager</i> <ul style="list-style-type: none">• Developed all processes and procedures for a start up Medical Cannabis Dispensary.• Execute and oversee all daily operations of the Medical Cannabis Dispensary.• Interface with employees, patients, ownership, vendors, law enforcement, state compliance officers to ensure strict adherence to the program guidelines.• Manage all sales functions and patient compliance through Point Of Sale software system (MJ Freeway).• Manage inventory of all medicine in the dispensary which originates from grow site to the onsite manufactured edible products.• Ensure patient and employee files from the dispensary and grow facility are fully compliant with all state and local laws and ordinances.• Motivate staff to achieve sales goals and maintain a high level of compassion for the patients.• Implement all company policies, objectives and procedures.• Determine staffing requirements and interview, hire, terminate and train employees.• Acting Human Resources Generalist for the entire company.• Convey the policies and interests of the organization to the public through different forms of media while developing and maintaining the reputation of the organization.• Develop, promote and conduct regular educational seminars around the state to educate the public on the benefits of using medical cannabis for specific approved conditions.• Develop and maintain physician relationships through:<ul style="list-style-type: none">○ Collaborating and speaking at our public educational programs○ Physician education programs	Ellsworth, ME
2006-2010	Comcast Spotlight	Wellesley, MA

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

Senior Human Resources Generalist

- Provided advice and counsel to managers and employees for sensitive and non-routine employee relations issues and concerns.
- In charge of the placement and management of multiple intern students each year.
- Counseled, oriented and trained managers and supervisors on the interpretation and administration of HR policies including performance management, EEO, wage and salary management, employee development, succession planning, and benefits.
- Developed and conducted training programs for 100 employees in eight offices in the Boston market.
- Assisted with developing and maintaining communications programs that successfully impart the company's mission, values, culture, and objectives.
- Played a major role in the eighteen month roll out of the HRIS System.

2004-2006

Adelphia Media Services

Plymouth, MA

Human Resource Generalist

- Intricate part of a major acquisition between Adelphia & Comcast. Responsibilities included due diligence and integration strategies.
- Ensured high Human Resource service levels and assisted in facilitating two-way communication among functional areas and human resources.
- Responsible for providing advice, counsel and influence to all levels including senior level management.
- Effectively managed Employee Relations issues within legal and policy parameters.
- Assisted in development and implementation of programs such as benefits (including open enrollment), performance management/merit review, and training.
- Partnered with the staffing resources and hiring managers in recruitment and selection activities.
- Managed all leaves of absences including, maternity leave, FMLA, STD, and LTD.

2001-2004

Advent International Corporation

Boston, MA

Human Resources Generalist

- Acted as a consultant on HR practices, processes, policies, and laws to ensure efficient, responsive results.
- Worked with third party administrator to resolve day to day benefit claims issues, as well as with brokers to deliver solid benefit services.
- Planned and conducted new employee orientation to foster positive attitude toward organizational objectives.
- Worked to ensure positions and job descriptions were updated, evaluated, and market priced on a consistent basis.
- Organized and executed communication activities to ensure effective, accurate and timely dissemination of information.

1998-2001

Seagreen Technologies

Boston, MA

Human Resources Administrator

- Built the HR Department from the ground level for a Computer Software Development start up firm.

EDUCATION

- Capella University -Bachelor's of Science in Business /Human Resources Management (graduated 2014)
- Human Resources Certification Institute - Professional Human Resources (PHR) (Certified since 2006)

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

ORGANIZATIONAL CHART AND STAFFING

ROY JOSEPH CIARLO

39 Maplevue Drive | Wolcott, CT 06716 | 203.879.1777 | RoyJCiarlo@gmail.com

LICENSED PHARMACIST

Licensed Pharmacist with 20+ years of proven performance delivering pharmaceutical care within demanding retail, hospital, methadone clinic and state agency environments. Business-minded leader skilled in directing fast-paced operations and multidisciplinary teams in line with revenue and service goals. Continually focused on fostering positive customer and patient experiences via responsive communications, accurate prescription fulfillment and prompt issue resolution. **Areas of Expertise:**

- Pharmaceutical Care
- Patient Counseling
- Safety Compliance
- Operations Management
- Customer / Patient Service
- Medication Therapy
- Clinical Services
- Revenue Acceleration
- Team Leadership
- Prescription Fulfillment
- Strategic Planning
- Communications

PROFESSIONAL EXPERIENCE

PHARMACY MANAGER

2001 – 2012

CVS Pharmacy

Terryville, CT

Directed operations, purchasing, inventory and team performance within customer-facing setting. Oversaw prescription fulfillment, dispensing, logging and organization in line with loss prevention and safety standards. Ensured operational alignment with HIPAA regulations and corporate expectations.

Key Achievements

- Lauded for commitment to customer satisfaction in demanding setting (1,000 Rx's per week)
- Resolved complex, third-party discrepancies and other prescription-filling issues through strategic troubleshooting and cross-organizational collaboration

PHARMACY MANAGER

1998 – 2001

Rite Aid

Waterbury, CT

Led daily activities and prescription filling in compliance with Drug Utilization Review and Final Quality Assurance requirements. Delivered customized customer counseling on wide array of pharmaceutical care topics. Complied with all state and federal regulations. Mentored, coached and directed team of pharmacy technicians and support staff. Scheduled and managed execution of cycle counts and will-calls.

Key Achievements

- Built customer trust and loyalty through effective resolution of escalated issues
- Key point of contact with area physicians and medical administrators on pharmaceutical issues

EARLY CAREER

PHARMACIST

1993 – 2005

Connecticut Counseling Centers, Inc., Methadone Clinic (Chief Pharmacist)

Waterbury, CT

American Home Patient

Waterbury, CT

Charlotte Hungerford Hospital

Torrington, CT

State of Connecticut, Department of Corrections, Cheshire Regional Pharmacy

Cheshire, CT

EDUCATION & CREDENTIALS

Board of Pharmacy Licenses: Connecticut, New York, Maine, Florida

Bachelor of Science, Pharmacy, University of Connecticut, Storrs, CT

- Inducted into Rho Chi National Pharmacy Honor Society

Bachelor of Science, Biology, University of Connecticut, Storrs, CT

Additional Coursework:

SUNY at Buffalo, Buffalo, NY (41 credits completed of two-year add-on Pharm.D. Program)

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE ORGANIZATIONAL CHART AND STAFFING

John H. O'Brien Jr.
12053 Mockingbird Lane, Painter, Va. 23420
(575) 442-4506
(732) 674-8206
[**jonhig60@gmail.com**](mailto:jonhig60@gmail.com)

An experienced professional with a demonstrated ability to direct a diverse team of individuals in the successful development, implementation and maintenance of a variety of innovative programs. Possesses a proven ability to successfully analyze an organization's critical business requirements, identify deficiencies, leverage opportunities, and develop innovative and cost-effective solutions for enhancing operational efficiencies and improving customer service. Experienced in navigating the governmental, regulatory, political and public policy landscape. Equally comfortable directing from the corner office or from the trenches.

Career Experience:

- *Executive Director for the New Jersey Department of Health – 3.5 years*
- *Enlisted member of the New Jersey State Police – 26 years*

Executive Director

*Medicinal Marijuana Program
New Jersey Department of Health*

December 2011 – April 2015

Responsible to the Commissioner of Health for the implementation of the Compassionate Use Medicinal Marijuana Act (N.J.S.A. 24:6I-1 et al.)

Achievements:

- Streamlined program staffing needs through the identification of professionals with appropriate skill sets.
- Mitigated duplication of services by partnering and leveraging established infrastructures in sister state agencies.
- Assured client satisfaction through the development of an electronic registration process augmented by a customer service function to assist applicants in the registration process.
- Developed and implemented a comprehensive background examination process utilized to investigate principals of prospective licensed facilities.
- Assured facility compliance with statutory and regulatory requirements through the development of a pre and post permitting monitoring process.
- Assured product quantification and quality in the development and implementation of a laboratory testing protocol through the DEA licensed state public health laboratory.
- Assured product quantification and quality in the development of a manufacturing standard for the production of cannabis infused products.
- Navigated challenging political, media and advocacy group inquiries and responses of program development and implementation.

August 2015

1

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

ORGANIZATIONAL CHART AND STAFFING

Assistant Bureau Chief

State Bureau of Identification

New Jersey Division of State Police

December 2003 – June 2011

Responsible to the Bureau Chief for the overall command of nine units, ten enlisted and 110 civilian personnel that comprise the State Bureau of Identification (SBI).

Achievements:

- Streamlined productivity and efficiency through the development and implementation of a statewide electronic fingerprinting system.
- Acted as an elected member and state representative to the National Crime Prevention and Privacy Compact Council.
- Coordinated legislative analysis and ensure division responses were consistent with state and federal guidelines.
- Provided expert testimony to New Jersey Legislature on SBI related issues.
- Provided oversight and management of a 20 million dollar revenue source.

Unit Head

Criminal Information Unit

National Instant Criminal Background Check System Unit

State Bureau of Identification

September 1998 - December 2003

Responsible to the Assistant Bureau Chief for the efficient operation and supervision of the units under my command.

Achievements:

- Responsible for the development of programs and processes in response to state and federal legislation requiring criminal history background checks for noncriminal justice purposes.
- State representative to the Federal National Instant Criminal Background Check System

Field Representative

Field Services Unit

Identification and Information Technology Section

April 1993 - September 1998

General Duty Road Trooper

Troop C

Field Operations Section

June 1985 - April 1993

Education:

New Jersey State Police Academy accredited thru Seton Hall University

Mercer County Community College, West Windsor, N.J.

College of New Jersey, Ewing, N.J.

August 2015

5. RFA (E)(2): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

ORGANIZATIONAL CHART AND STAFFING

Applicable Specialized Training:

New Jersey Department of Health:

- Flexible Staffing Initiative, Trenton, N.J.
- Continuous Quality Improvement, Trenton, N.J.
- Crisis Communication Training, Trenton, N.J.

New Jersey State Police:

- Advanced Criminal Investigation School, Sea Girt, N.J.
- Interview and Interrogation School, Sea Girt, N.J.
- Crisis/Hostage Negotiation School, Sea Girt, N.J.
- Instructor Training/Public Speaking, Sea Girt, N.J.

August 2015

5. RFA (E)(3): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE
CHIEF SECURITY AND COMPLIANCE OFFICER CV - JOHN O'BRIEN

5. RFA (E)(3): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

CHIEF SECURITY AND COMPLIANCE OFFICER CV - JOHN O'BRIEN

"Provide the name, title and a copy of the resume of the person who will be responsible for all information security requirements, including the requirement that patient information remain confidential."

JOHN H. O'BRIEN JR.

12053 Mockingbird Lane, Painter, Va. 23420

(575) 442-4506

(732) 674-8206

jonhig60@gmail.com

An experienced professional with a demonstrated ability to direct a diverse team of individuals in the successful development, implementation and maintenance of a variety of innovative programs. Possesses a proven ability to successfully analyze an organization's critical business requirements, identify deficiencies, leverage opportunities, and develop innovative and cost-effective solutions for enhancing operational efficiencies and improving customer service. Experienced in navigating the governmental, regulatory, political and public policy landscape. Equally comfortable directing from the corner office or from the trenches.

CAREER EXPERIENCE:

- Executive Director for the New Jersey Department of Health – 3.5 years
- Enlisted member of the New Jersey State Police – 26 years

EXECUTIVE DIRECTOR

Medicinal Marijuana Program

New Jersey Department of Health | December 2011 – April 2015

Responsible to the Commissioner of Health for the implementation of the Compassionate Use Medicinal Marijuana Act (N.J.S.A. 24:61-1 et al.)

Achievements:

- Streamlined program staffing needs through the identification of professionals with appropriate skill sets.
- Mitigated duplication of services by partnering and leveraging established infrastructures in sister state agencies.
- Assured client satisfaction through the development of an electronic registration process augmented by a customer service function to assist applicants in the registration process.
- Developed and implemented a comprehensive background examination process utilized to investigate principals of prospective licensed facilities.
- Assured facility compliance with statutory and regulatory requirements through the development of a pre and post permitting monitoring process.
- Assured product quantification and quality in the development and implementation of a laboratory testing protocol through the DEA licensed state public health laboratory.
- Assured product quantification and quality in the development of a manufacturing standard for the production of cannabis infused products.
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5. RFA (E)(3): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

CHIEF SECURITY AND COMPLIANCE OFFICER CV - JOHN O'BRIEN

ASSISTANT BUREAU CHIEF

State Bureau of Identification

New Jersey Division of State Police | December 2003 – June 2011

Responsible to the Bureau Chief for the overall command of nine units, ten enlisted and 110 civilian personnel that comprise the State Bureau of Identification (SBI).

Achievements:

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UNIT HEAD

Criminal Information Unit

National Instant Criminal Background Check System Unit

State Bureau of Identification | September 1998 - December 2003

Responsible to the Assistant Bureau Chief for the efficient operation and supervision of the units under my command.

Achievements:

- Responsible for the development of programs and processes in response to state and federal legislation requiring criminal history background checks for noncriminal justice purposes.
- State representative to the Federal National Instant Criminal Background Check System

FIELD REPRESENTATIVE

Field Services Unit

Identification and Information Technology Section | April 1993 - September 1998

GENERAL DUTY ROAD TROOPER

Troop C

Field Operations Section | June 1985 - April 1993

EDUCATION:

New Jersey State Police Academy accredited thru Seton Hall University

Mercer County Community College, West Windsor, N.J.

College of New Jersey, Ewing, N.J.

APPLICABLE SPECIALIZED TRAINING:

New Jersey Department of Health:

- Flexible Staffing Initiative, Trenton, N.J.
- Continuous Quality Improvement, Trenton, N.J.
- Crisis Communication Training, Trenton, N.J.

5. RFA (E)(3): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

CHIEF SECURITY AND COMPLIANCE OFFICER CV - JOHN O'BRIEN

New Jersey State Police:

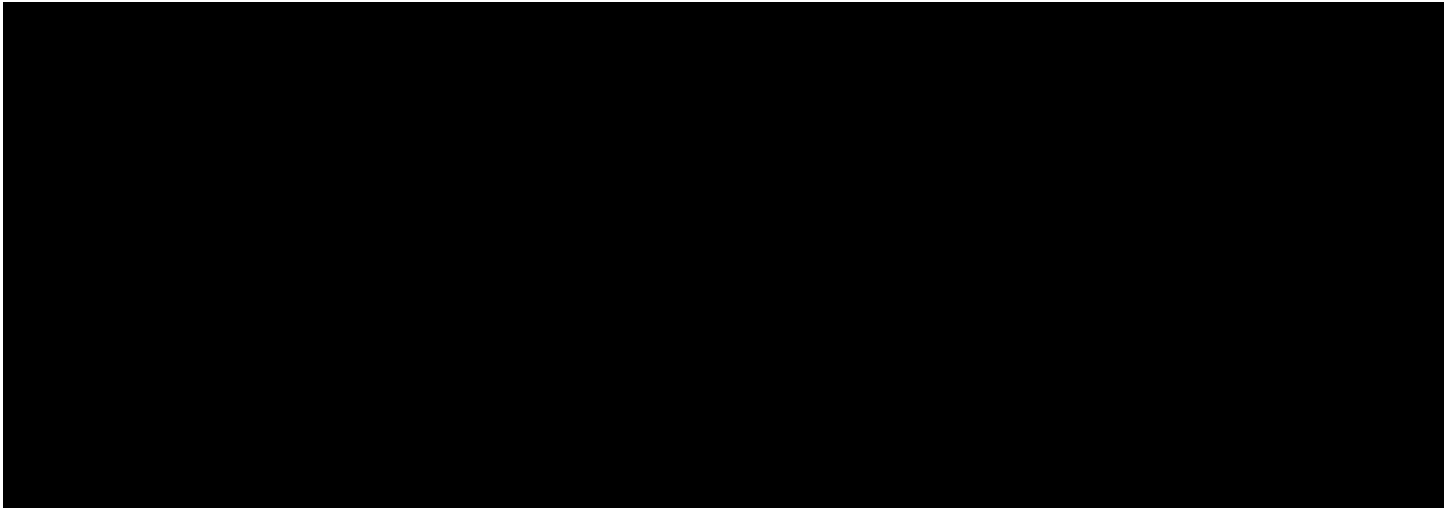
- Advanced Criminal Investigation School, Sea Girt, N.J.
- Interview and Interrogation School, Sea Girt, N.J.
- Crisis/Hostage Negotiation School, Sea Girt, N.J.
- Instructor Training/Public Speaking, Sea Girt, N.J.

**5. RFA (E)(4): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE**
BACKER COMPENSATION AGREEMENTS

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5. RFA (E)(4): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE
BACKER COMPENSATION AGREEMENTS

"Provide a copy of all compensation agreements with dispensary facility backers, directors, owners, officers, consultants, other high-level employees or any other person required to complete Appendices B, C or E. 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."



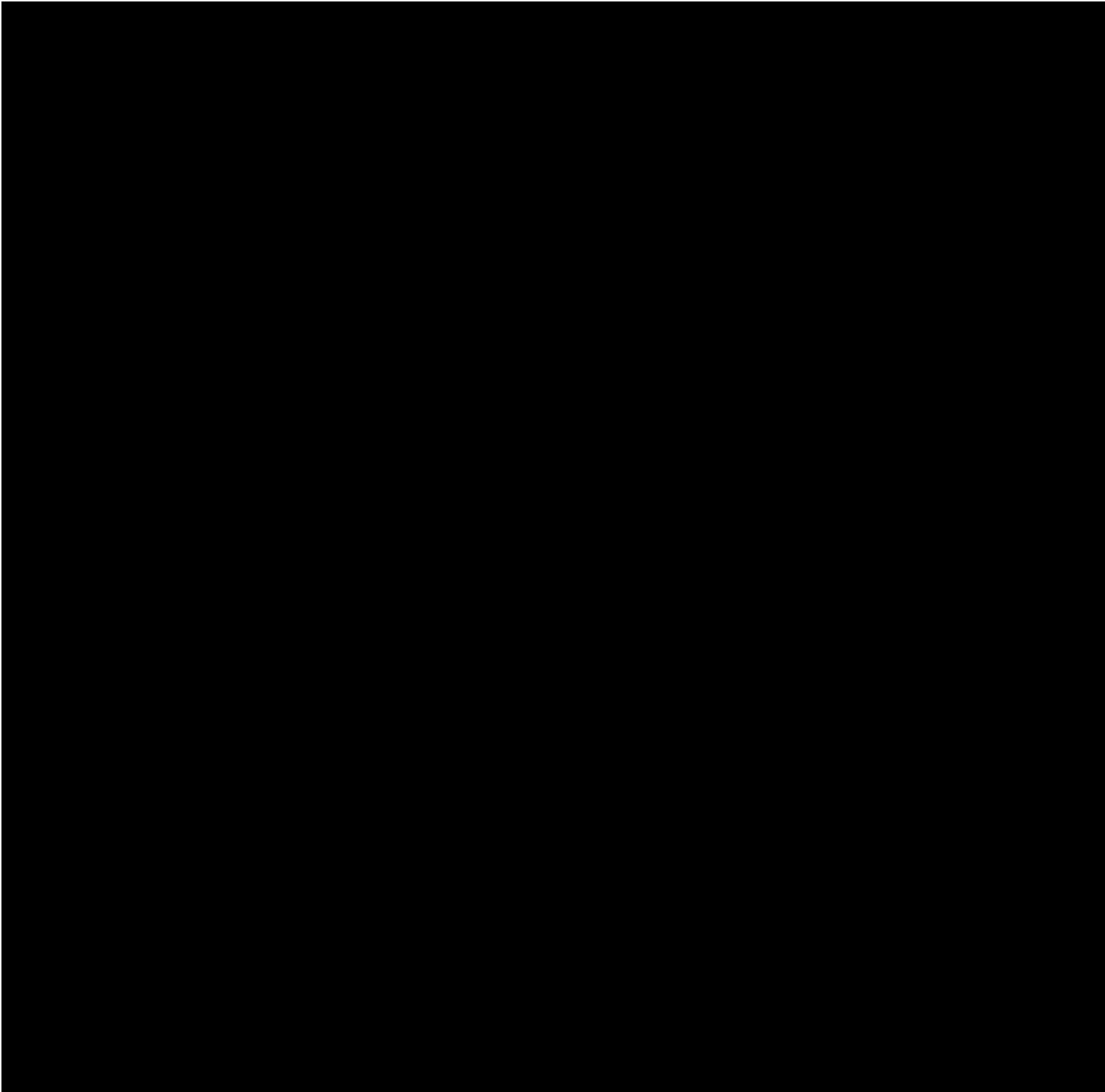
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**5. RFA (E)(5): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE**
SUMMARY OF INDEBTEDNESS

.....
"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 dispensary facility."
.....

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**5. RFA (E)(5): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE**
SUMMARY OF INDEBTEDNESS



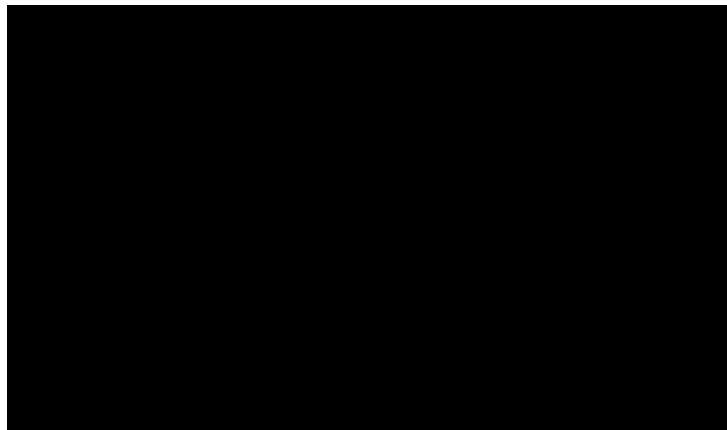
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5. RFA (E)(6): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE
AUDITED FINANCIAL STATEMENTS

.....
"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."
.....

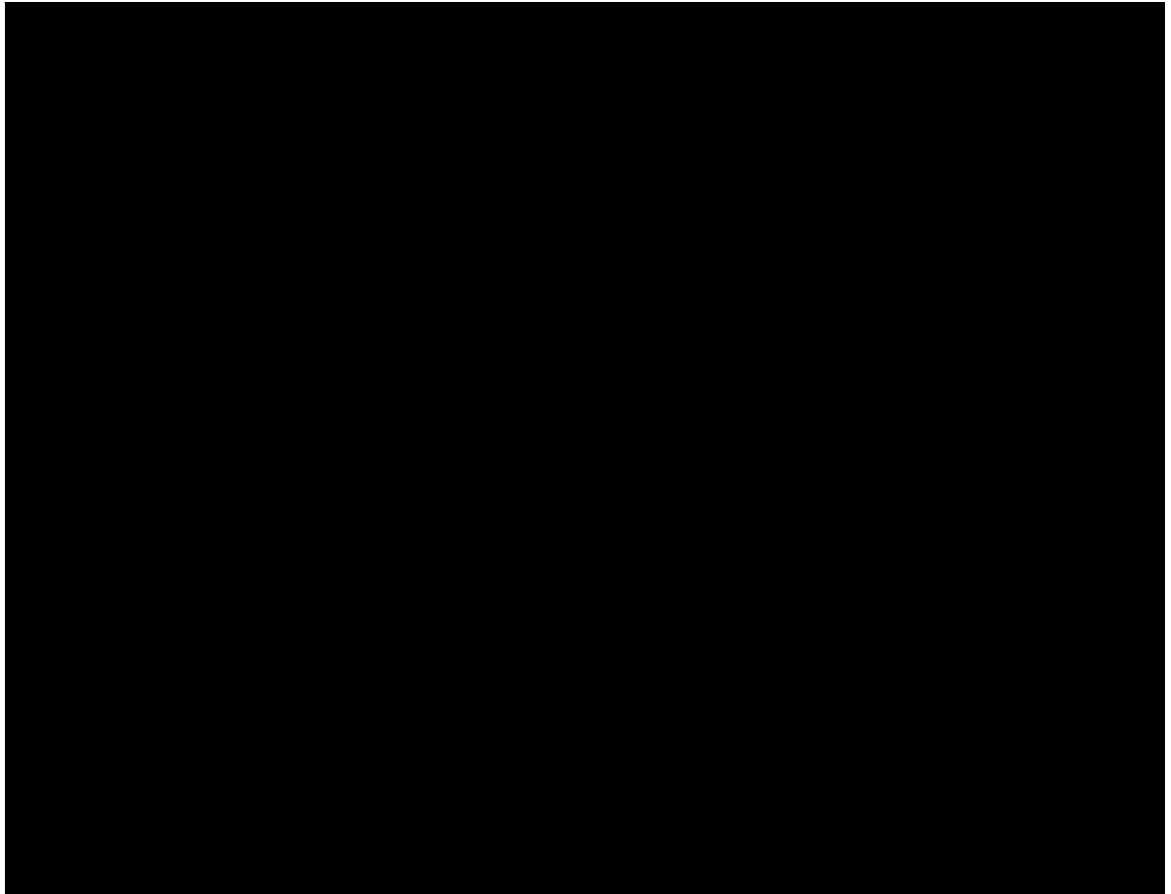
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AUDITED FINANCIAL STATEMENTS



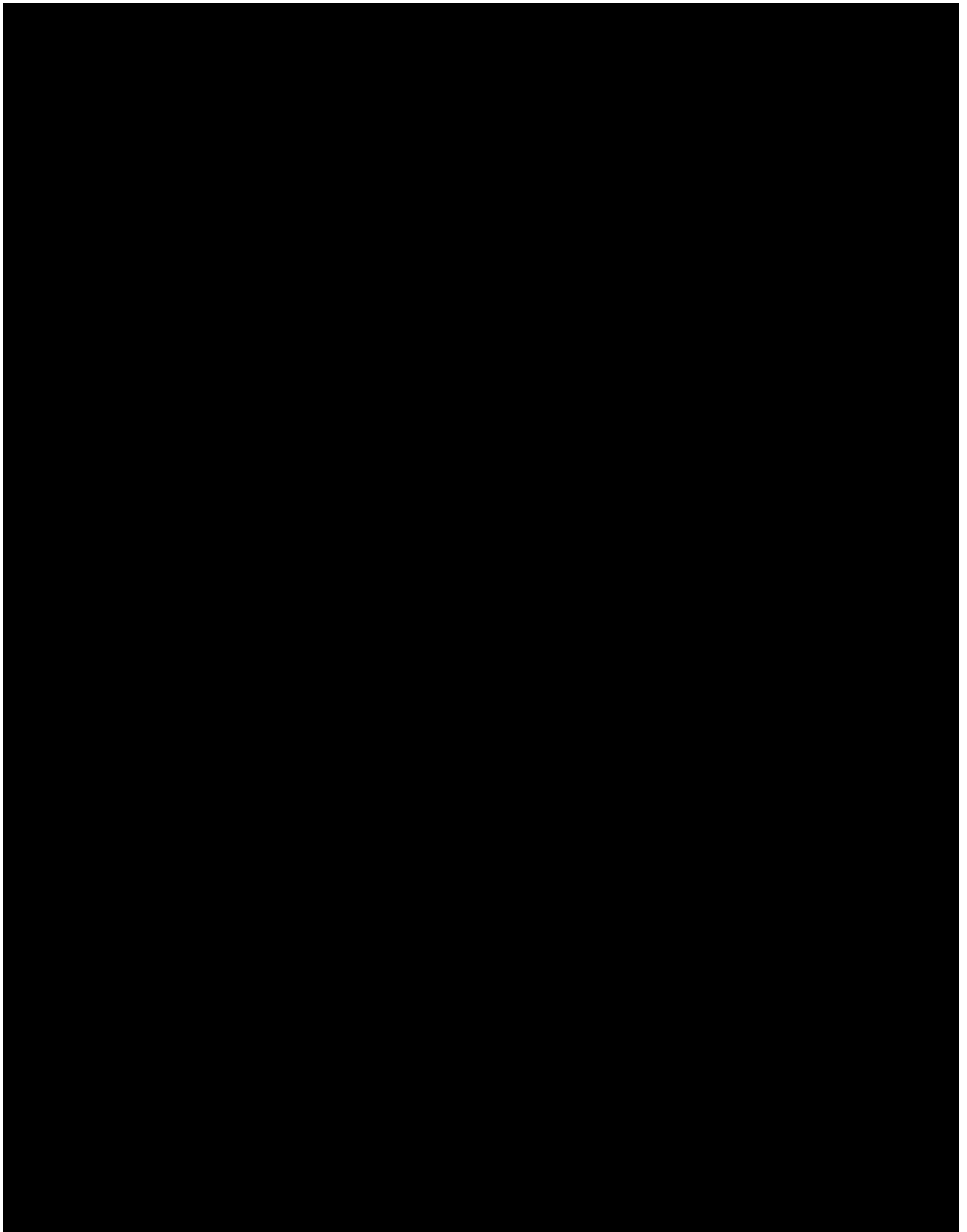
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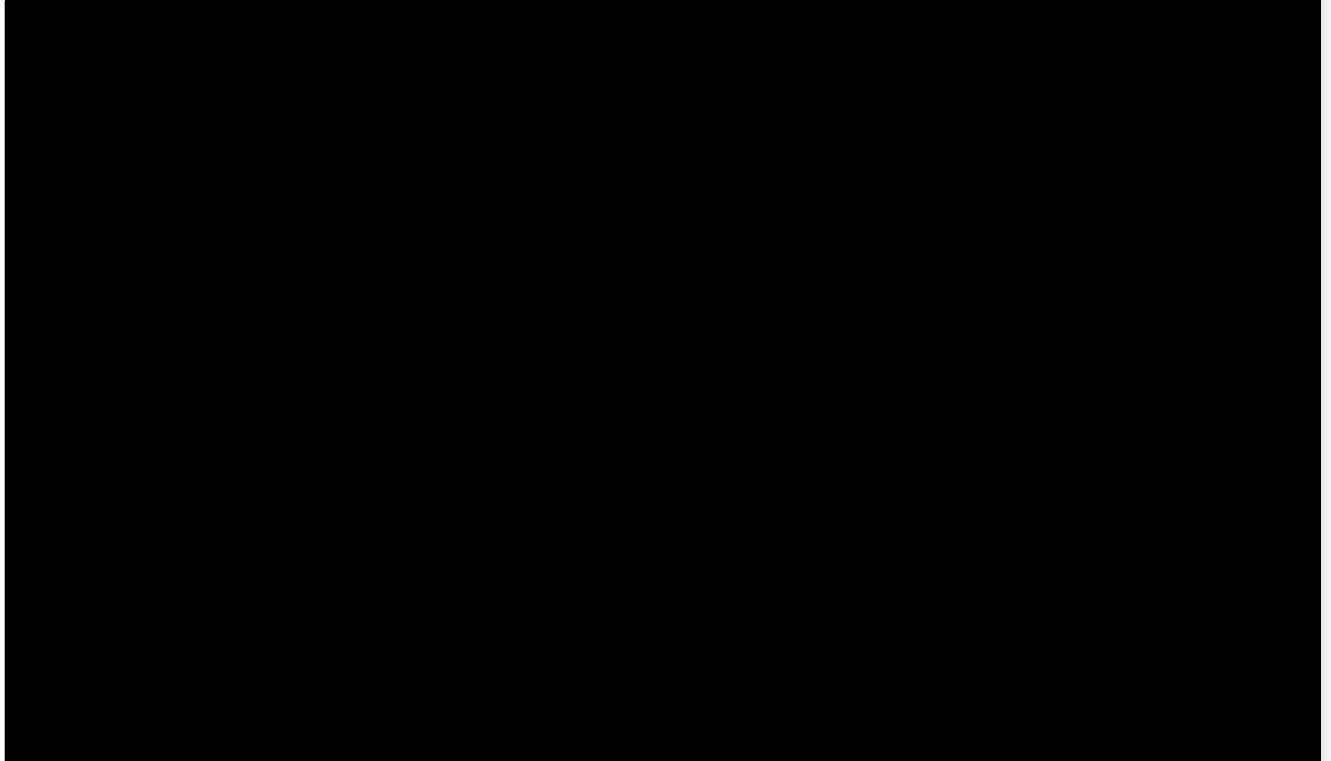
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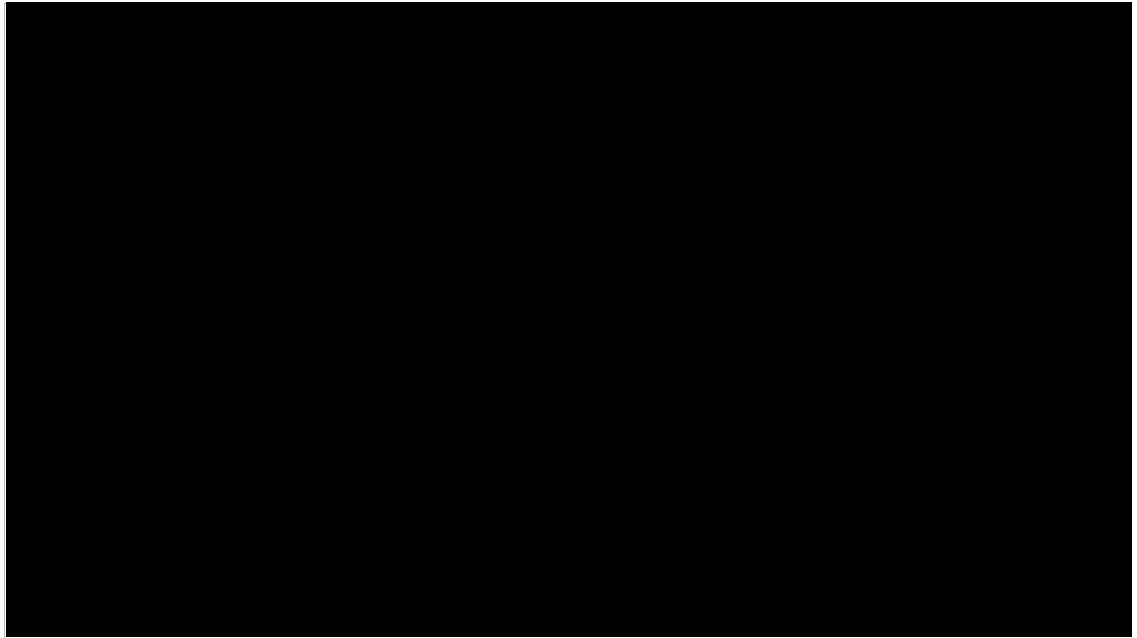
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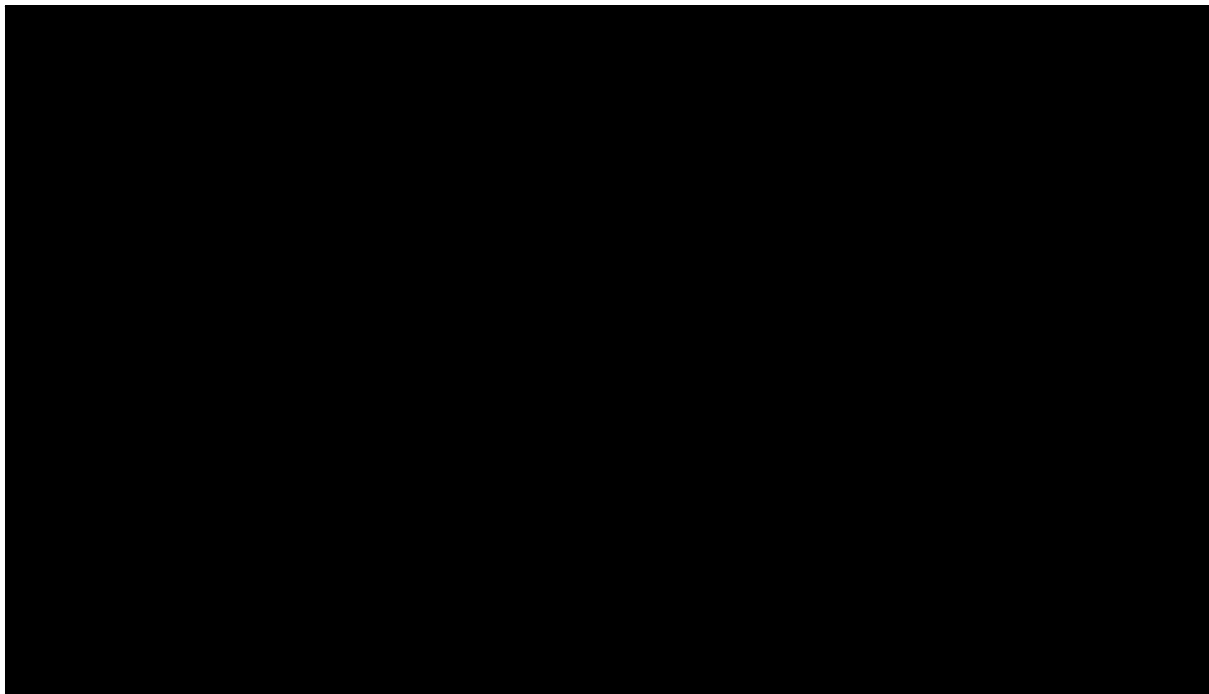
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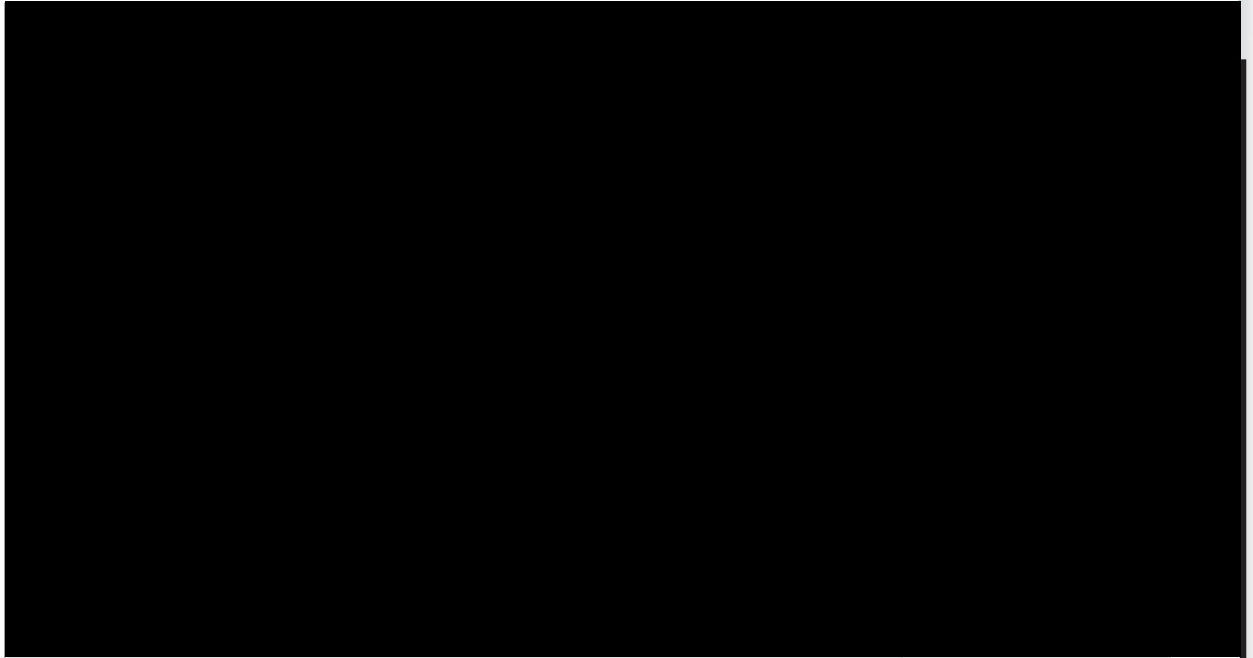
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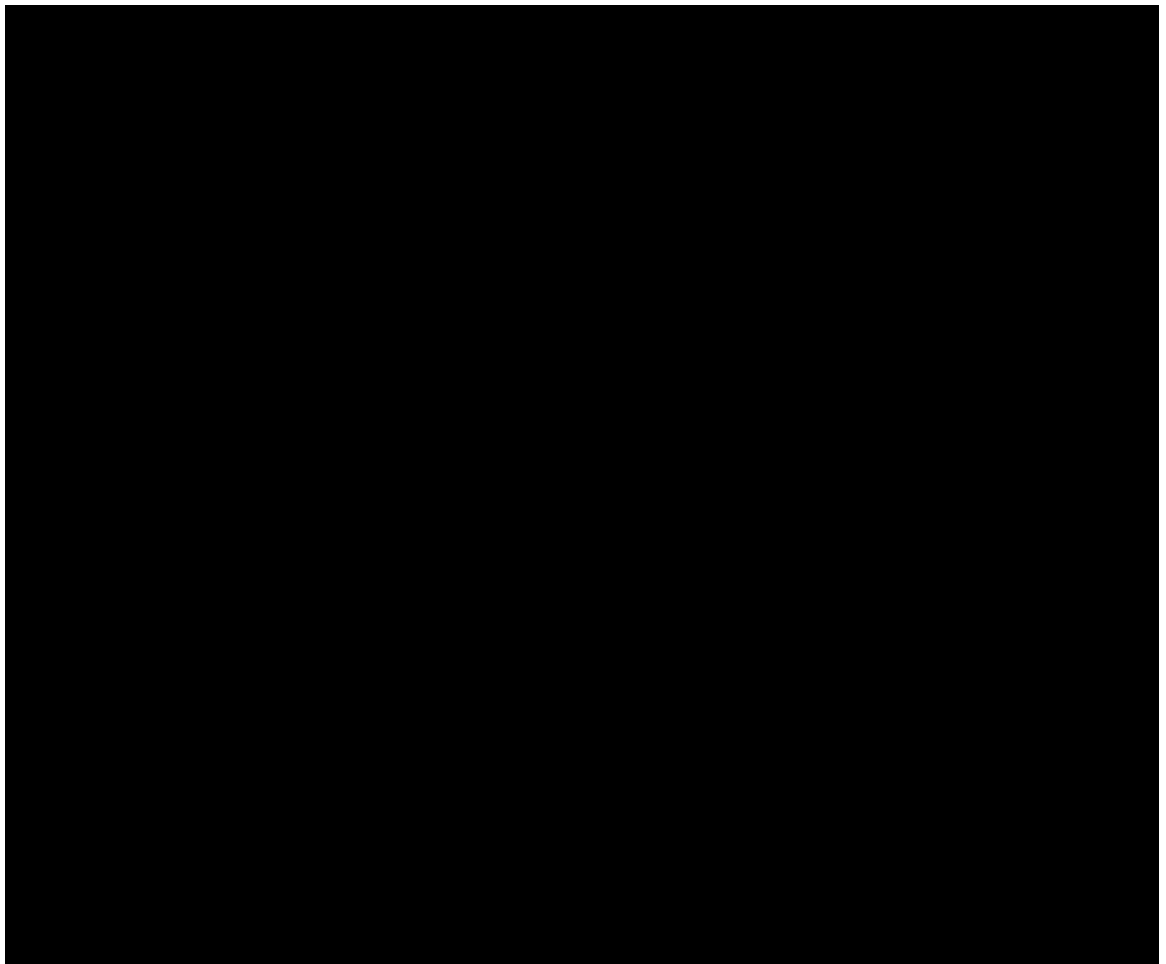
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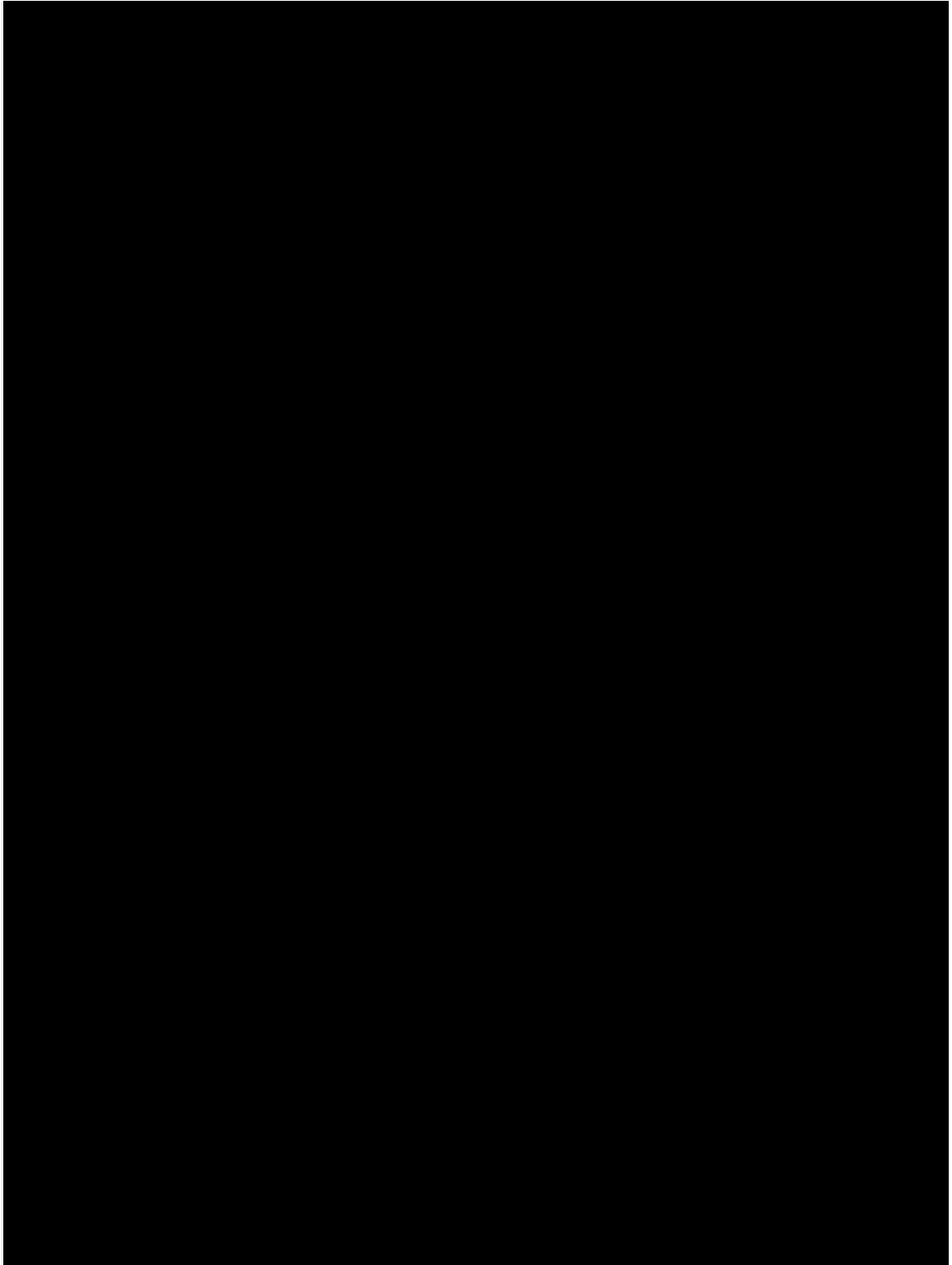
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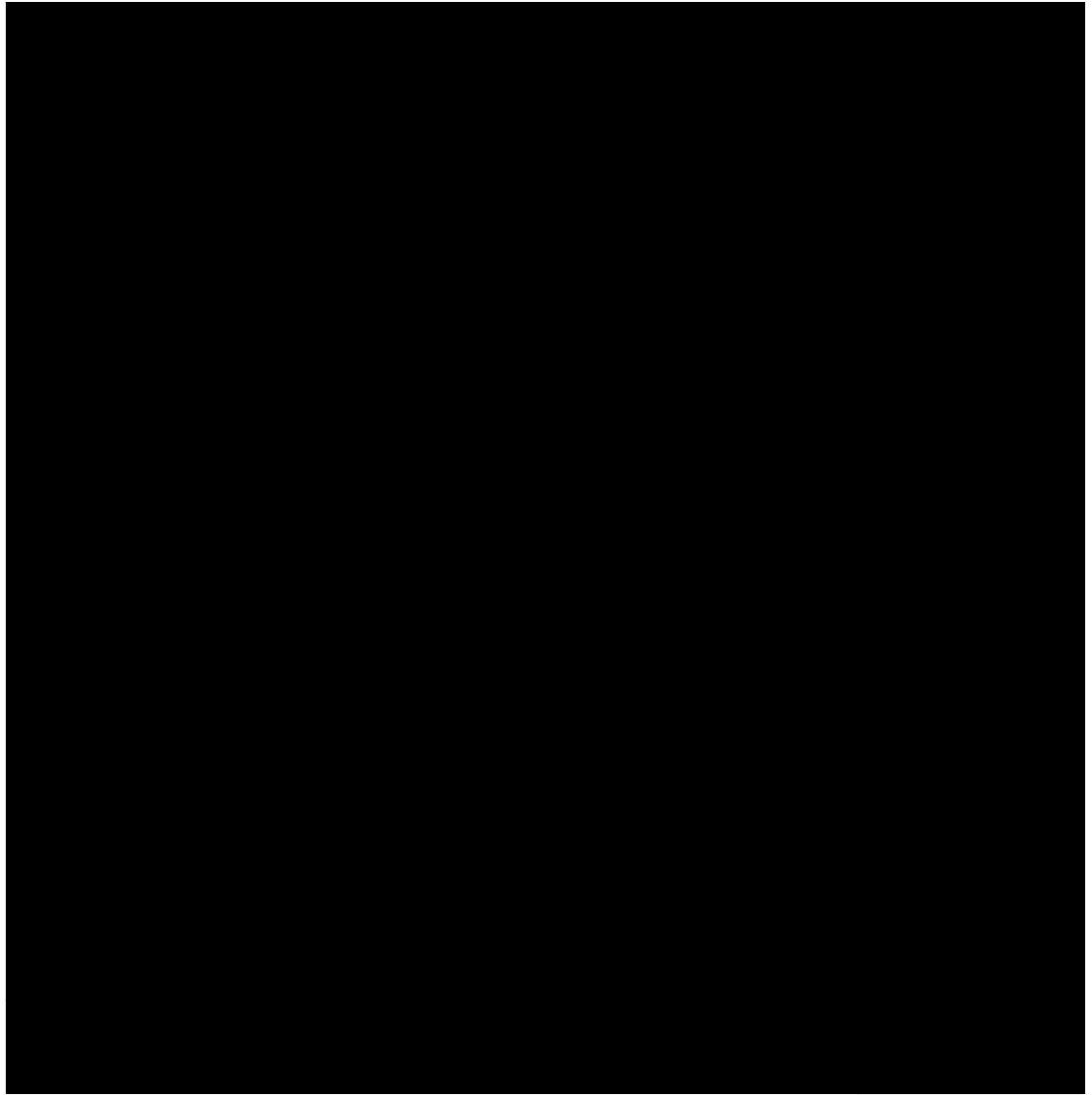
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ORGANIZATIONAL STRUCTURE**
AUDITED FINANCIAL STATEMENTS



**6. RFA (E)(7): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE
PRO FORMA STATEMENTS**

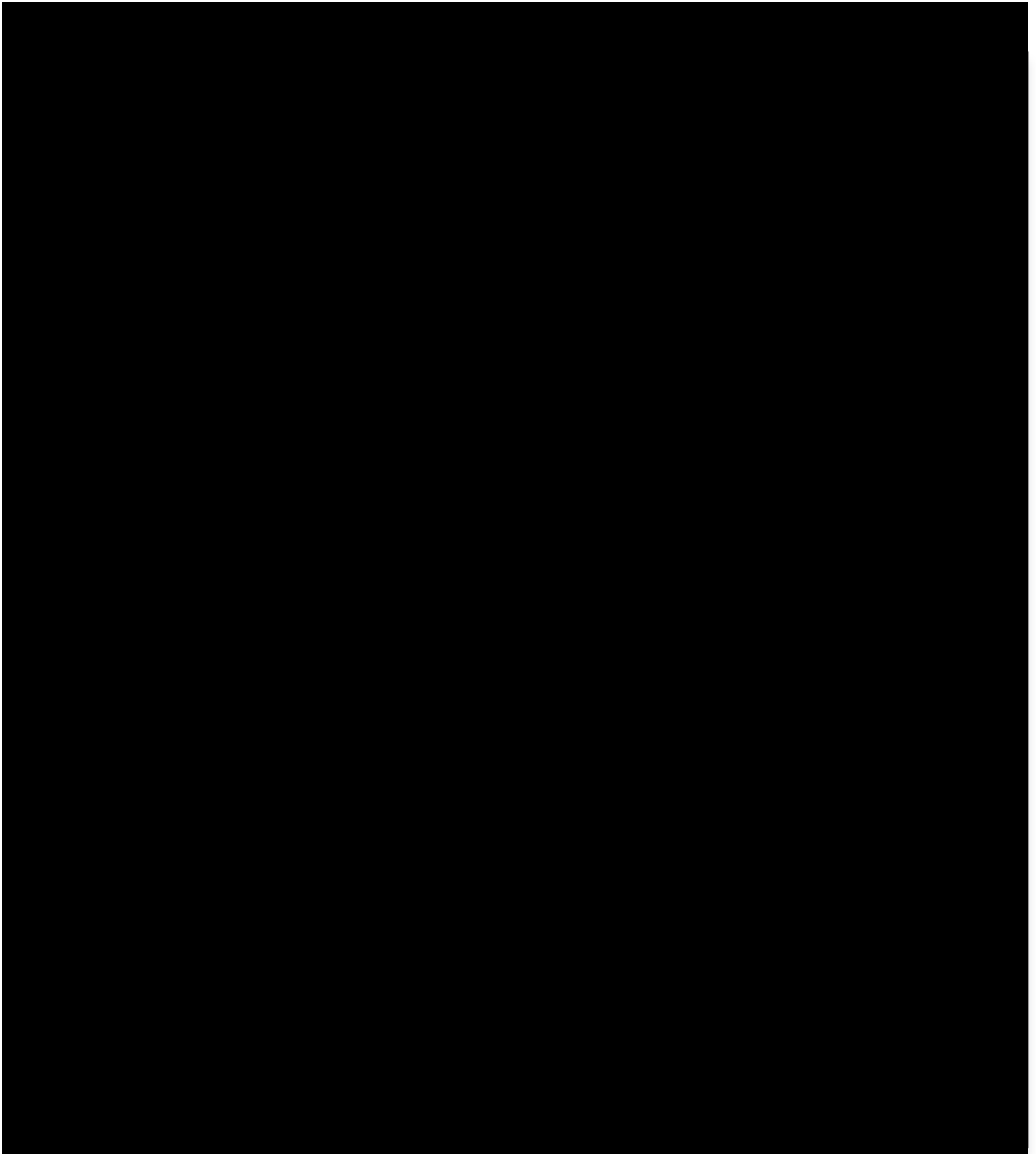
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**6. RFA (E)(7): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE
PRO FORMA STATEMENTS**

.....
"Provide any pro forma financials used for business planning purposes."
.....

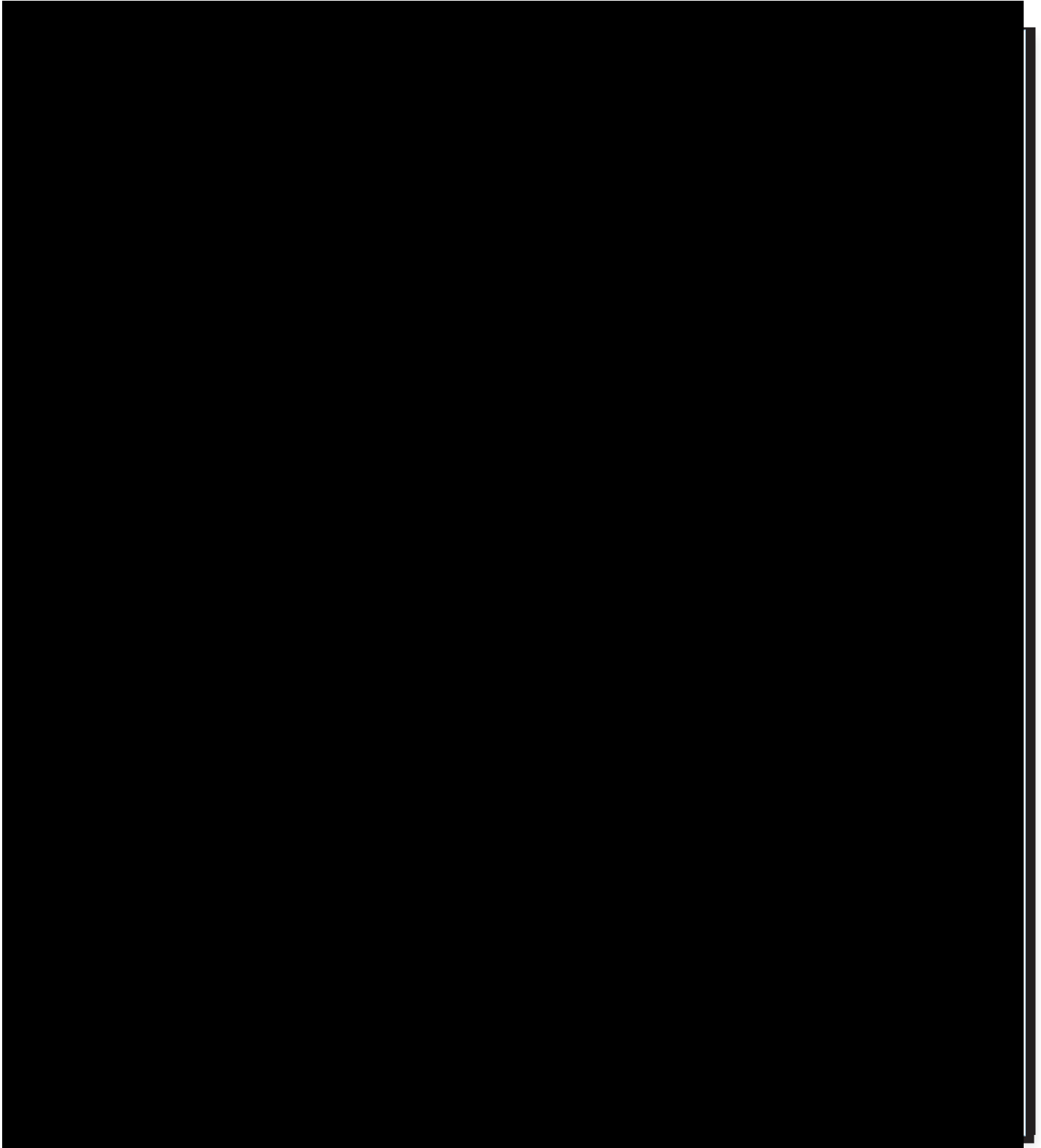
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**6. RFA (E)(7): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE**
PRO FORMA STATEMENTS



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**6. RFA (E)(7): FINANCIAL STATEMENTS AND
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PRO FORMA STATEMENTS



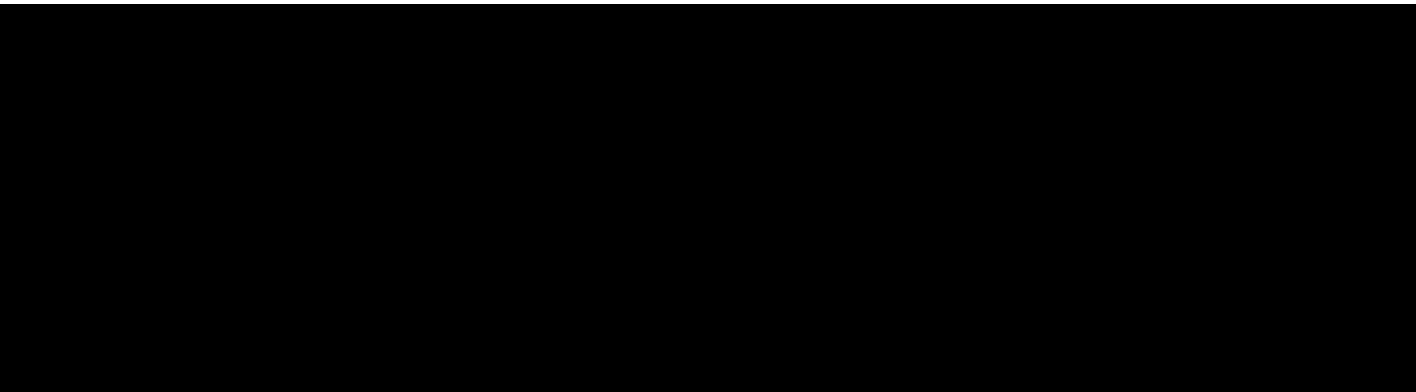
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**6. RFA (E)(8): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE
APPLICANT TAX RETURNS**

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**6. RFA (E)(8): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE
APPLICANT TAX RETURNS**

.....
"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."
.....



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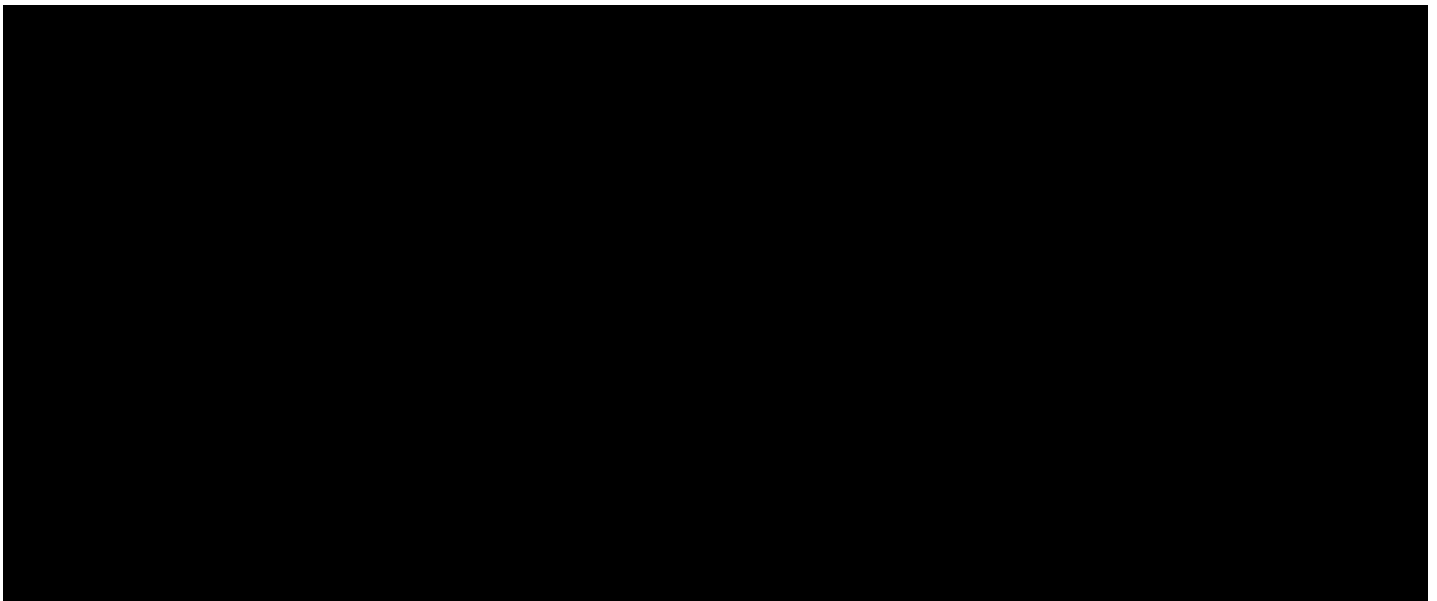
**6. RFA (E)(9): FINANCIAL STATEMENTS AND
ORGANIZATIONAL STRUCTURE**
FEDERAL, STATE AND FOREIGN TAX RETURNS (BACKERS)

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6. RFA (E)(9): FINANCIAL STATEMENTS AND ORGANIZATIONAL STRUCTURE

FEDERAL, STATE AND FOREIGN TAX RETURNS (BACKERS)

.....
"Provide complete copies of the most recently filed federal, state and foreign (with translation) tax returns filed by each: (i) dispensary facility backer; and (ii) each backer member identified in Section B of Appendix B."
.....



MEDICAL MARIJUANA DISPENSARY FACILITY LICENSE APPLICATION
STATE OF CONNECTICUT- DEPARTMENT OF CONSUMER PROTECTION



F. BONUS POINTS 410

- RFA (F)(1): EMPLOYEE WORKING ENVIRONMENT PLAN.....411
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6. RFA (F)(1): BONUS POINTS
EMPLOYEE WORKING ENVIRONMENT PLAN

6. RFA (F)(1): BONUS POINTS

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.”

EMPLOYEE WORKING ENVIRONMENT PLAN

Our mission is to establish a facility that meets a pharma-standard of palliative care by setting the highest technical, scientific and training standards in the medical Cannabis industry. Executing on the mission is only possible by valuing our Team. PalliaTech provides a clean, safe, healthy and economically beneficial working environment for our employees. We understand that maintaining a safe work environment requires the continuous cooperation of all employees.

PalliaTech and all employees must comply with all occupational safety and health standards and regulations established by the Occupational Safety and Health Act and CONN_OSHA and all local employment regulations. In addition, all employees are required to obey PalliaTech's carefully developed safety rules and inventory tracking processes and procedures and, of course, exercise caution and common sense in all work activities.

As per our procedures, employees must immediately report any unsafe conditions to their supervisor. Employees who violate safety standards, cause hazardous or dangerous situations, or fail to report or, where appropriate, remedy such situations may be subject to disciplinary action, up to and including termination of employment.

In the case of an accident that results in injury, regardless of how seemingly insignificant the injury may appear, employees must notify their supervisor and supervisors are required to follow company procedure to access the nature of the injury and determine if reporting should be escalated to up the organizational chain.

Executive Experience and Expertise: We have brought together a uniquely-qualified group of executives with extensive in-depth international, national and Connecticut expertise in establishing service and retail operations, securities trading and sales, as well as operating pharmacies, nursing homes, long-term care facilities, laboratory testing and diagnostics, food preparation and scientific medical marijuana facilities.

PalliaTech strives to be the industry leader in workplace satisfaction by:

- offering competitive wages, incentive programs and benefits packages;
- Places a focus on best practices and continuing education;
- developing a culture that values a proper work-life balance;
- boasts a transparent and accessible executive team; and
- fosters a work ethic that focuses on our mission and the spirit of the Connecticut Medical Marijuana Program.

Codes of Conduct: The company's conduct governing all employees is summarized in the “Employee Handbook”, which include but are not limited to:

- Equal opportunity and non-discrimination is afforded in all aspects of the employment relationship, including among others: hiring, promotion, transfer, selection for training opportunities, wage and salary administration and the application of benefits plans. We encourage employees to promptly report all perceived incidents of discrimination or harassment and will thoroughly investigate each report.
- We provide our employees with the training necessary to adhere to our mission to set the highest technical and scientific standards in the medical Cannabis industry and in accordance with upmost levels of attention to professionalism and integrity with a focus on patients, caregivers and public safety; Federal and State laws regarding medical Cannabis; patient's rights to privacy and confidentiality; confidentiality of Company information and operations; the Company's policies regarding security and inventory reporting procedures; and the Company's policy and procedure on emergency preparedness. This includes on-the-job education using existing

6. RFA (F)(1): BONUS POINTS

EMPLOYEE WORKING ENVIRONMENT PLAN

workplace equipment, and internally-developed tools and documents. These is supplemented with internal and external subject experts, online training, and both off-site and on-site workshops.

- Our compliance training ensures each employee understands the Company's "Employee Handbook," including policies such as: the prohibition of illegal drug and alcohol use; the Company as a smoke-free environment; workplace violence prevention; and guidelines for adhering to the highest professional standards. We will expand our existing mentoring program to the Connecticut dispensary to match experienced employees with less experienced colleagues to further advance the knowledge and expertise of our staff.
- A copy of the "Employee Handbook" will be provided to each new hire. PalliaTech gives the new employee an opportunity to review the handbook and to ask any questions they may have. Each individual must then return a signed attestation that they have read it, understand it and agree to comply with the outlined standards.

EMPLOYEE BENEFITS:

- **Medical and Dental Insurance:** Full-time employees regularly scheduled to work a minimum of 30 hours per week enrollment receive medical and dental insurance coverage. We also offer full-time employees an employee-funded flexible spending account and access to counseling services through our employee assistance program.
- **Group Life Insurance:** The Company offers full-time employees an employer-paid group term life insurance policy along with accidental death and dismemberment policy.
- **Disability Insurance:** We offer both short-term and long-term disability to full-time employees. Employees are automatically enrolled in our noncontributory long-term disability plan, which offers 50% of basic monthly earnings to a maximum benefit of \$1,000 per month.
- **Retirement Benefits:** The Company offers a voluntary pretax 401K plan in which full-time and part-time employees at least 21 years of age or older can participate in beginning with their first pay period.
- **Paid Leave of Absences:** We recognize nine paid holidays a year as outlined in the "Employee Handbook." All full and part-time employees are eligible for paid vacation. Full-time employees are eligible for paid vacation days, while part-time employees will earn vacation on a pro-rated basis (insert details). Full-time employees are entitled to 10 days per year, and part-time employees accrue sick leave in a prorated amount using the full-time total of 10 days per year and the average number of hours the part-time employee works per week. The Company will pay full-time and part-time employees for time off for jury duty for up to one week of pay. Bereavement leave will be granted unless there is unusual business or staffing requirements and the Company complies with all aspects of the Family Medical Leave Act.
- **Educational Benefits:** In addition to a comprehensive and robust training program, PalliaTech will offer a Continuing Education program for all employees. 15 hours of acceptable continuing education is required of each PalliaTech employee, per year. In the event that there are fees associated with satisfying this requirement (registration, materials, etc.), PalliaTech will reimburse 100% of the cost, as long as employee receives prior written permission from their direct Manager.
- **Living Wage Standards:** In keeping with our commitment to creating a pharma-standard model, we are prepared to offer competitive wages to attract high-quality, motivated professionals. Management positions will be salaried according to experience and qualifications. Entry-level employees will be paid hourly, at rates that range between \$12-\$15 an hour, exclusive of overtime and holiday pay. No employee will be permitted to work more than six hours without a 60 minute break.

6. RFA (F)(2): BONUS POINTS
COMPASSIONATE NEED PLAN

6. RFA (F)(2): BONUS POINTS

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 producer applicant; and
- Any other information you think may be helpful to the Department in evaluating your compassionate need program.”

COMPASSIONATE NEED PROGRAM

PalliaTech is dedicated to helping relieve the pain and suffering experienced by patients with serious diseases who qualify for physician-guided treatment with medical marijuana.

We understand that patients may be economically disadvantaged and require assistance acquiring this much-needed medication. Our Compassionate Need Program allows eligible patients to acquire reduced cost medication.

WHO IS ELIGIBLE FOR REDUCED COST MEDICATION?

Depending upon your annual household income, you could be eligible for the program. The basis for our program is the federal poverty level which is set annually by the United States Department of Health and Human Services.

The table below shows the poverty level based on number of individuals in your household. If your household income is below this level you qualify for our Compassionate Need Program.

If you fall at least 25% below the poverty level as outlined below, we will provide your medication FREE of cost.

If you fall within the poverty level as outlined below, but are not 25% below, you are eligible to receive a discount of 25% on all medication.

2015 Poverty Guidelines for the 48 Contiguous States and the District of Columbia

Persons in family/household	Poverty guideline
-----------------------------	-------------------

For families/households with more than 8 persons, add \$4,160 for each additional person.

1	\$11,770
2	15,930
3	20,090
4	24,250
5	28,410
6	32,570
7	36,730
8	40,890

Our Compassionate Med program will be capped at 5% of net sales.

6. RFA (F)(2): BONUS POINTS

COMPASSIONATE NEED PLAN

HOW DO I APPLY?

Contact our Dispensary Associates who can work with you to determine your eligibility. All inquiries about our program will be addressed in a timely manner.

HOW IS INCOME VERIFIED?

Patients will need to provide their most recent Federal Tax Return. If they cannot furnish a tax return, we will work with the patient to verify their income using other means. Once approved for the program, the patient is flagged as a "member" in our BioTrack system for one year. Patients will need to continue to provide proof of their income on an annual basis to maintain eligibility in our program.

6. RFA (F)(3): BONUS POINTS
RESEARCH PLAN

6. RFA (F)(3): BONUS POINTS 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.”

PalliaTech has a strong research capability and a commitment to advance the science and practice of palliative care. Our Research Advisor, Noel Palmer, is an experienced analytical chemist with extensive expertise in plant and soil chemistry. He is skilled in chromatographic and spectroscopy methods, specializing in the detection of heavy metals, pesticides and herbicides in plants and soils. Together with our Chief Research Officer, Bob Winnicki, a full program of clinical trials and research plans are being developed.

The Advisor oversees research, testing and laboratory operations at a state-of-the-science laboratory in Denver, Colorado where he oversees cannabinoid, terpenoid, residual solvent, plant tissue, soil, and microbial assessment for the medical Cannabis industry. His current research portfolio includes studies into medical device technology, plant genetics and the identification, extraction and reverse engineering of phytochemical expression as well as agricultural optimization of *Cannabis* cultivation. He also works with industry partners to license and develop advanced lab-testing methodologies.

The Director received his Masters of Science degree and PhD in analytical and soil chemistry from the University of Idaho and has managed research laboratories at the University of Idaho and at Montana Botanical Analysis, a lab that focused on phytochemical testing and the study of *Cannabis* chemistry. He has published peer reviewed articles and co-authored Industry Standards for Laboratory Testing of medical *Cannabis* for Americans for Safe Access and the American Herbal Products Association. He serves on the board of the Alliance for *Cannabis Science*, an international community of scientists. In 2014, he was named *Cannabis Researcher of the Year* by Americans for Safe Access.

The following research initiatives were designed in consultation with our Director of Research. We have focused our work on two important projects, both designed to advance one of the most critical aspect of cannabinoid medicine: accurately assessing the effects of medical Cannabis.

STUDY TO ACCURATELY ASSESS THE EFFECTS OF MEDICAL CANNABIS (1)

This proposal is for a survey-based data accumulation project that examines of patient Cannabis use, trends, and opinions. Currently, administration of Cannabis can be via smoking, vaporizing, oral, sublingual, transdermal, rectal, topical, and ophthalmic. The purpose of this work is to better understand what the general patient population prefers and uses for therapeutic applications of Cannabis. An expected outcome of this work is to be able to produce the most effective and appropriate medical preparations using cannabinoids.

A 2012 International Association for Medicinal Cannabis survey showed that approximately 80% of medical Cannabis patients administered Cannabis via smoking or vaporization, and the other 20% of medical Cannabis patients administered Cannabis via sublingual or oral routes. The technology of producing infused products with cannabinoids has improved dramatically over the last number of years and a patient based surveys will help understand what administration forms are most effective and desired.

6. RFA (F)(3): BONUS POINTS RESEARCH PLAN

Methodology: The methodology of studying the effects of Cannabis is ground in surveys of patient interaction. This will be done with questionnaires and/or an online/IPad type questionnaire. Questions will focus on the respondent's experience with their previously-purchased strain of Cannabis or Cannabis product.

Issues to be Studied: The issues to be studied will include, but not be limited to, therapeutic effects of the Cannabis or Cannabis products, their side effects (sleepy, dizzy, hungry, excited, pain reduced, red eyes, cottonmouth, happiness, etc.), and what patients expected from the Cannabis (to determine the likelihood of placebo effects).

Methods of Identifying and Selecting Study Participants: The study would rely on the dispensary's patient base, employing our relationships and interaction with patients to advance the science and practice of medical Cannabis. Surveys will be performed at the point of sale – with a small discount offered as an incentive. Survey responses will generate data for key demographics based on gender, medical condition, age, type of product used, etc. The process will also focus on areas of special interest including the efficacy of CBD on patients with PTSD.

Identity of People-Organizations Associated with Study and Their Roles: The company will conduct the studies in-house under the supervision of our Director of Research. Staff will be trained to administer the questionnaires and data will be recorded in keeping with patient confidentiality. The data will be analyzed by our Research Advisor and his team.

Duration of Study and Anticipated Peer Review: As a meta-data accumulation study, this research project will be ongoing to collect a rich and growing body of data. We will work to draw the relevant conclusions after an appropriate sample size has been established and will continue to model results as the respondent population expands. Once a statistically significant baseline is established, we will work with peers in the research community to produce a scientific paper or journal article based on the findings.

Intended use of study results: The ultimate goal of this and similar studies is to provide patients with customized Cannabis medicines that are the most effective for their specific conditions.

STUDY TO ACCURATELY ASSESS THE EFFECTS OF CANNABIS (2)

Vaporization of medical Cannabis offers safe and rapid therapeutics for patients, however until now there has been limited research performed on the efficacy of this administration route. The purpose of this study is to determine the therapeutic efficacy of low, medium and high doses of standardized Cannabis in pre-loaded dosed cartridges on medical patients for various ailments. Survey based responses and blood metabolite data will be collected to correlate patient responses with pharmacokinetic data.

For the last 3 years, our operational partner has been working to produce an FDA standard, medical grade dose controlled vaporizing device. The device, the PT 1000, is the first that delivers the rapid relief of smoking without the toxic and carcinogenic byproducts in metered doses, which enable treatment to the dose-response curve. The medical grade-vaporizing device has been tested and optimized to maximize the vaporization of THC and other cannabinoids through extensive research on temperature, flow and plant material content. The prototypes are available for efficacy trials in Connecticut. The goal of this work is to apply the dose controlled vaporizing device to the therapeutic delivery of cannabinoids for patients, and determine the efficacy of such a delivery method.

Methodology of the study to accurately assess the effects of Cannabis

The methodology of studying the effects of a dose controlled vaporizer using Cannabis will be survey based as well as monitoring blood metabolite dynamics in vivo. Patients will be selected based on an inclusion criteria (TBD) and allowed to utilize one of the vaporizer devices for a duration of 7 days with filled-dose specific cartridges. Both during and following trial period, patients will be involved in filling out survey materials that address the efficacy of the device.

6. RFA (F)(3): BONUS POINTS RESEARCH PLAN

Issues to be studied

The issues to be studied should include, but not be limited to - therapeutic effects of the Cannabis (as a function of dose size) or Cannabis products, side effects of the Cannabis or Cannabis products (sleepy, dizzy, hungry, excited, pain reduced, red eyes, cottonmouth, happiness, etc), and what people expected from the Cannabis (to determine the likelihood of placebo effects.)

Methods of identifying and selecting study participants

Patients whom are curious and interested in vaporization as a method of administration will be good candidates for this study. Also, patients whom have respiratory complications may be good candidates for this study – as vaporization allows for safe administration of Cannabis via pulmonary administration.

Identity of people-organizations associated with study and their roles

Nursing organizations, hospice, universities, and other medical treatment centers may offer good opportunities for collaboration in this research because vaporization is a method of Cannabis administration that has been implemented in many European countries as a safe and viable method.

Duration of study and anticipated peer review

The vaporization studies can be performed in a matter of months, once the patient base has been identified. The reason it will take this long is because of a limited number of vaporization devices available for the study (only 2 currently).

Intended use of study results

The intended use of these study results is to add knowledge to the peer reviewed literature that dose controlled vaporization can be an effective method of Cannabis administration and therapeutics in a safe and controlled manner.

6. RFA (F)(4): BONUS POINTS
COMMUNITY BENEFIT PLAN

6. RFA (F)(4): BONUS POINTS COMMUNITY BENEFIT 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 dispensary facility license.”

COMMUNITY BENEFITS PLAN: STAMFORD

PalliaTech is committed to being a good neighbor and to making a positive contribution to the communities we serve. Our principals have a record of compliance in regulated Connecticut industries and commercial operations including medicine, pharmacies, laboratory testing and diagnostics and senior care, as well as highly regulated medical scientific medical marijuana operations in Colorado, Montana and New Jersey.

To fulfill our mission of providing the highest quality medical marijuana legally registered patients and an exceptional level of service to those patients and the community, we will adopt a multi-pronged approach to support the Stamford community and foster growth and development. This approach includes assisting in mitigating municipal expenses to maintain the health, safety and welfare of residents, reinvestment in the community through corporate social responsibility and education initiatives and job creation as well as a Charitable Care Policy to help offset the cost of medicinal marijuana to underserved populations.

Securing Health, Safety and Welfare of Residents: To offset expenses incurred to maintain the health, safety and welfare of residents and businesses, including increased police and fire monitoring, PalliaTech will make voluntary contributions to the City on an ongoing basis.

Community Reinvestment: Our commitment to corporate and philanthropic responsibility begins at the top with our founders and executive team’s depth of experience in the medical marijuana industry as well as designing and executing philanthropic and public affairs outreach programs for businesses and non-profits in the healthcare, medical and pharmaceutical industries. Our corporate and philanthropic efforts will be managed and implemented by our appointed Director of Community Affairs who will be given a budget to carry-out a comprehensive community relations program.

Philanthropic Initiatives: PalliaTech will provide an annual donation to the City for community events and outreach, which will be reviewed annually by our founders and executive team. In addition, we will provide annual donations to the following organization or programs:

- **Silver Hill Hospital**, a not-for-profit specialty hospital for mental health and substance abuse; and
- **Liberation Programs, Inc., Youth and Family Resources Program**, which emphasizes

For operating years one-five, we intend to provide an annual donation of \$5,000 to each community organization outlined above. After year five, we intend to provide an annual contribution of \$10,000 to each organization.

Education Initiatives: We believe that Connecticut can set a national standard for clinically appropriate, physician-driven and well-regulated palliative care. In addition to our substance abuse education outreach efforts, after the start-up phase and the Company becomes cash-flow positive, our medical and research team – overseen by Steve Patierno, PhD, a doctor of Pharmacology and a Director at the Duke Cancer Center, and Noel Palmer, PhD, the leading Cannabis researcher with extensive expertise in plant in soil chemistry – will work with Agriculture, Pharmacy and Medical Departments at Connecticut universities to formalize a lecture series on issues of medical Cannabis management, clinical practice, research, science and public policy.

Job Creation: Local hiring will be critical to benefiting the community and promoting economic growth in the City. We expect to create an estimated 25 new dispensary jobs by year three of operations in the City. Hiring locally will ensure tax dollars are invested back into the community, reduce the environmental impact of commuting and spurs further economic development in the community through employees reinvesting earnings into local businesses.

6. RFA (F)(4): BONUS POINTS COMMUNITY BENEFIT PLAN

Charitable Care Policy: We believe that no individual should be denied medical care based on their demonstrated inability to pay for those services. The organization will establish a Charitable Care Policy for providing care to people in need and to the underserved in a manner that preserves the dignity of the individual.

Our charitable care policies will conform to widely accepted community assistance practices.

Patients must be cardholders in good standing with the Connecticut Medical Marijuana Program to qualify for the charitable care program. The basis for our program is the federal poverty level which is set annually by the United States Department of Health and Human Services, and is outlined in our Compassionate Care Program.

We will maintain the highest level of confidentiality in determining a patient's need for charity care. Our staff will be trained to conduct intake interviews for financial assistance and needs assessments in accordance with the organization's Code of Conduct in a way that preserves the dignity of the individual. None of the information obtained in the patient's charity care application will be released by PalliaTech without the patient's express written permission, except as required by authorized government agencies.

6. RFA (F)(5): BONUS POINTS
SUBSTANCE ABUSE PLAN

6. RFA (F)(5): BONUS POINTS SUBSTANCE ABUSE PLAN

“Provide a detailed description of any plans you will undertake, if awarded a dispensary facility 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 PREVENTION PLAN: DISPENSARY CITY OF STAMFORD

PalliaTech’s mission is to set the standard for a medical model of palliative care, and to work with patients, physicians and caregivers to implement clinical practices for the safe administration of medical marijuana in relieving symptoms of painful, debilitating conditions. We are dedicated to ensuring that medical marijuana is administered consistent with research driven clinical guidelines and well-regulated palliative care.

Our founders, medical and executive teams have extensive in-depth international and national expertise developing companies and working within regulated industries, including emergency medicine, healthcare, pharmacy, long-term and nursing care as well as operating state-of-the-science medical marijuana facilities in Colorado, Montana, New Jersey and Washington.

Medical Advisory Board: We will set up a Medical Advisory Board (MAB) which will create educational programs and provide patients, caregivers and the medical and healthcare community the latest clinical and scientific information available on medical marijuana. The MAB will be led and recruited by:

- **Steve Patierno Ph.D.** Dr. Patierno is a doctor of Pharmacology and a Director at the Duke Cancer Center, Durham, North Carolina. Dr. Patierno is also a Professor of Medicine and a Professor of Pharmacology and Cancer Biology at Duke.

Physician and Healthcare Professionals Outreach: Our outreach program and curriculum for physicians, healthcare professionals and institutions will provide a survey of the latest science on the effects of cannabinoid medicine; inform doctors of state medical marijuana rules and regulations and clinical best practices; and provide patient education materials for physician offices. Our outreach efforts will focus on physicians treating debilitating medical conditions defined by the Compassionate Use of Cannabis Pilot Program Act, including oncologists, gastroenterologists, gerontologists, neurologists, rheumatologists and other physicians. The Company will conduct an ongoing direct outreach campaign engaging doctors with onsite visits, webinars, seminars, and mailings and conduct physician outreach at medical conferences such as the Connecticut State Medical Society and the National Multiple Sclerosis Society, Connecticut Chapter.

Patient Education and Counseling: We will train and employ experienced patient counselors, who will provide patients and caregivers with the knowledge and tools they need for the proper palliative use of medical marijuana. Our MAB will create the training materials for patient counselors and take-home patient resources detailing signs of addiction and community resources available for recovery. From the outset, our experienced patient counselors will conduct intake interviews with patients, providing information and background about the Connecticut Medical Marijuana Program and their rights and responsibilities so that they can make informed decisions and appropriately use medical marijuana as a palliative. Our patient counselors will provide educational counsel to patients and their caregivers on an ongoing basis through print and digital materials, live and online workshops and seminars, and regular notifications and email alerts.

Community Involvement: Our Director of Community Affairs will be a liaison to the community. We will partner with local officials, civic leaders, and community groups in a preemptive effort to deter substance abuse, including a targeted and effective plan to reach the broadest patient population and community residents.

6. **RFA (F)(5): BONUS POINTS** SUBSTANCE ABUSE PLAN

We will provide annual donations to the City of Stamford and other community groups within Fairfield County for substance abuse programs. We specifically have identified as initial community groups the Silver Hill Hospital, a not-for-profit specialty hospital for mental health and substance abuse and Liberation Programs, Inc.'s Youth and Family Resources Program, which emphasizes the importance of substance abuse education and prevention for both youth and parents.

The MAB will work with local, state and civic leaders to annually review our substance abuse charitable contributions to ensure we are meeting the needs of the community and the efficacy of the programs.

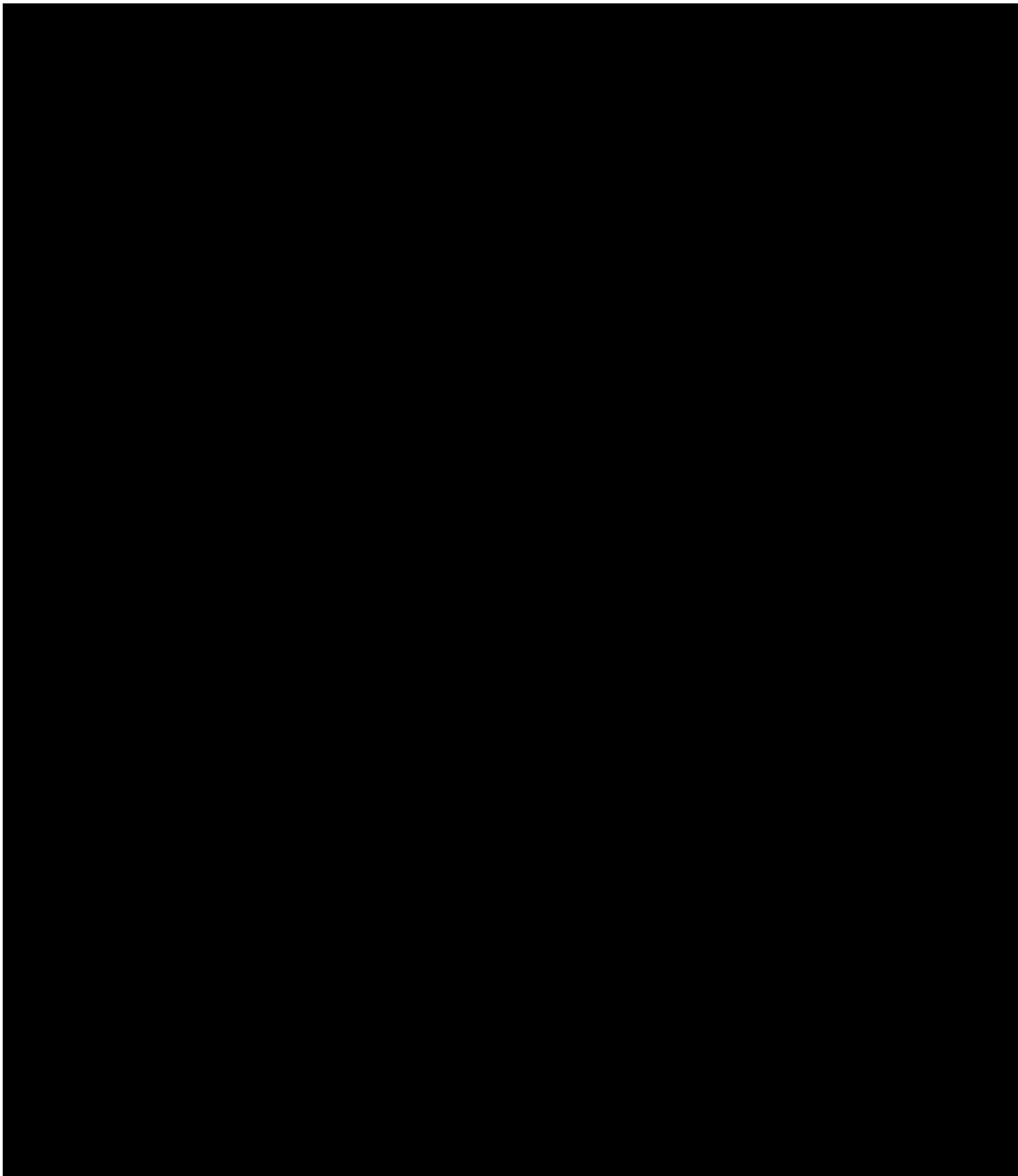
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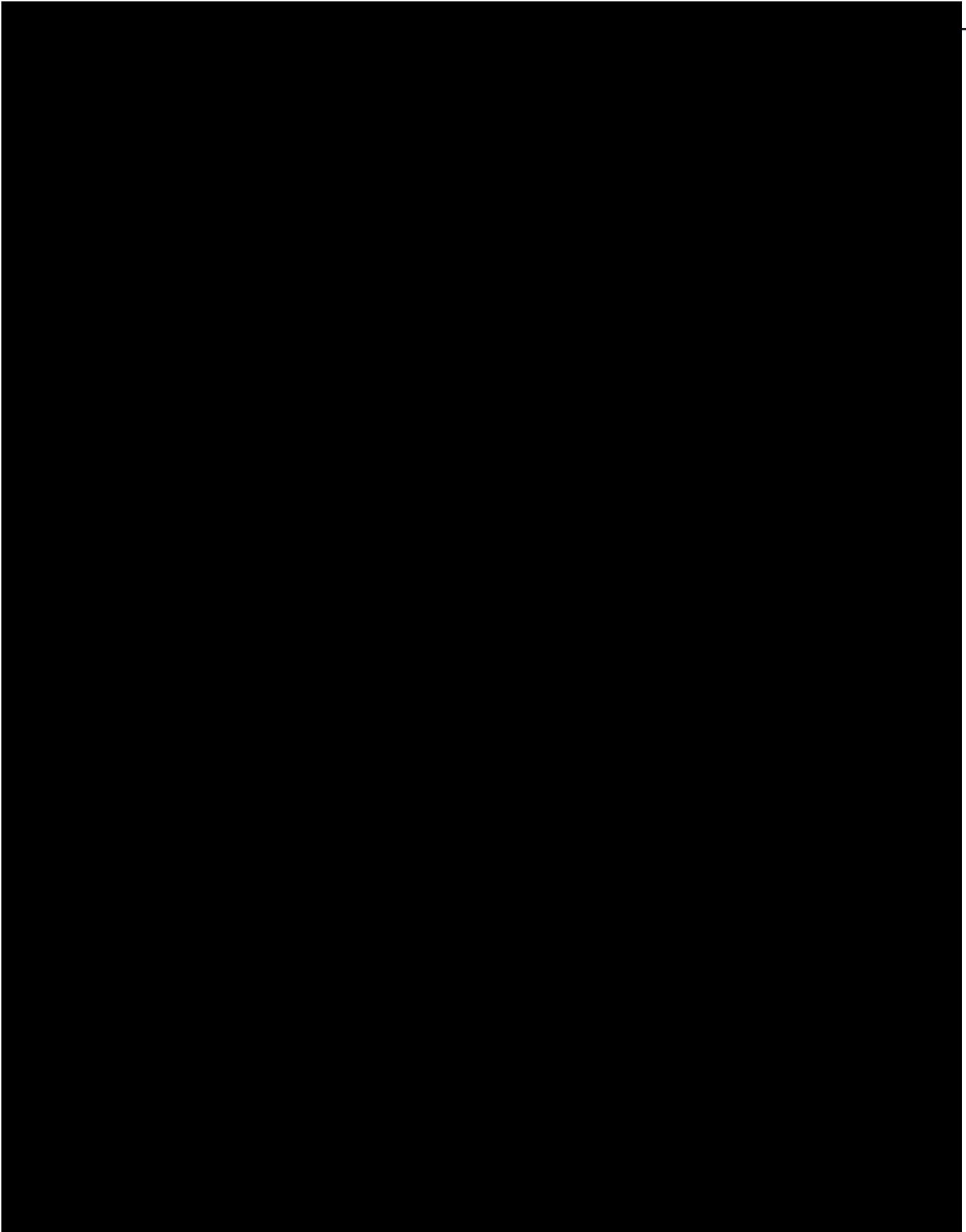
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ORGANIZATIONAL STRUCTURE**

FEDERAL, STATE AND FOREIGN TAX RETURNS (BACKERS)



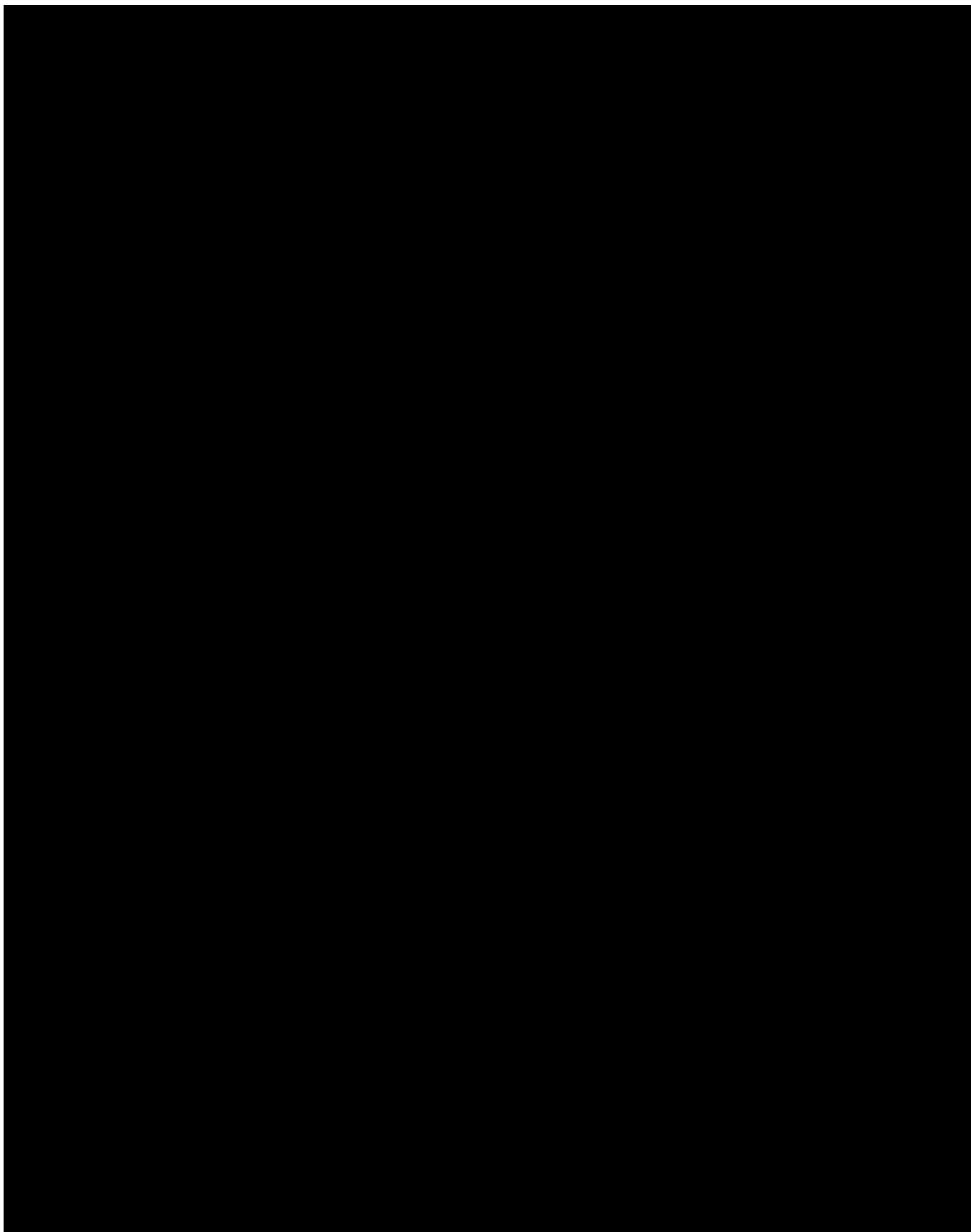
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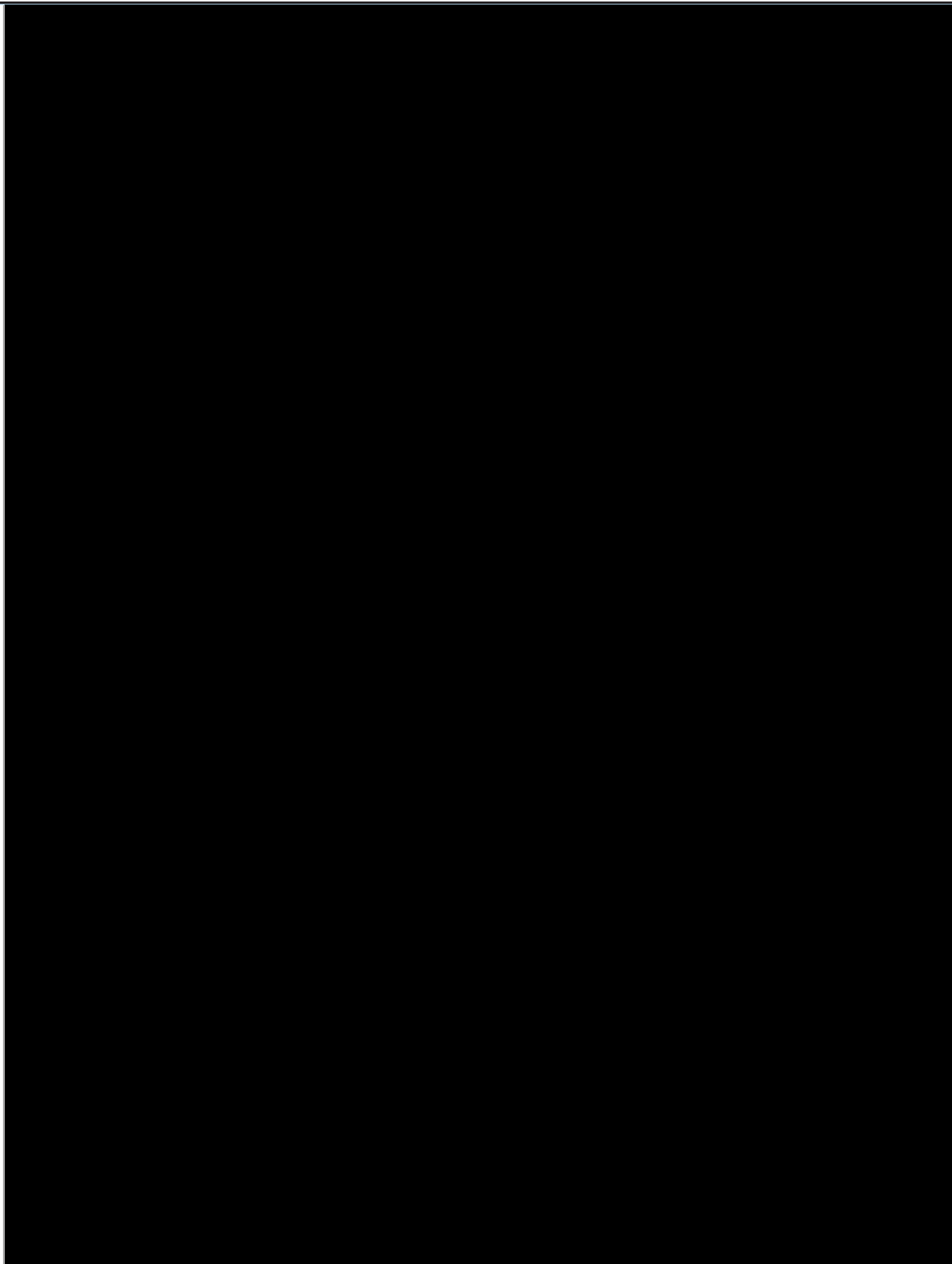


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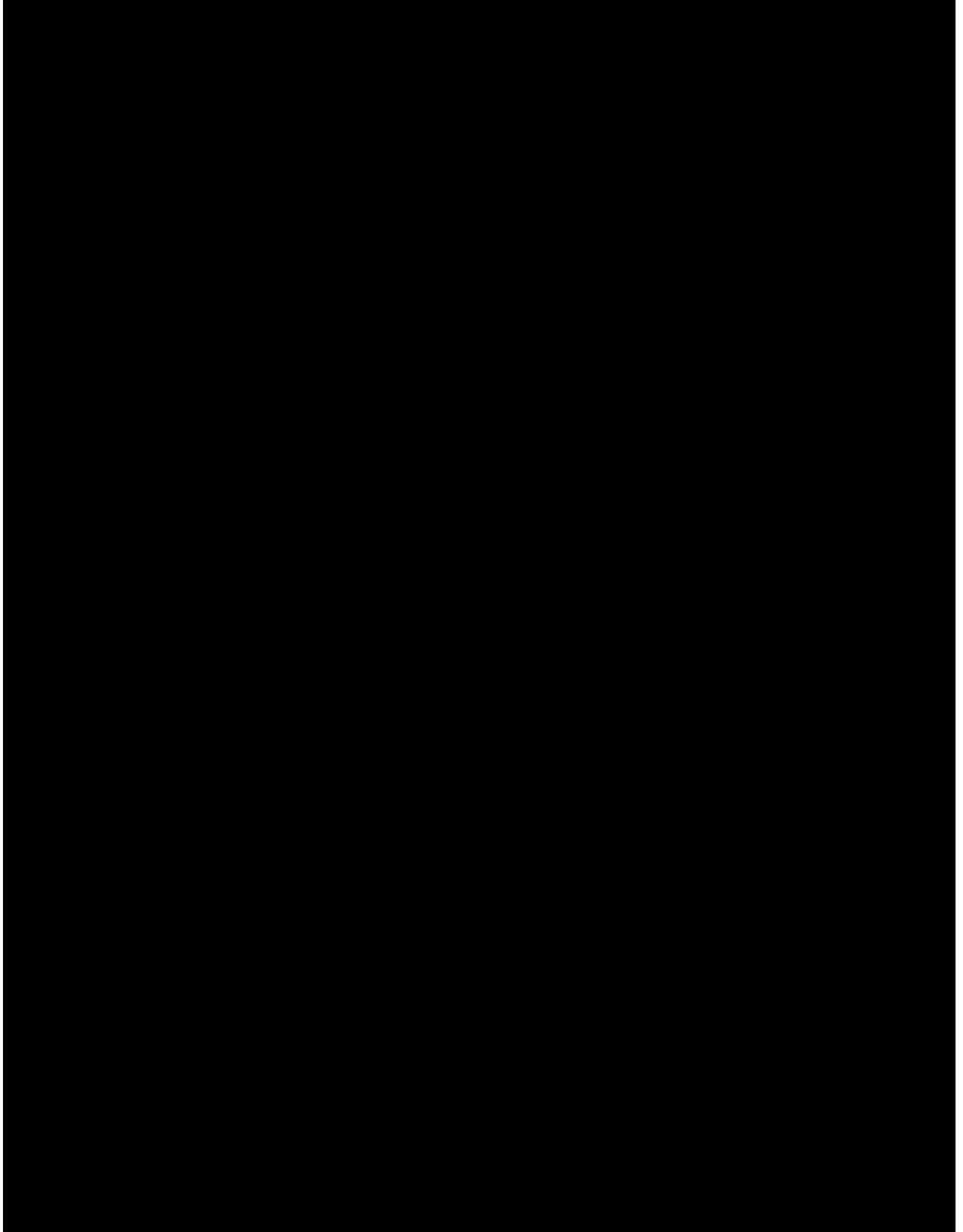
FEDERAL, STATE AND FOREIGN TAX RETURNS (BACKERS)



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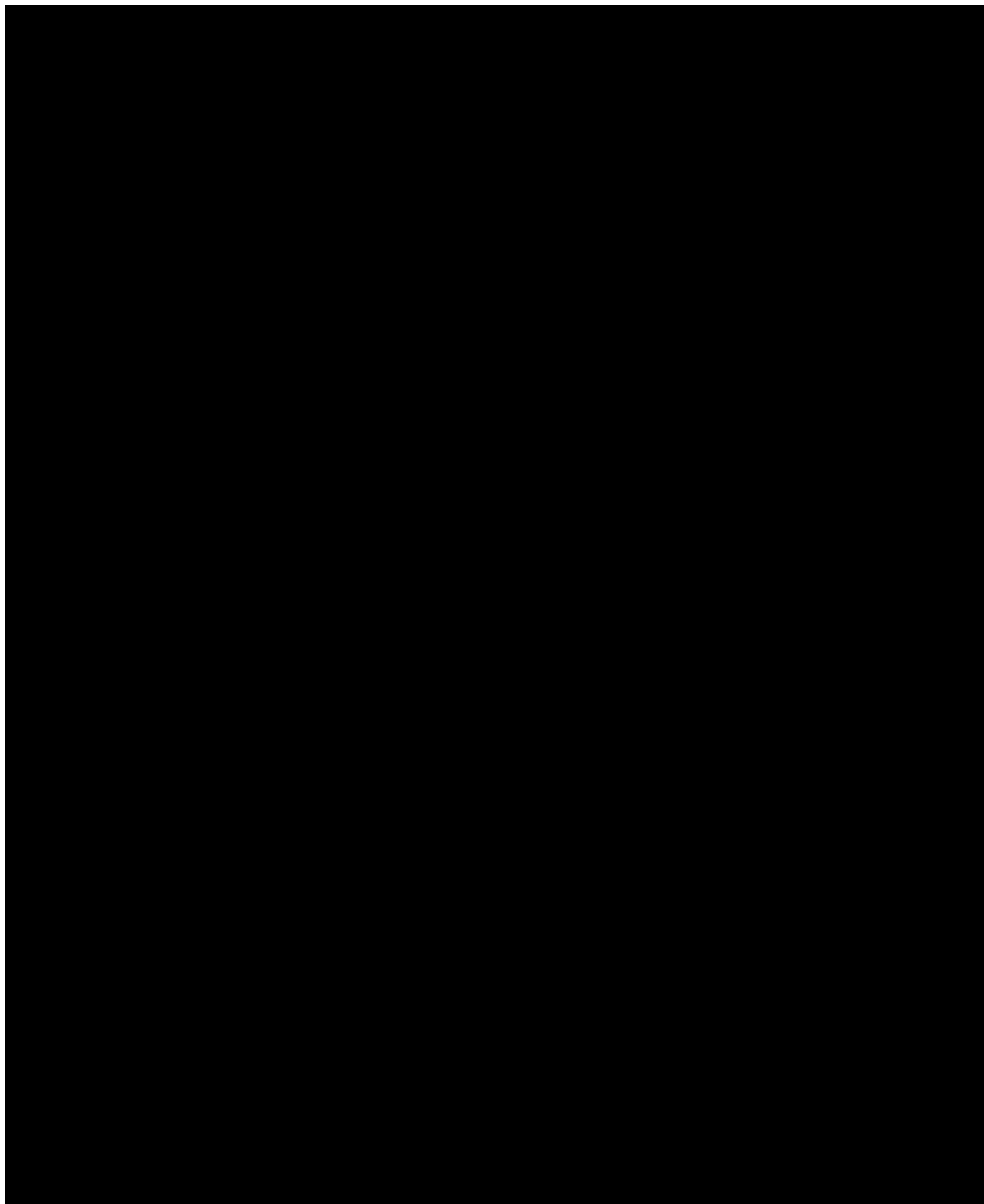


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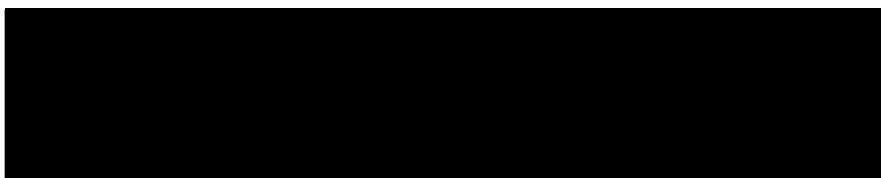
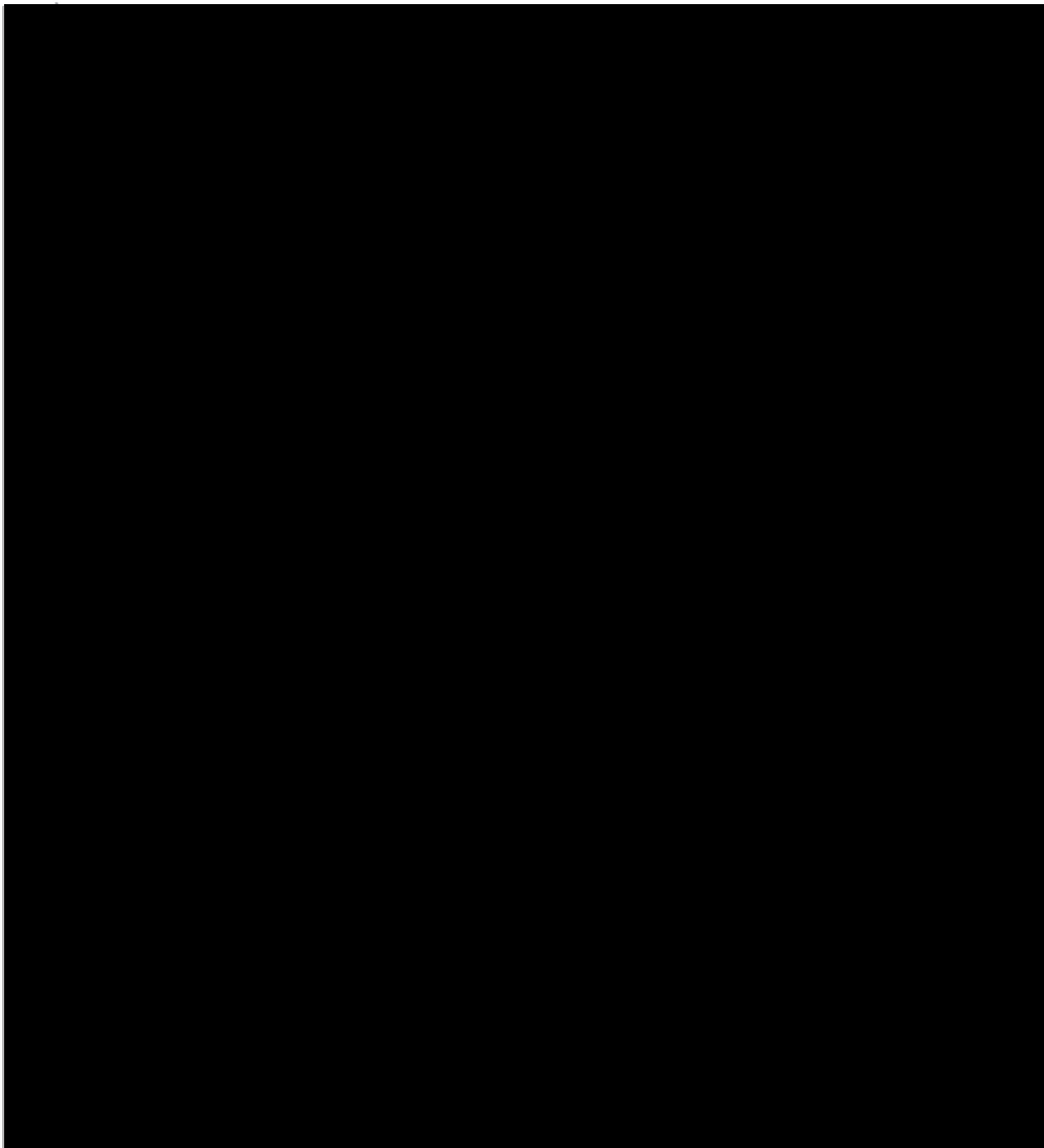


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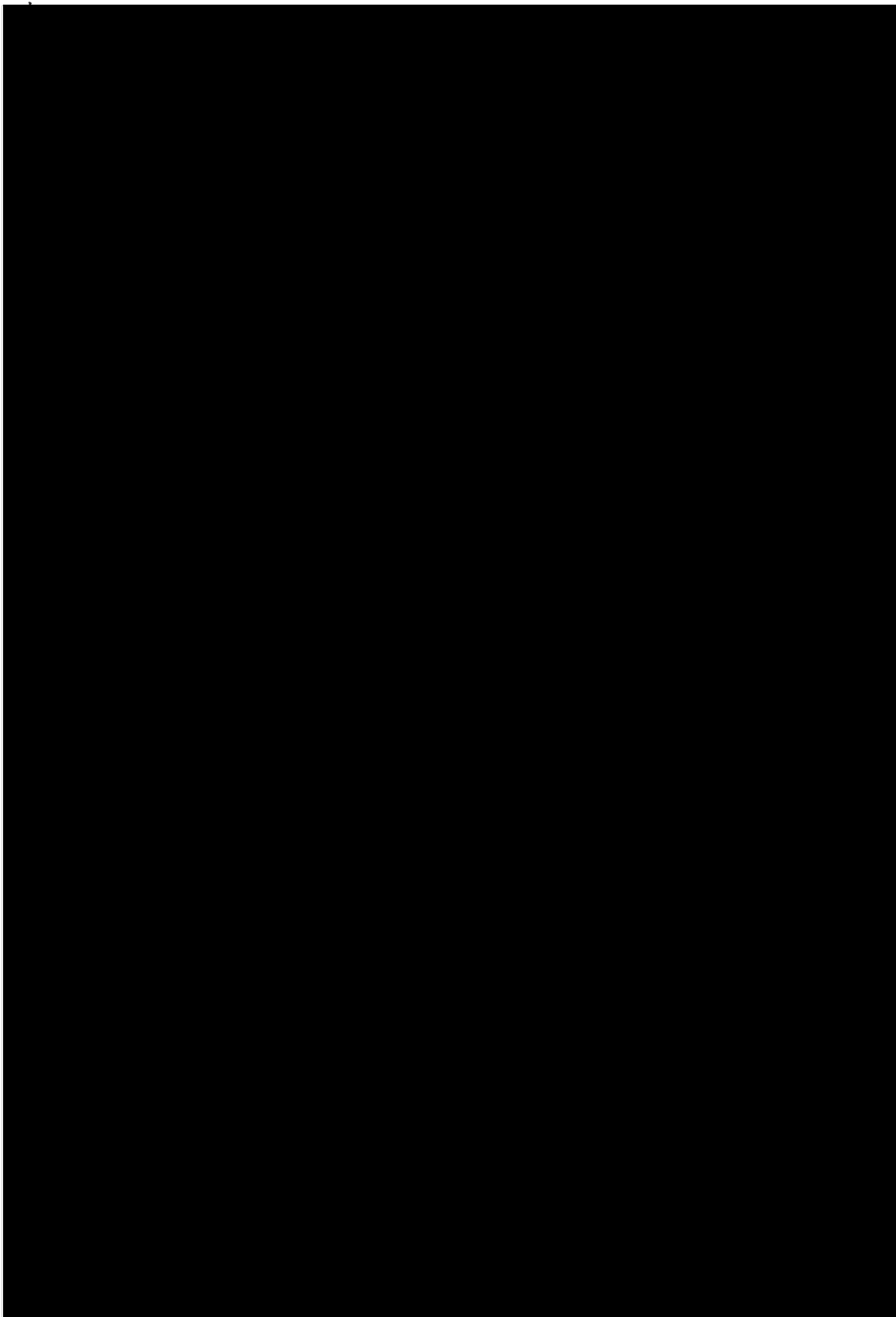
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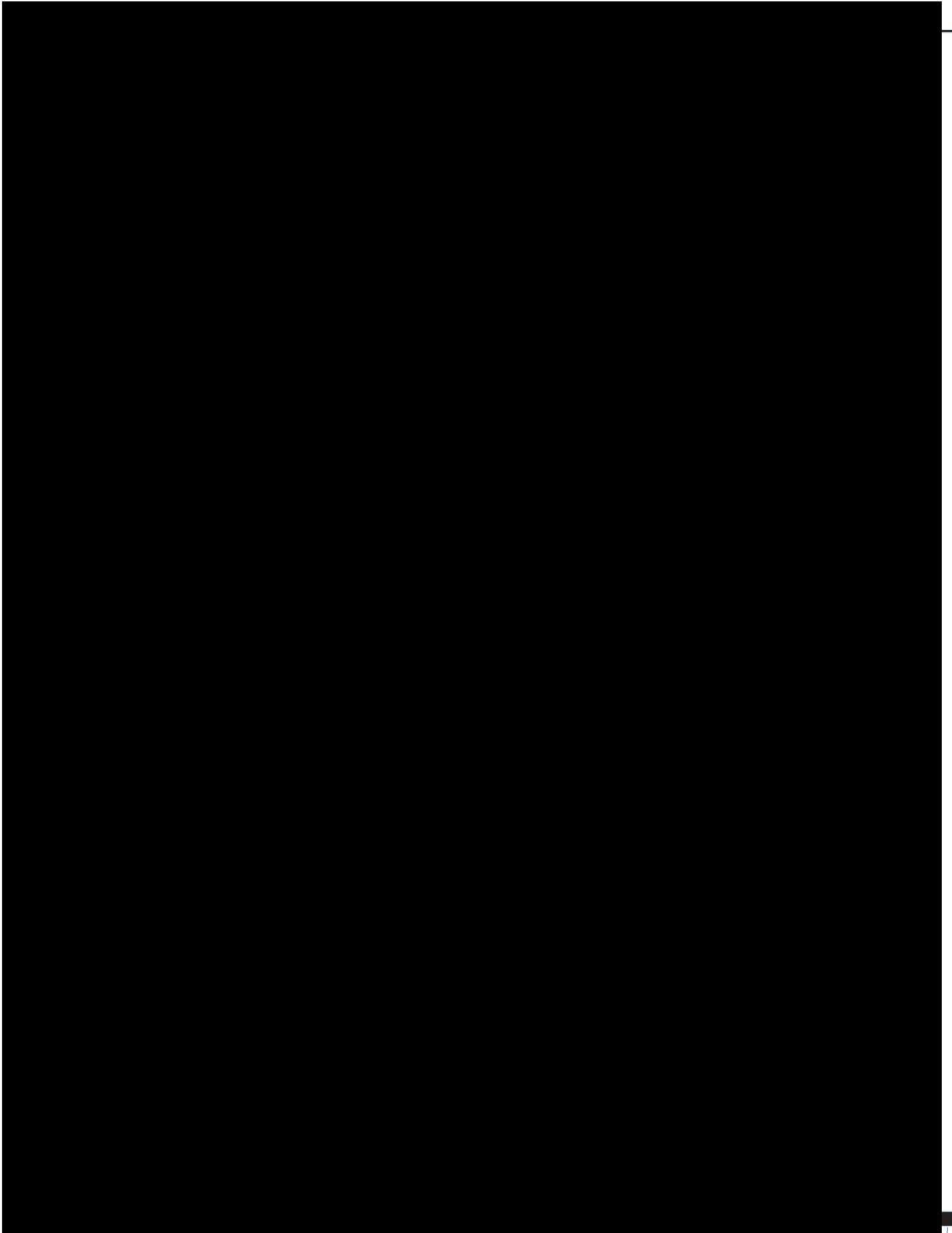


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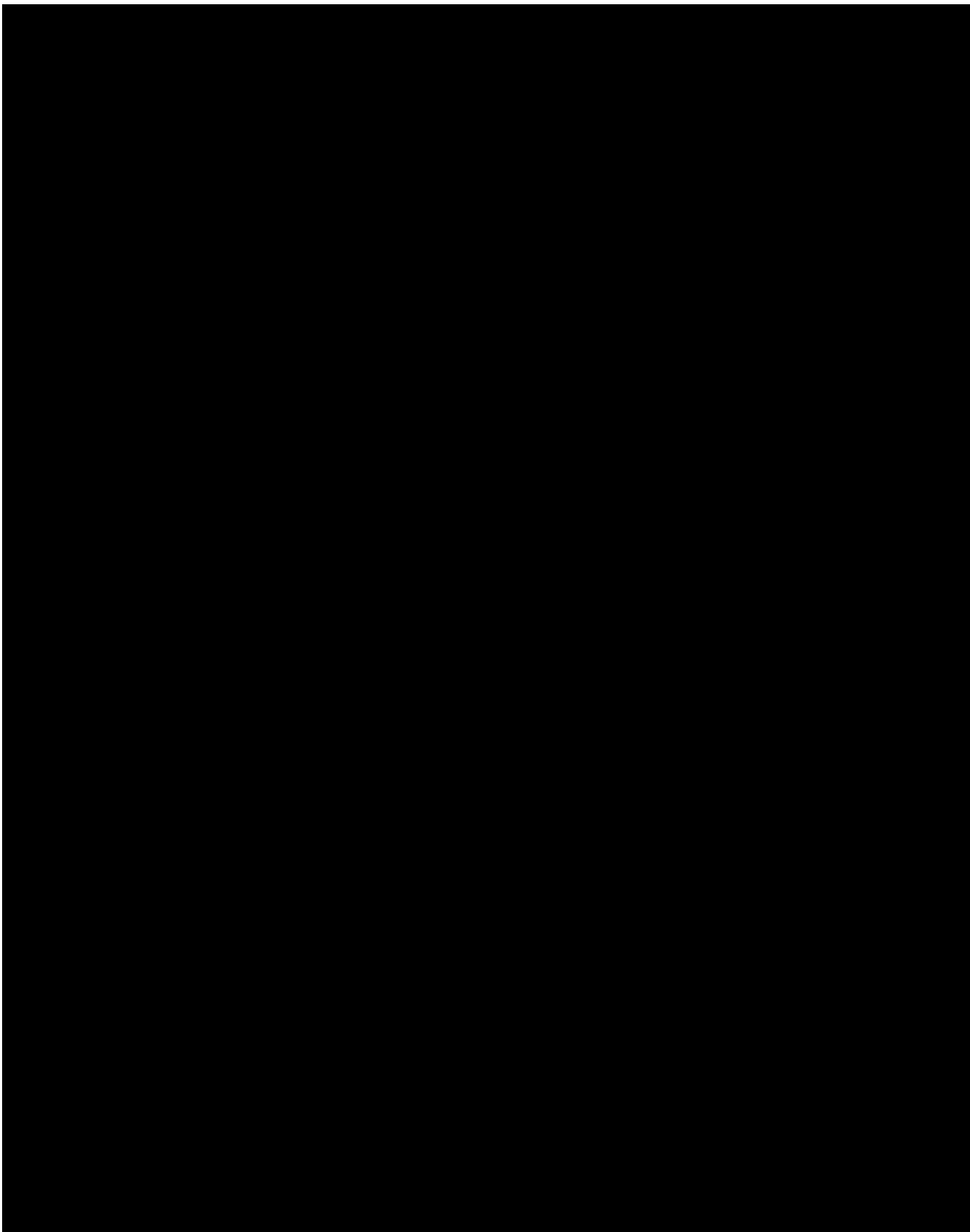
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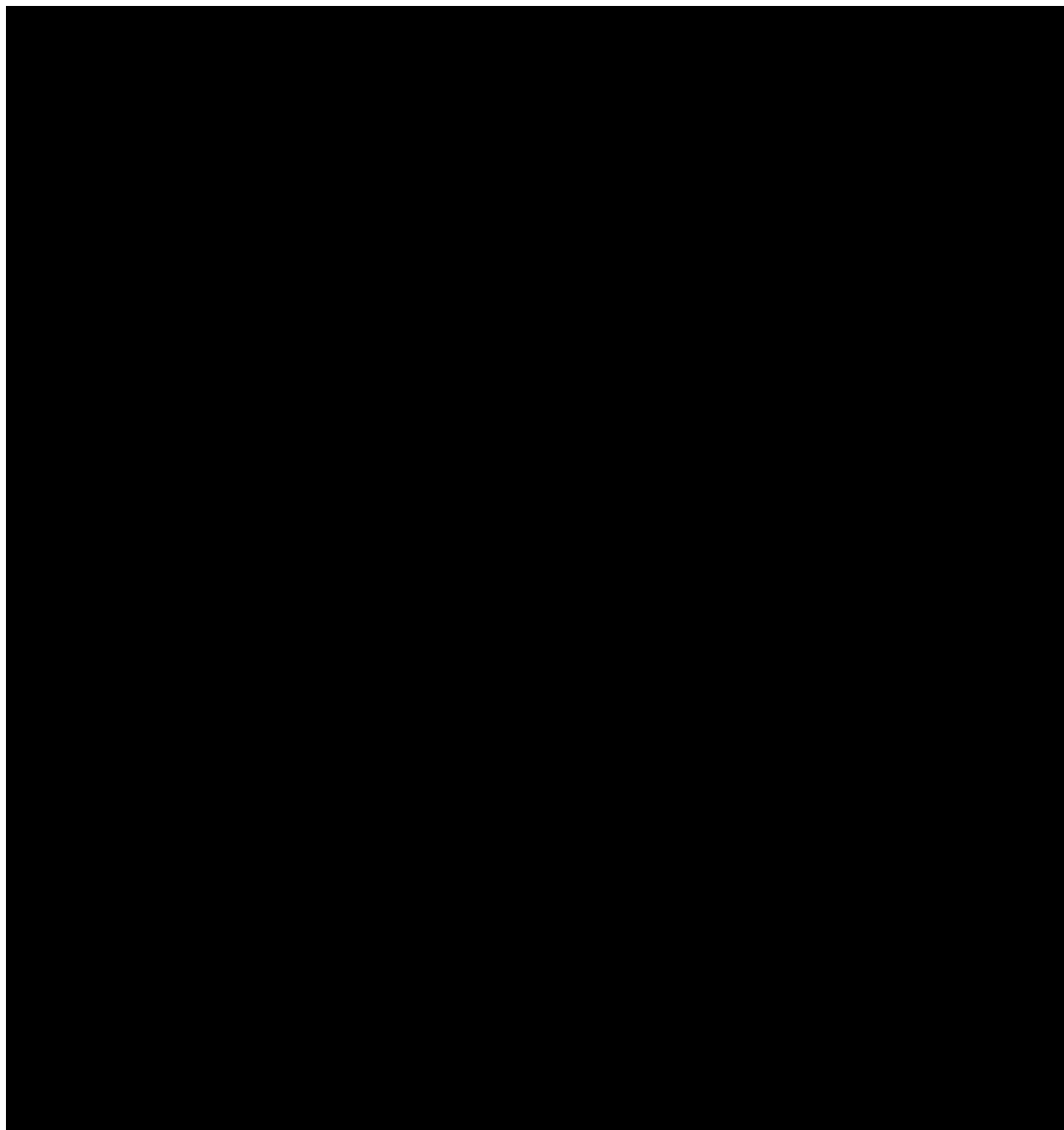
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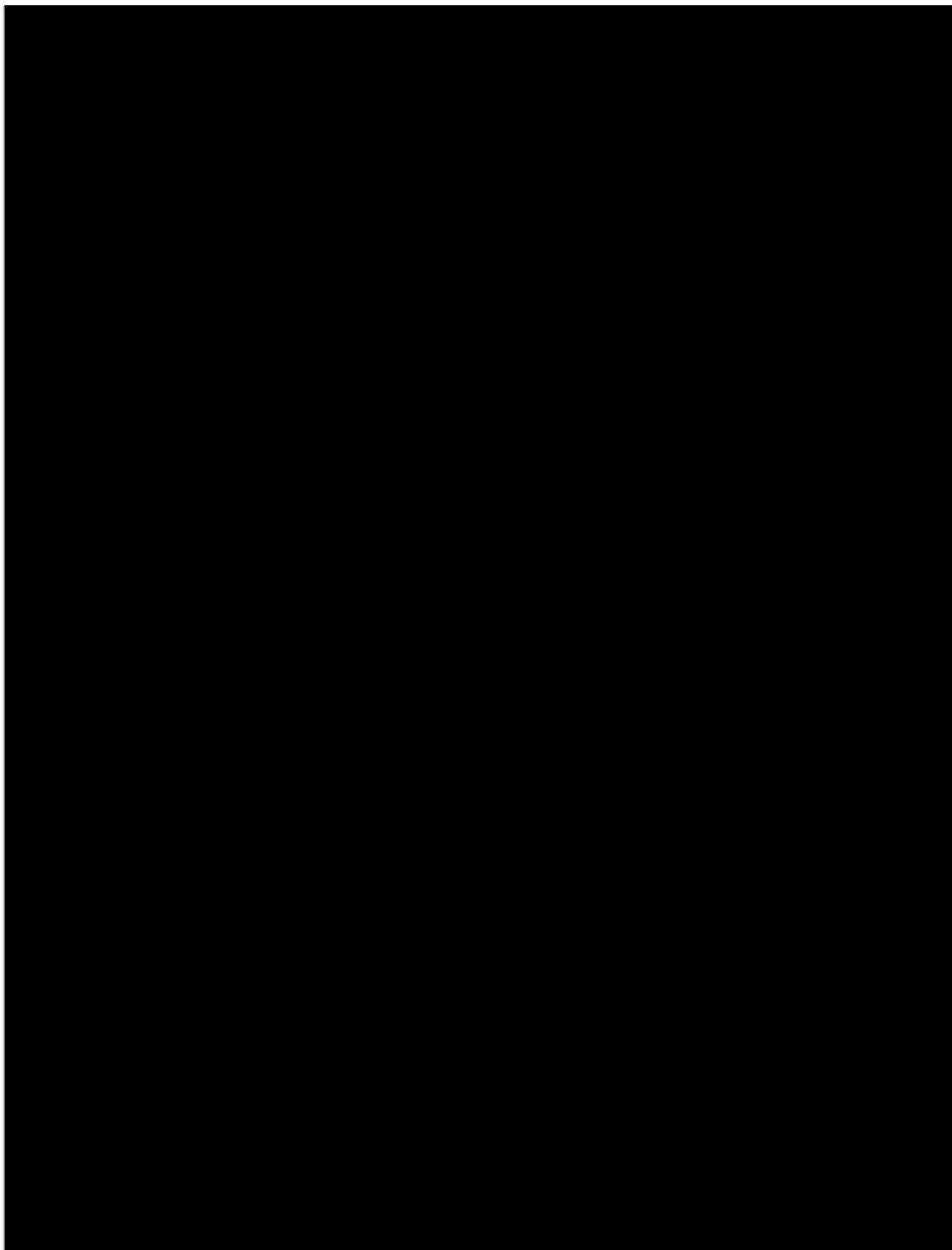
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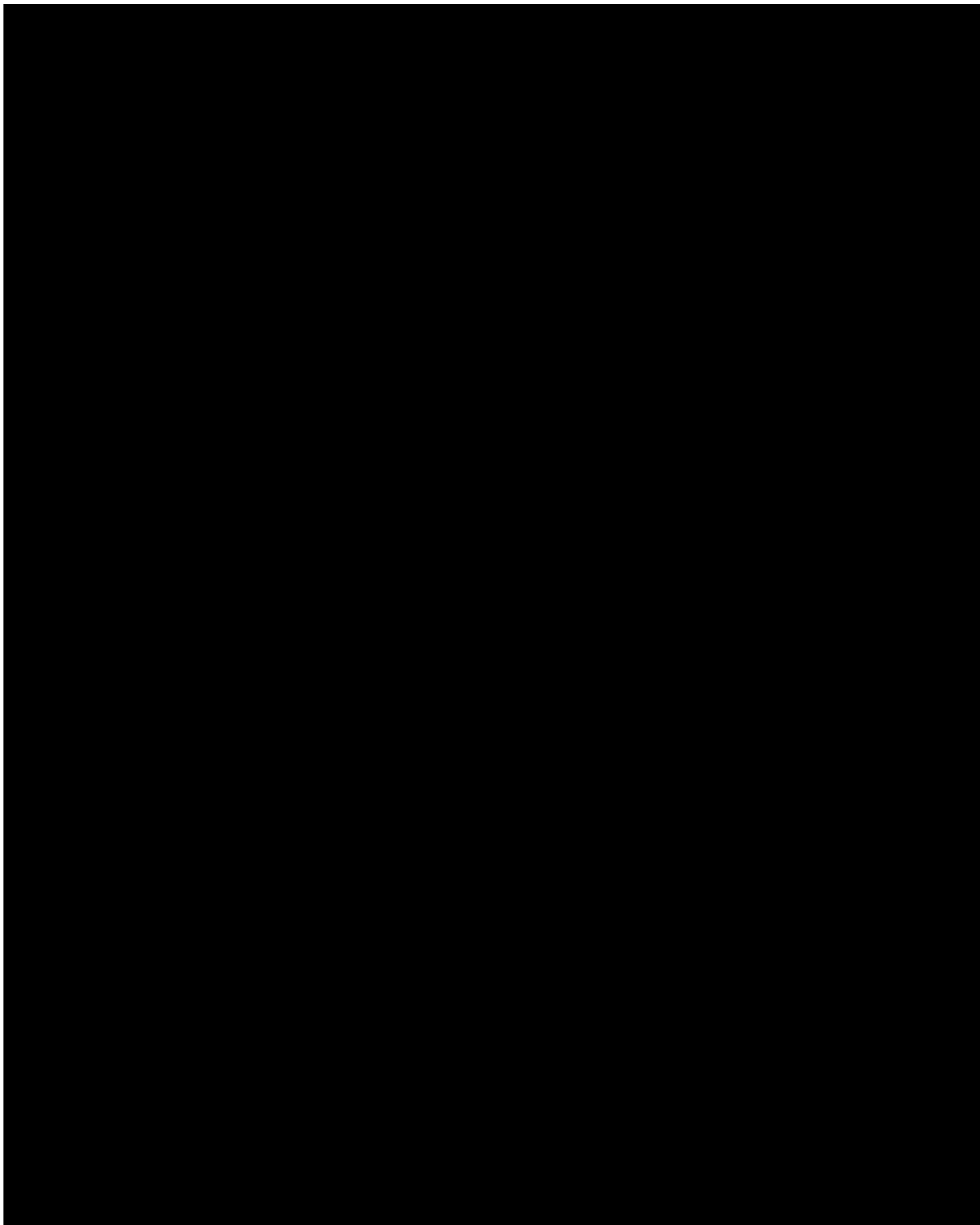
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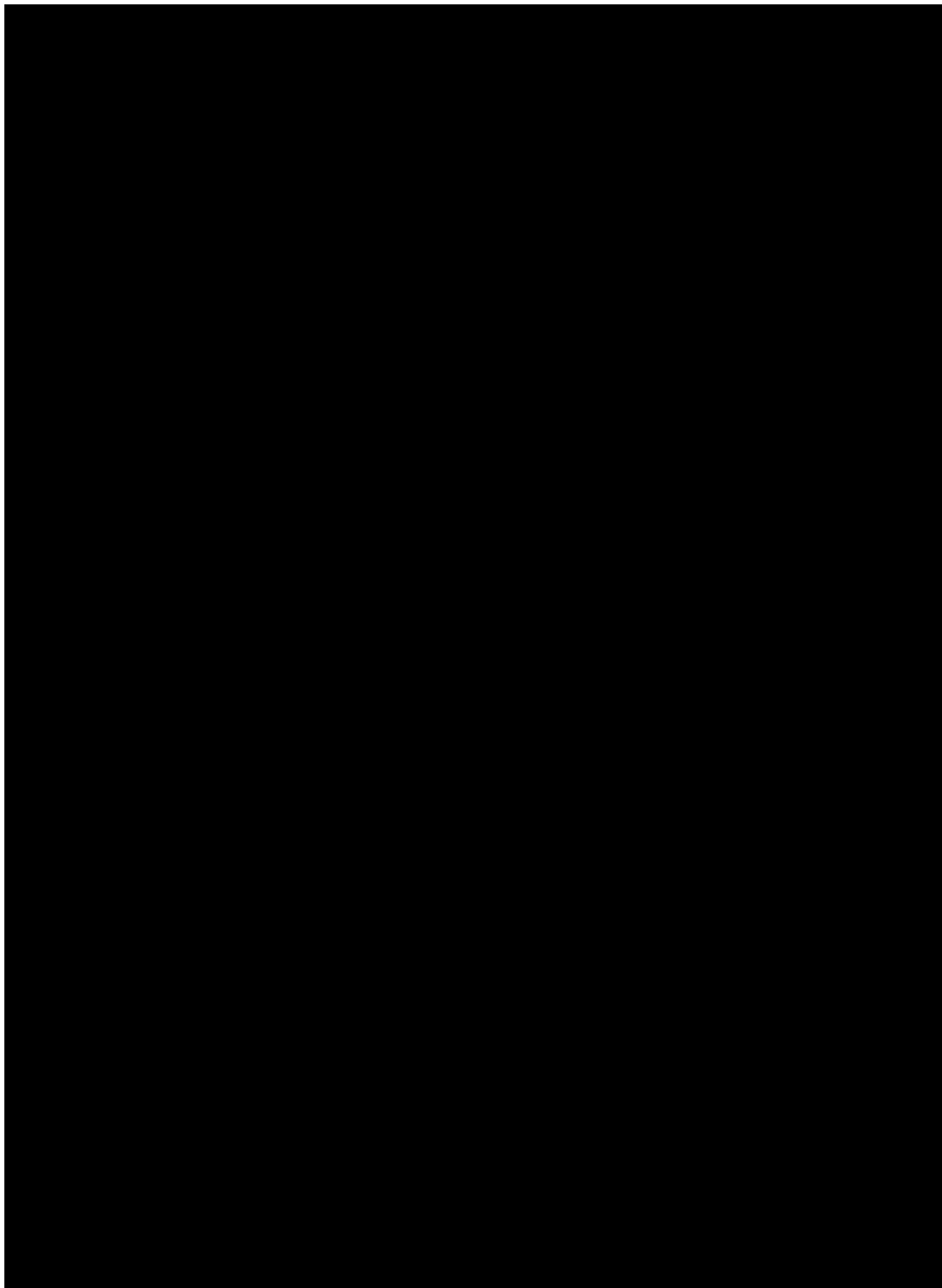
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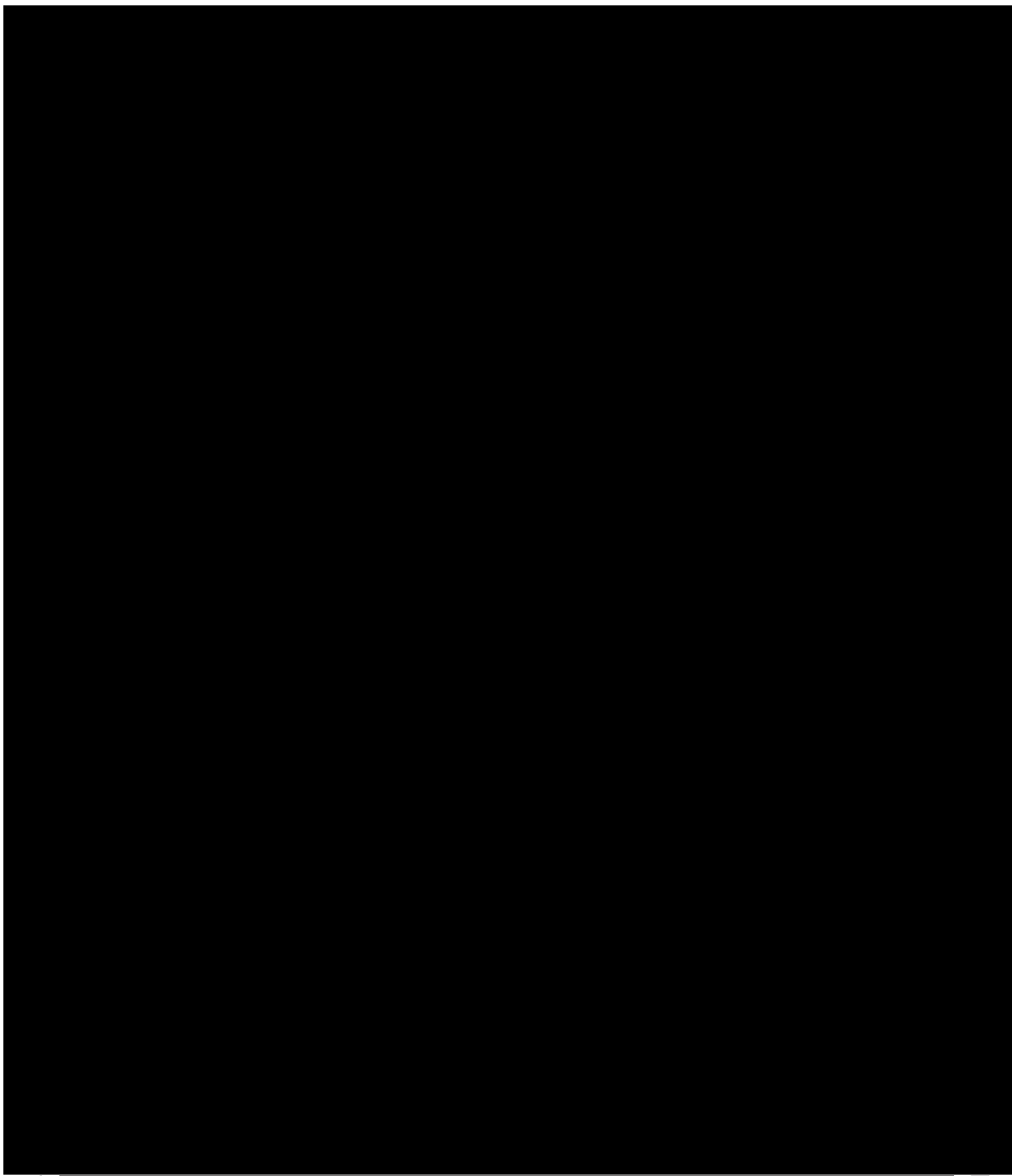
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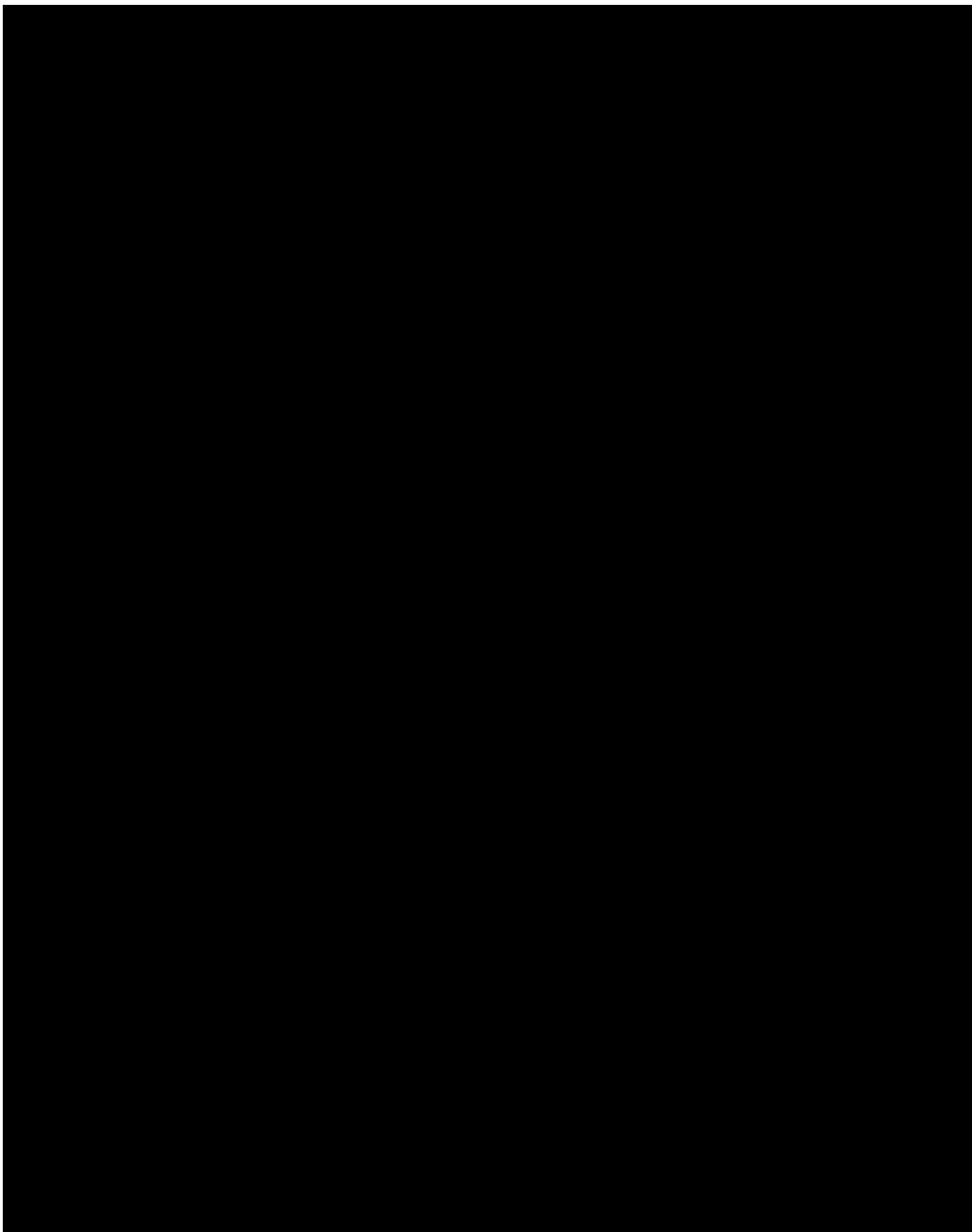
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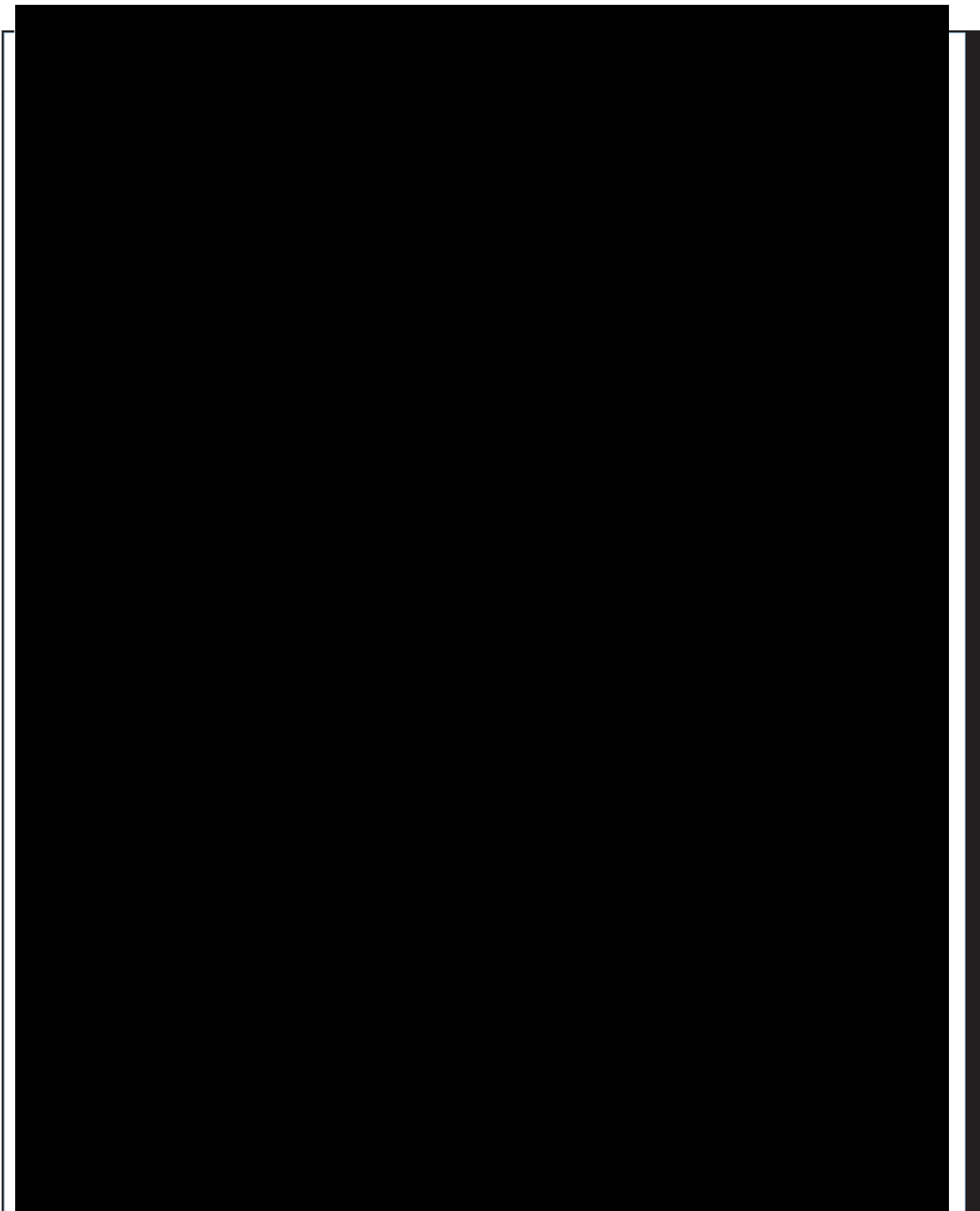
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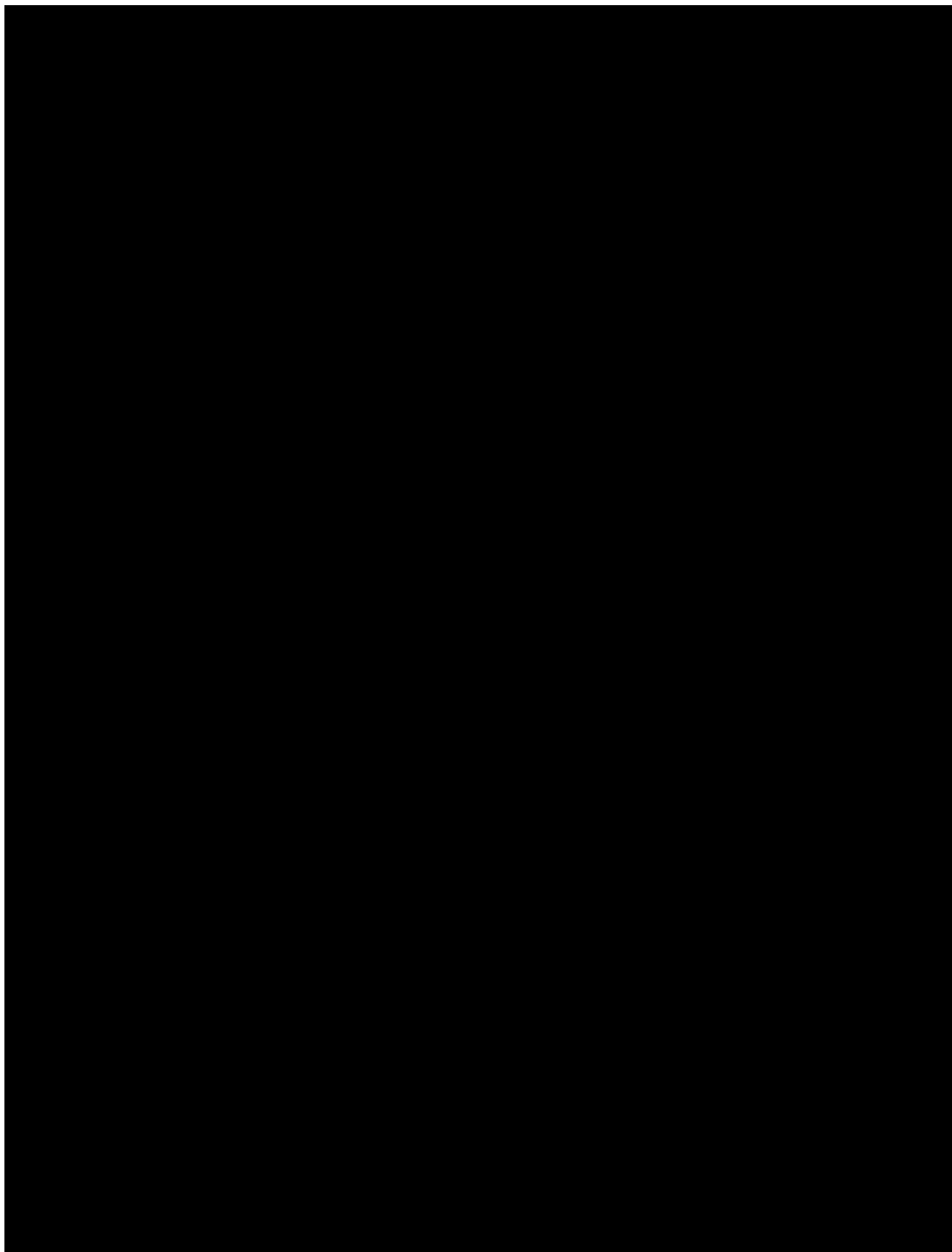
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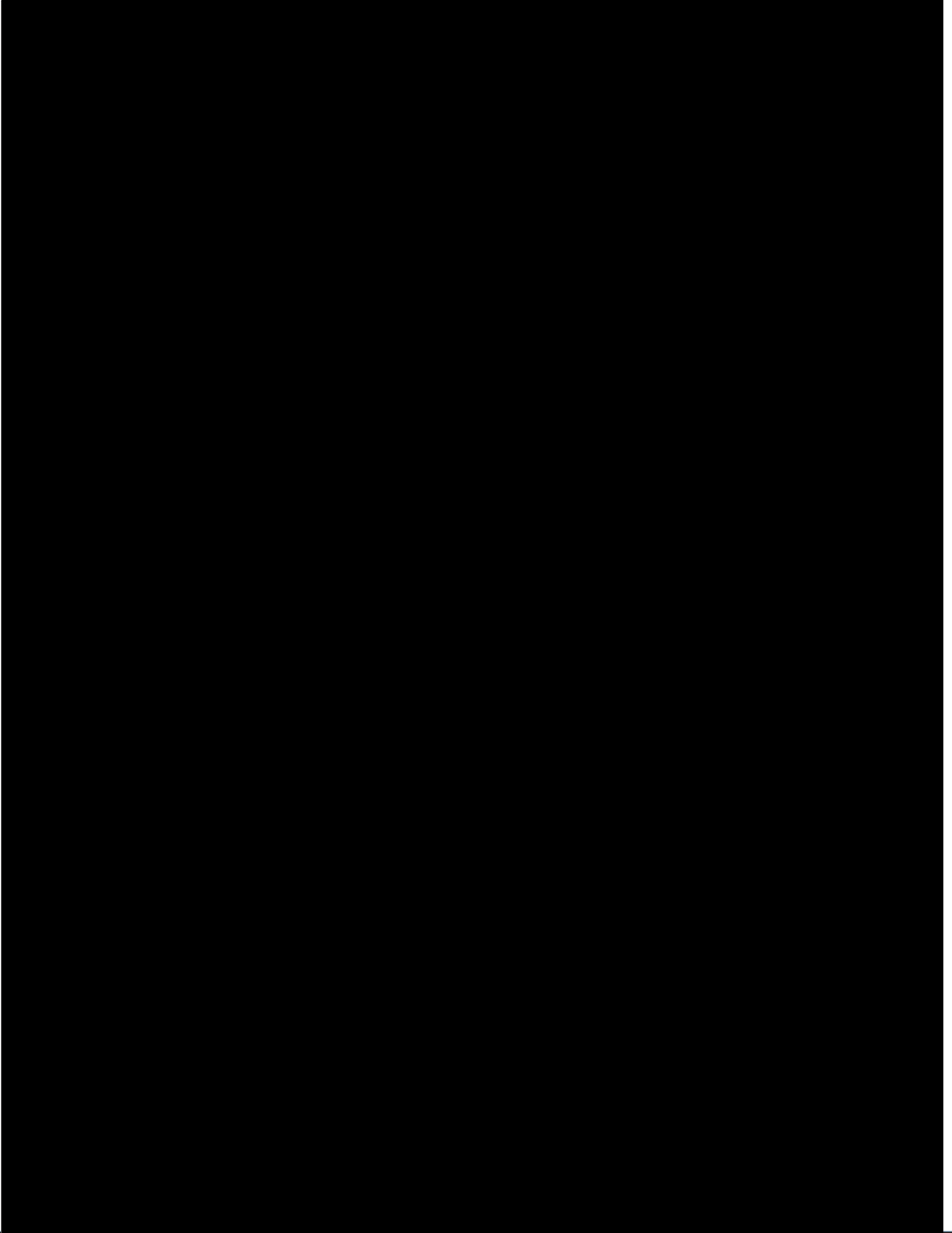


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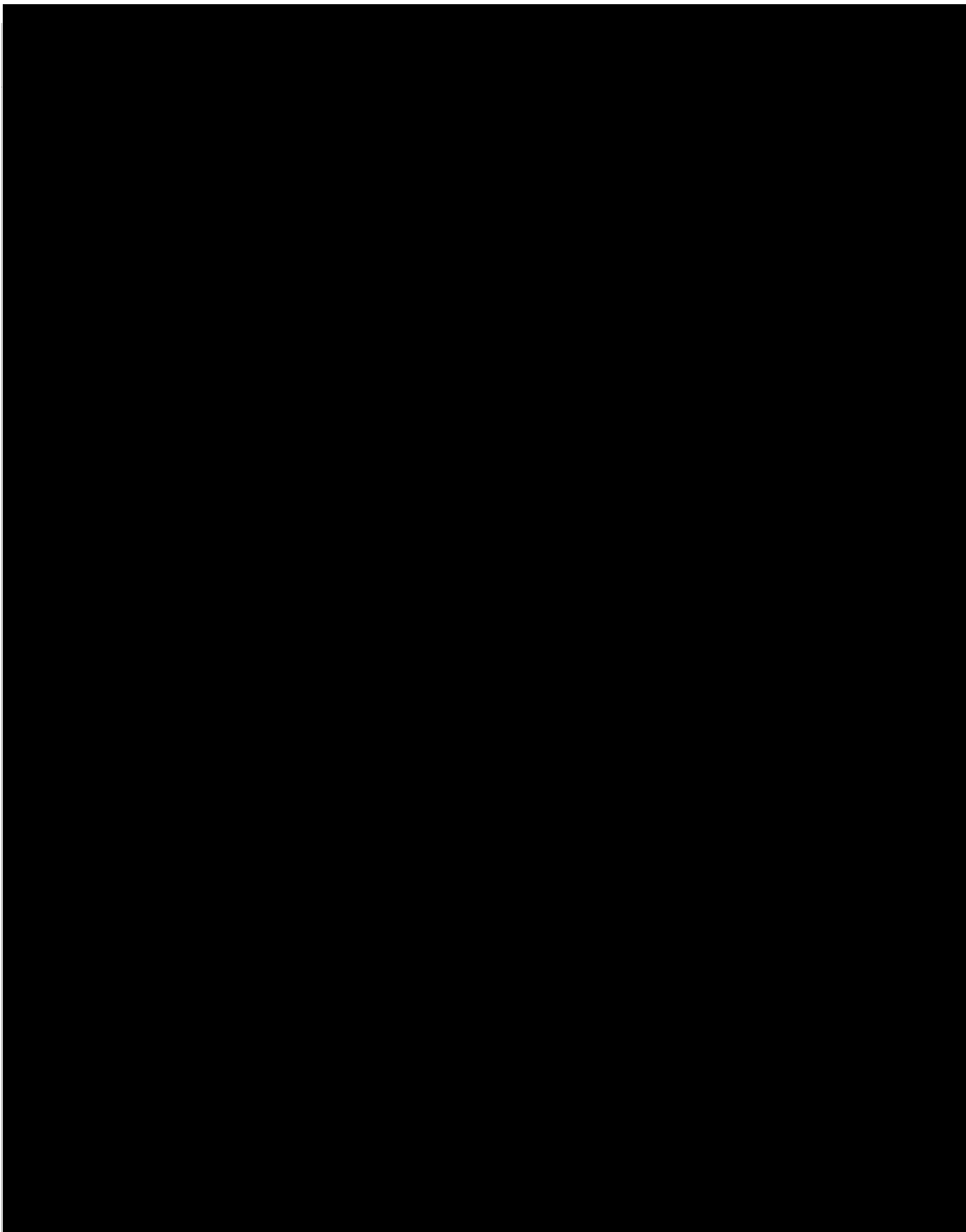


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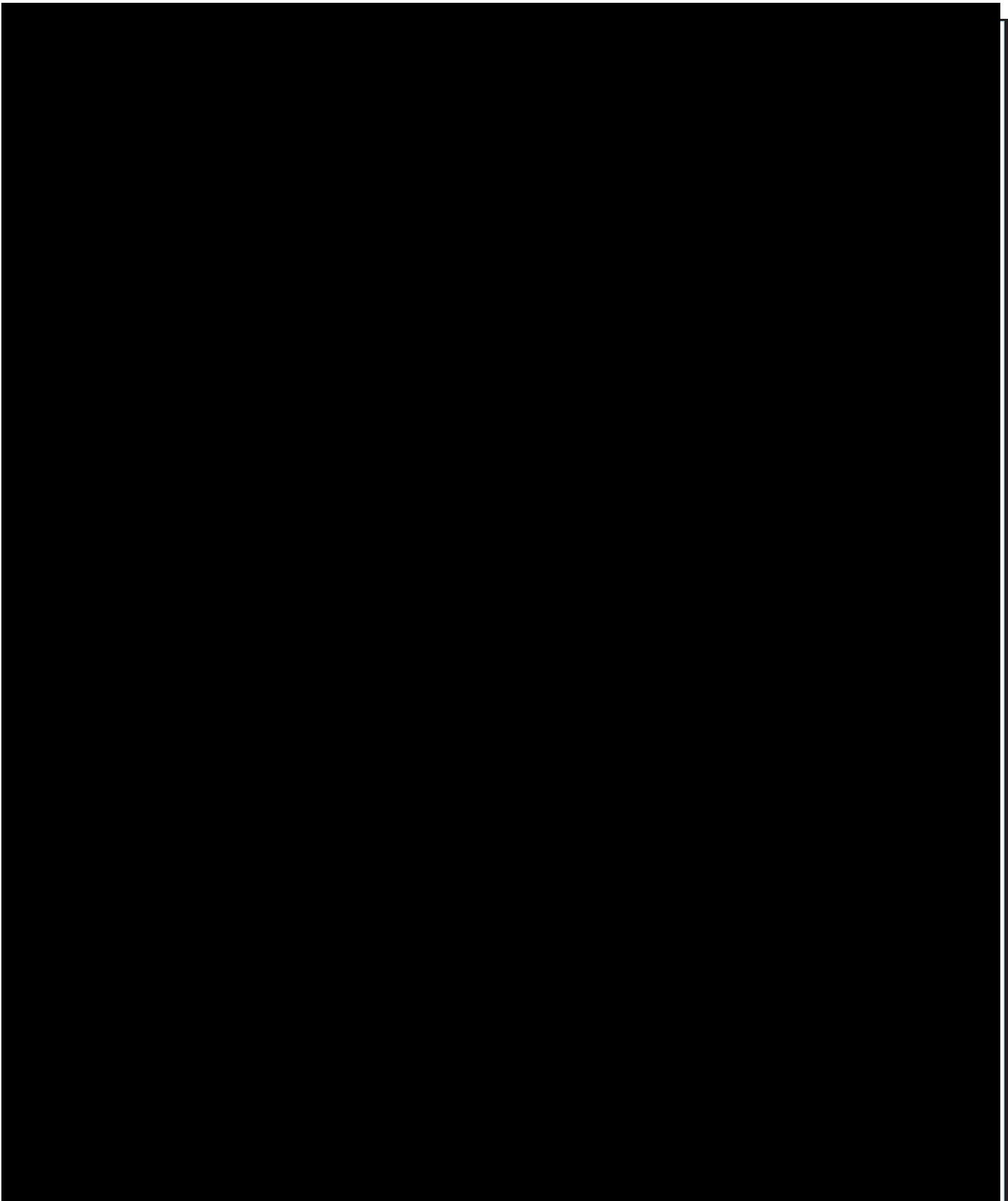
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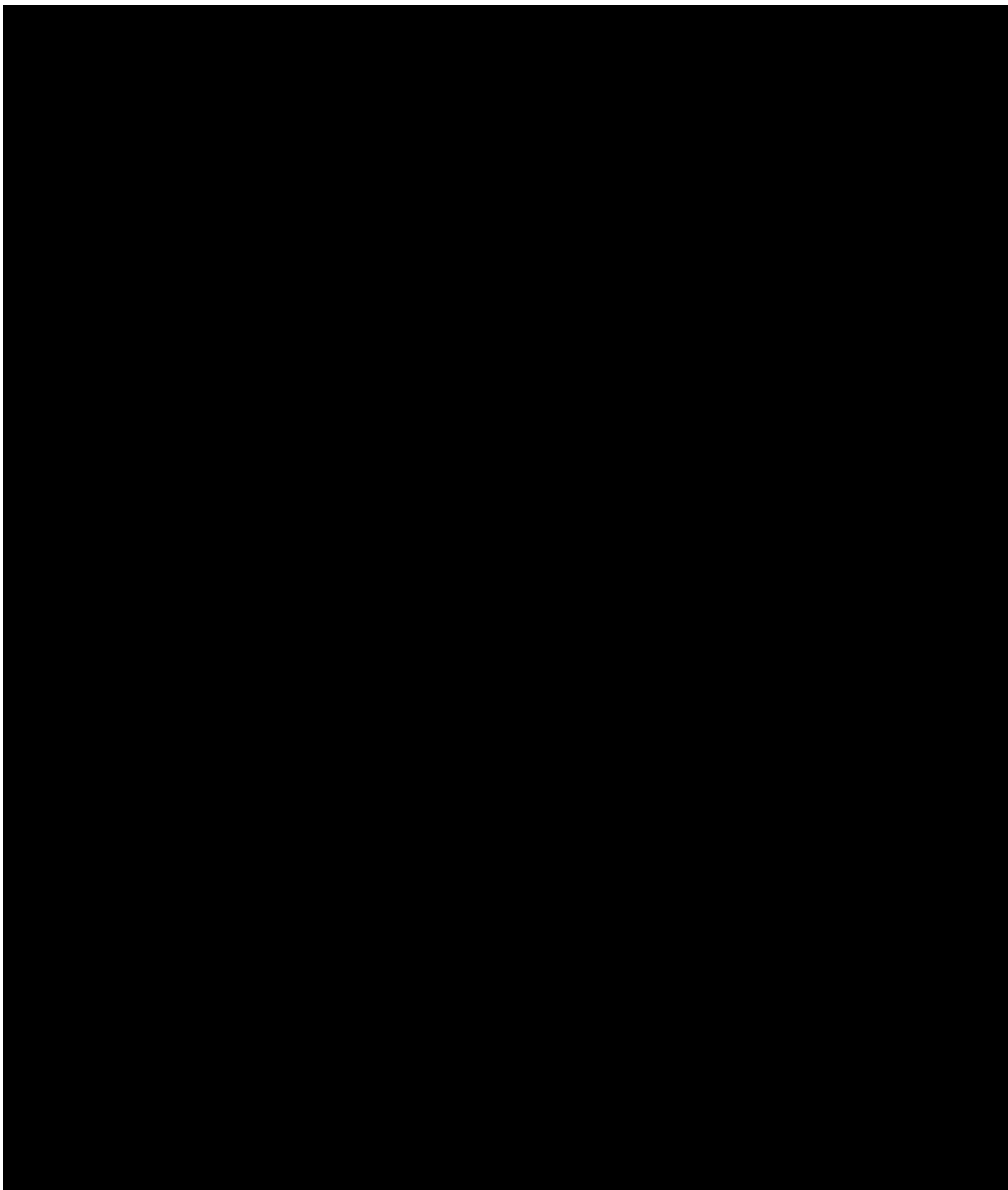
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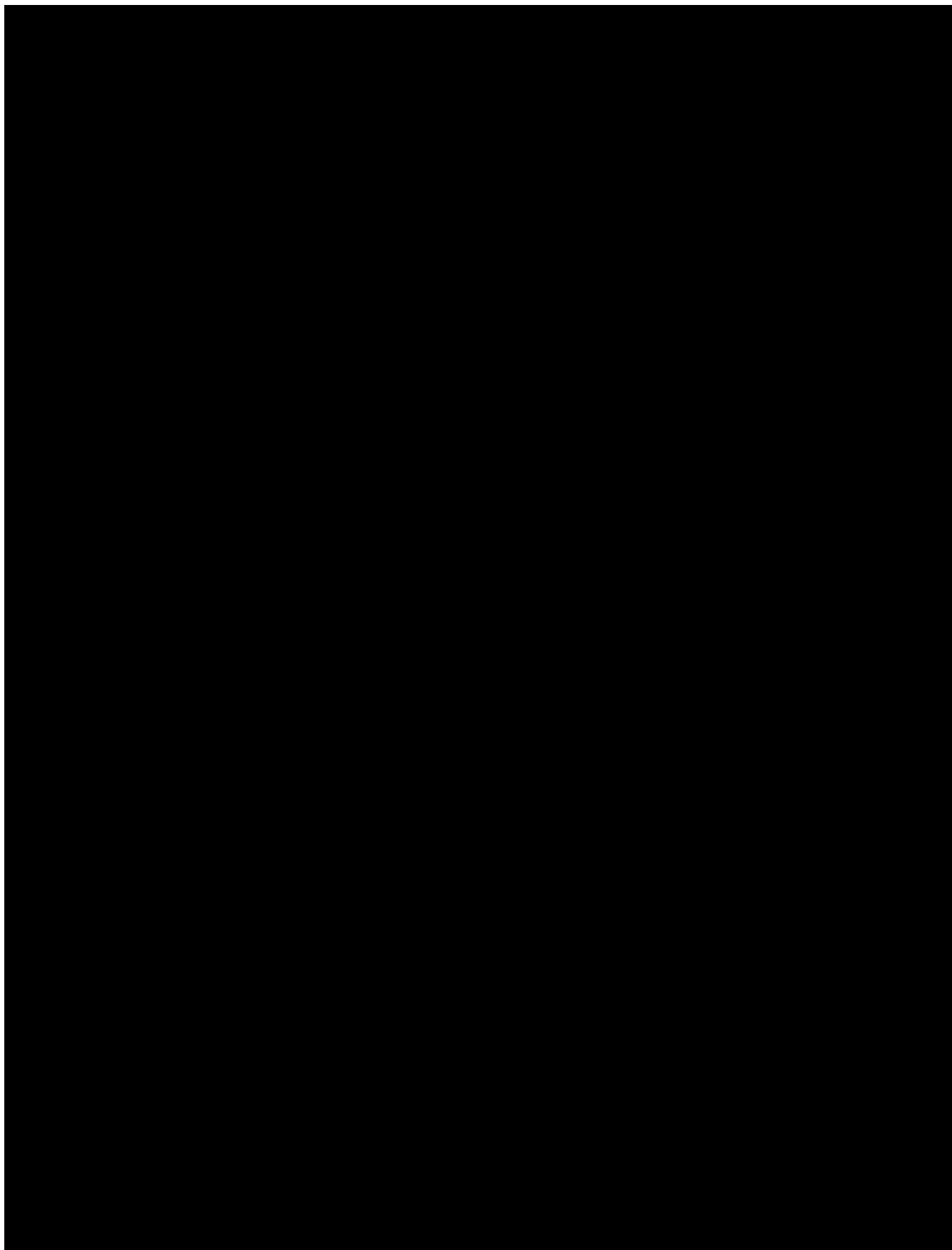
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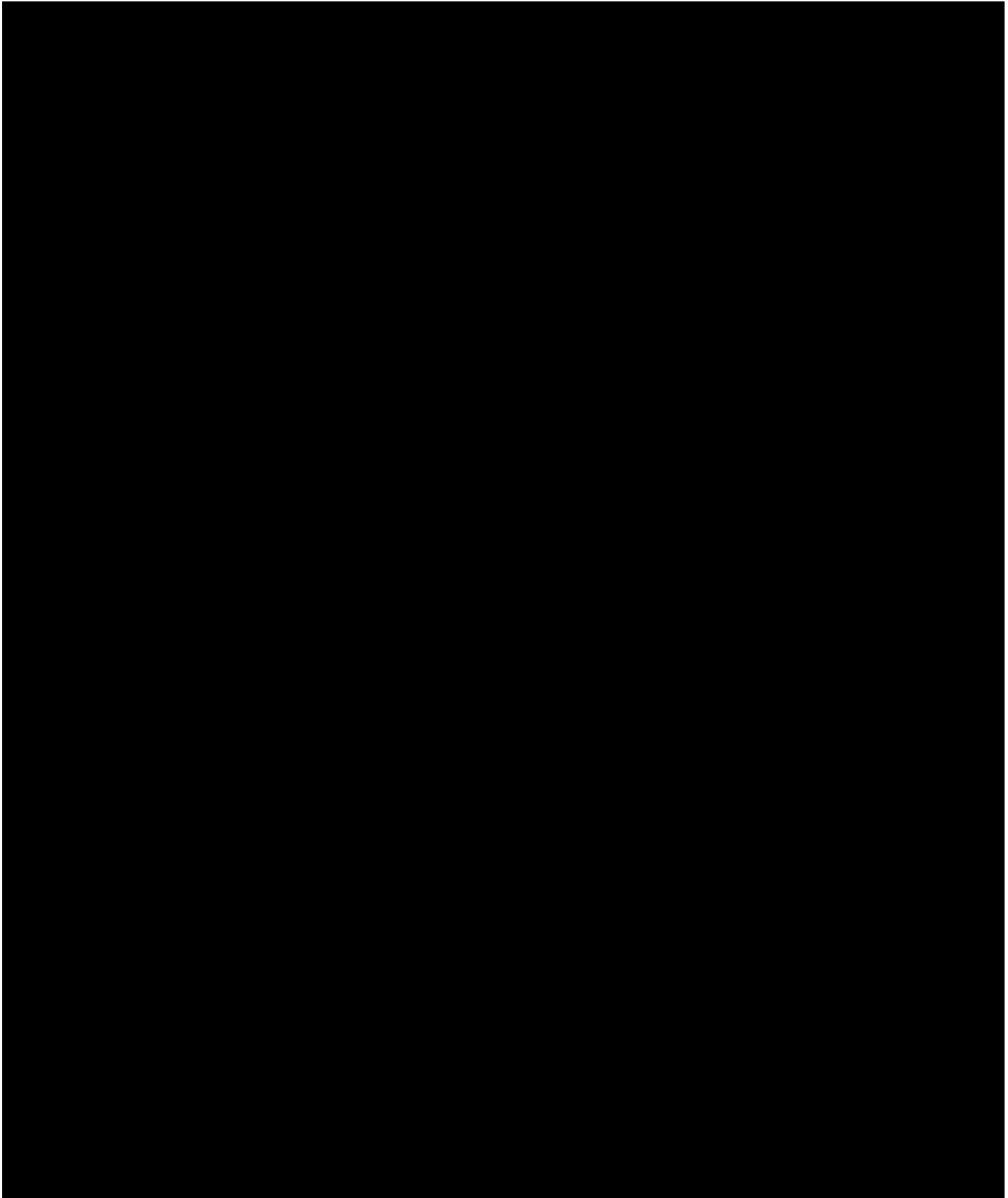
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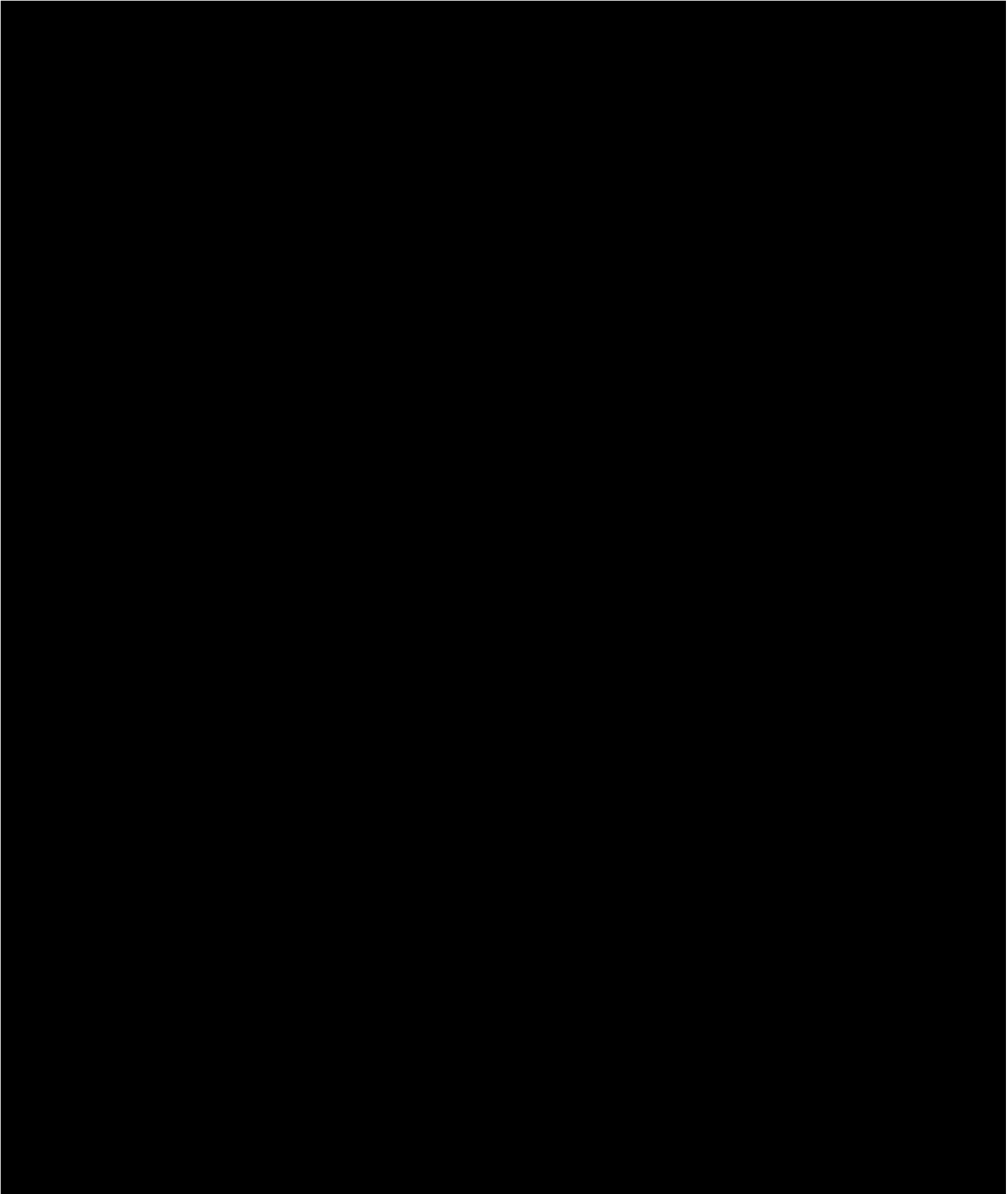
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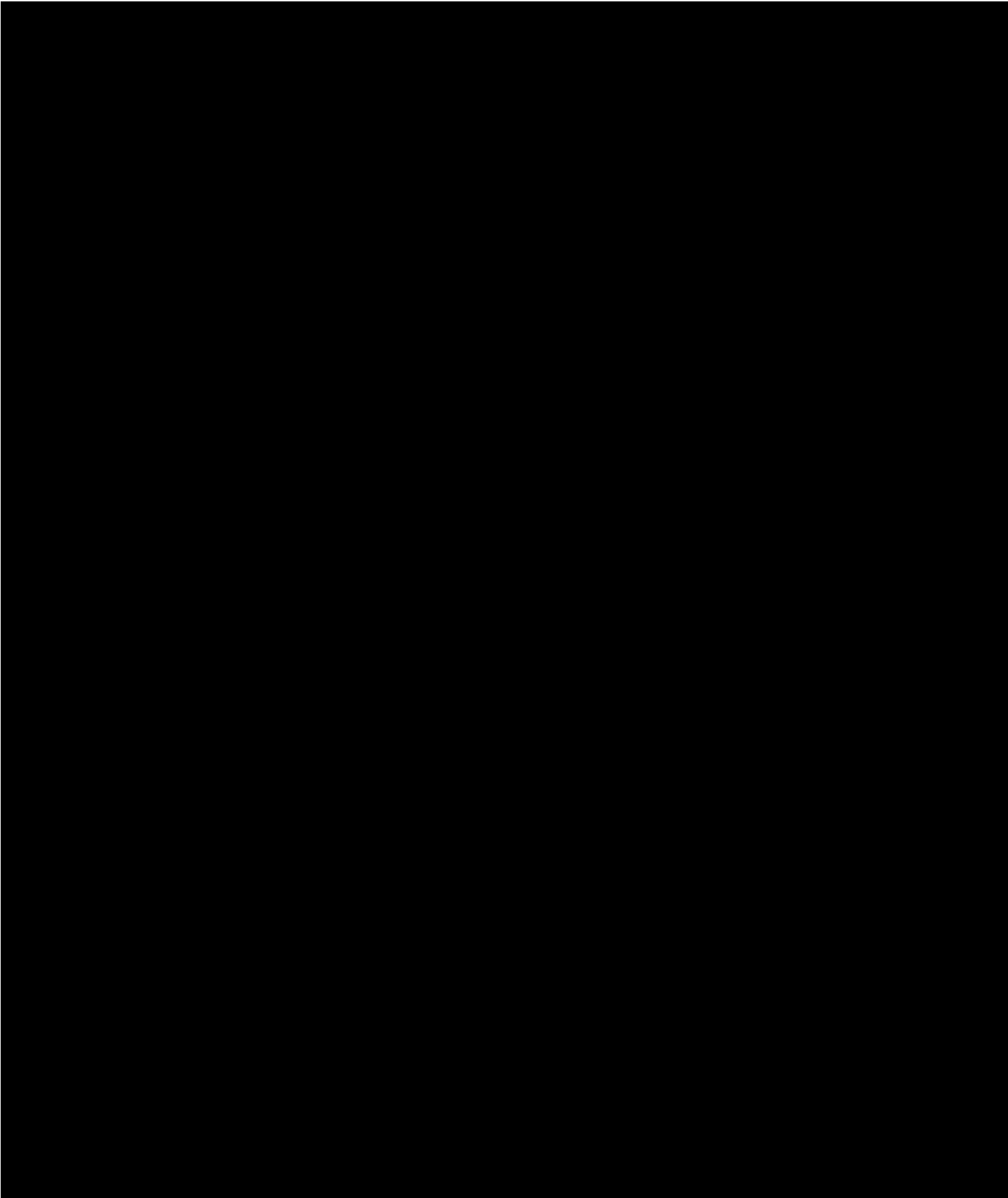


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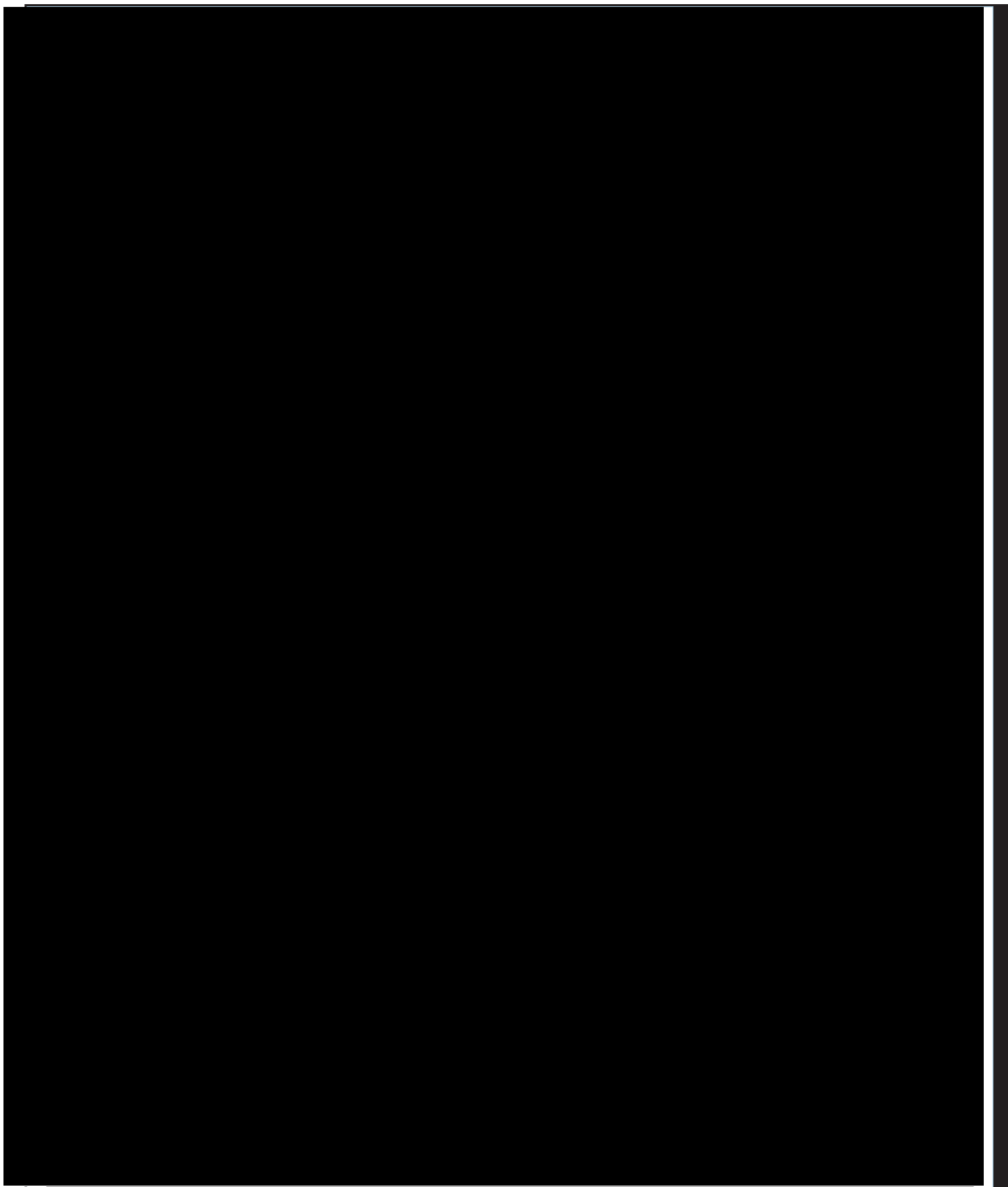


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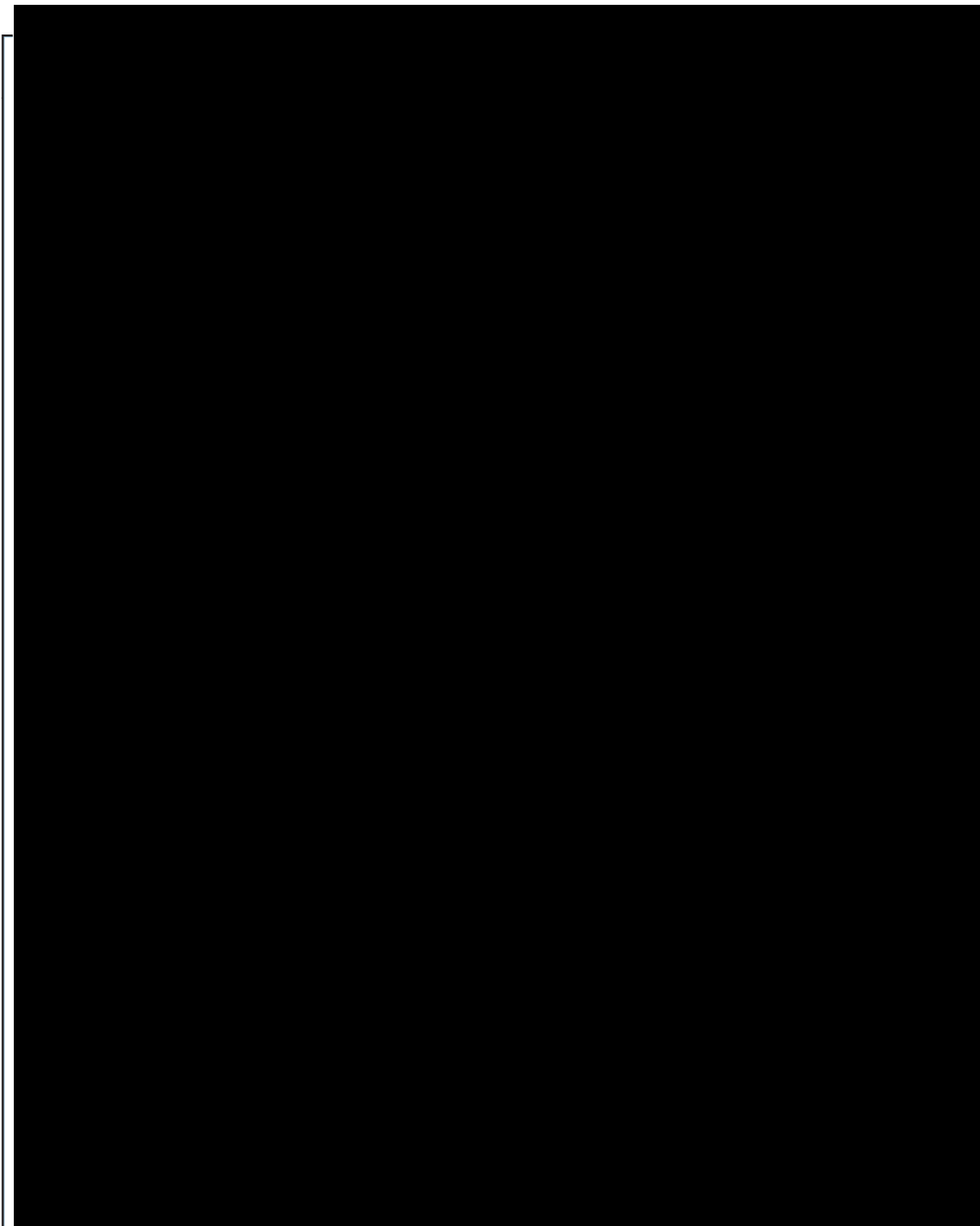
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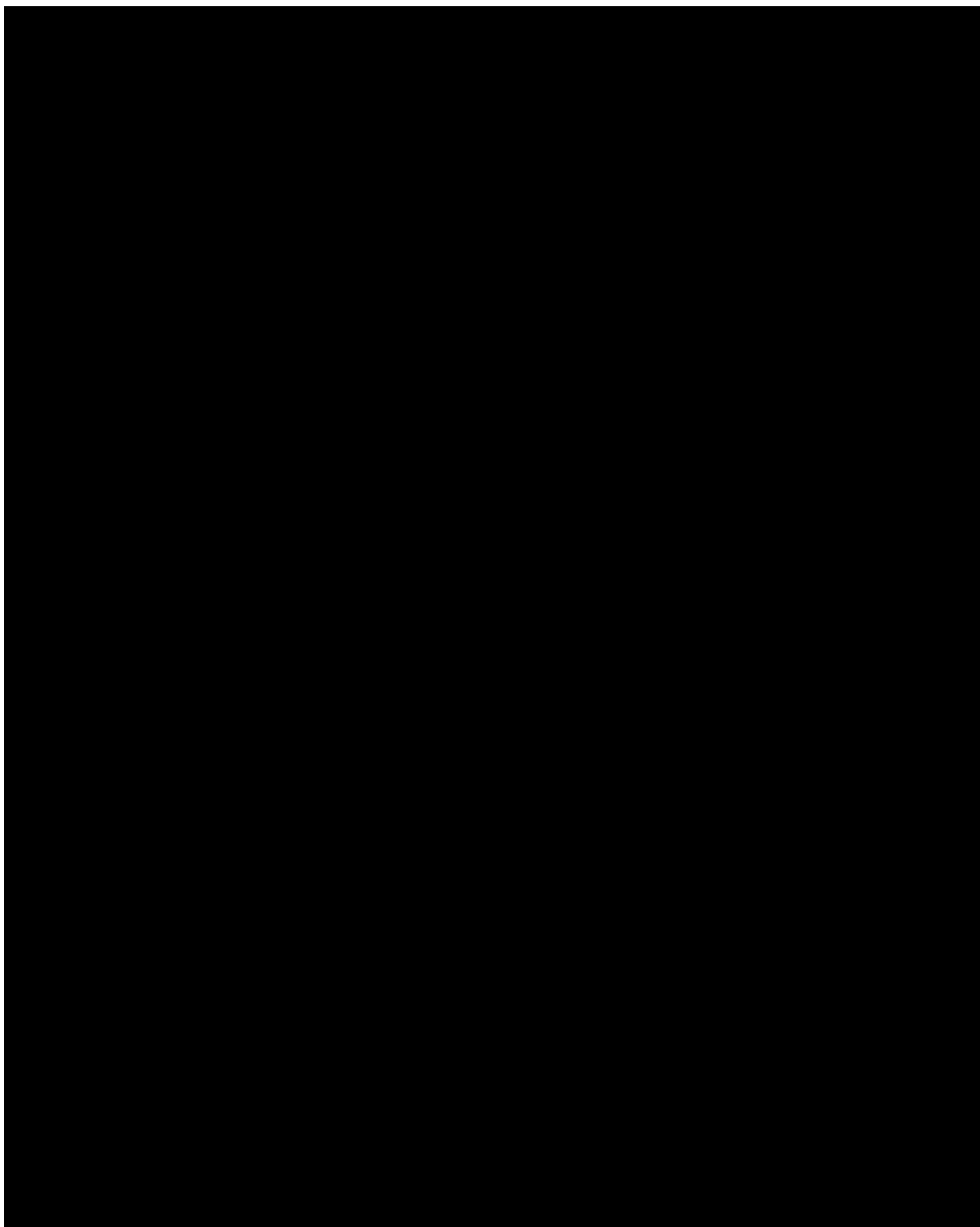
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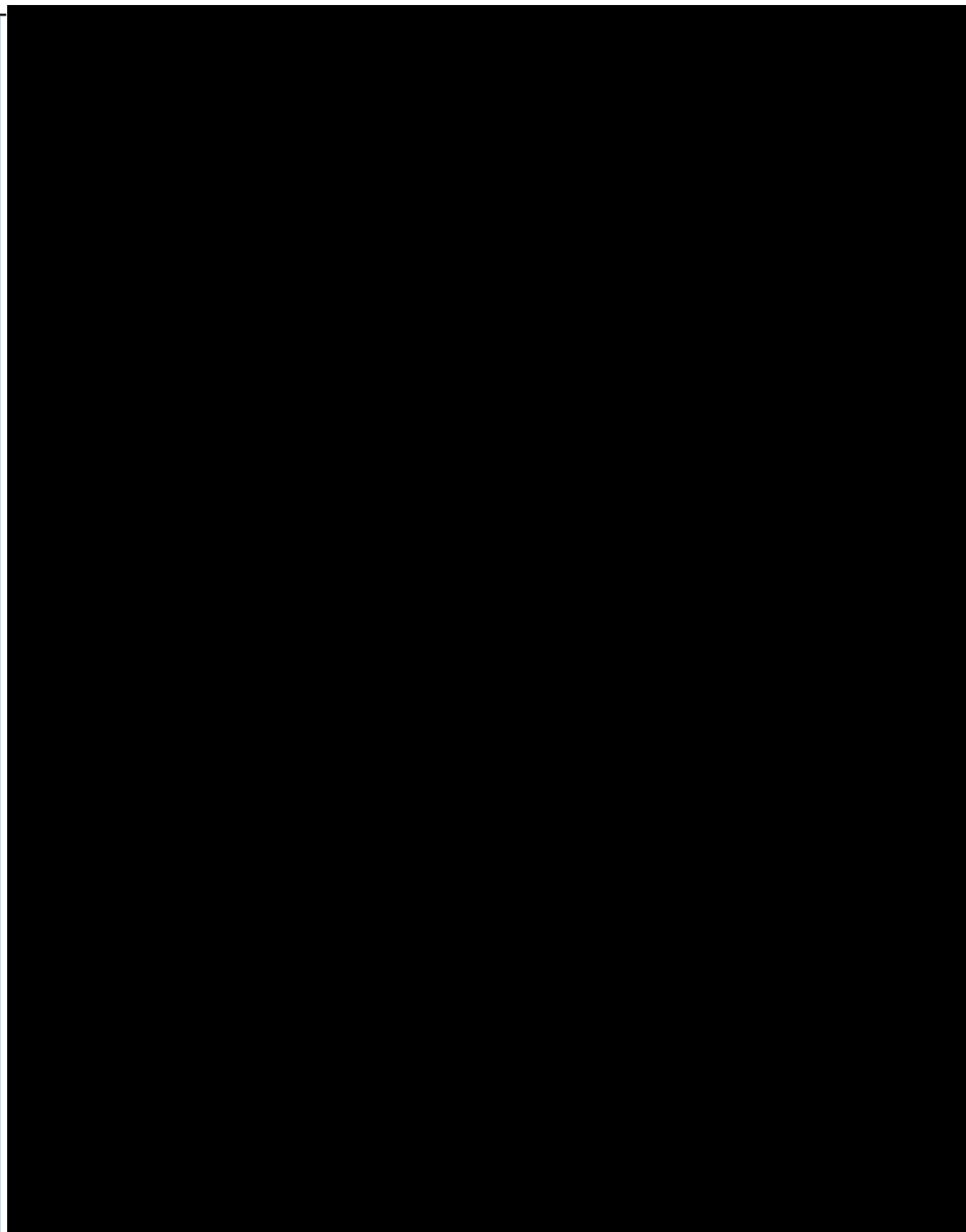
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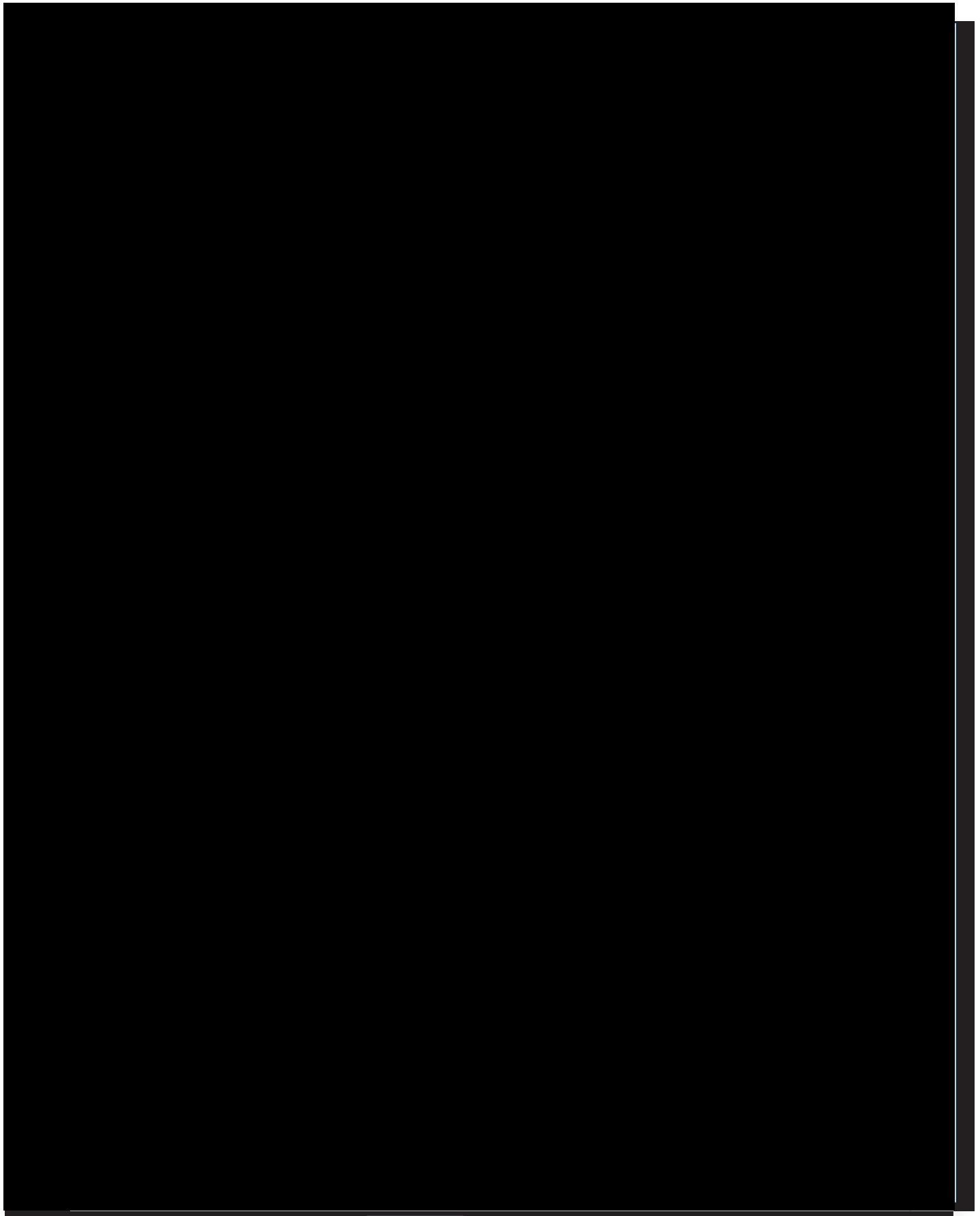
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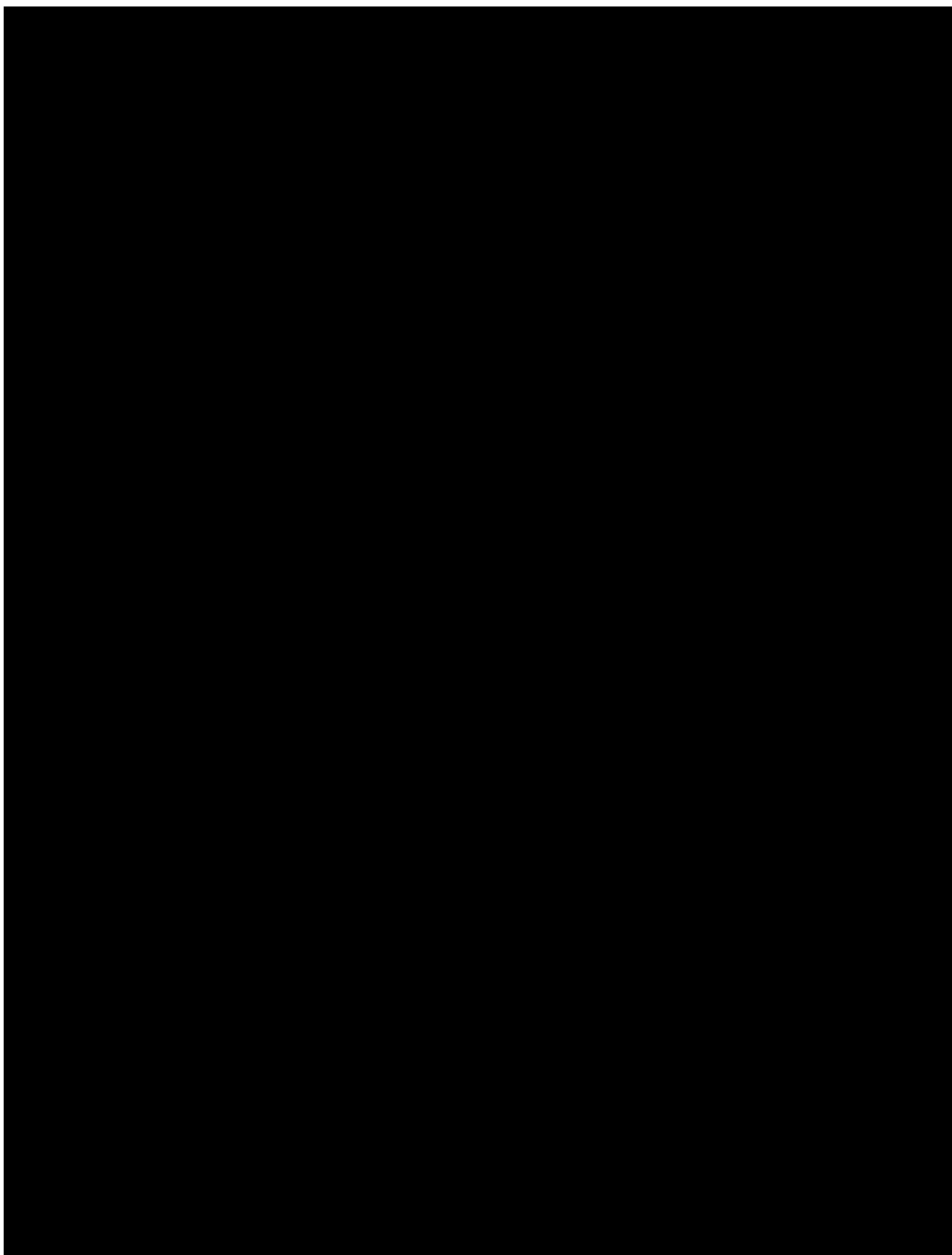
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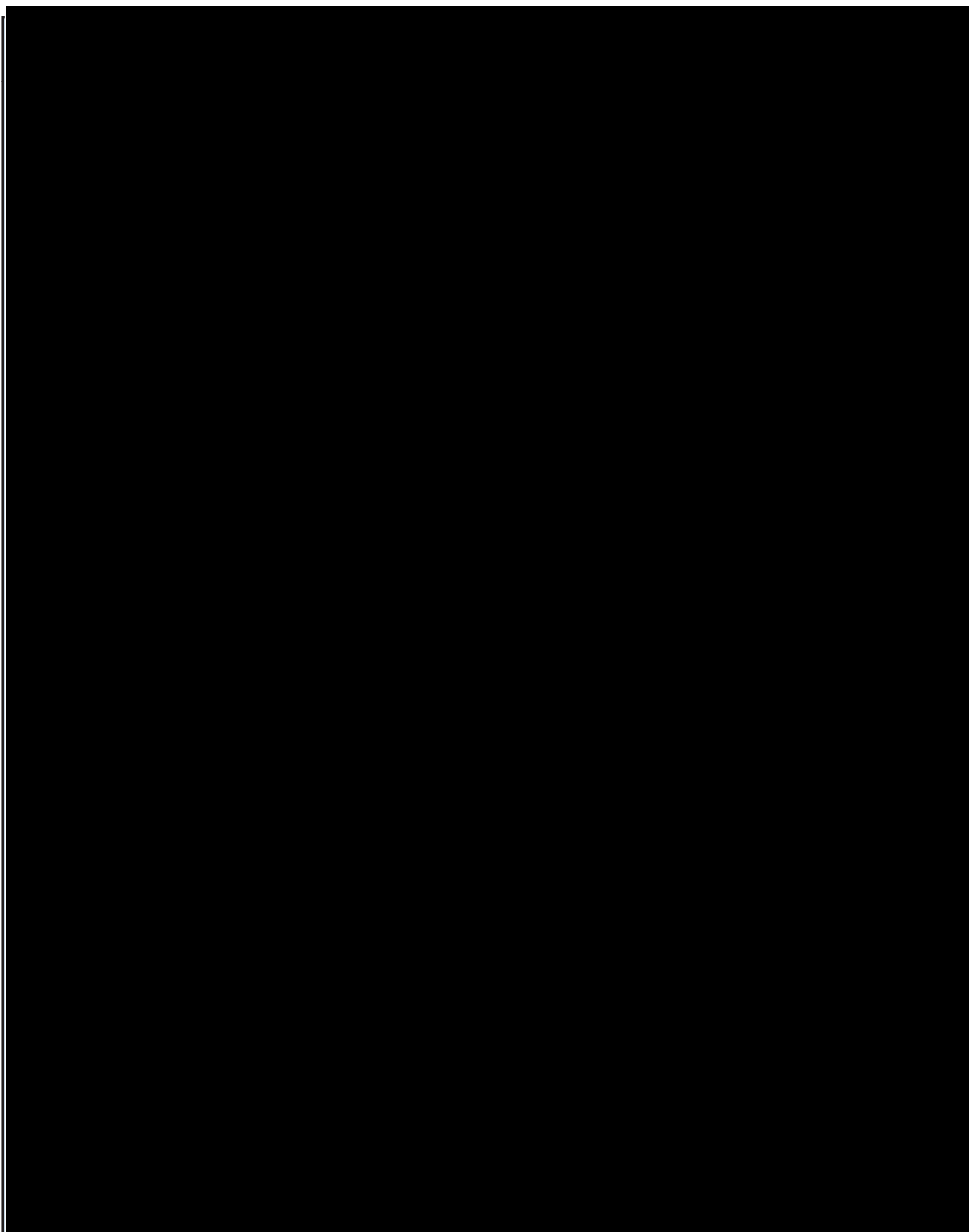
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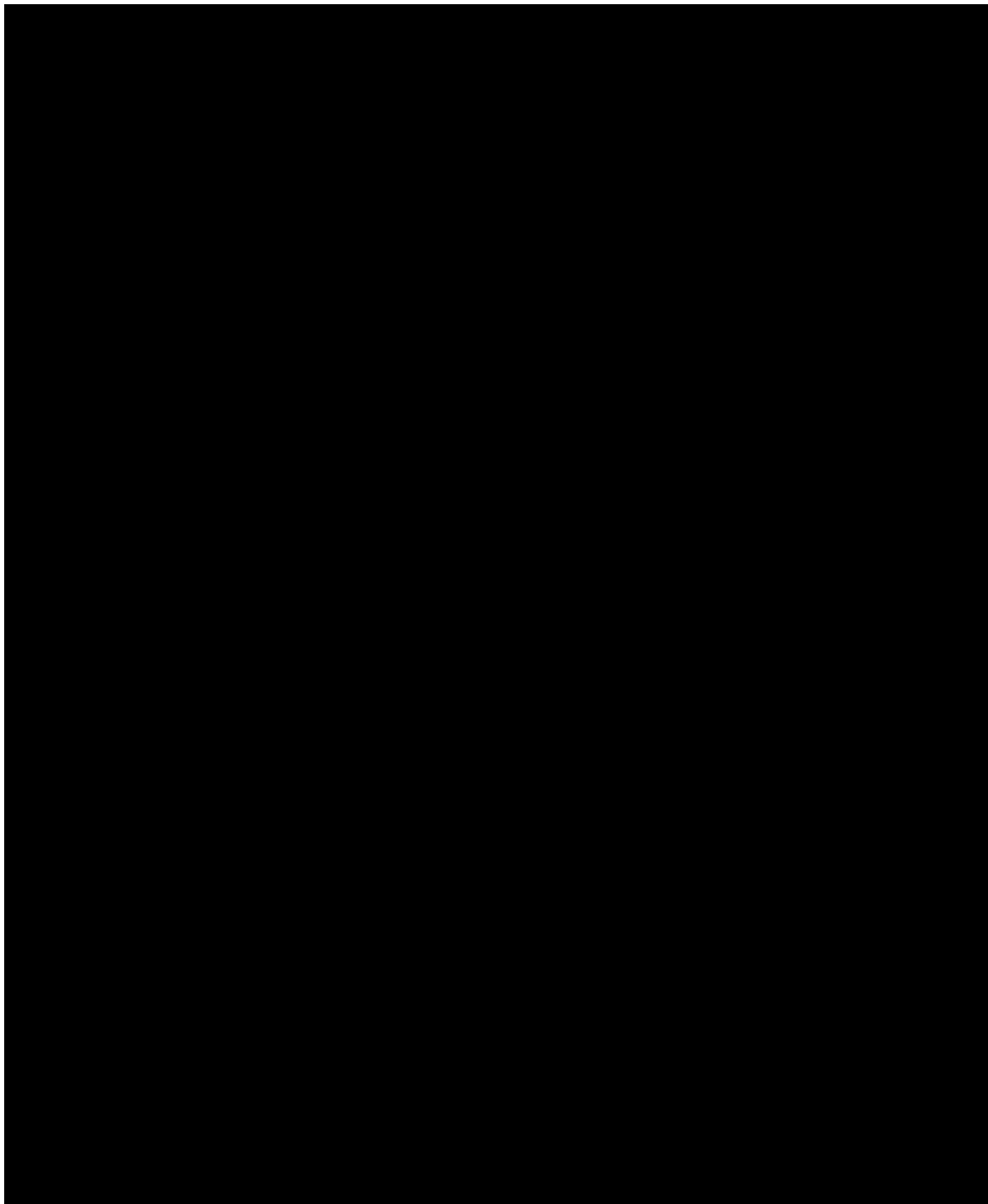
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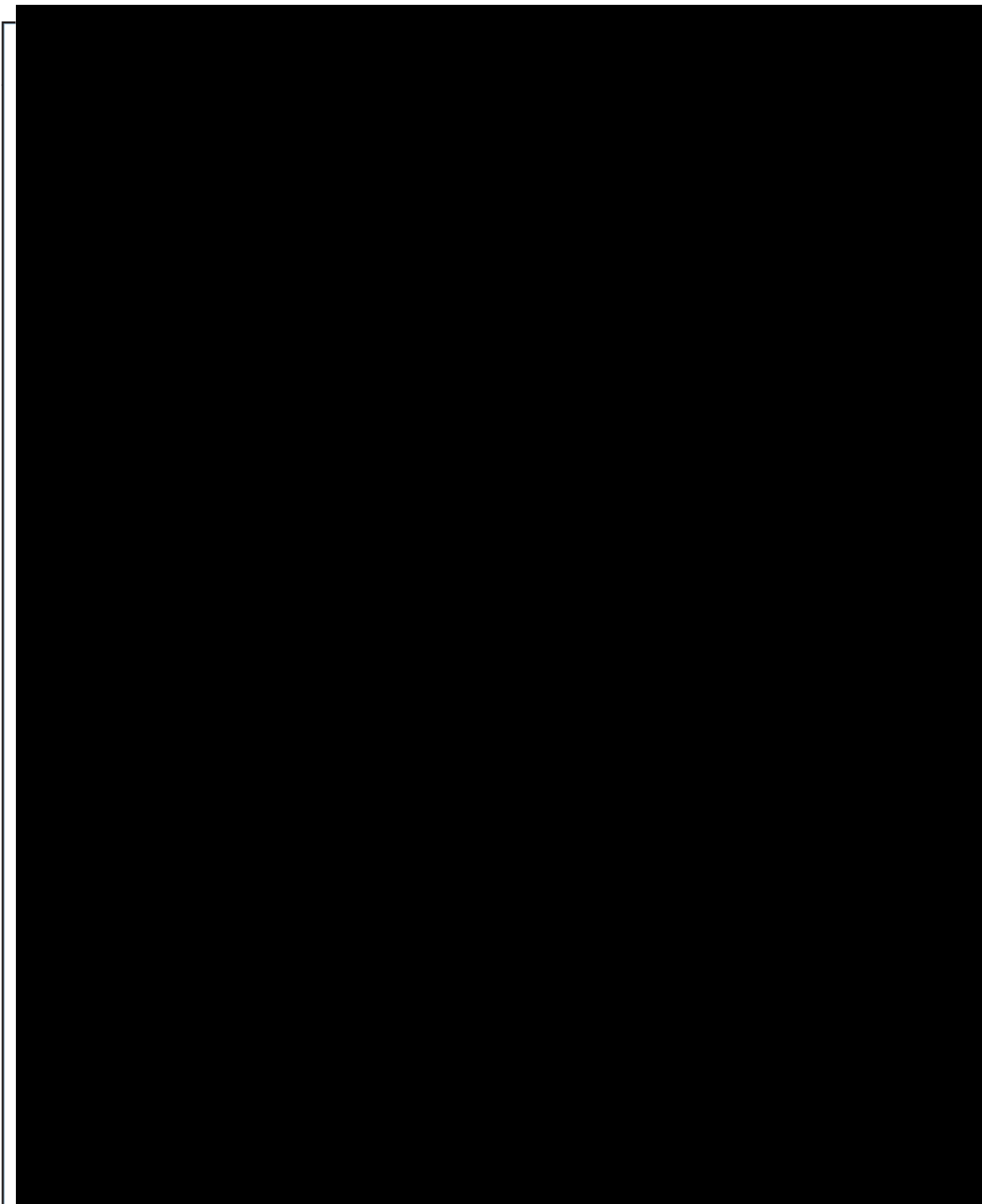
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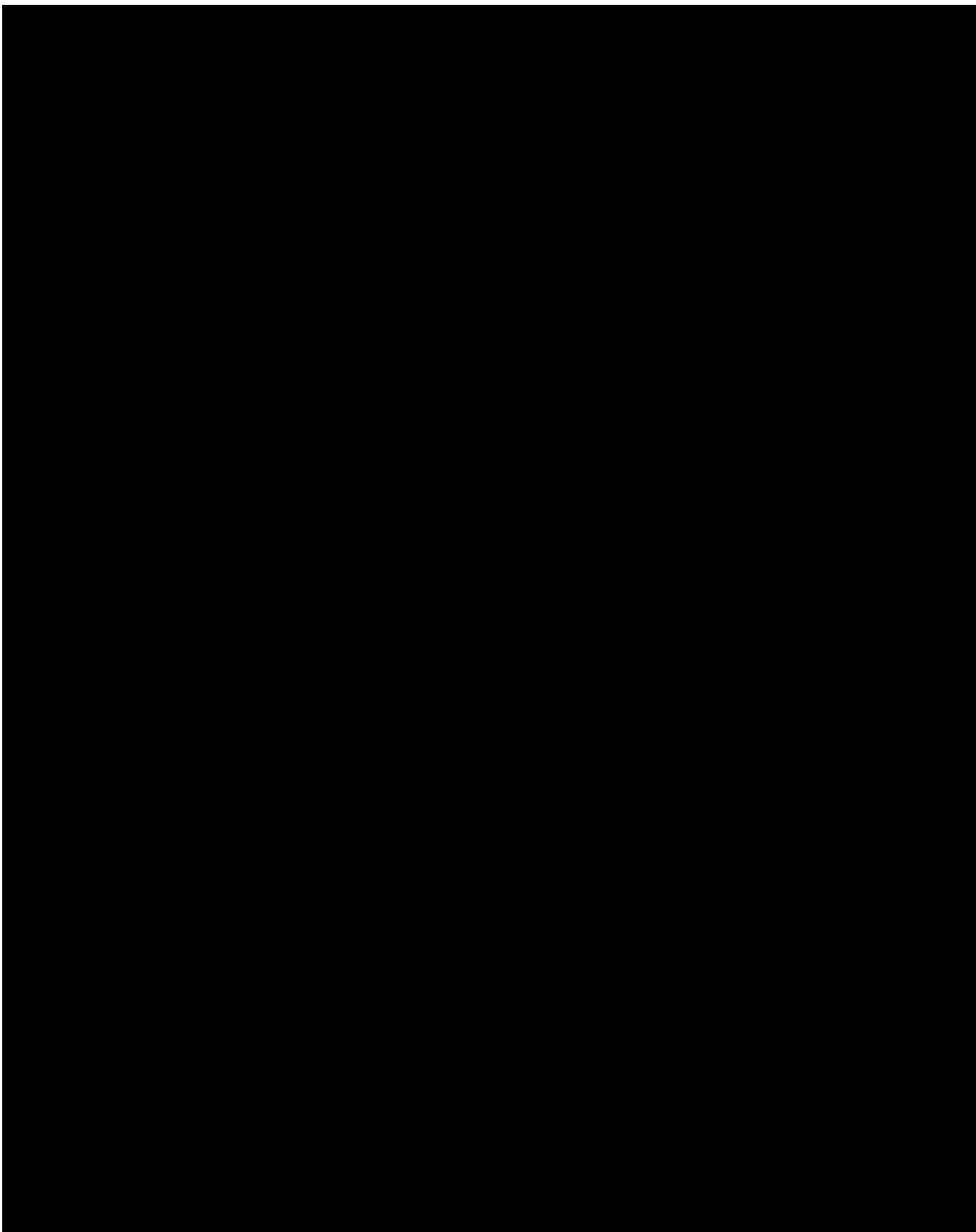
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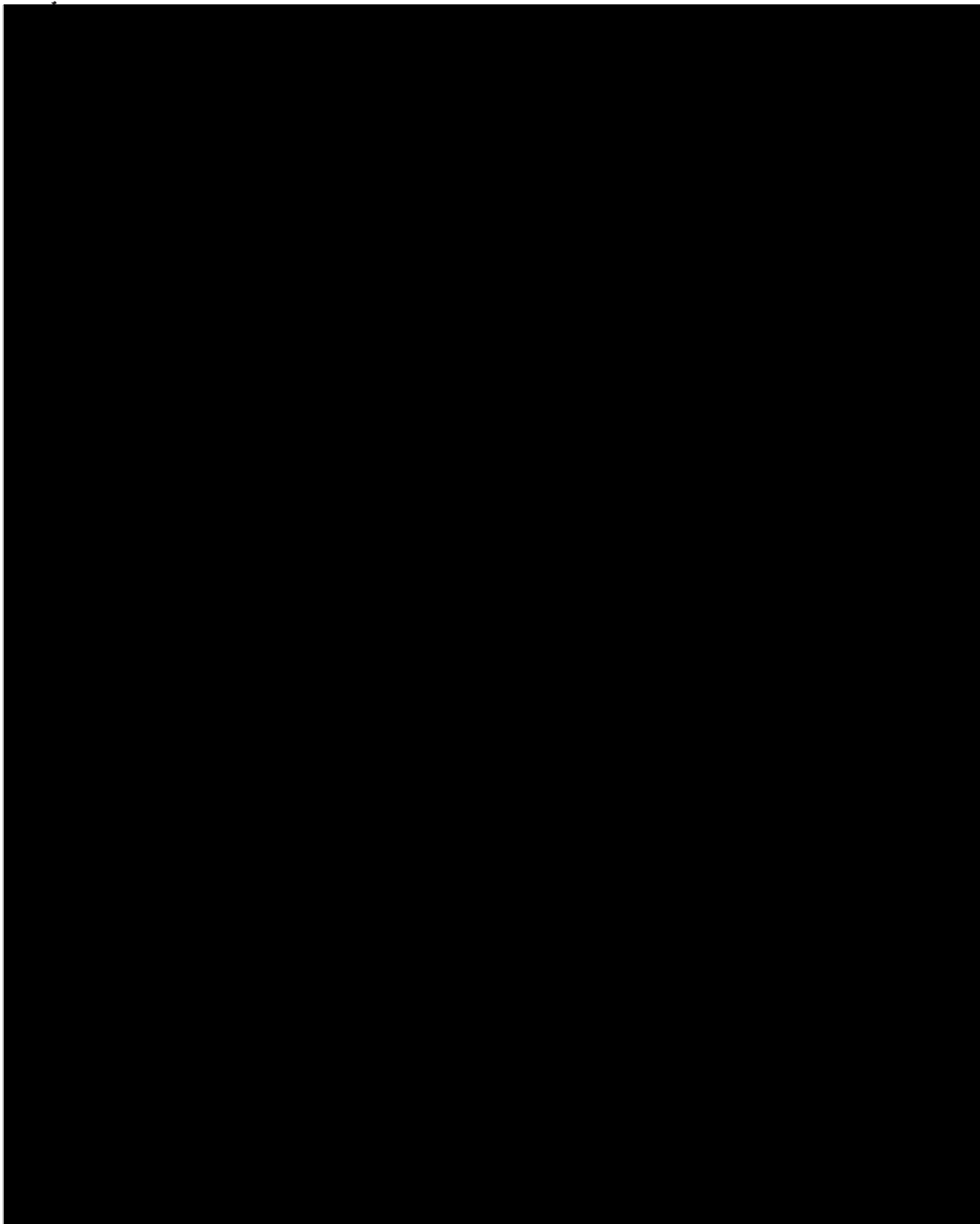
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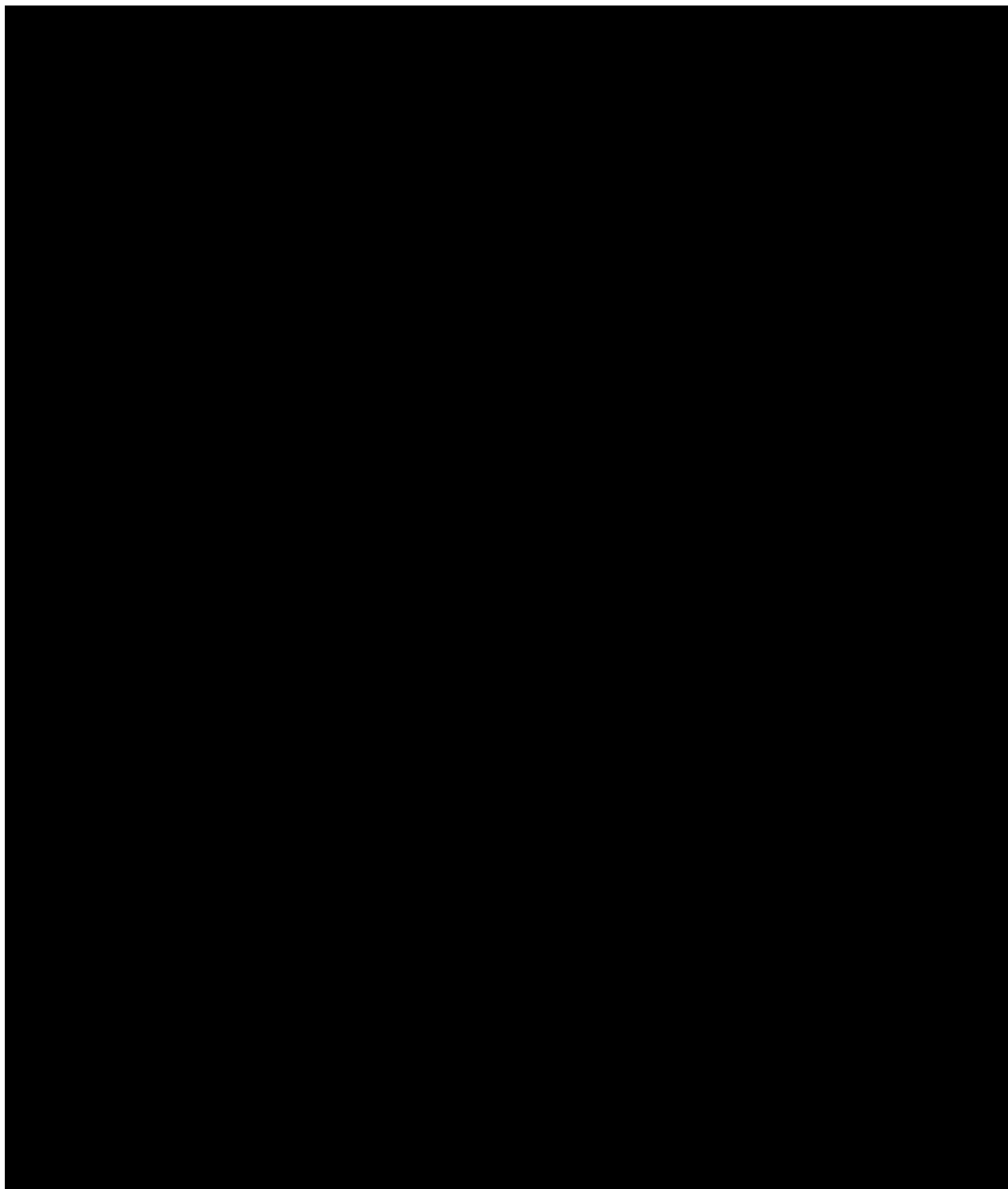
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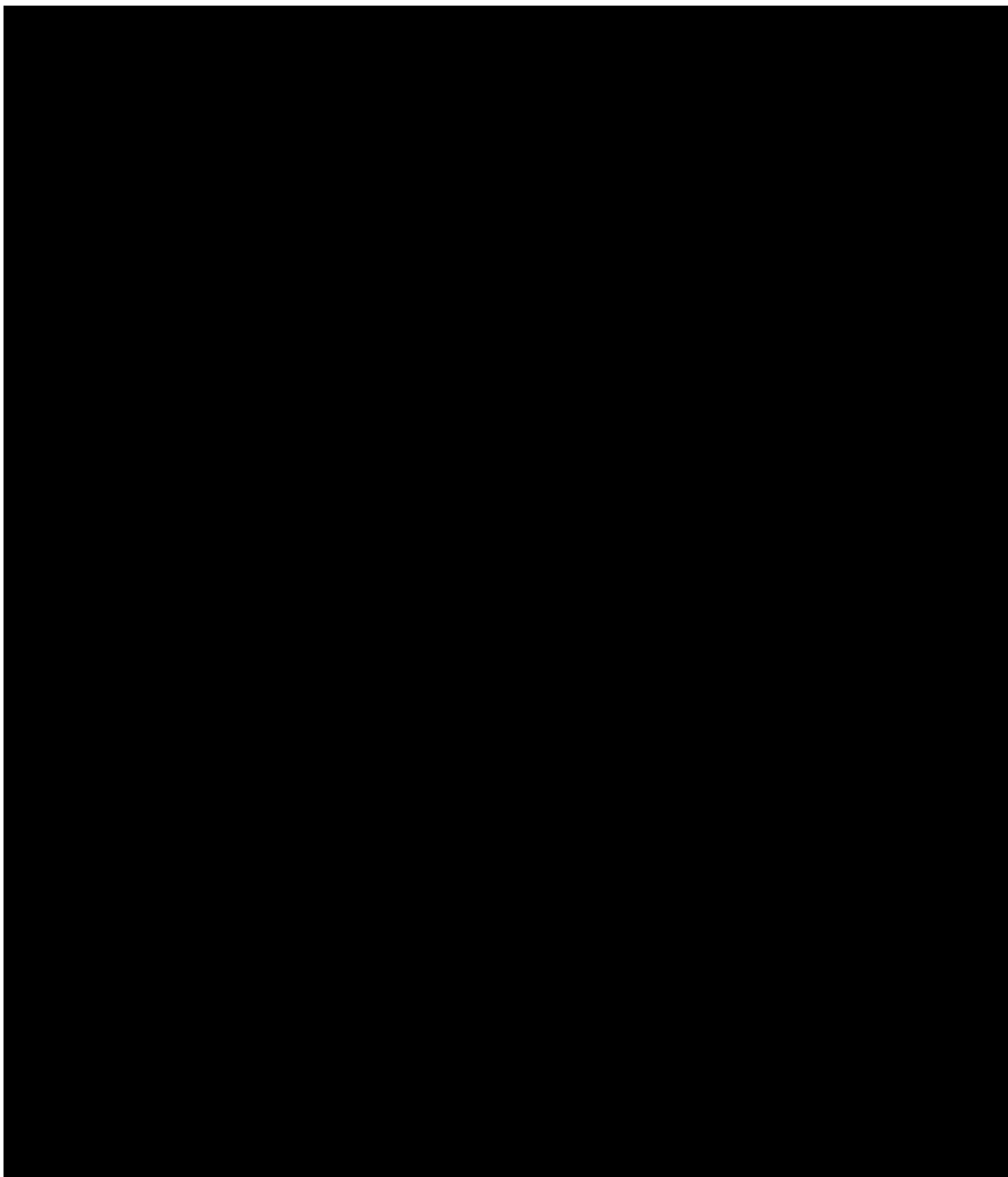
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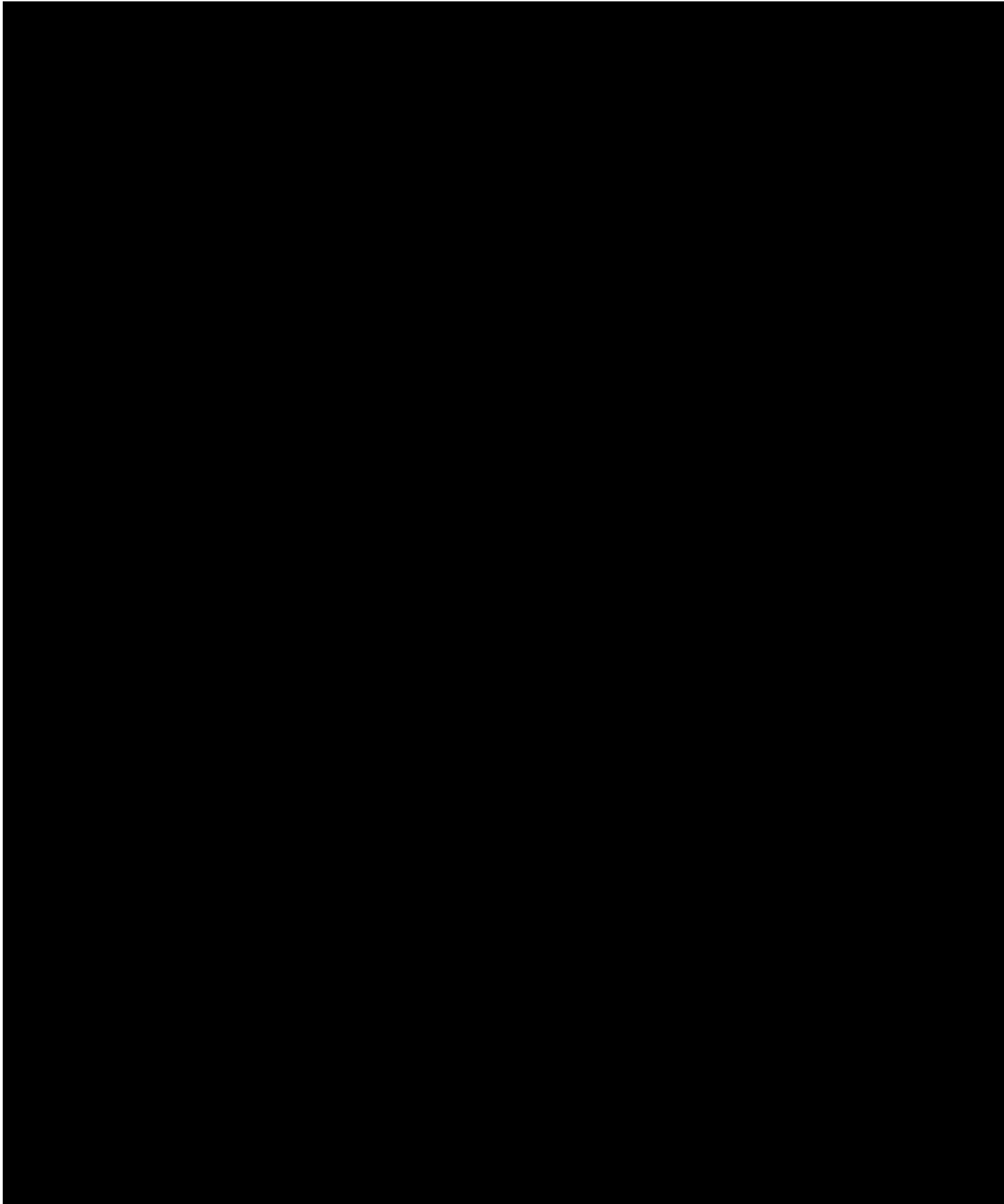
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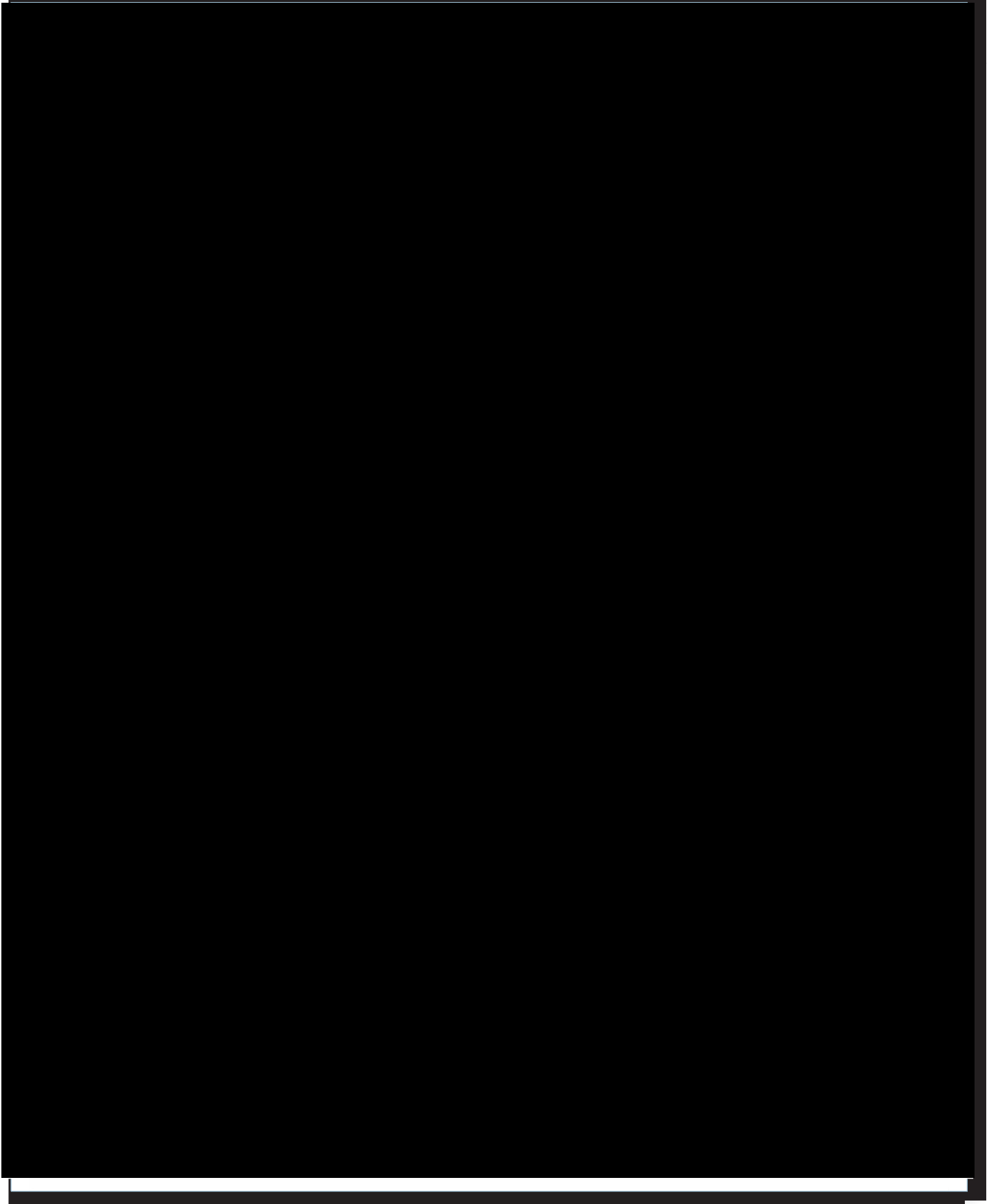


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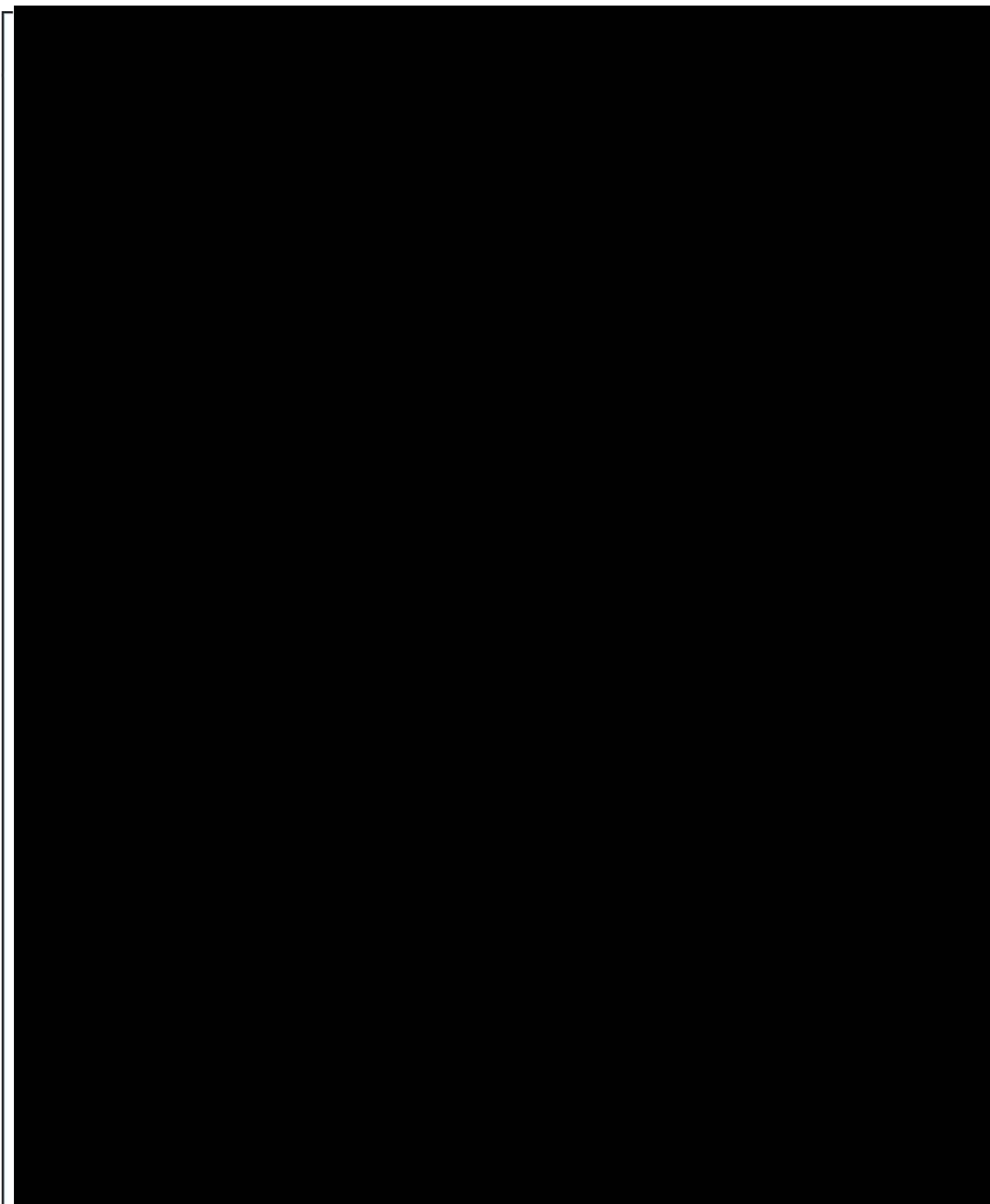


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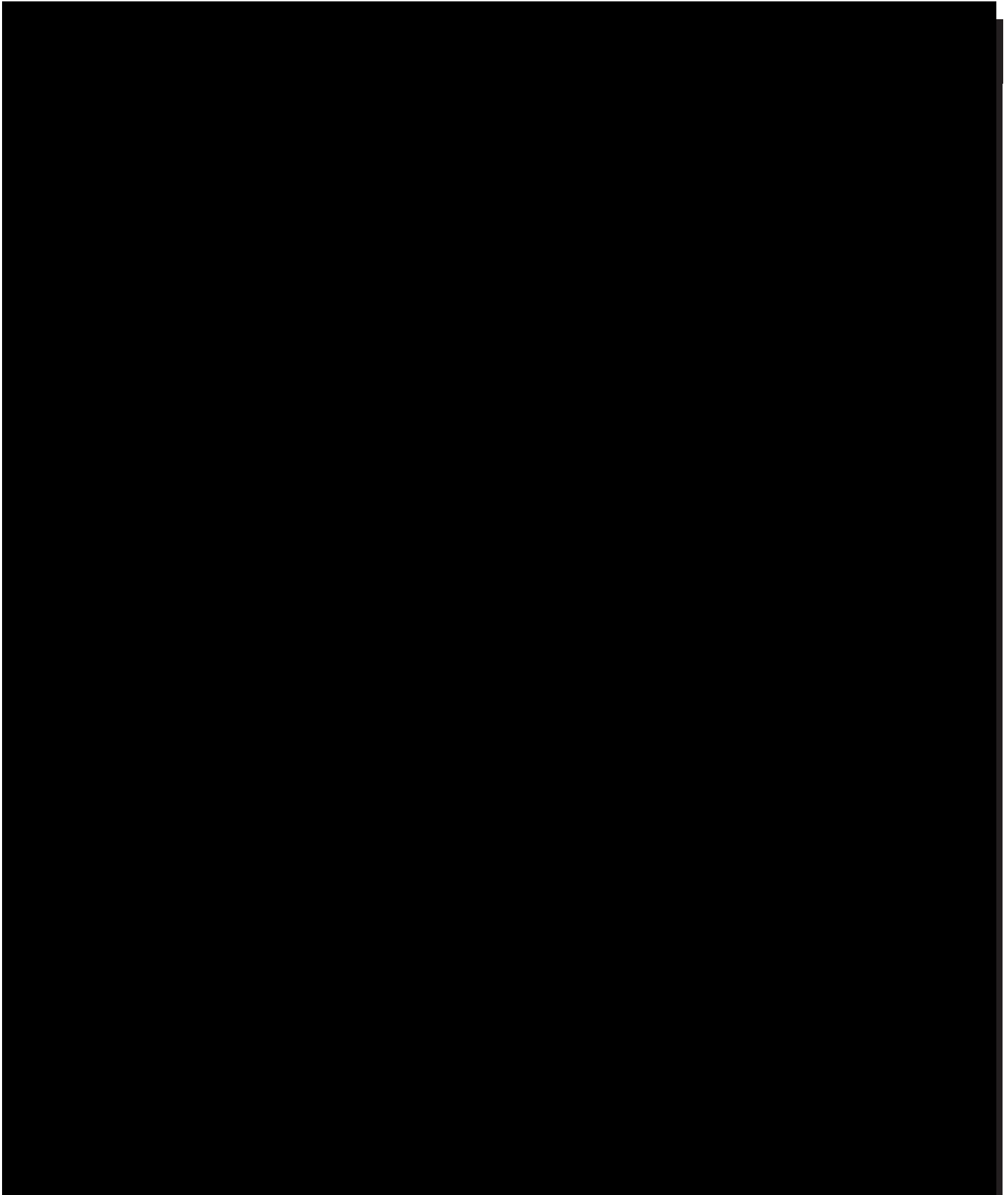
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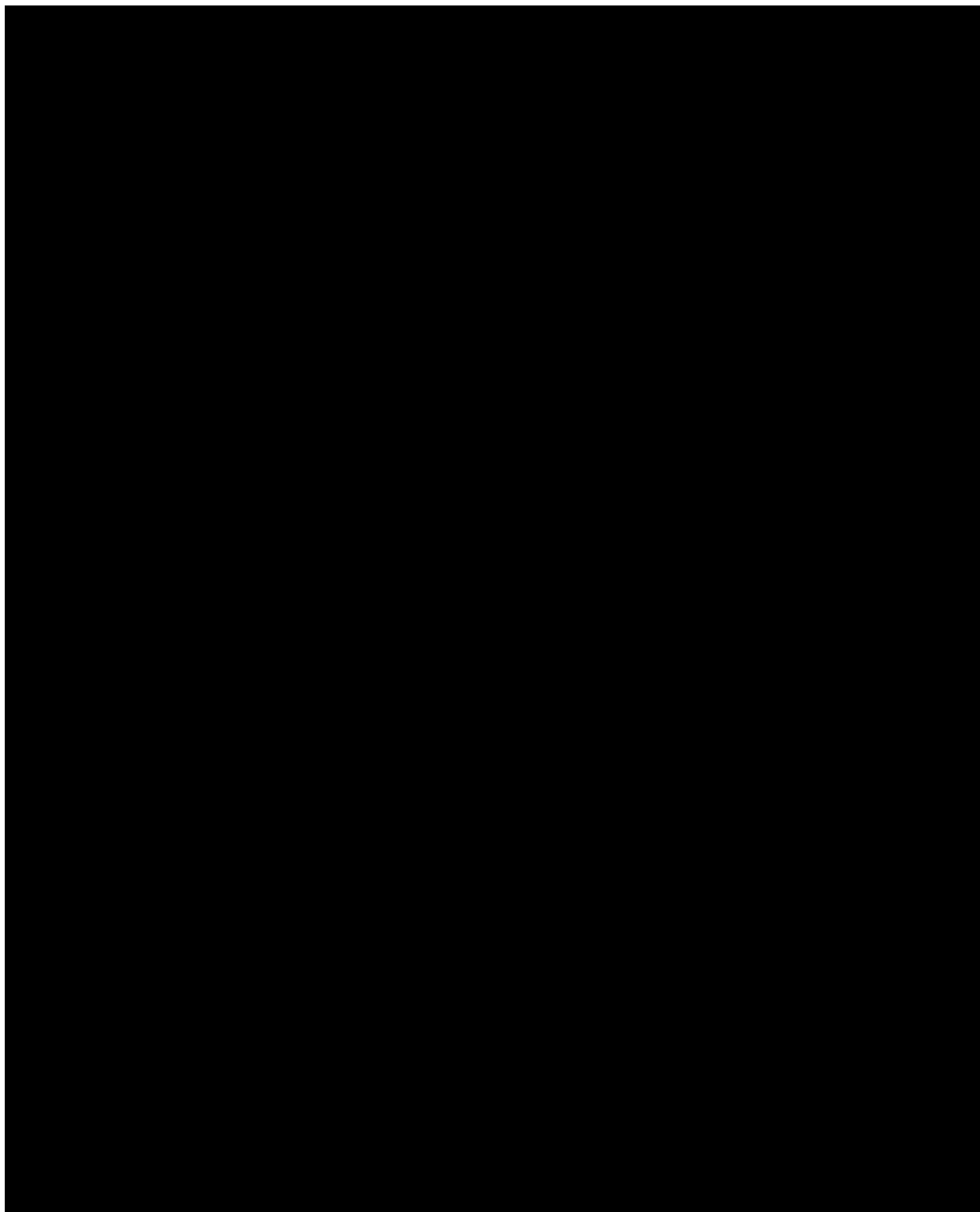
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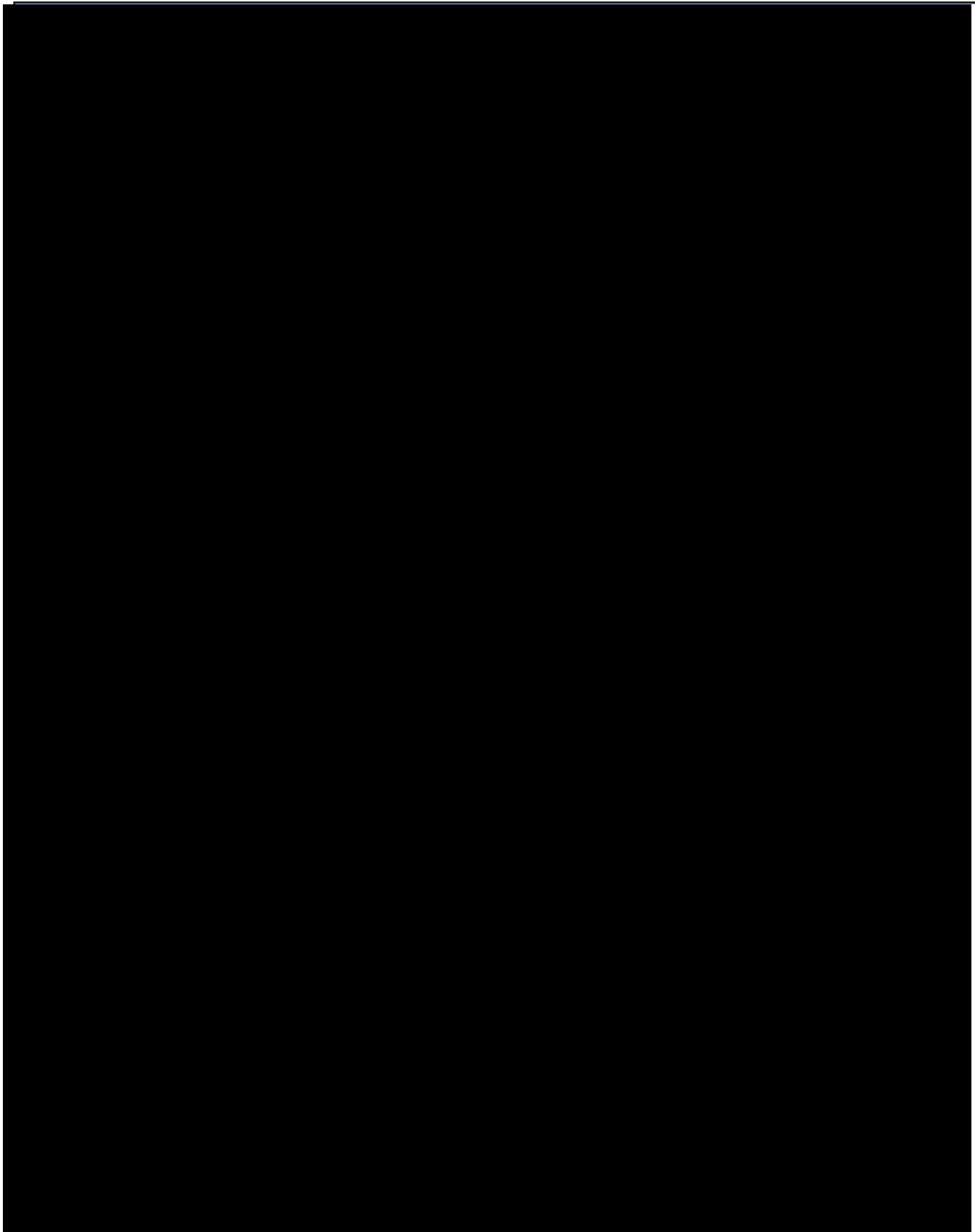
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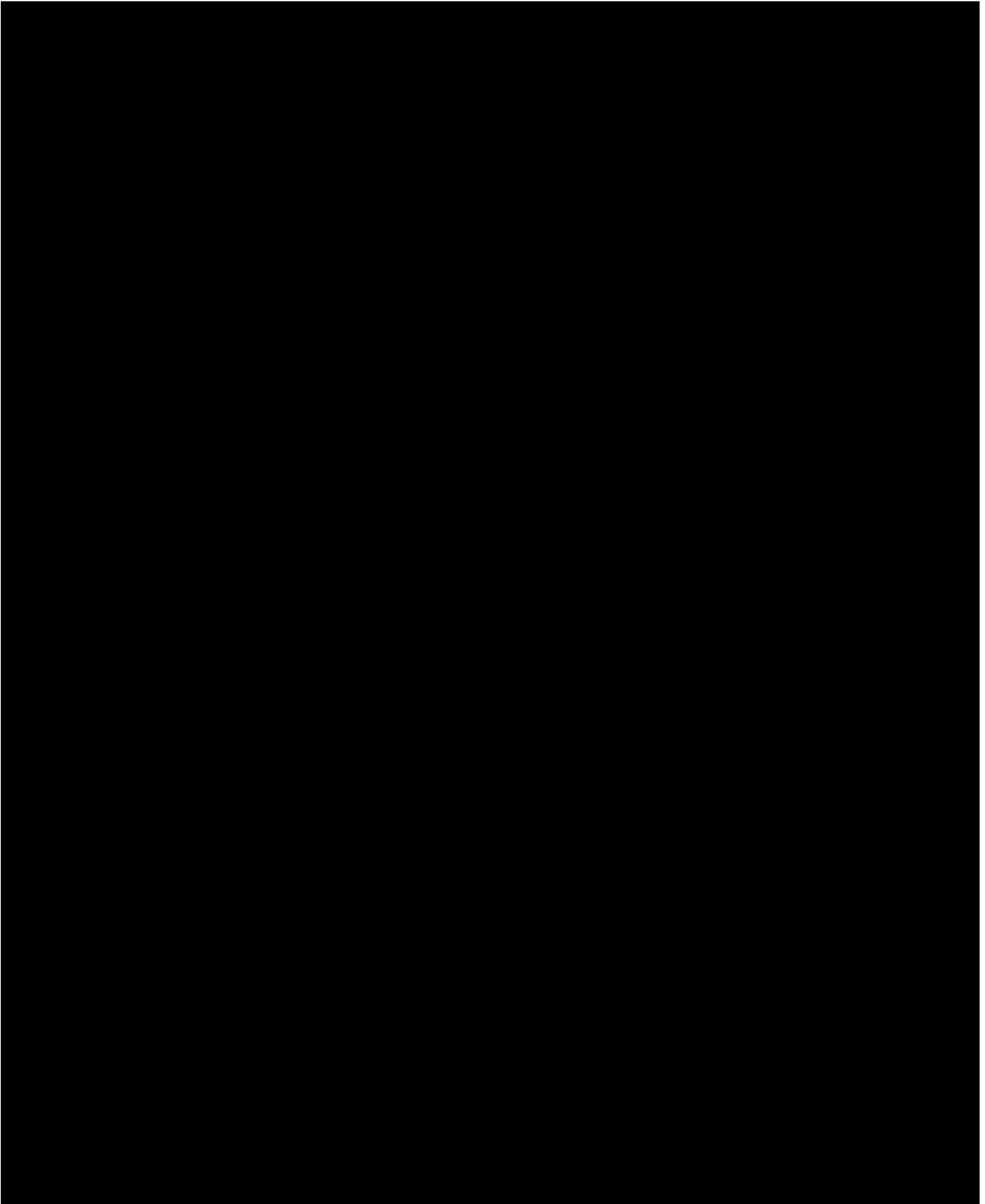
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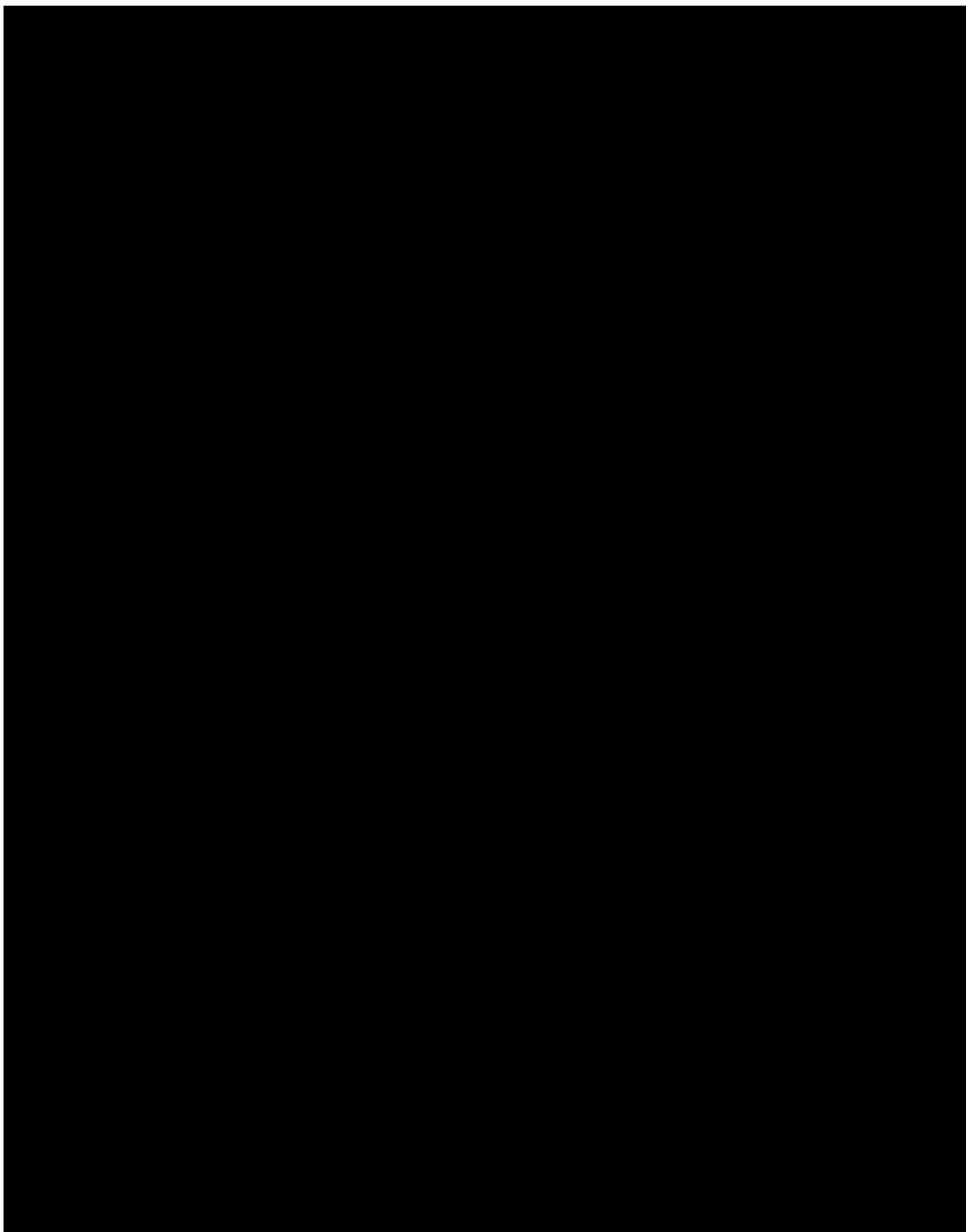
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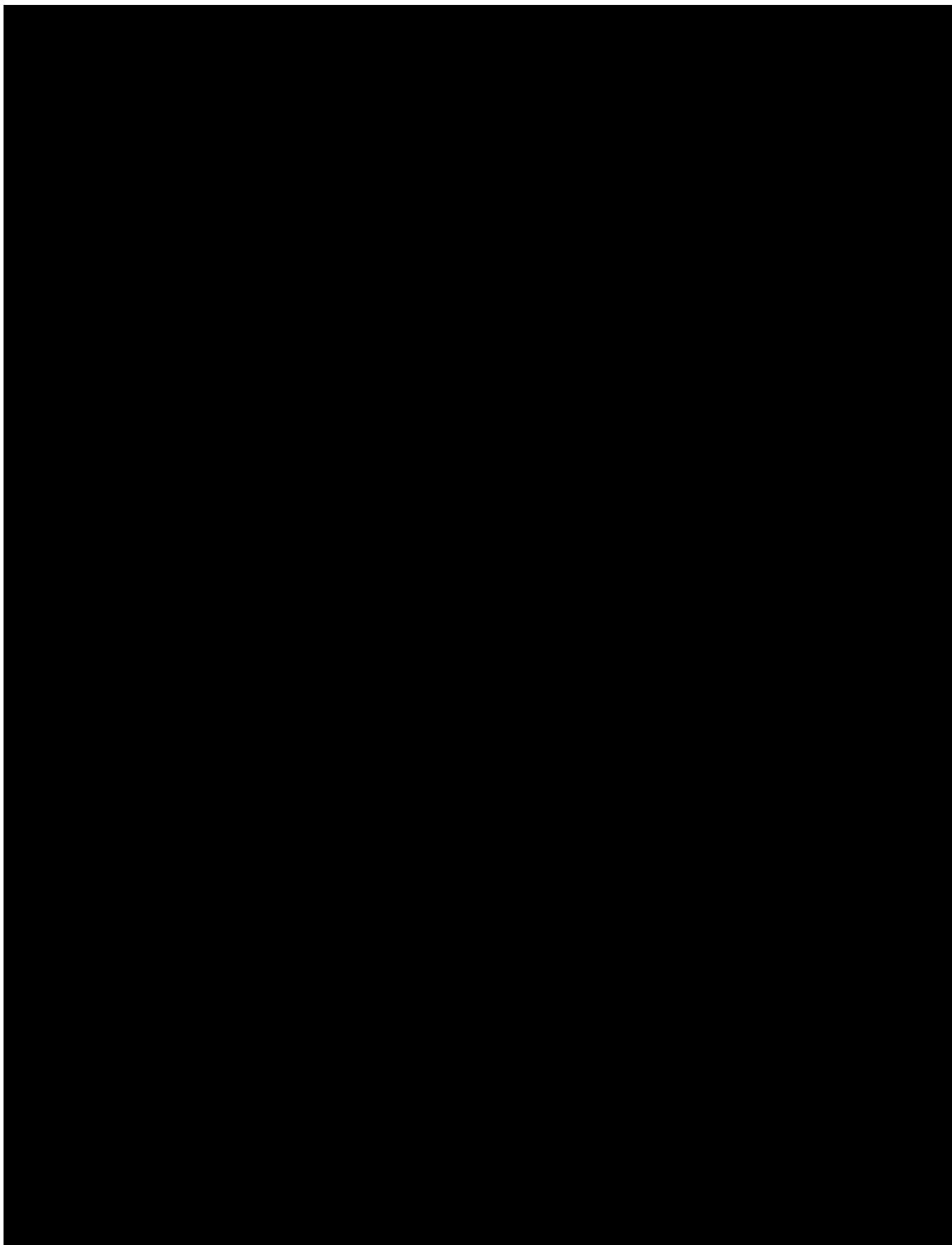
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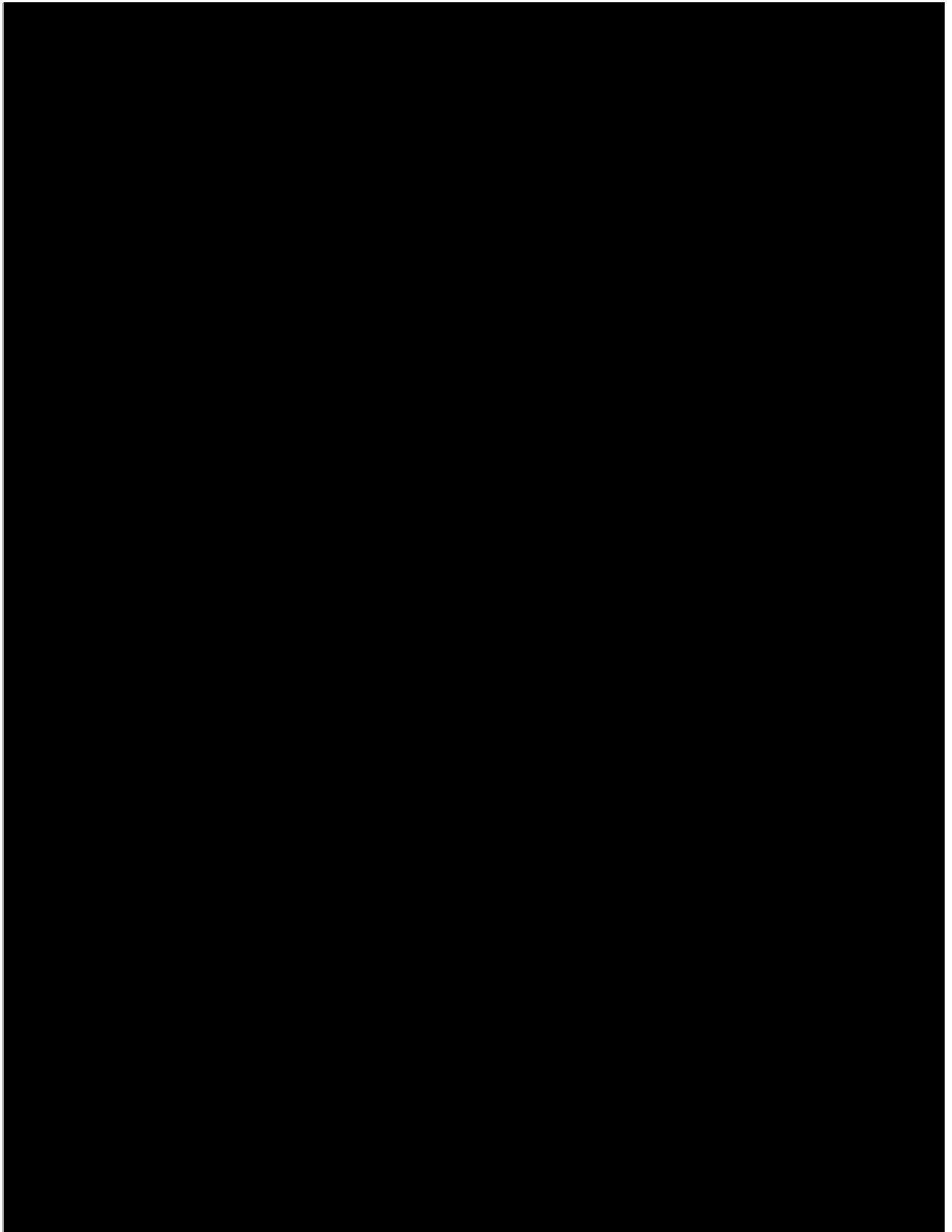
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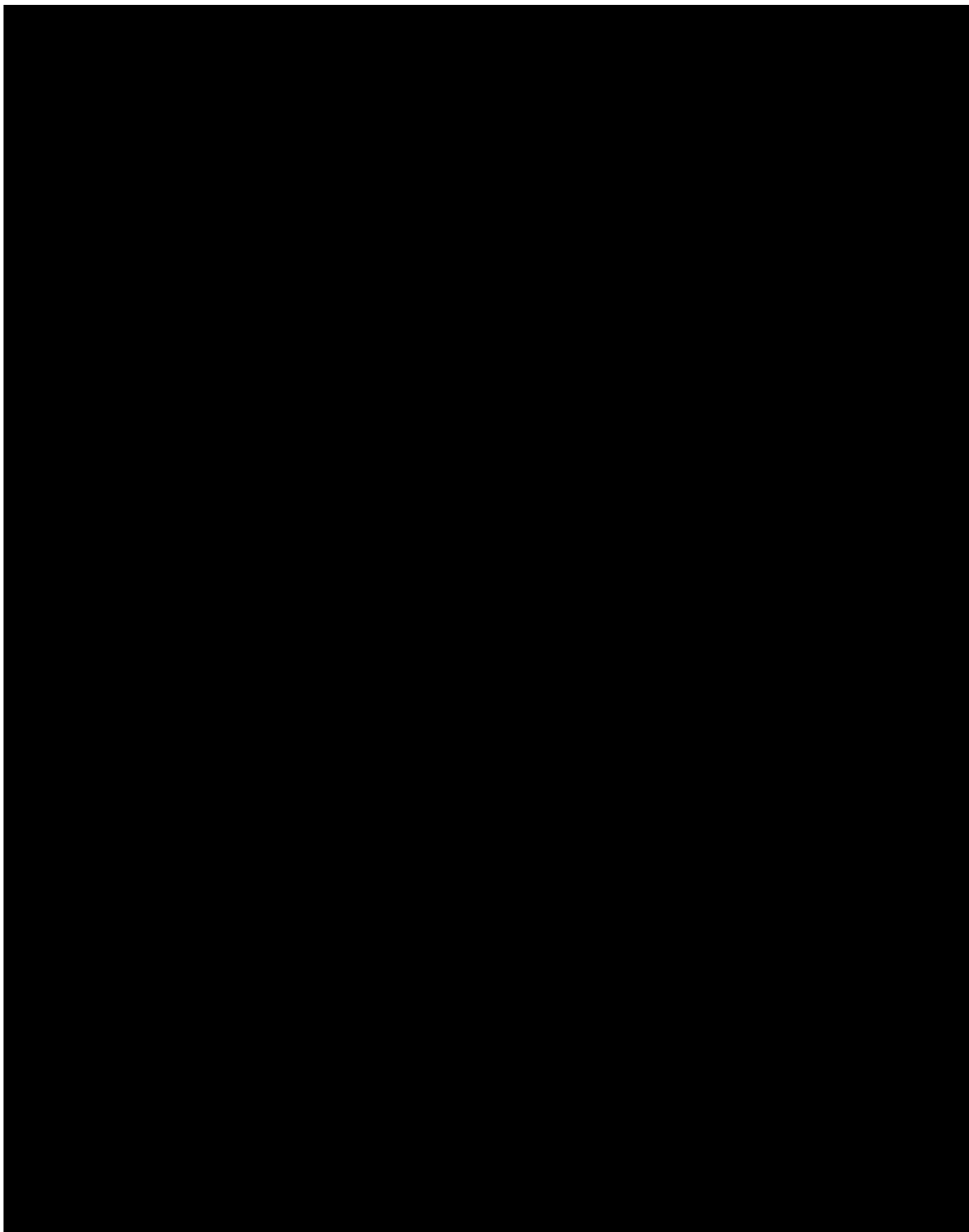
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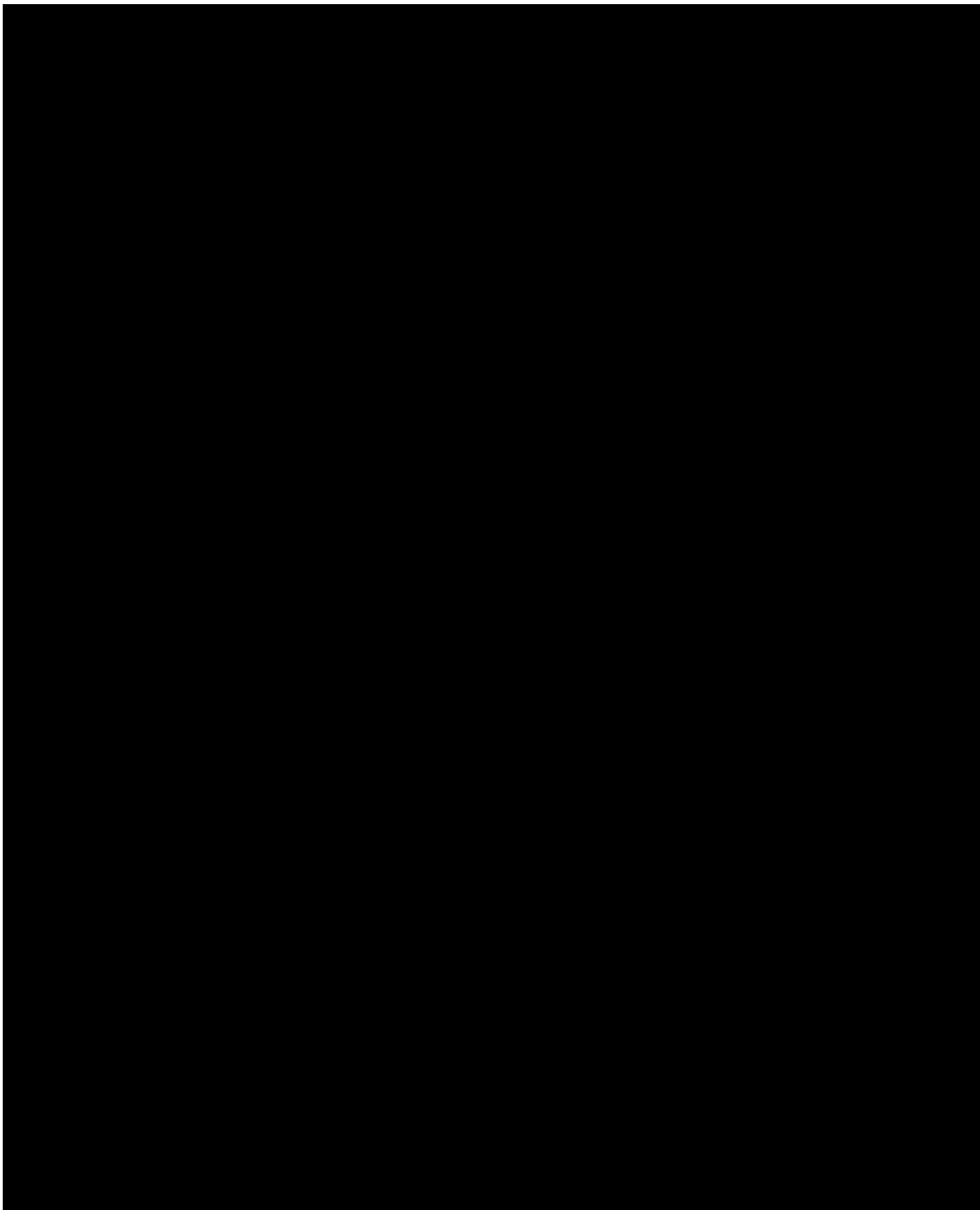
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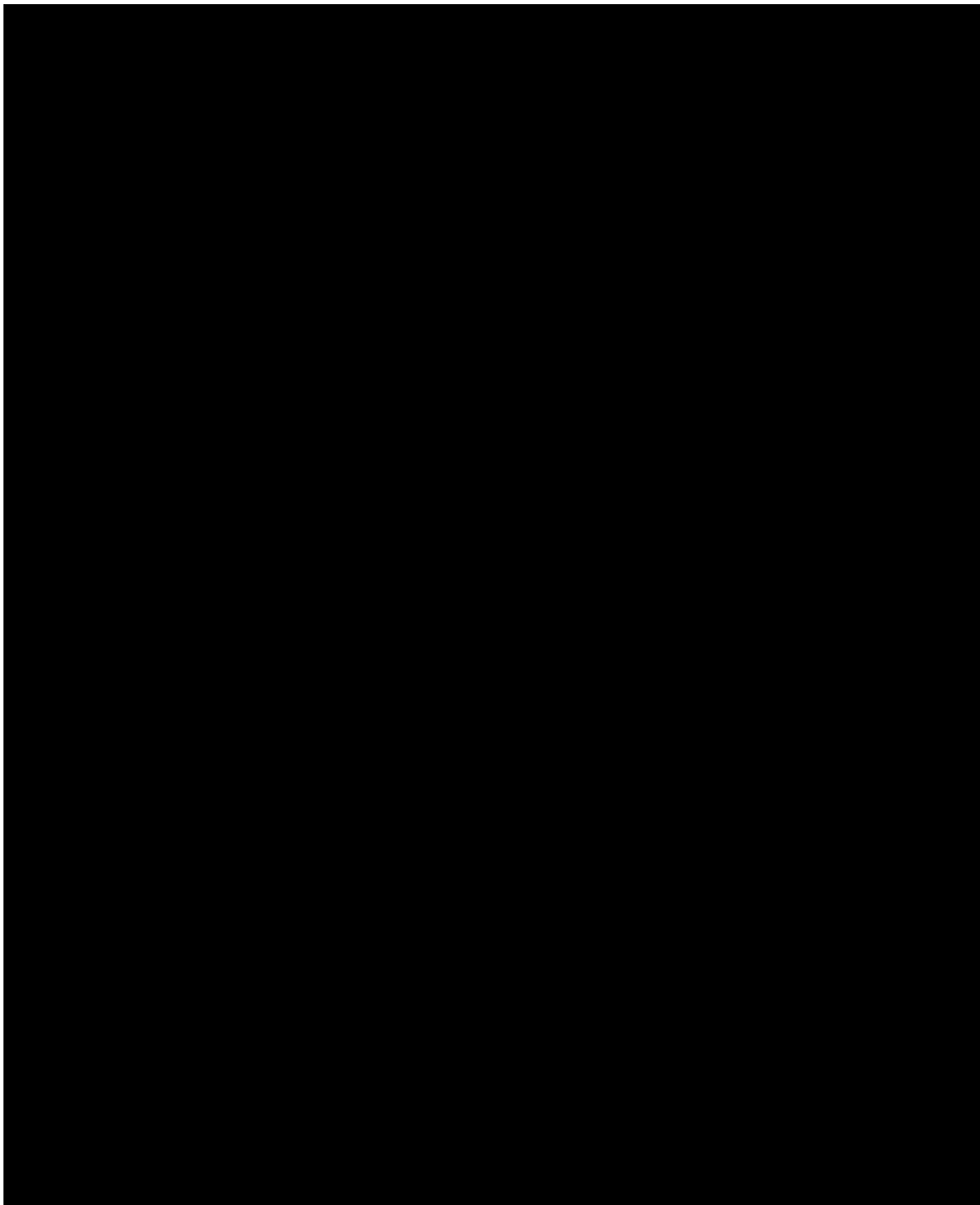
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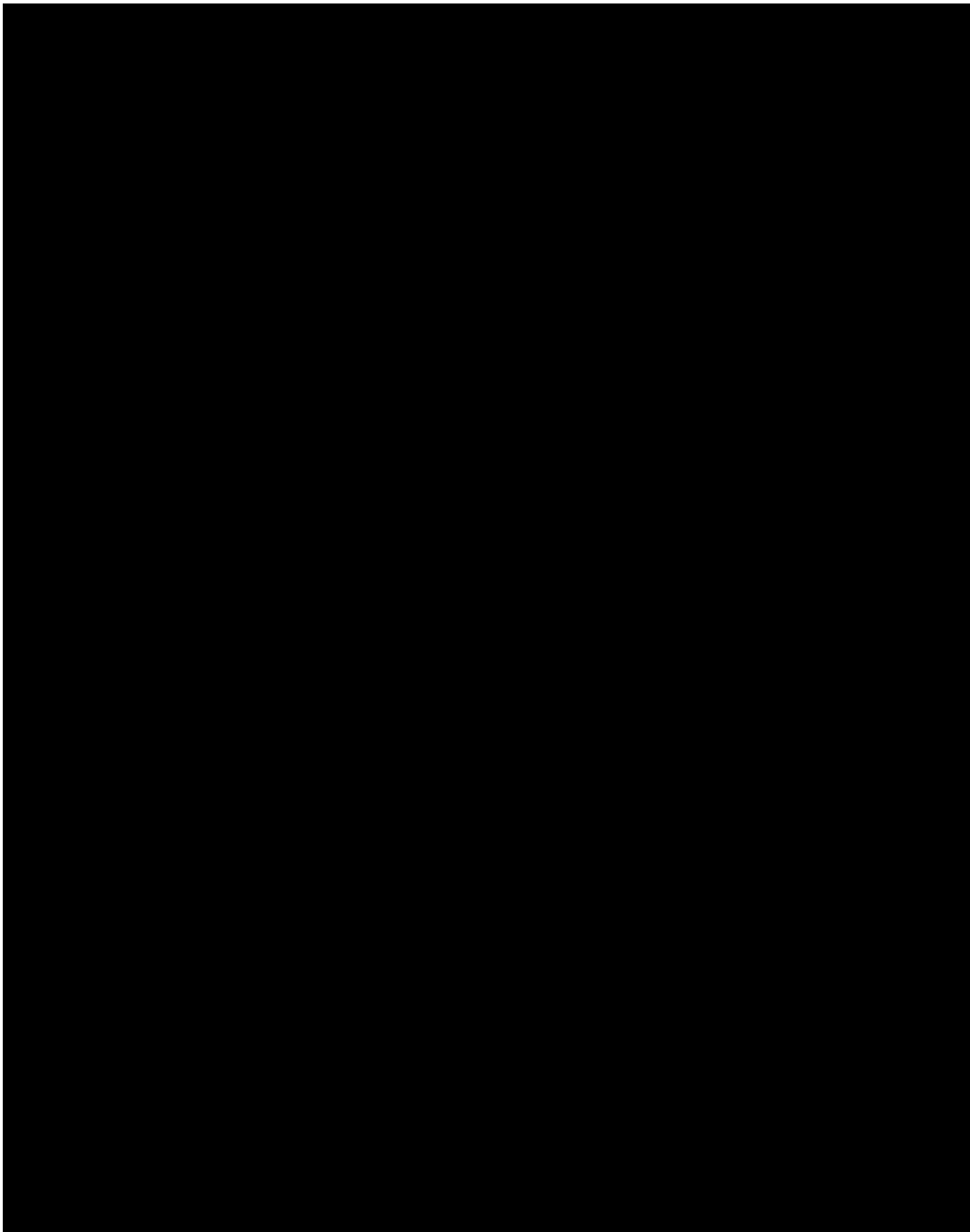
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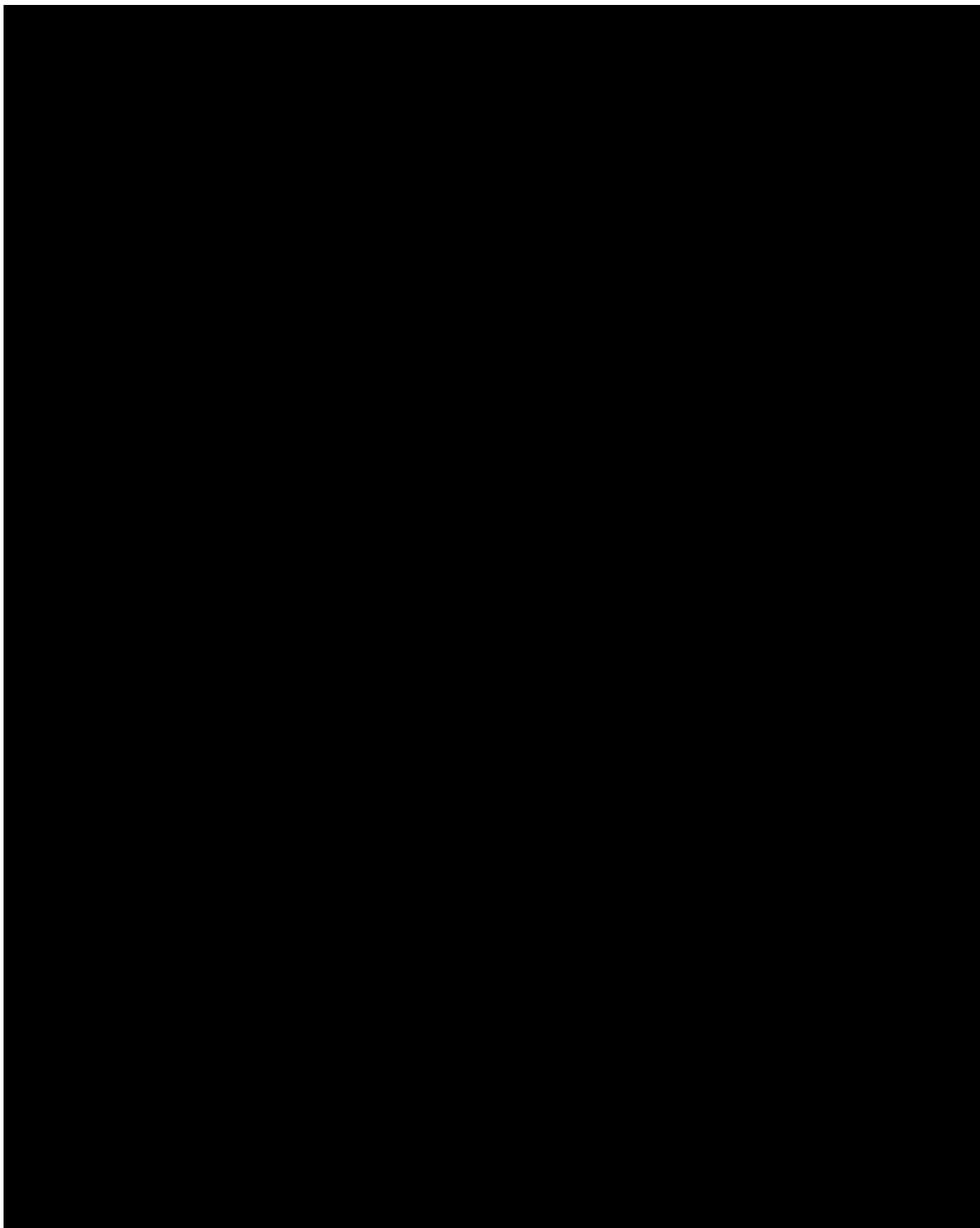
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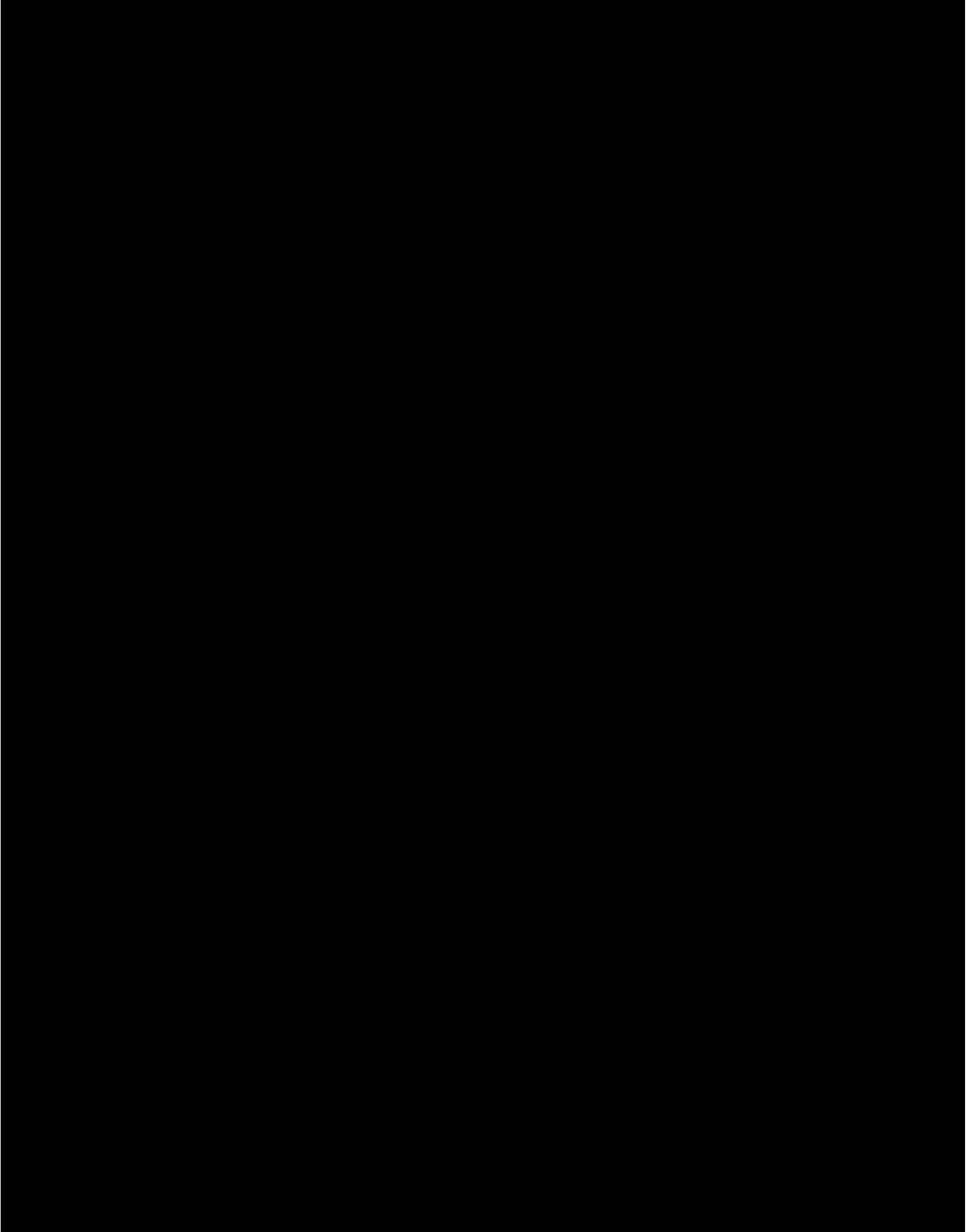
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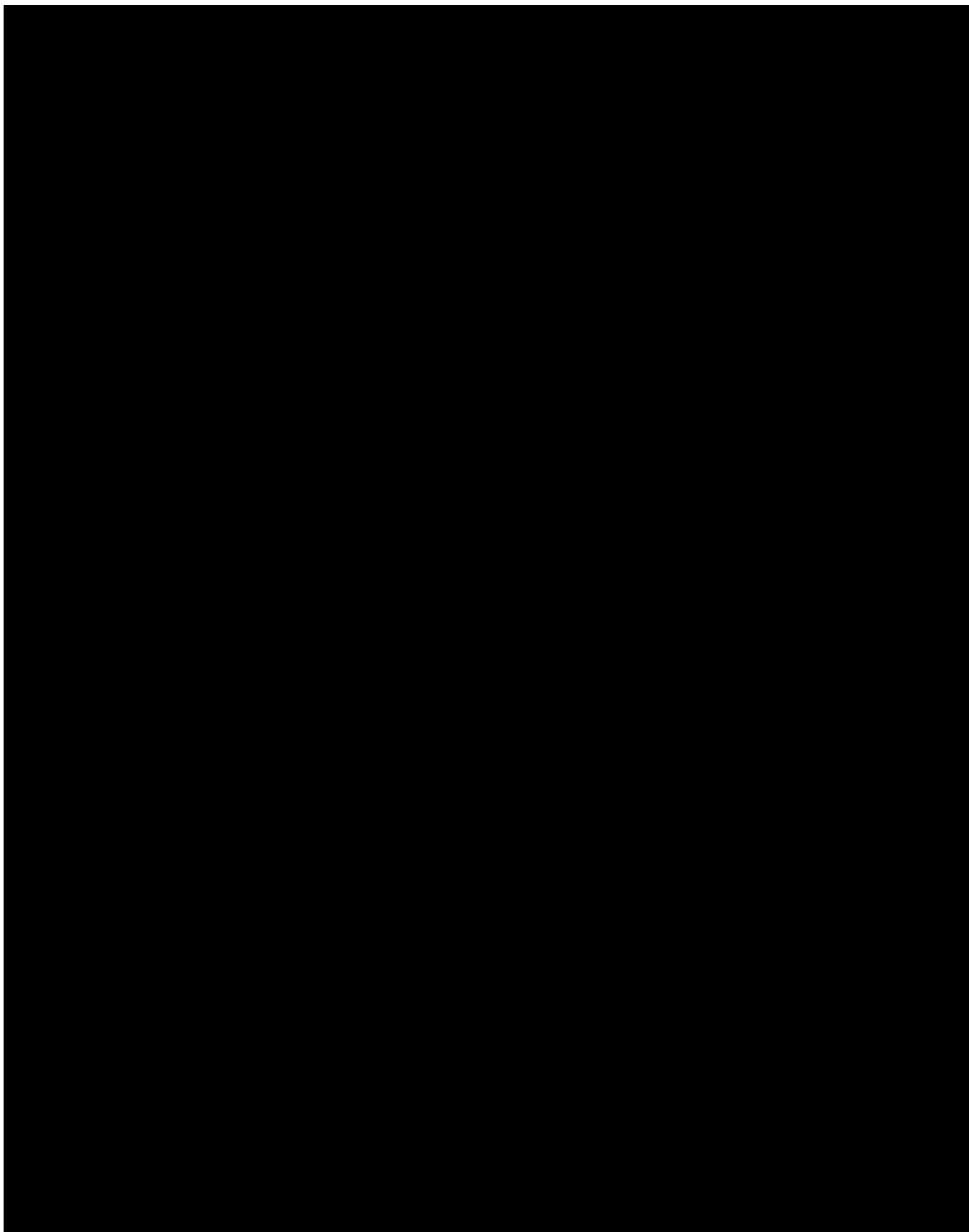
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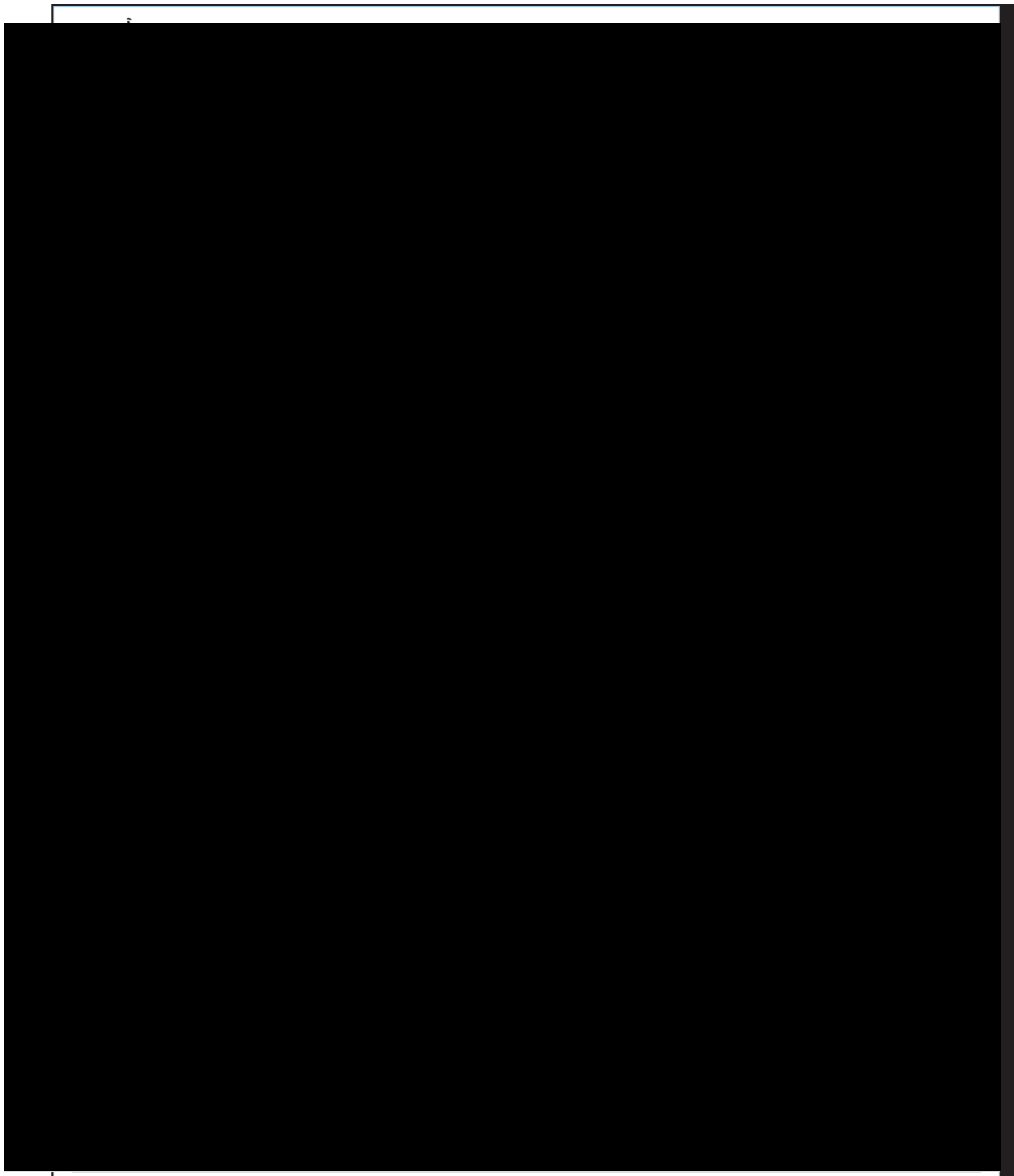
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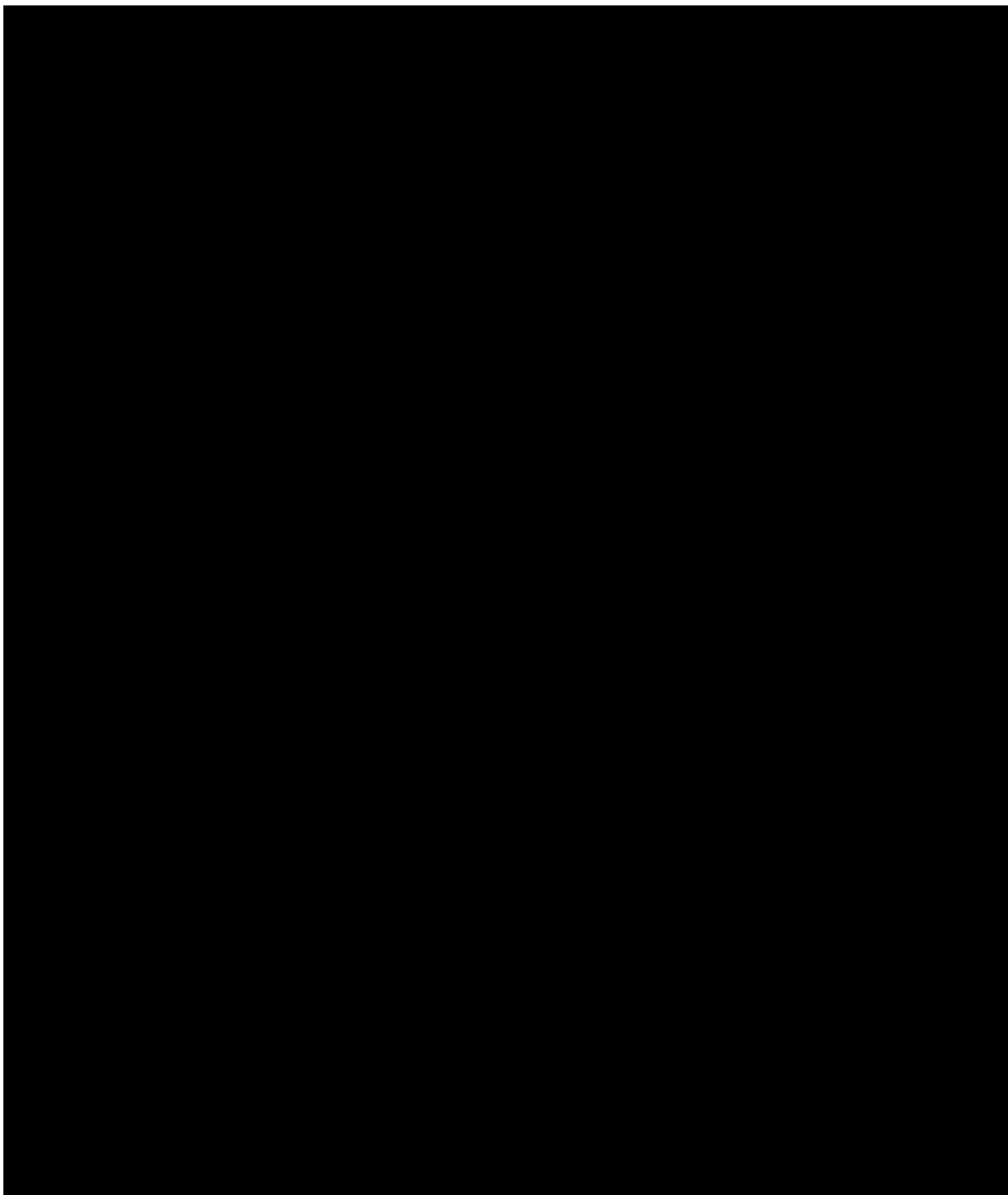
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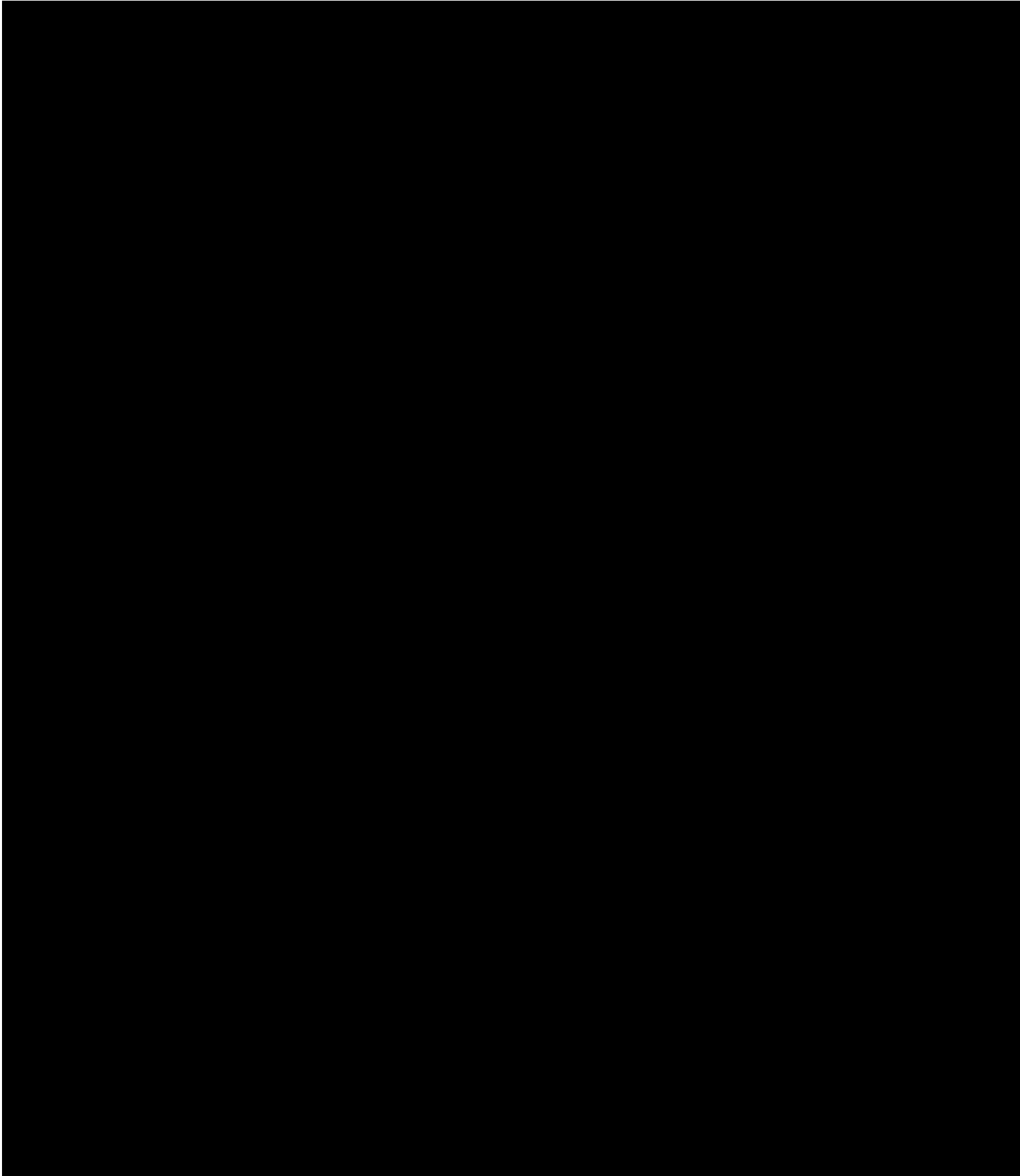


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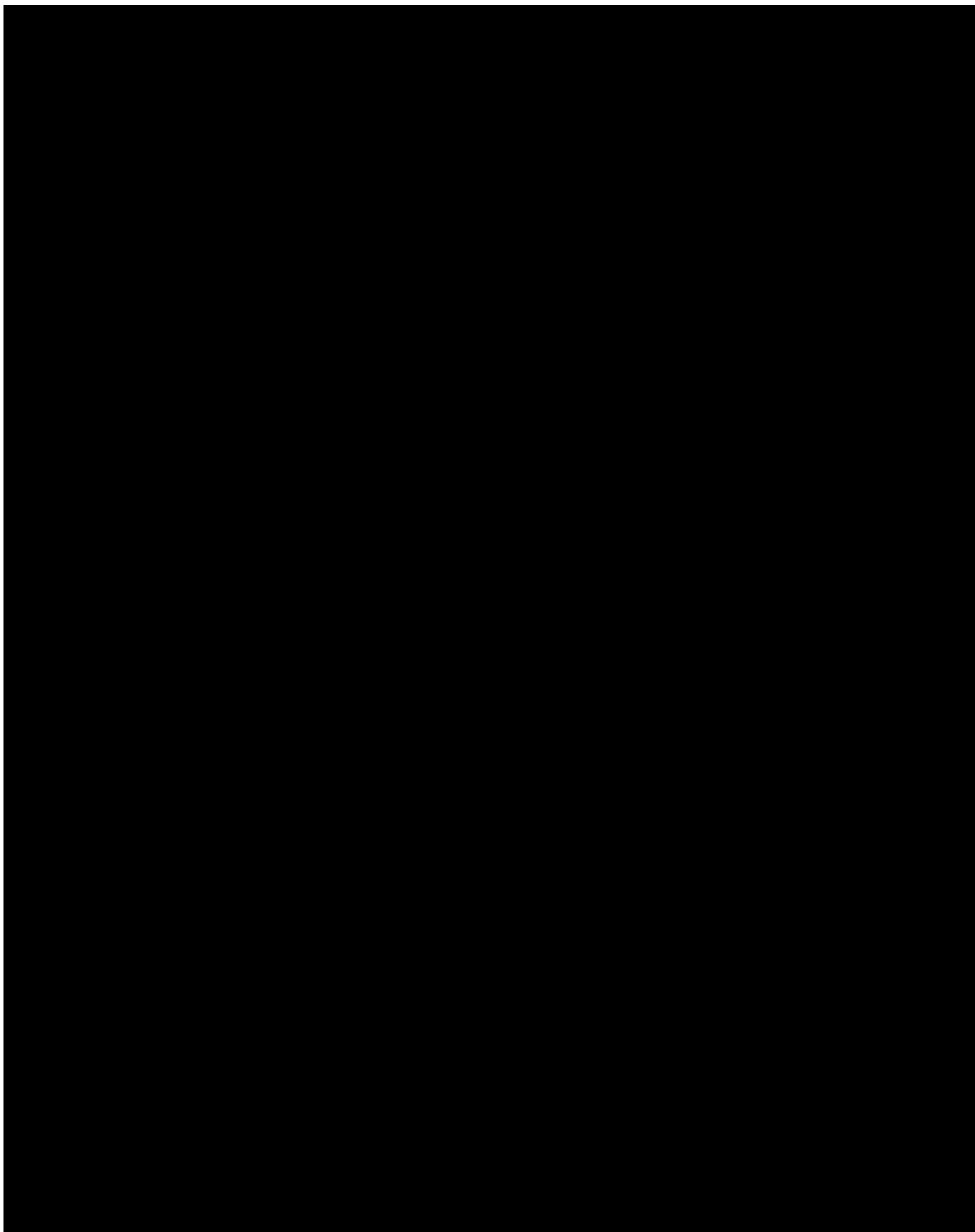
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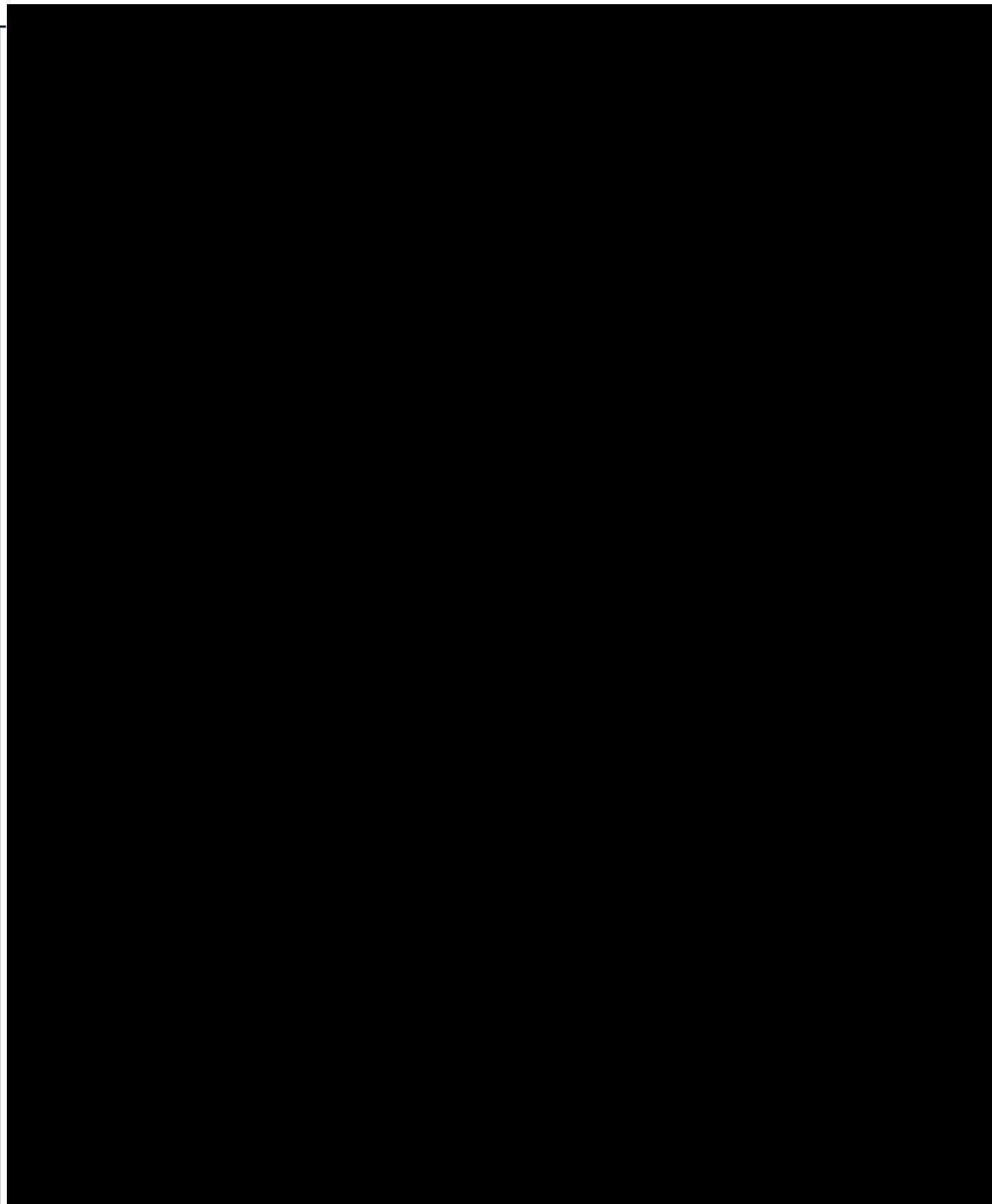
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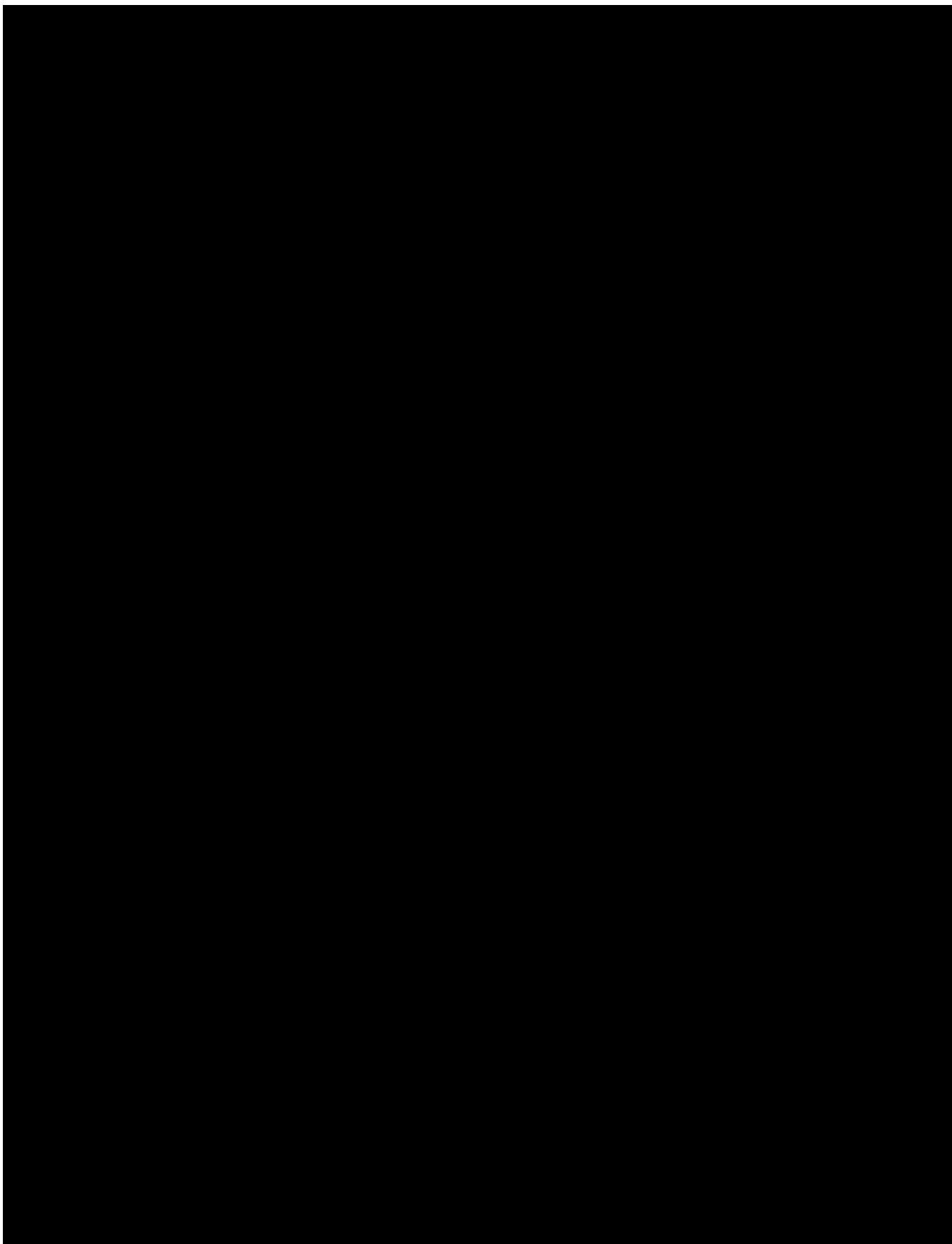
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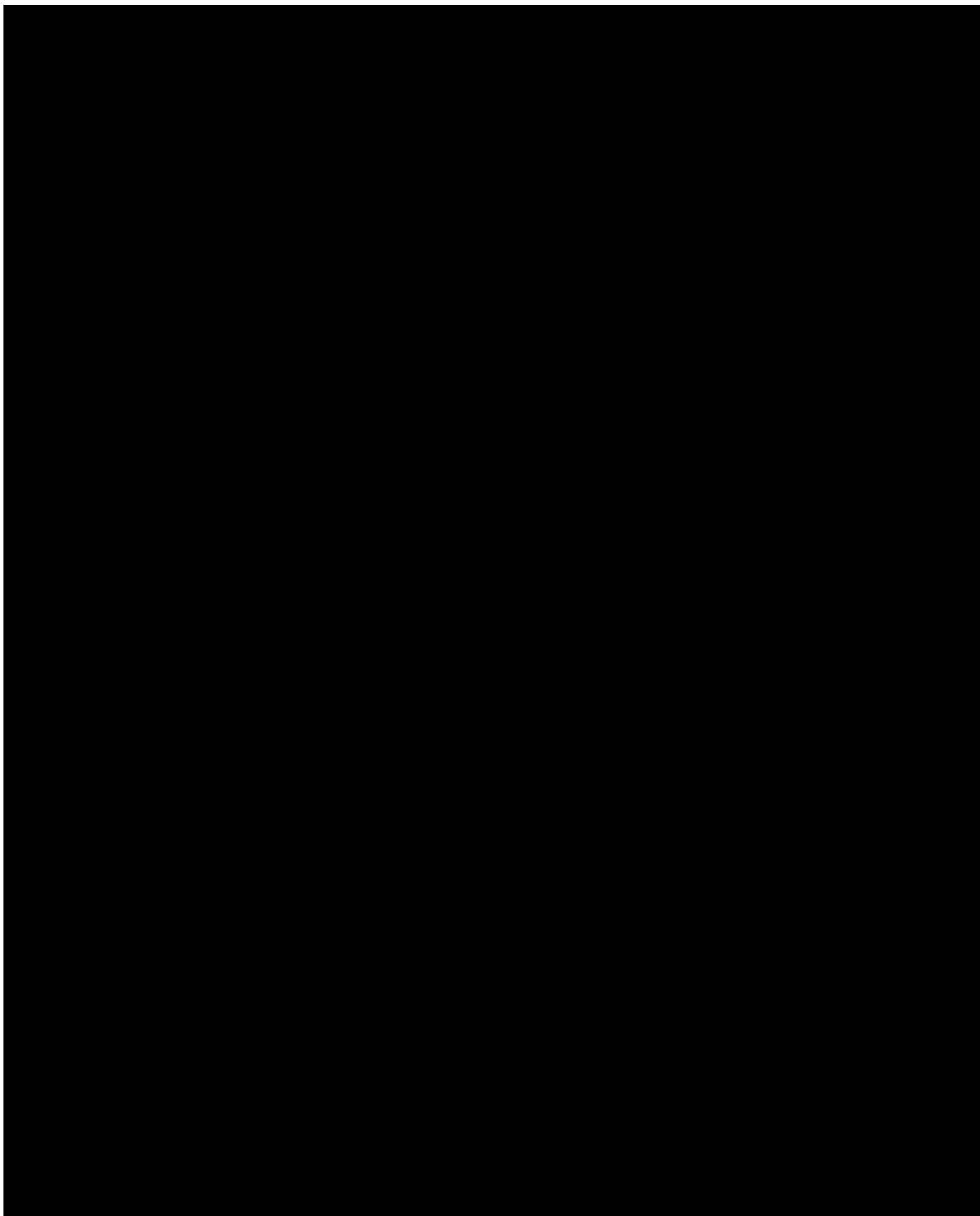
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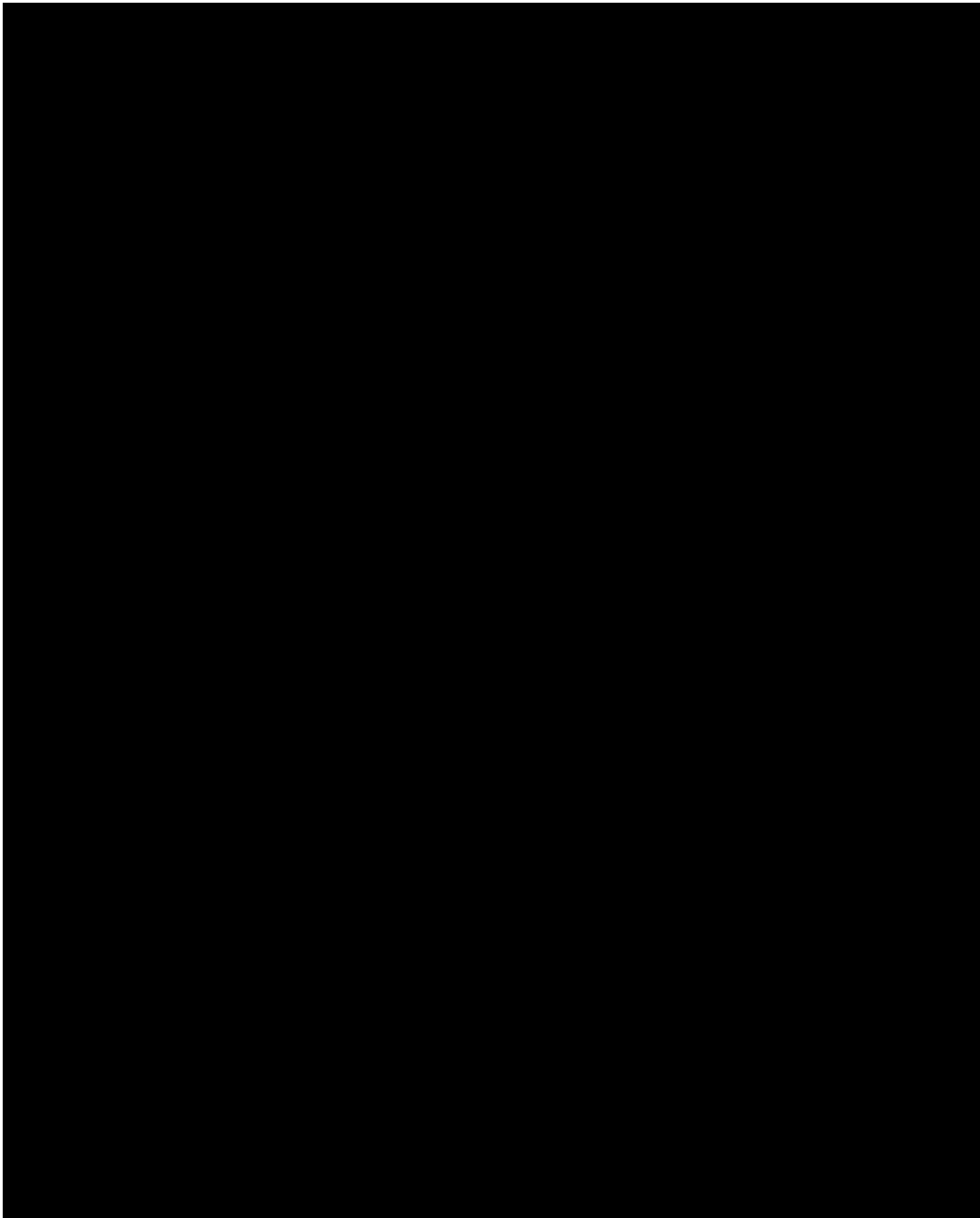
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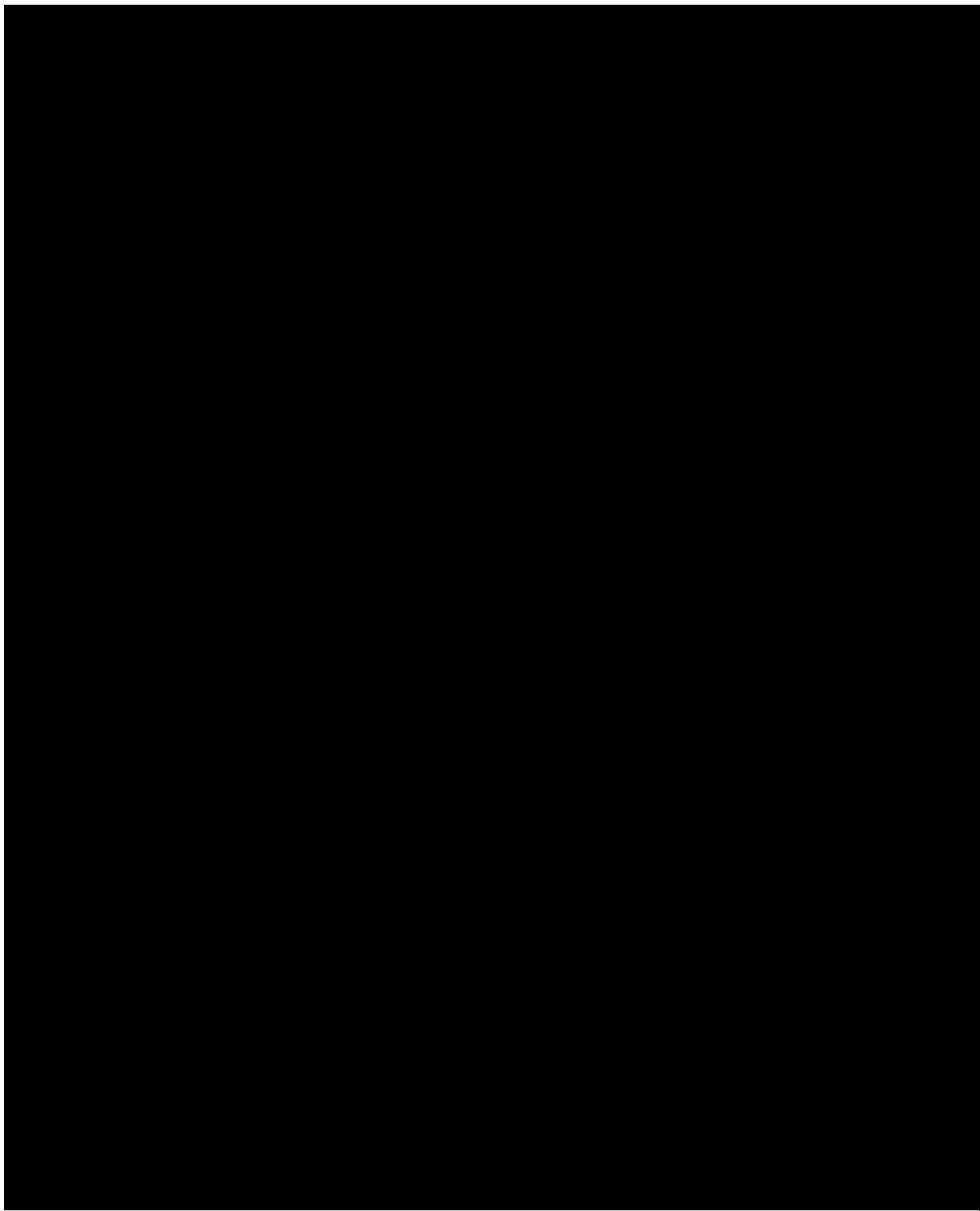
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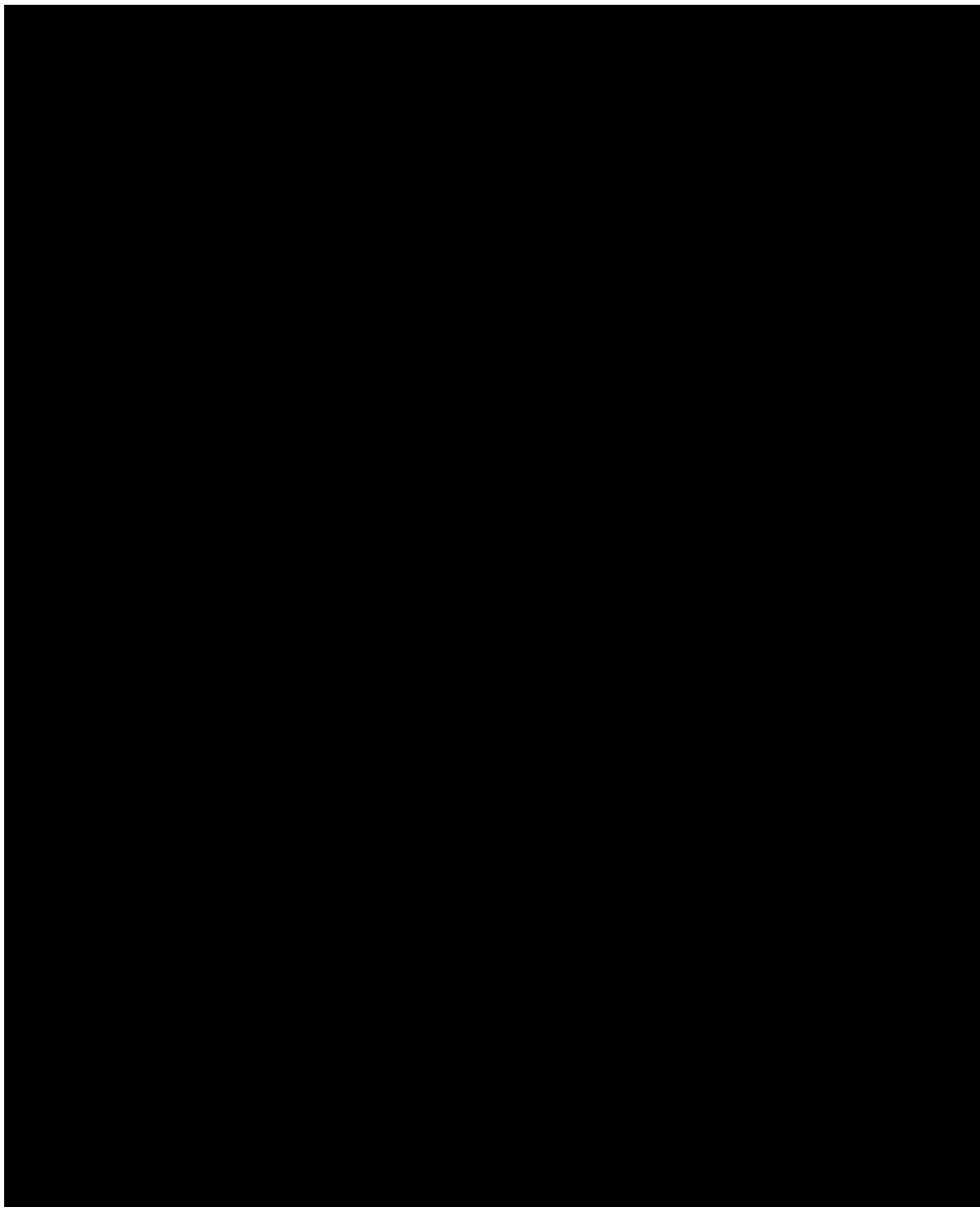
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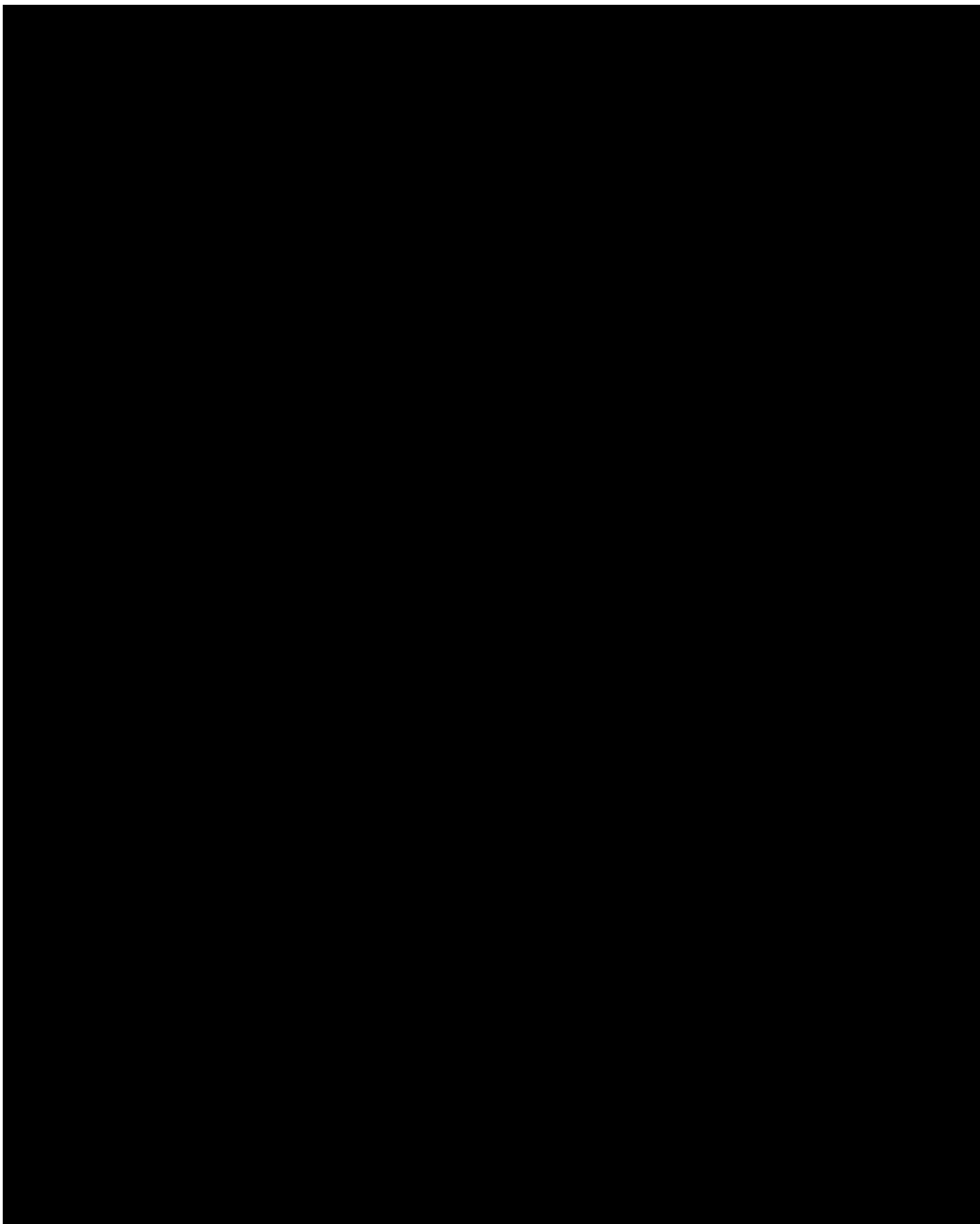
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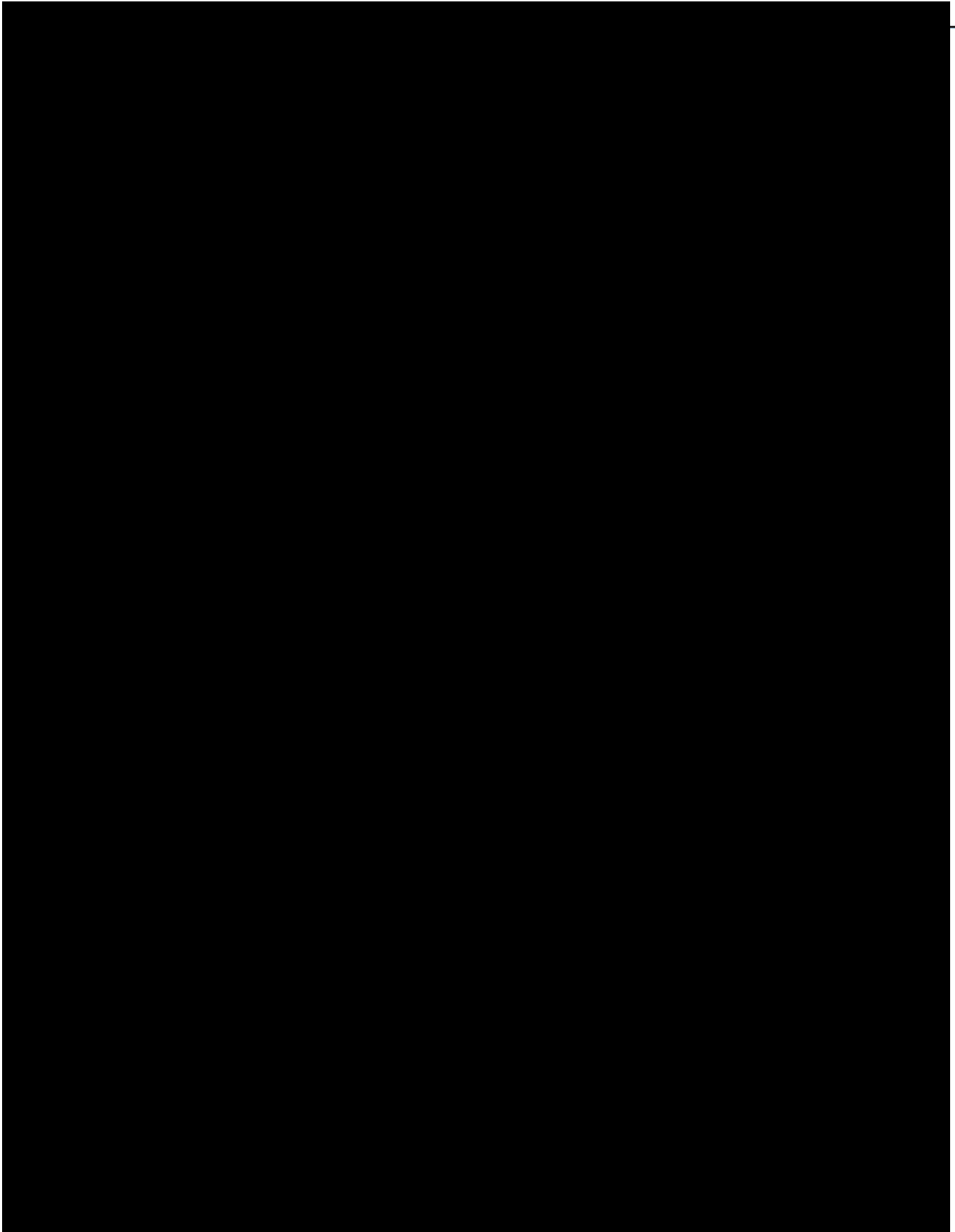
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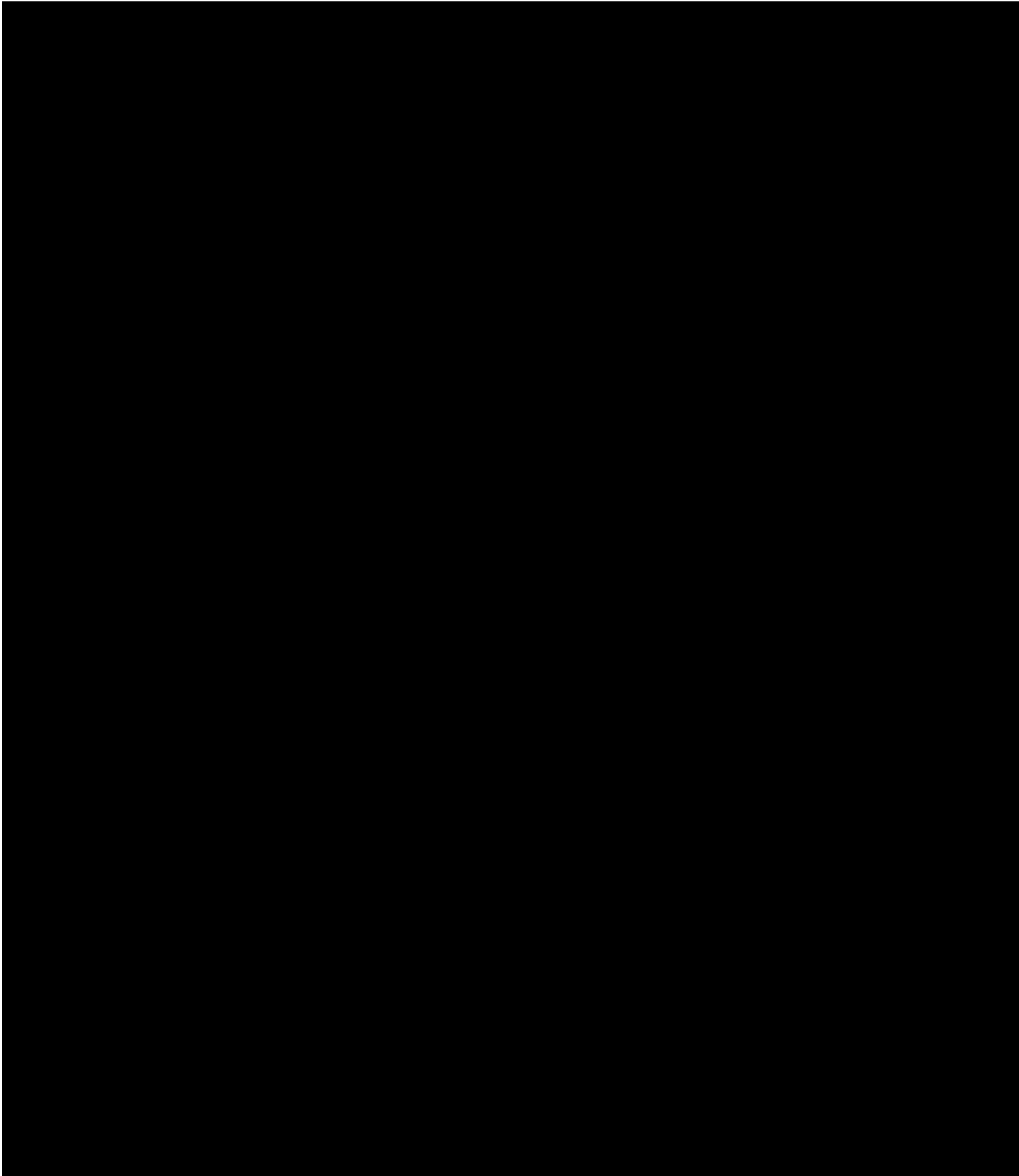
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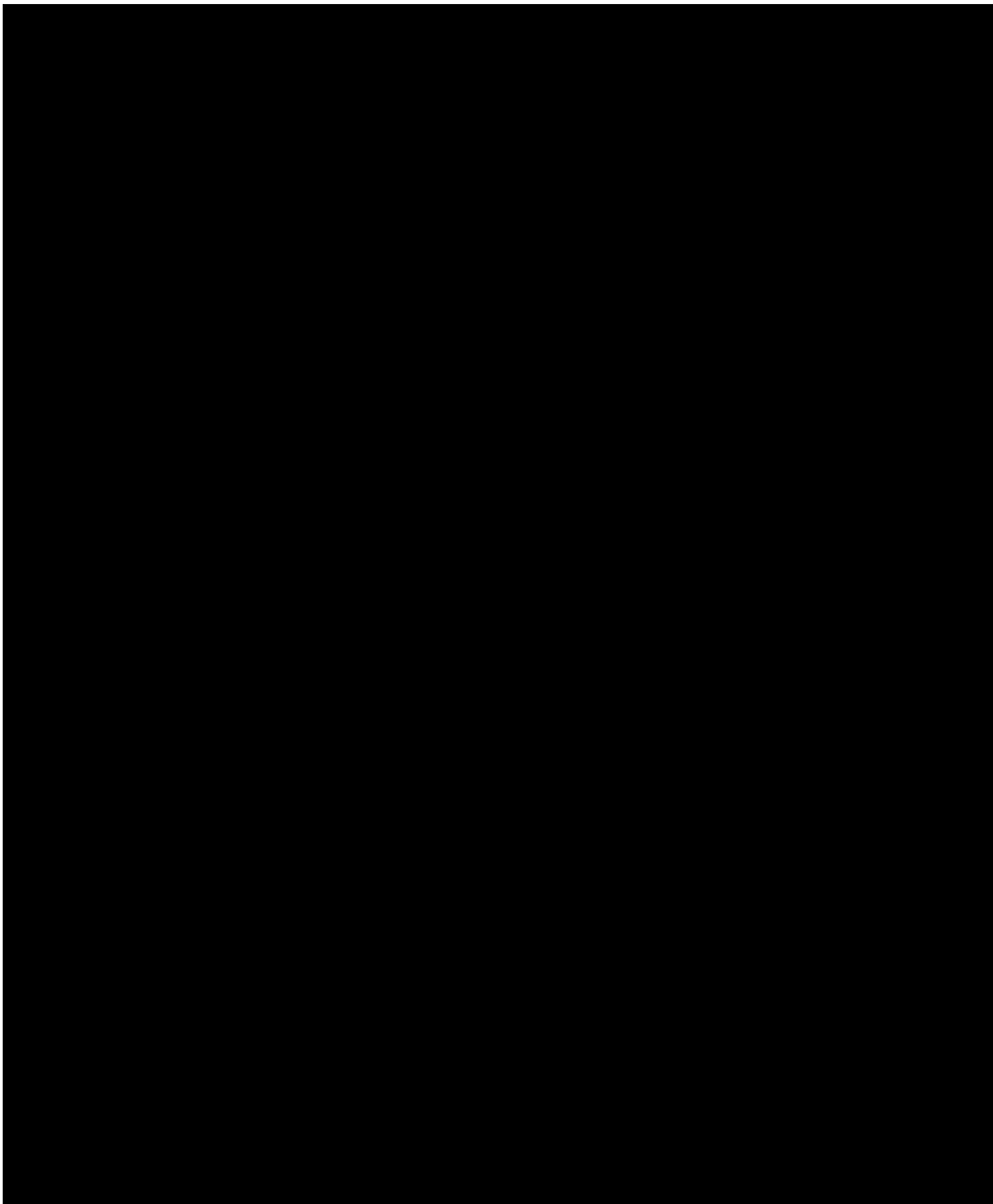
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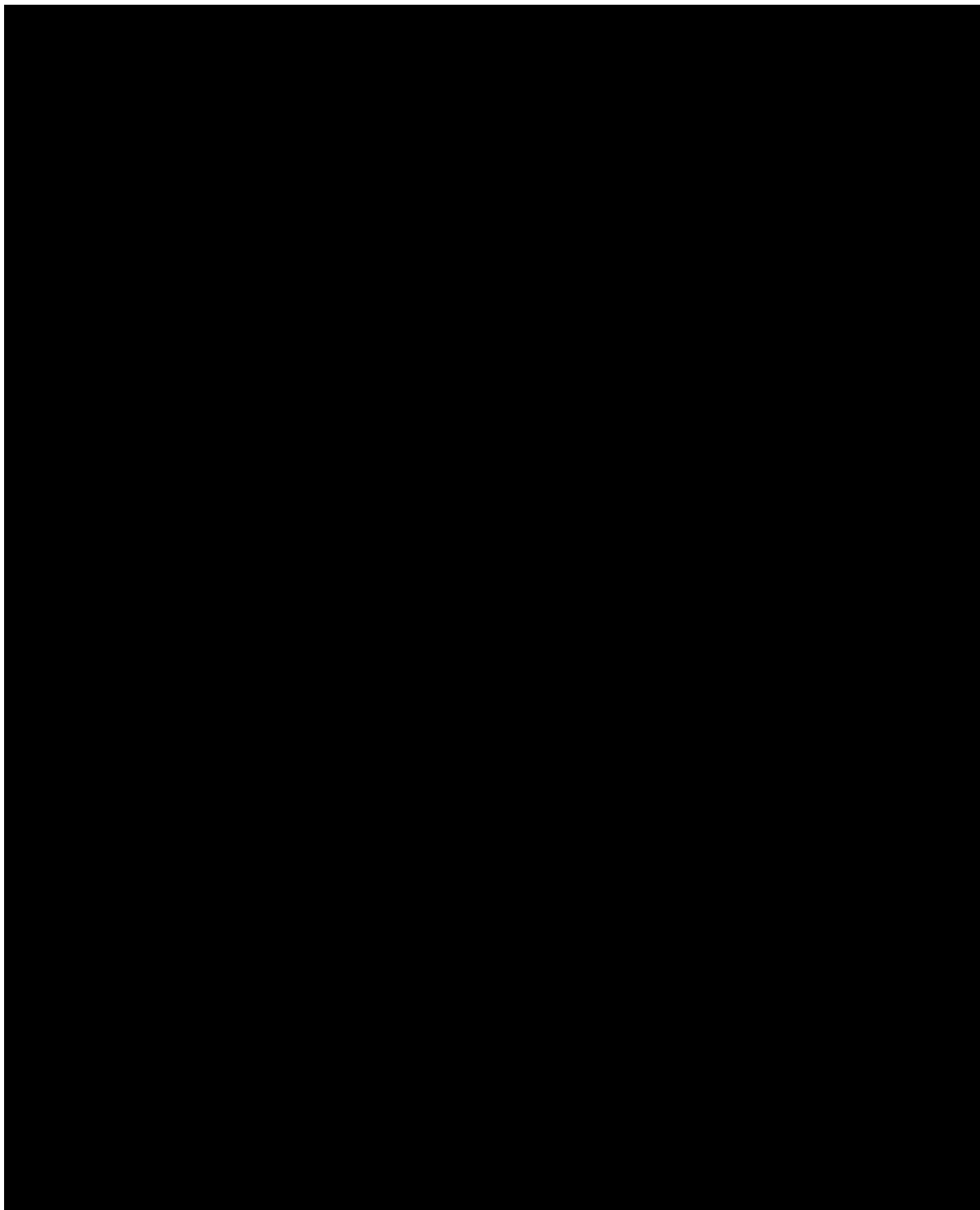
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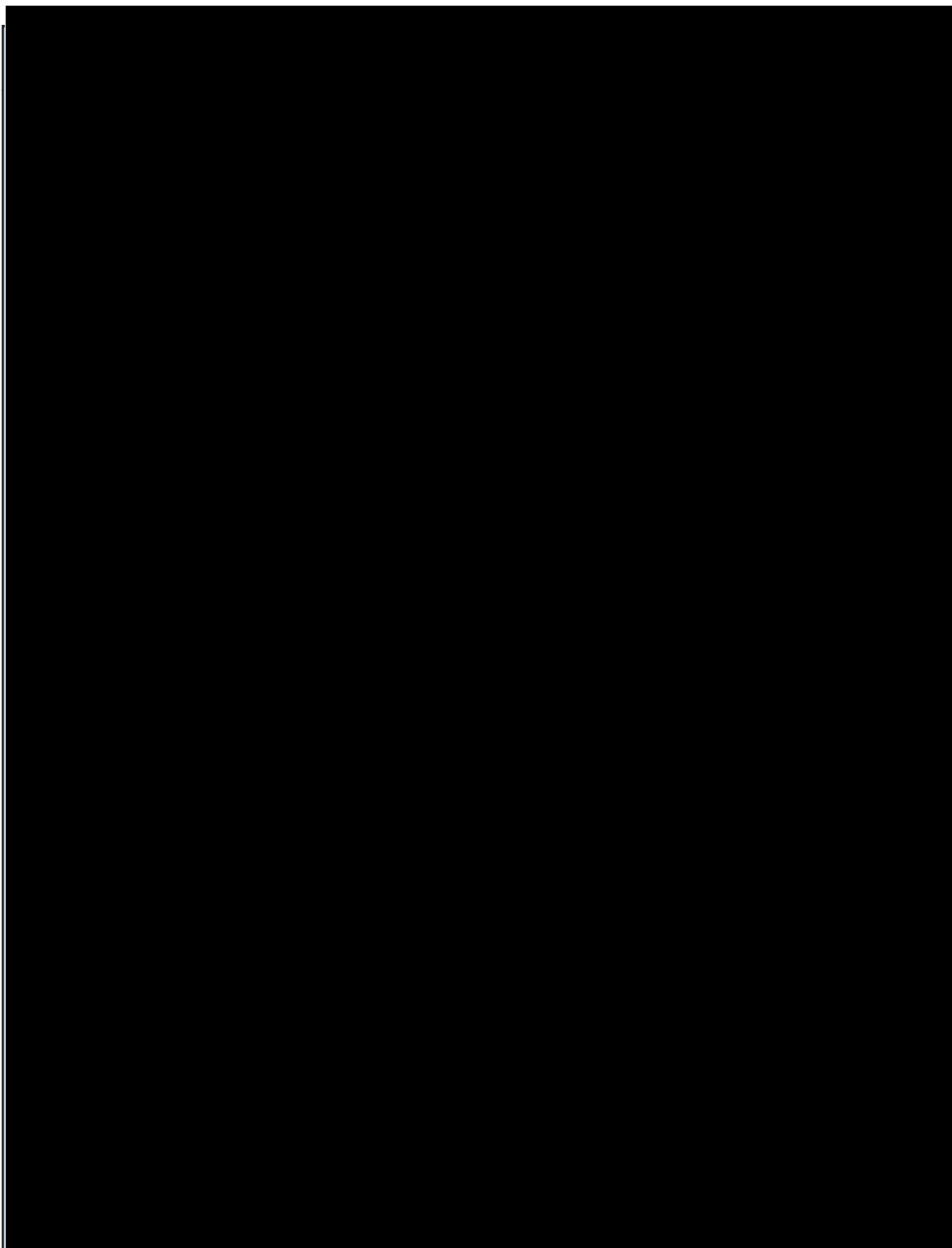


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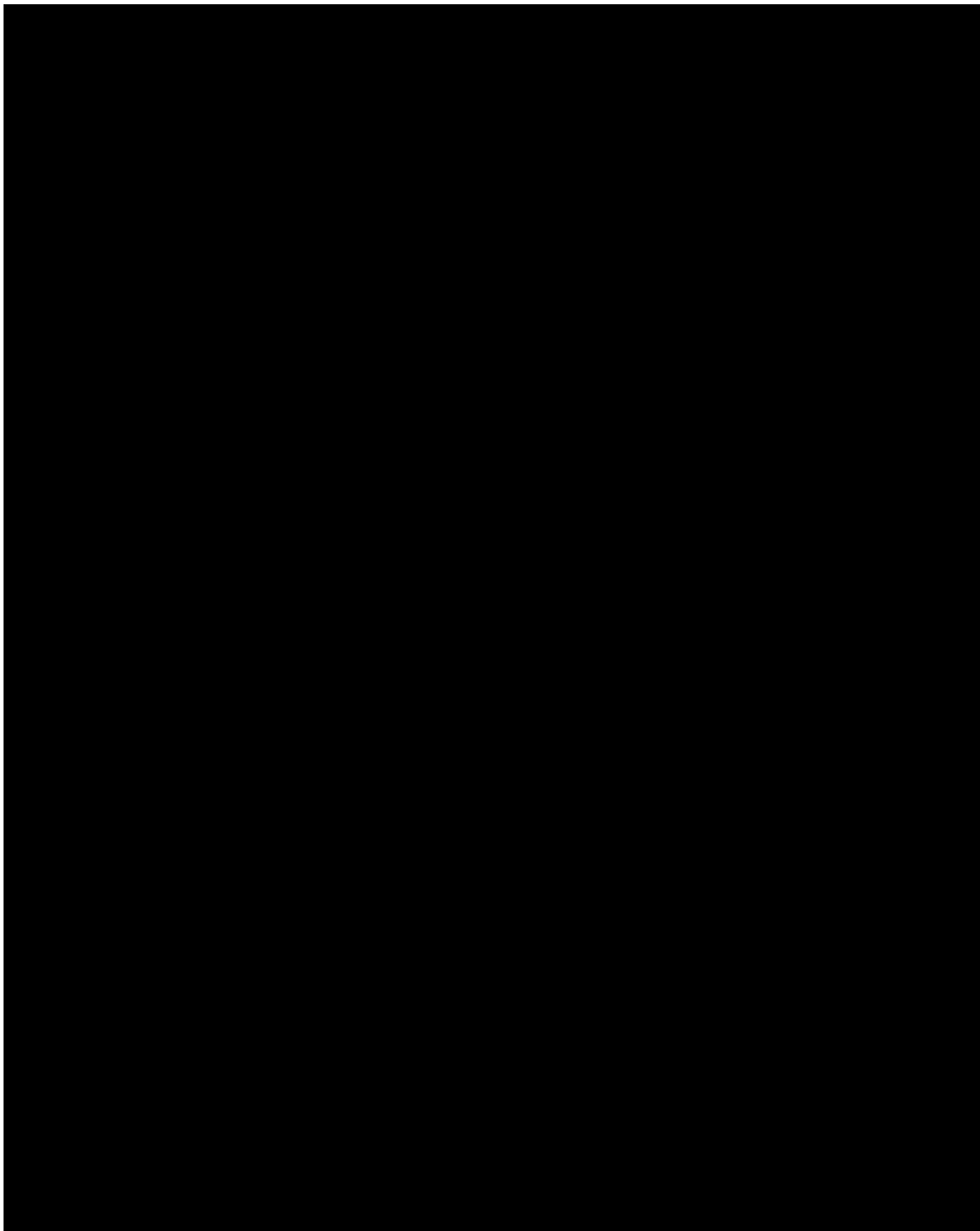
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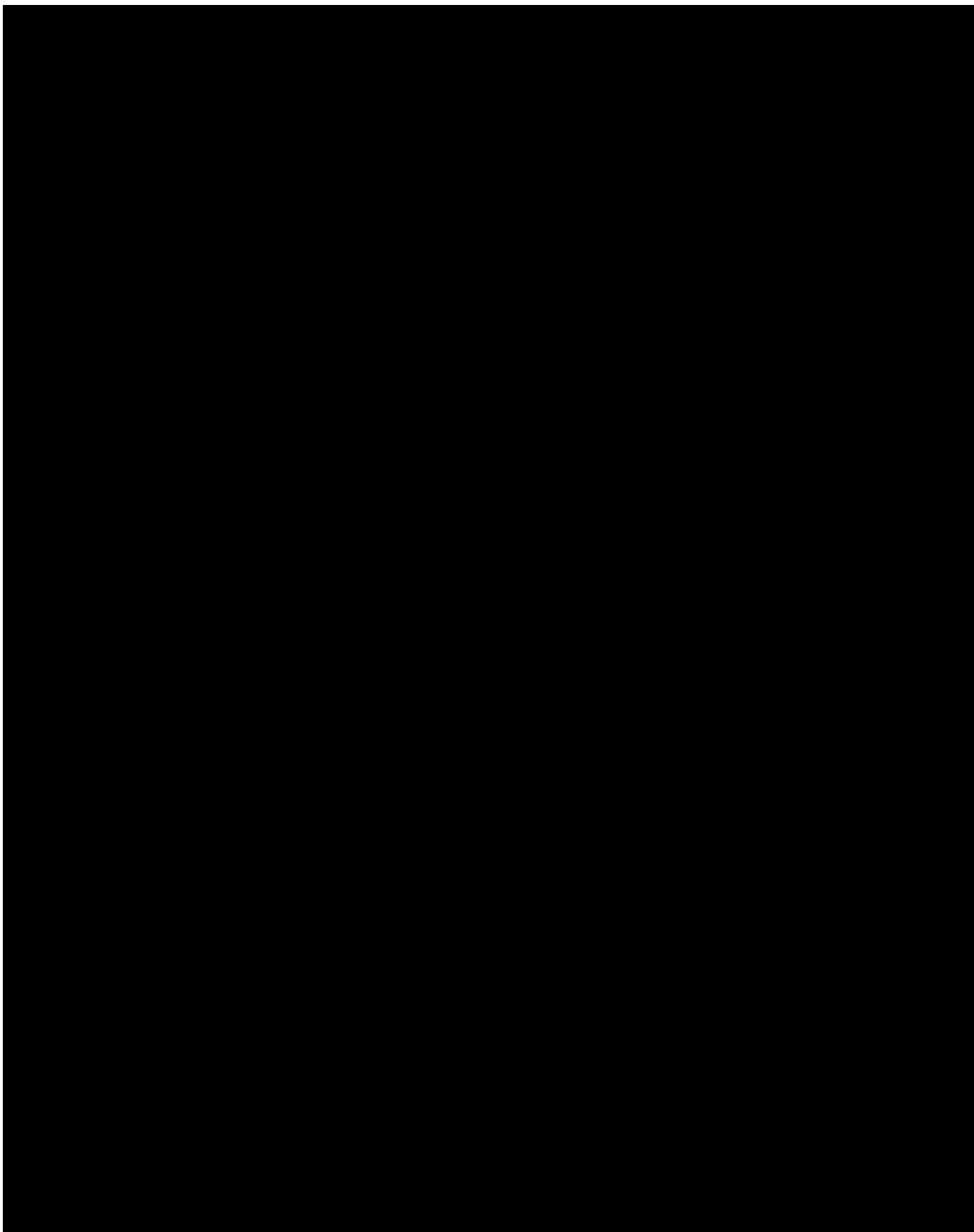
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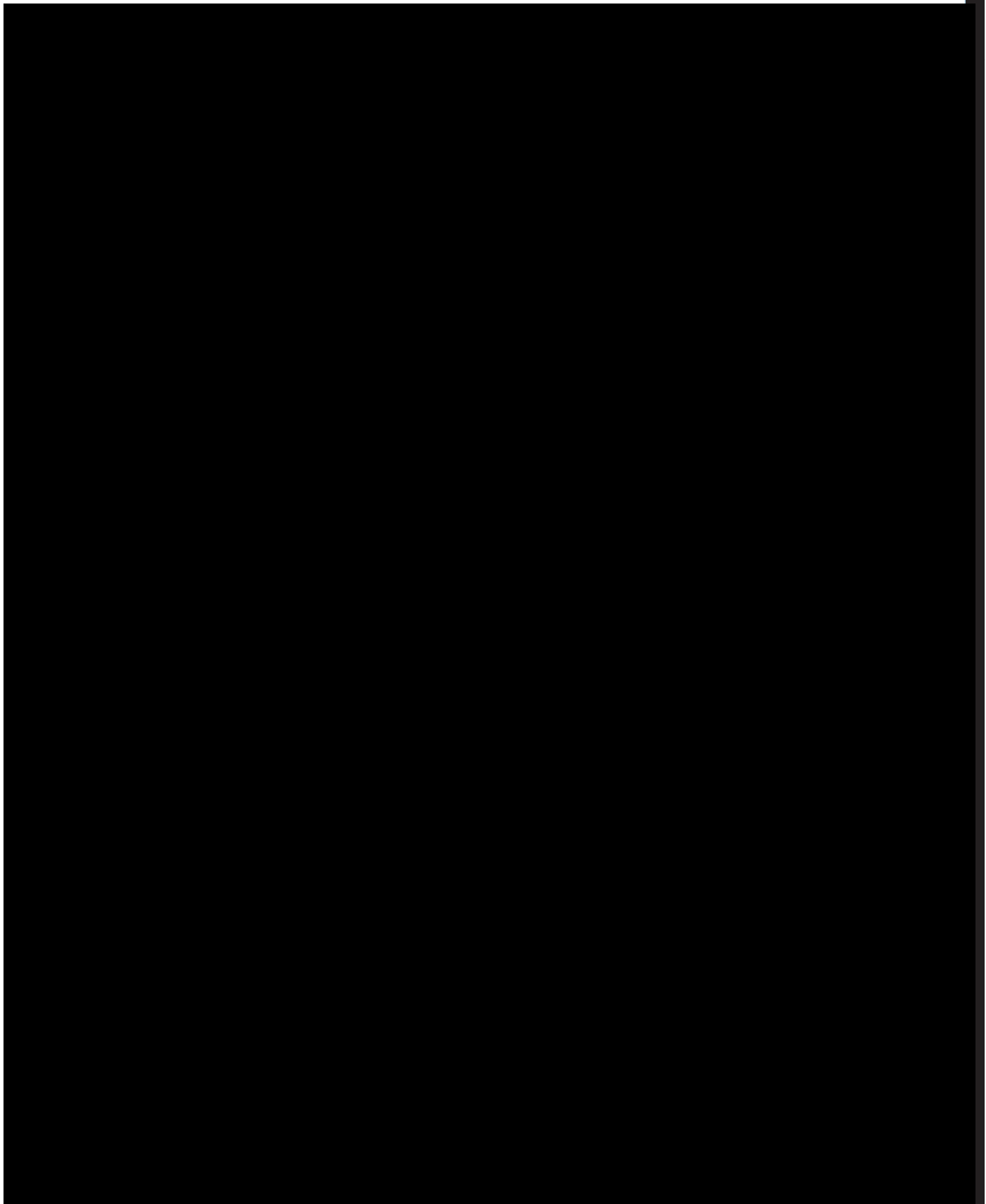
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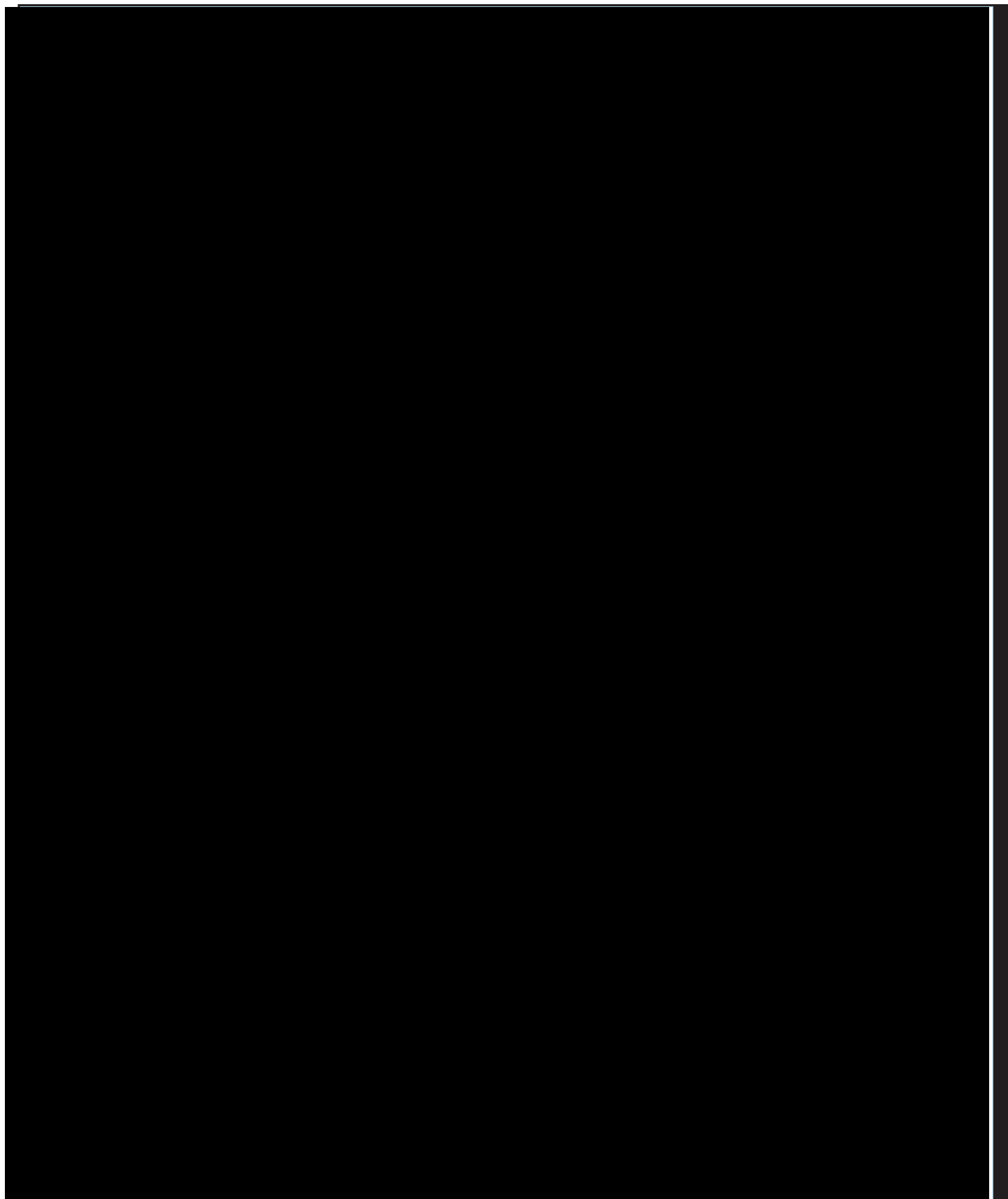
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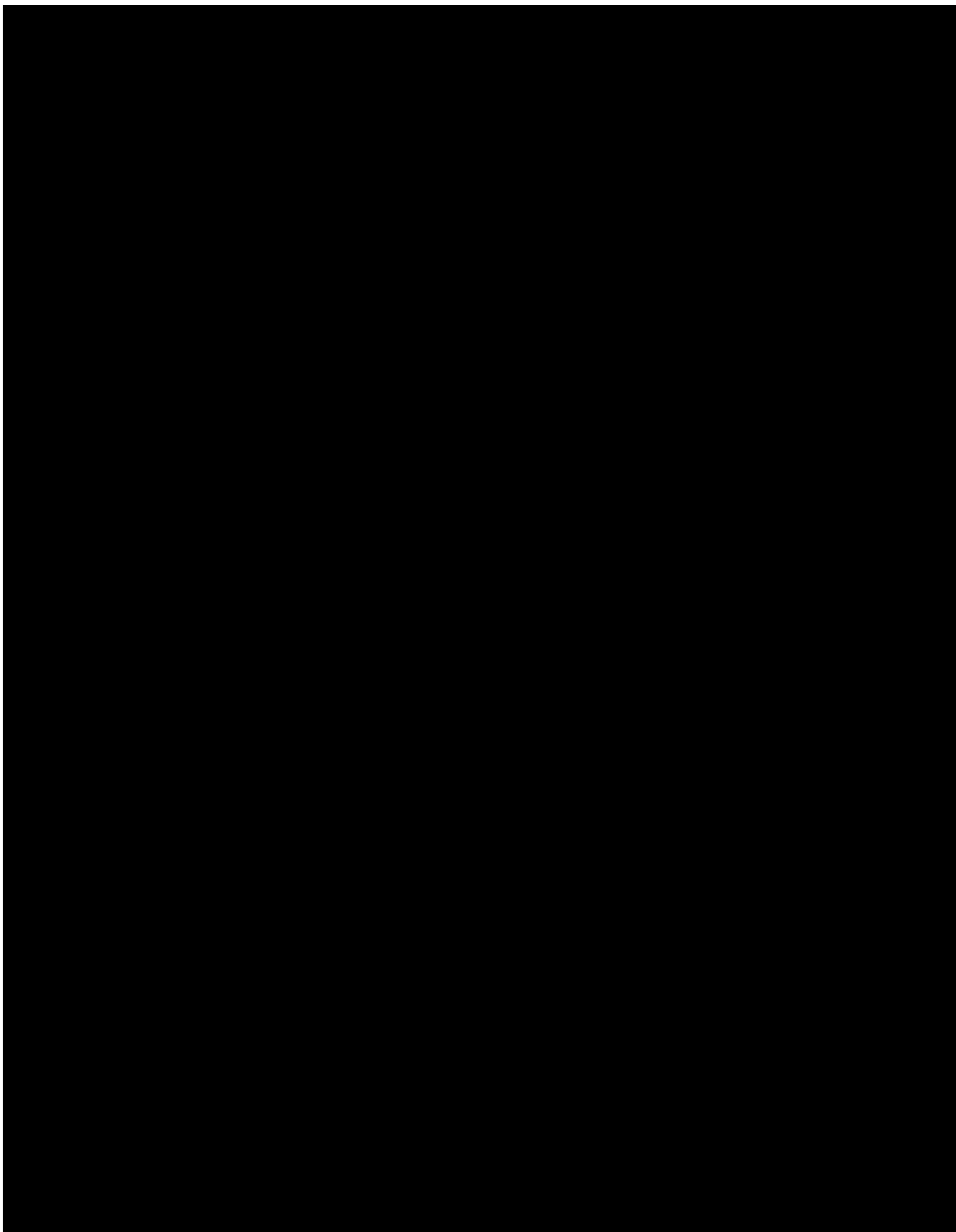
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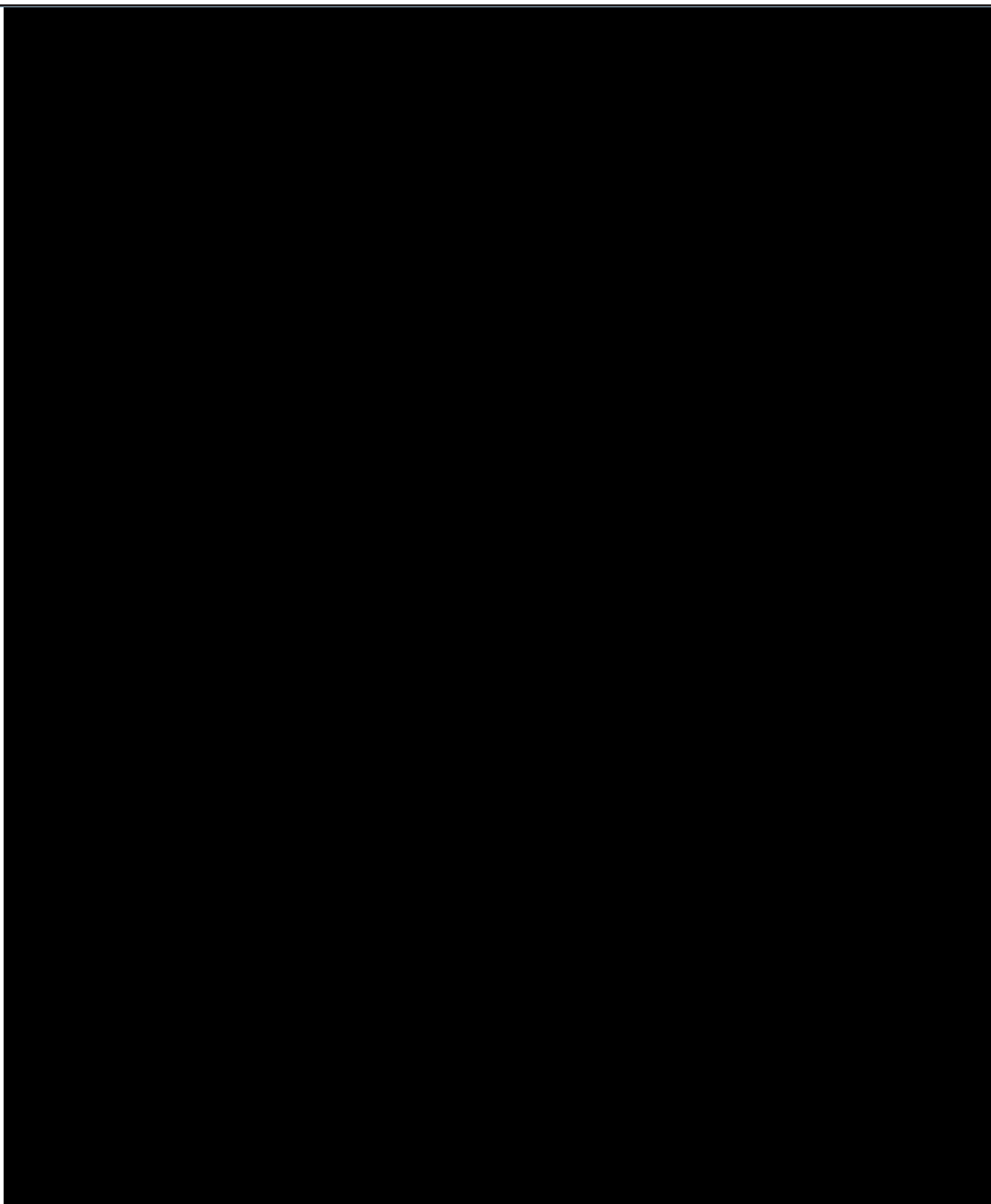
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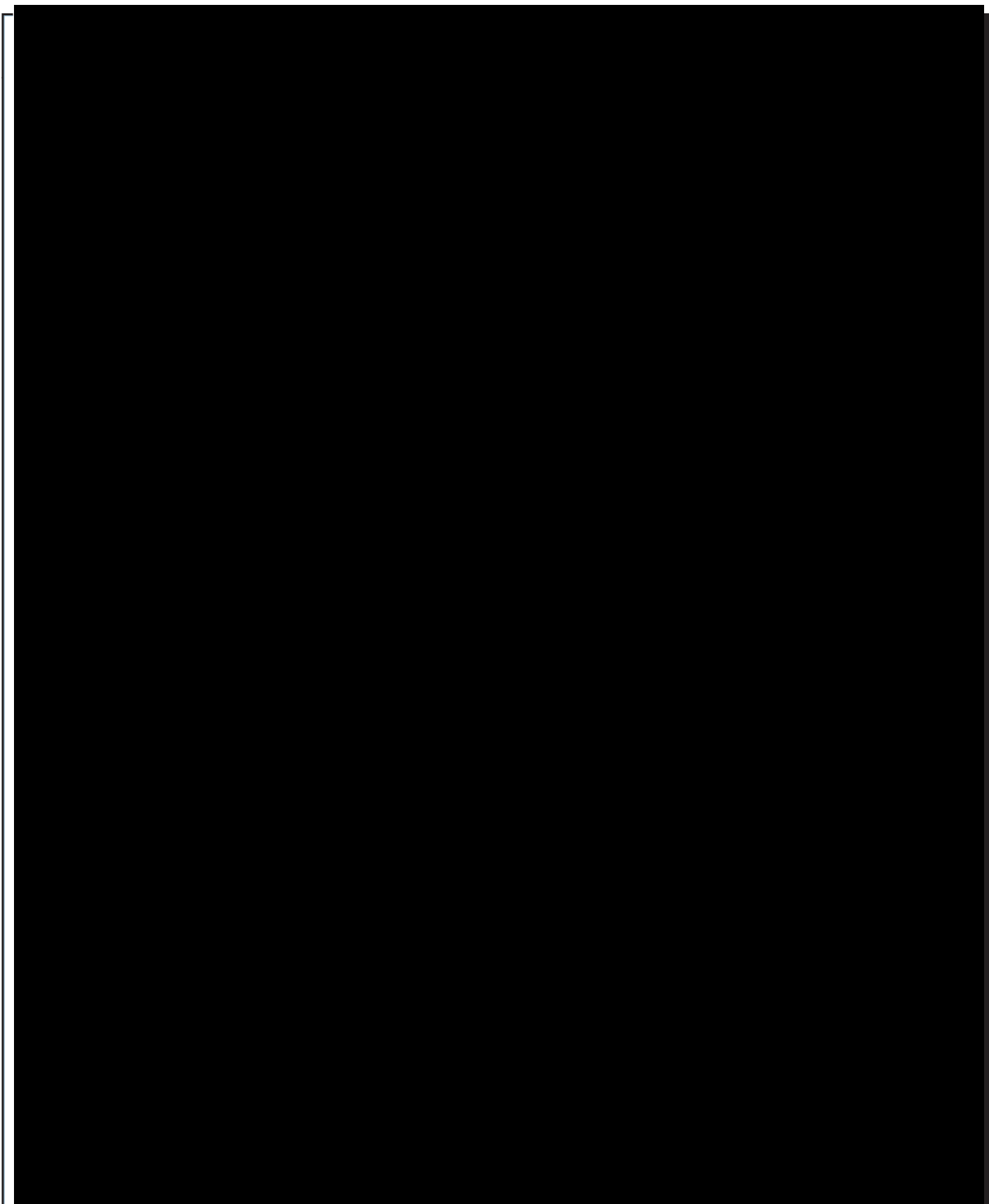
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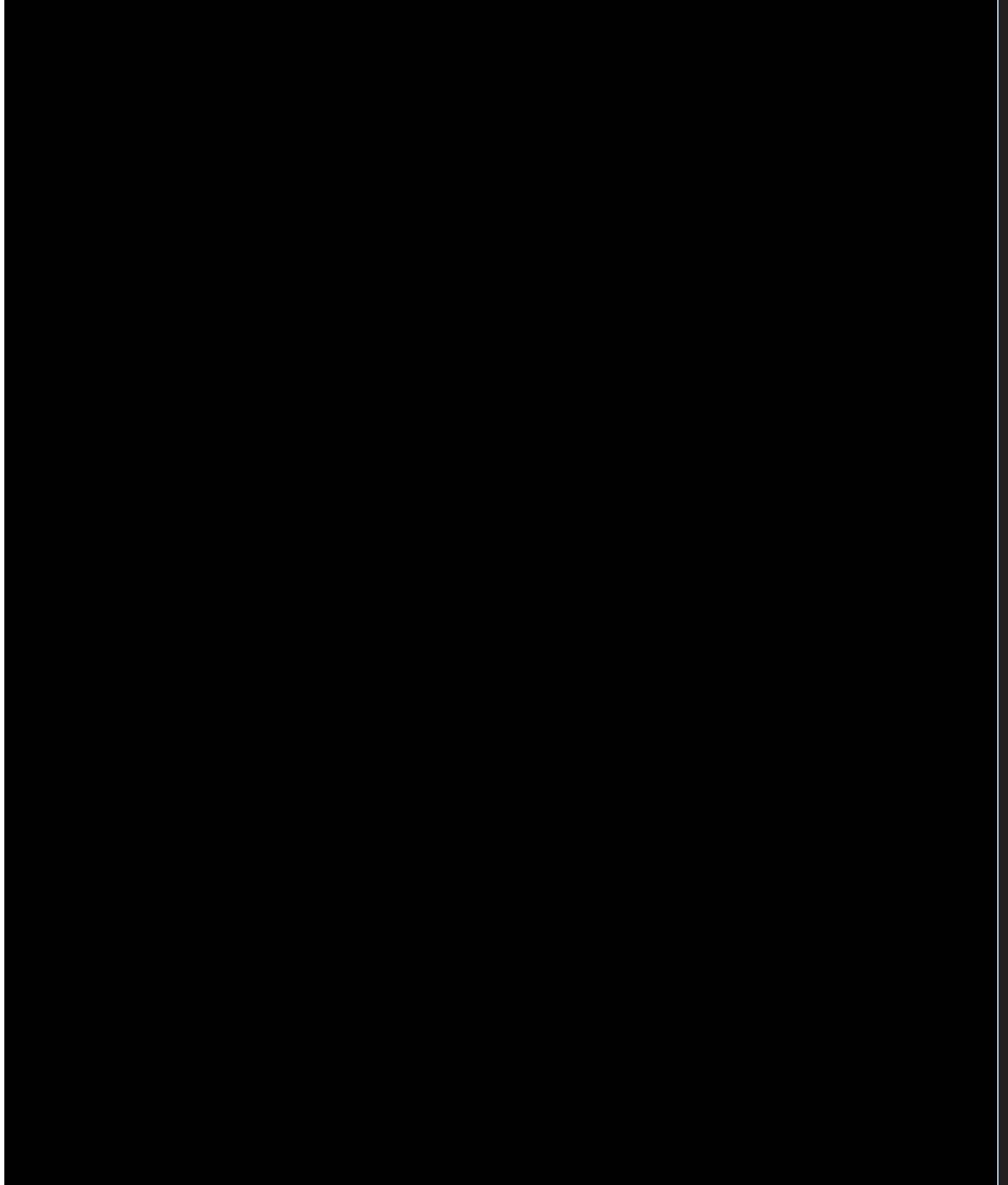


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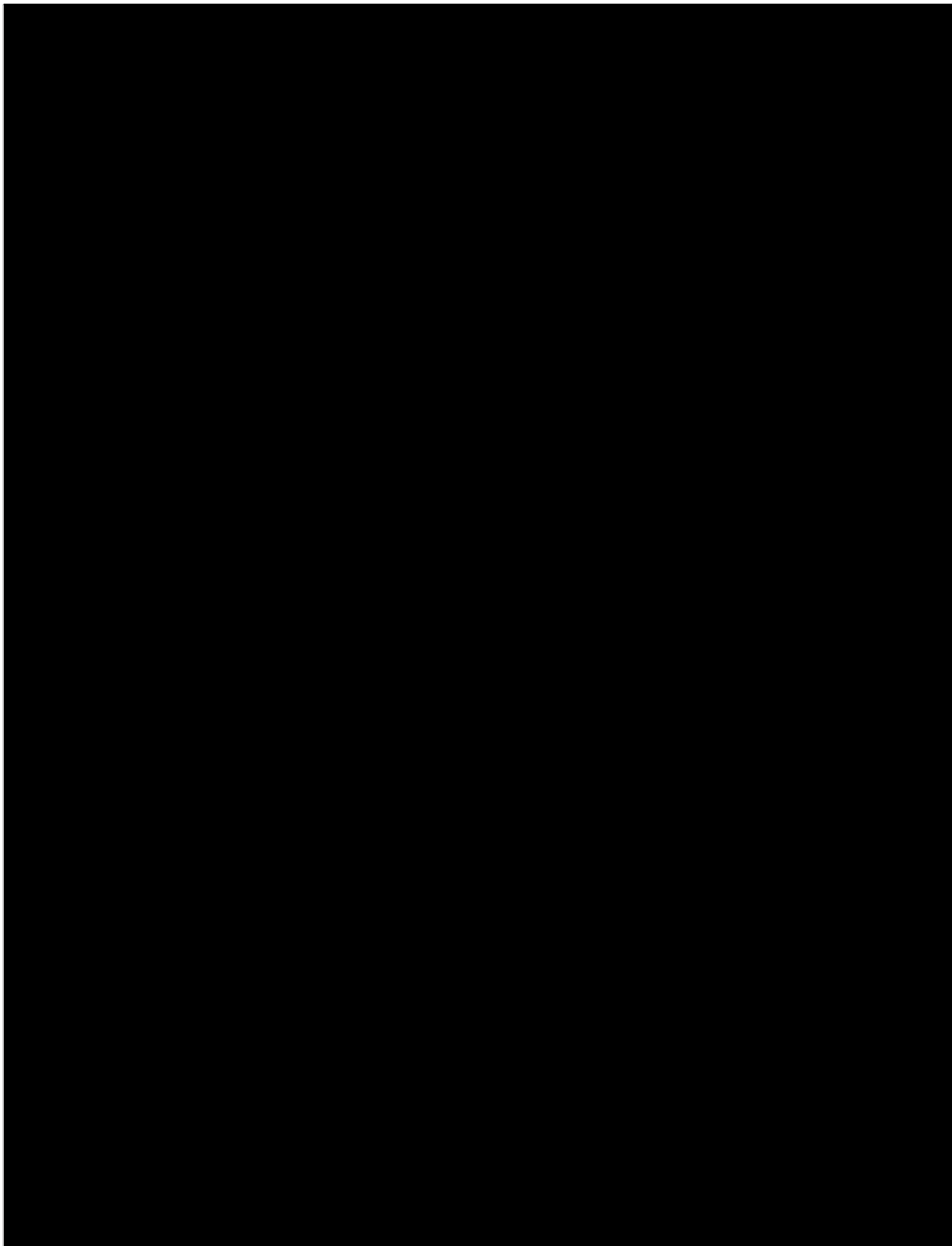
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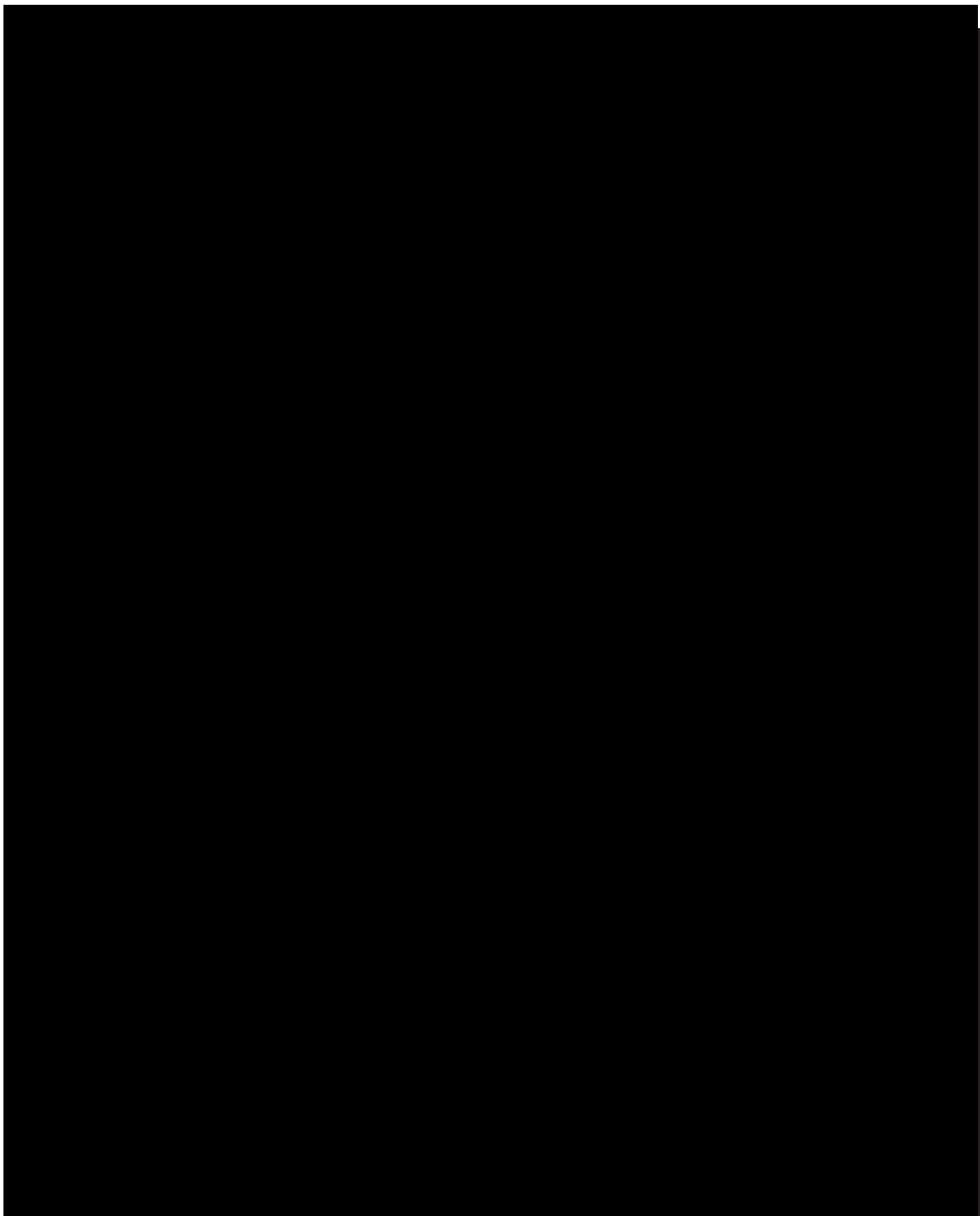


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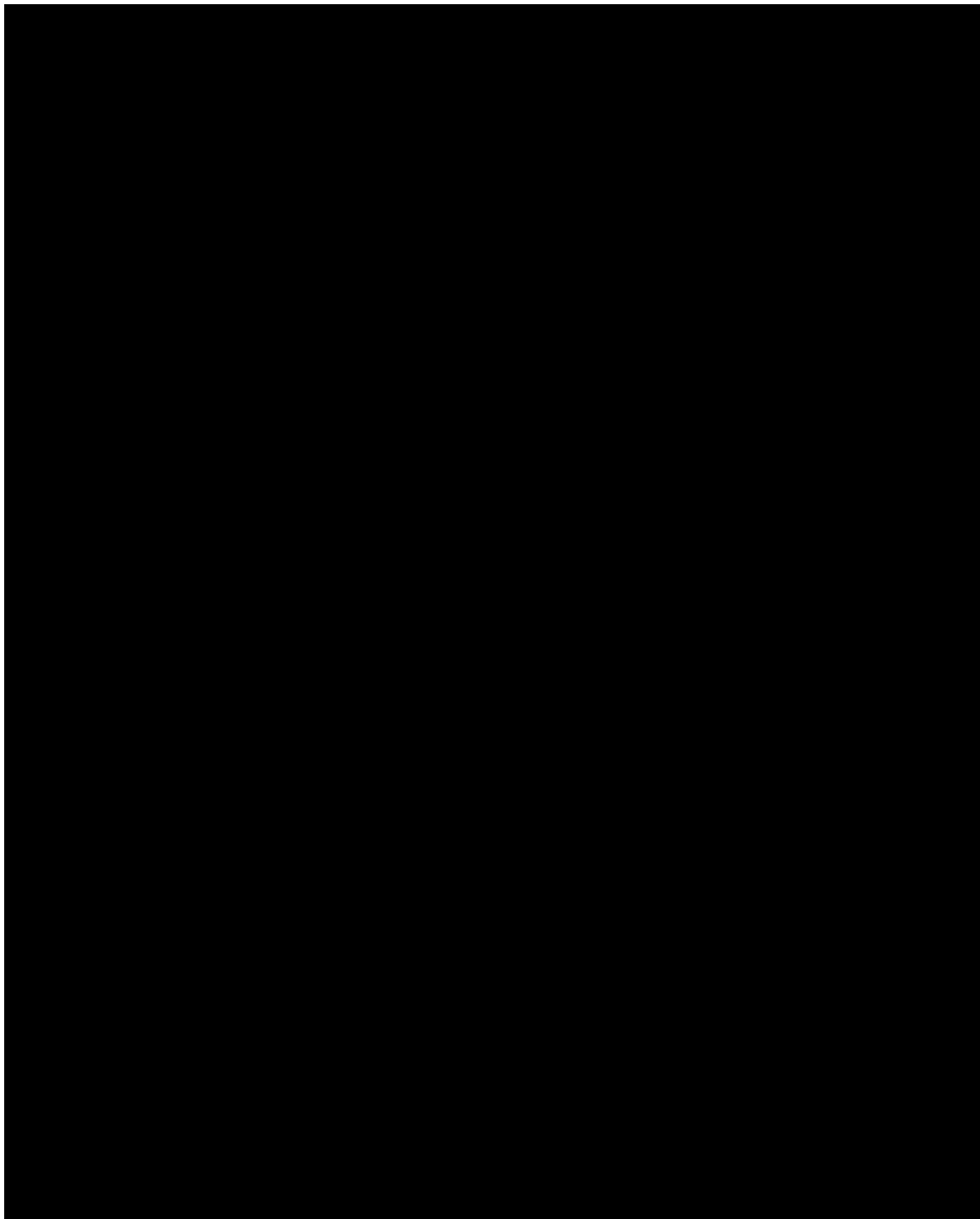
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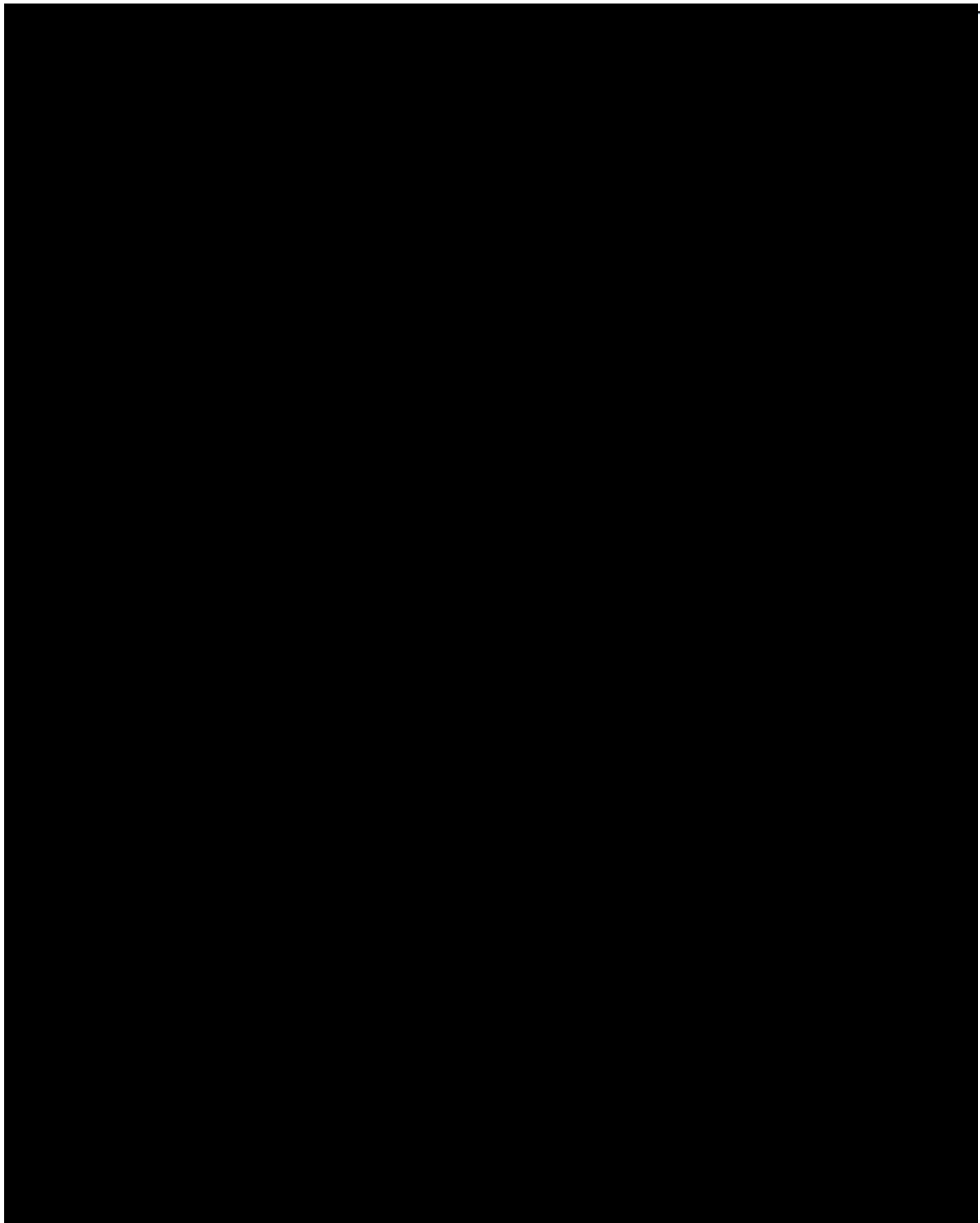
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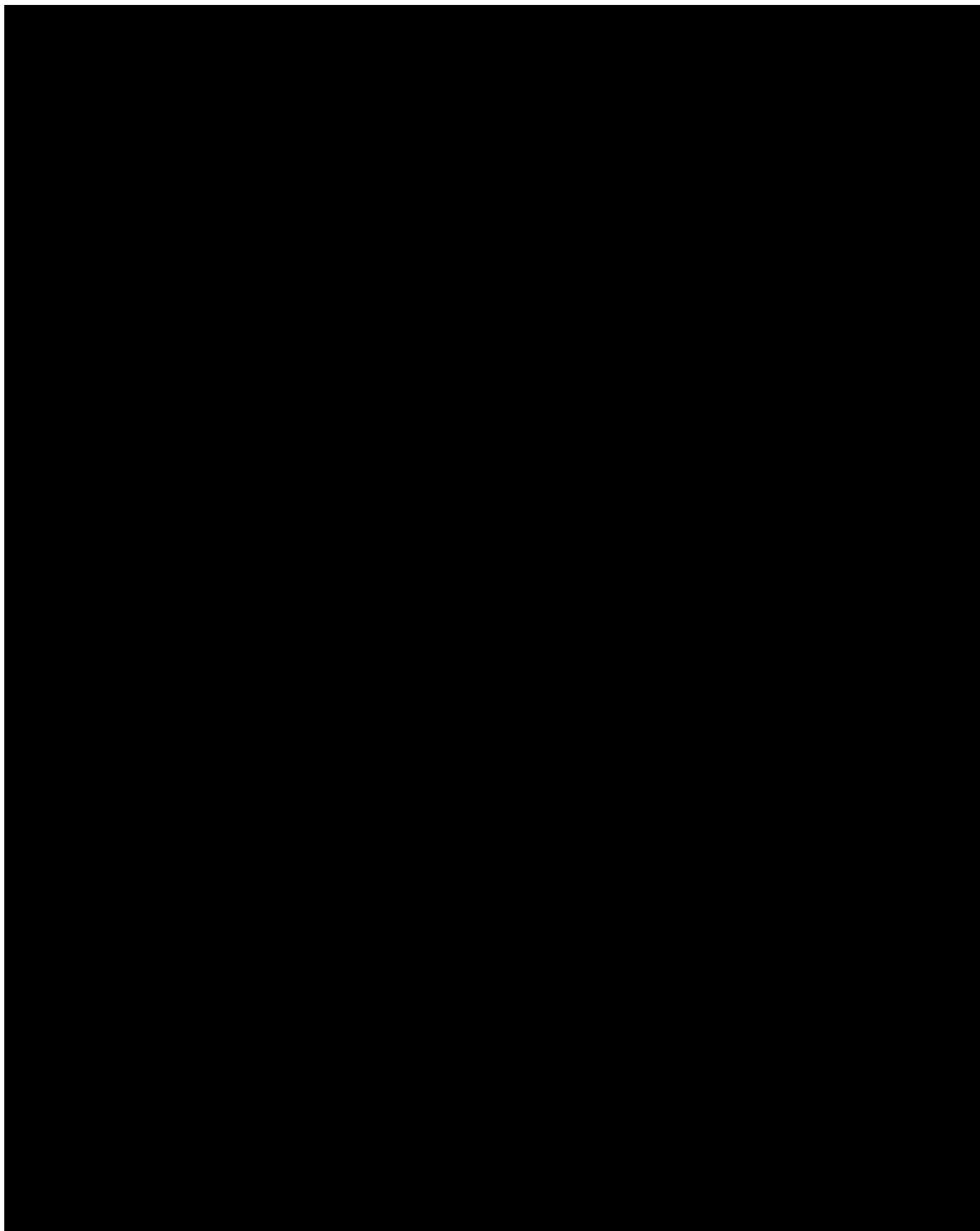
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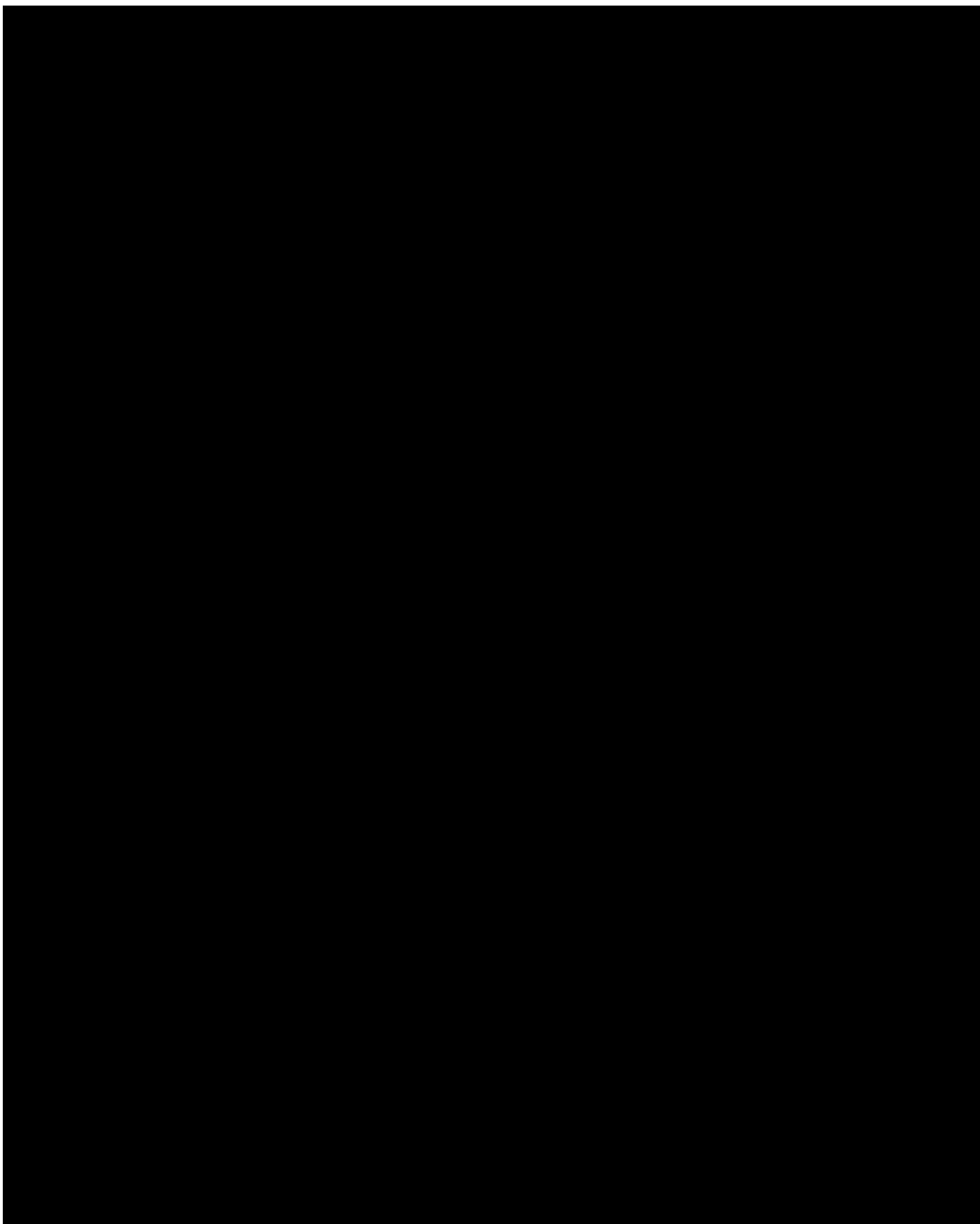
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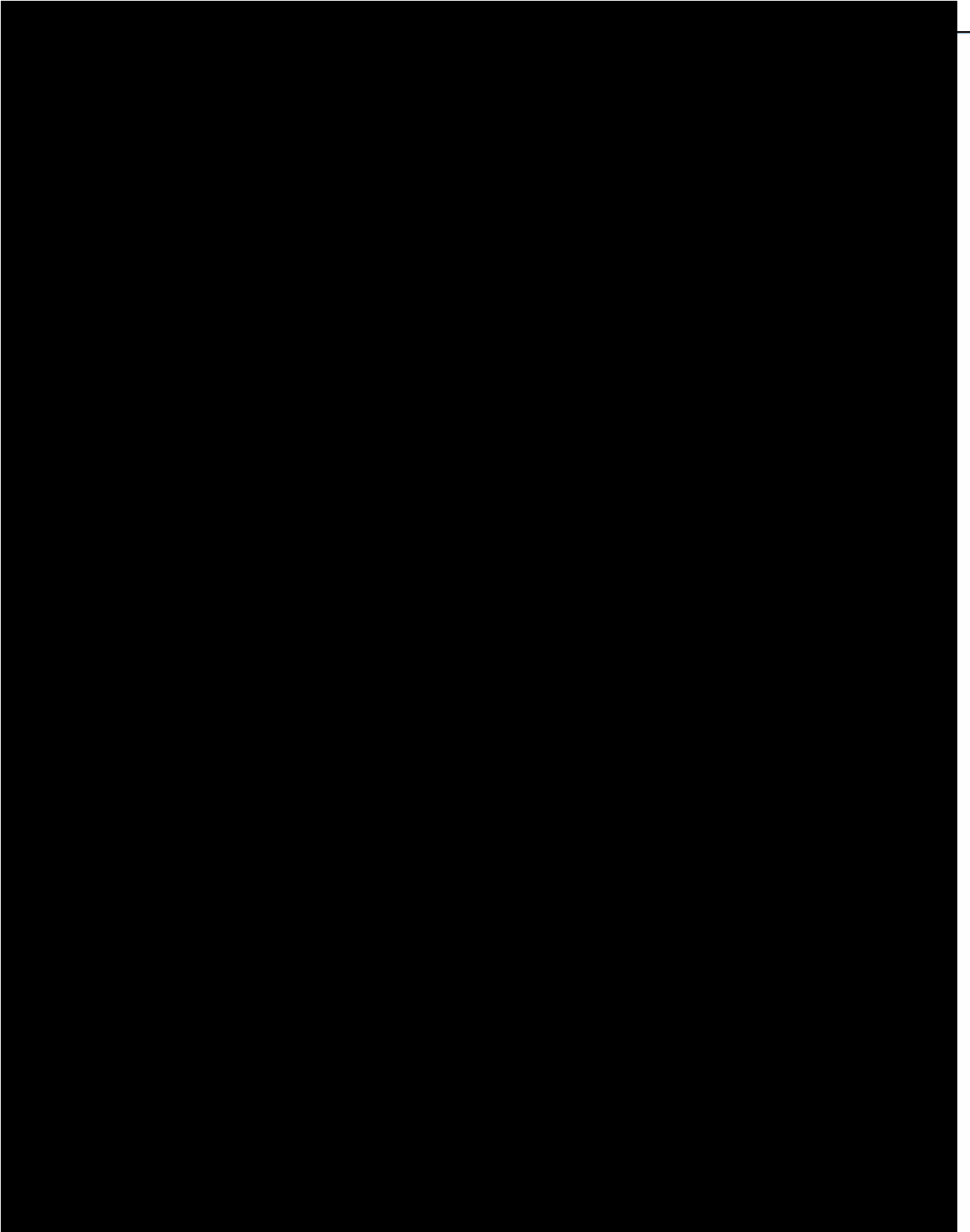
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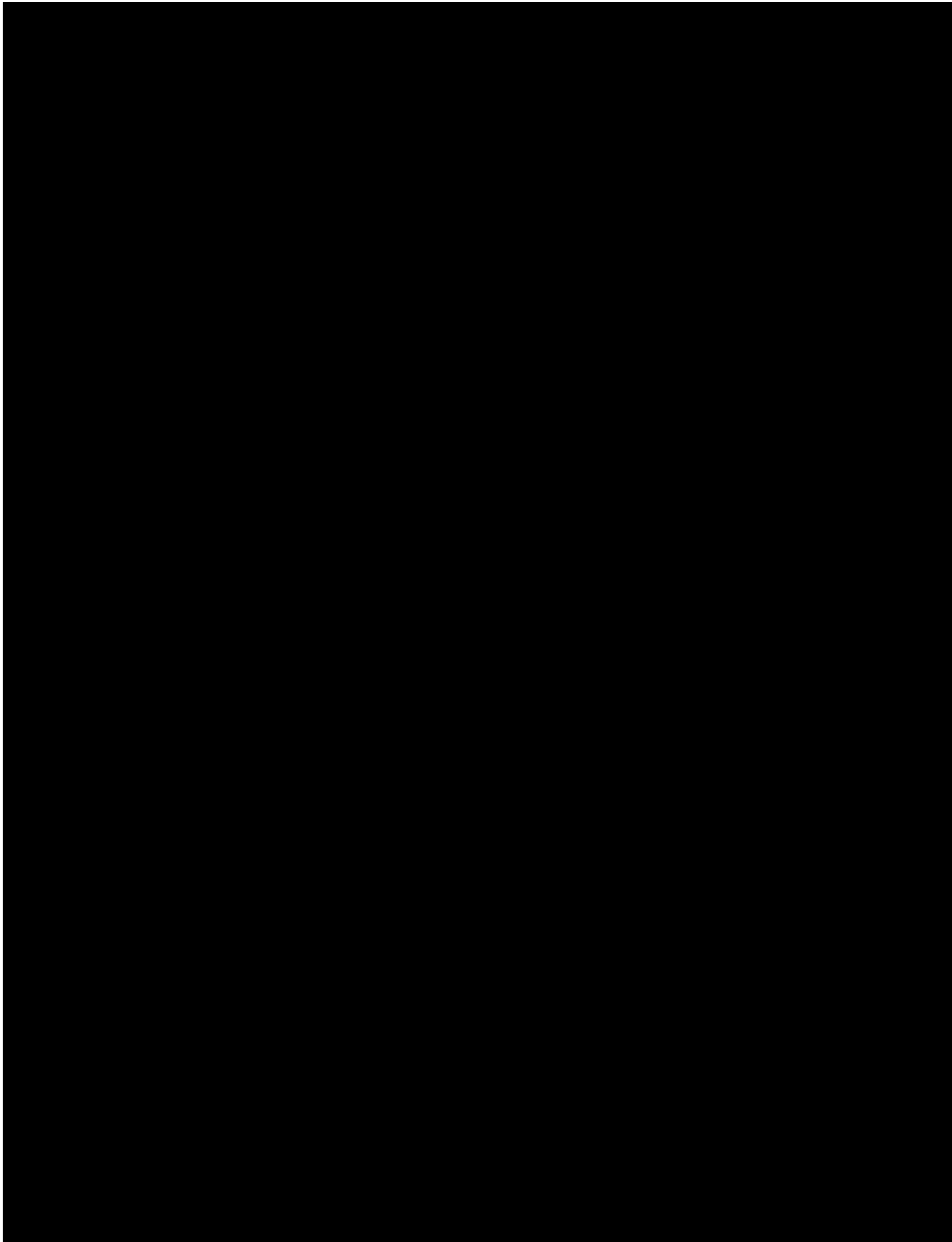
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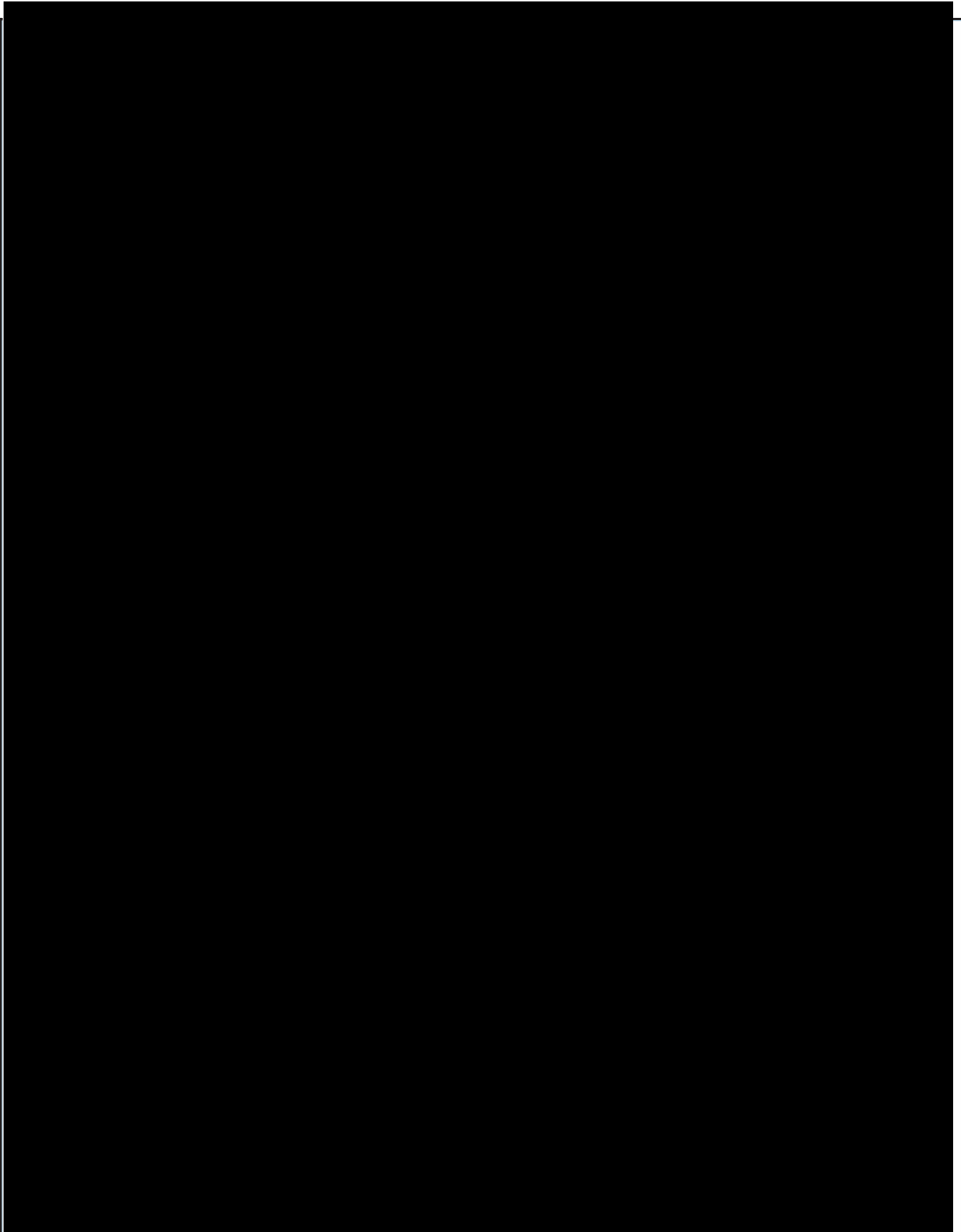
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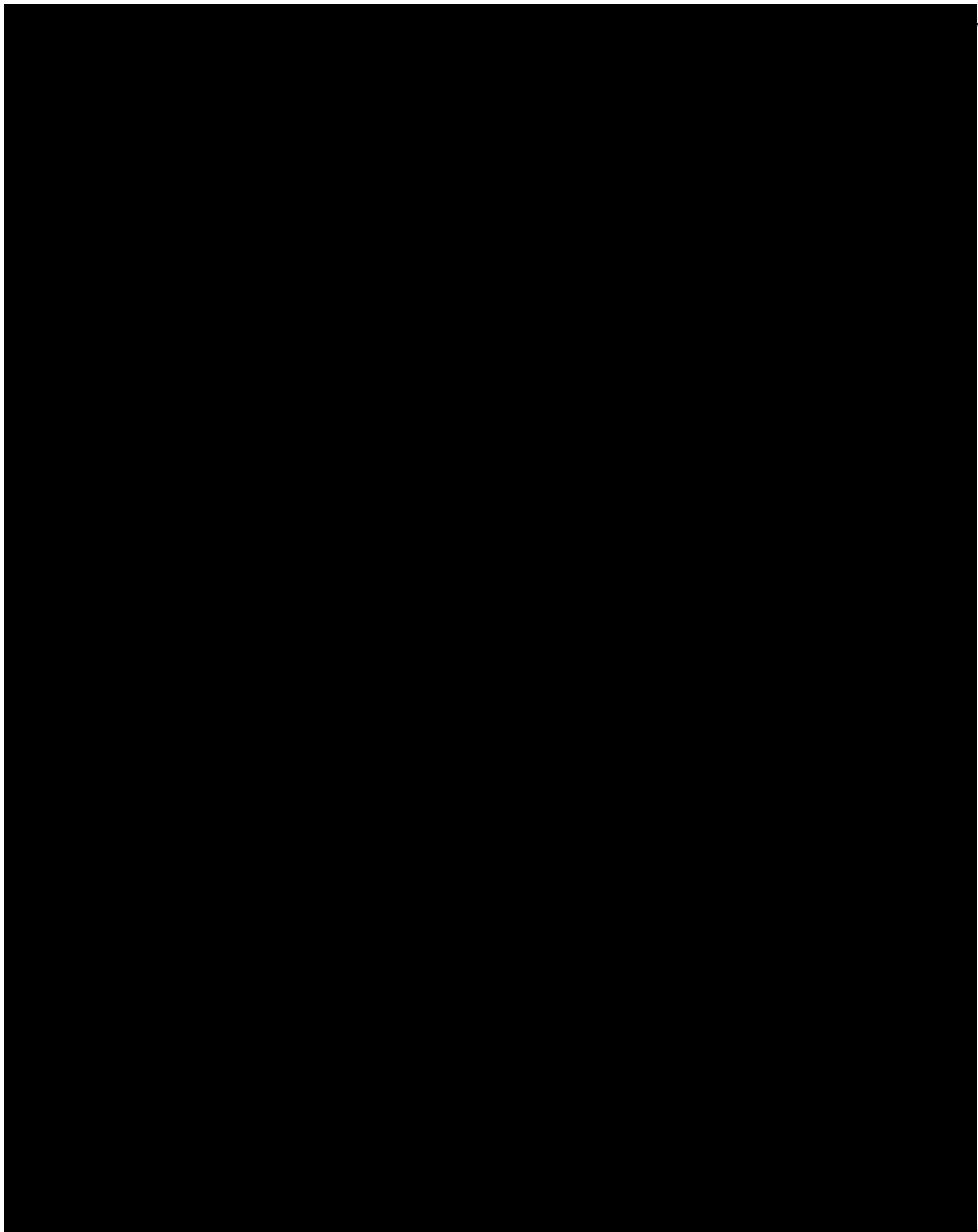
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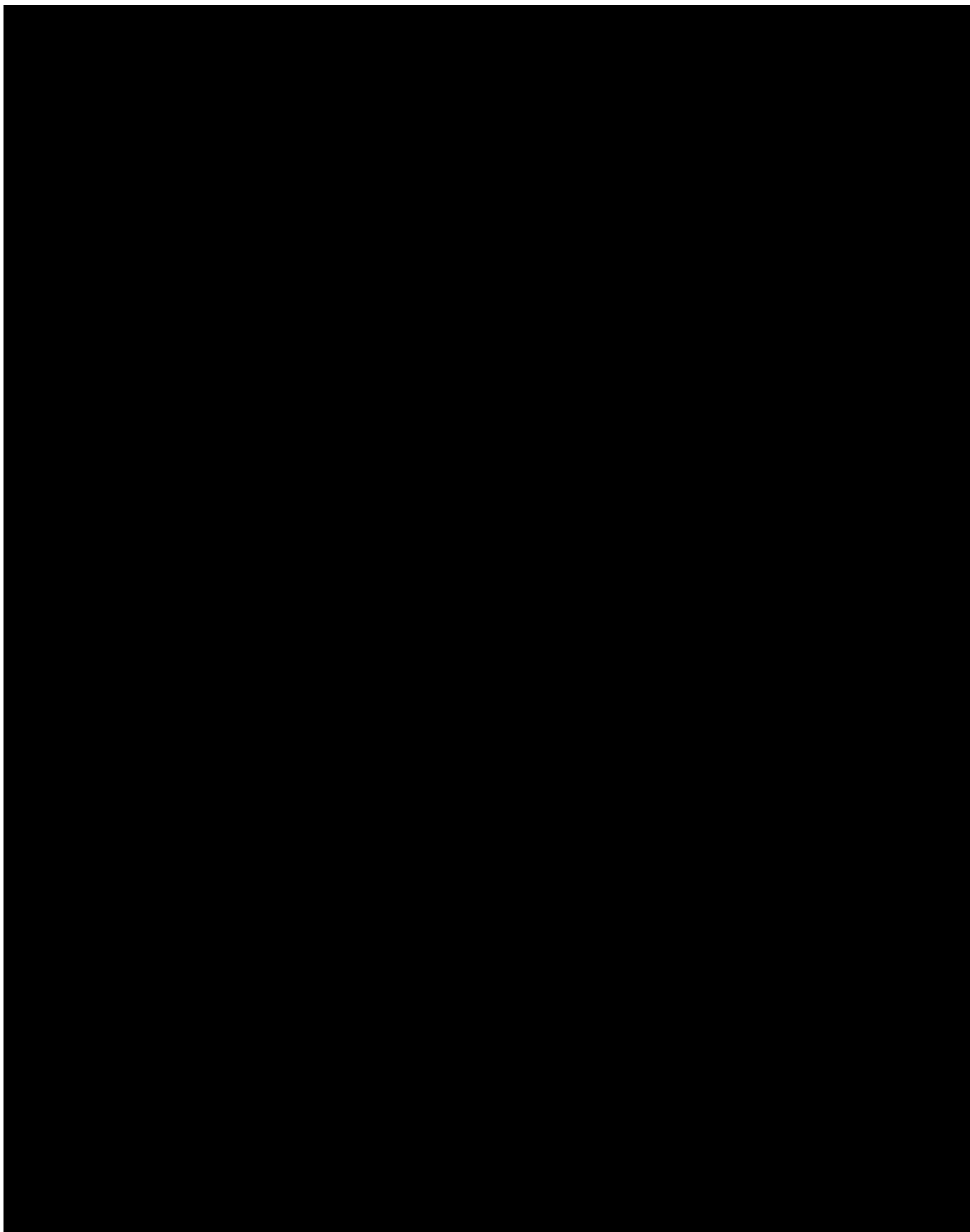
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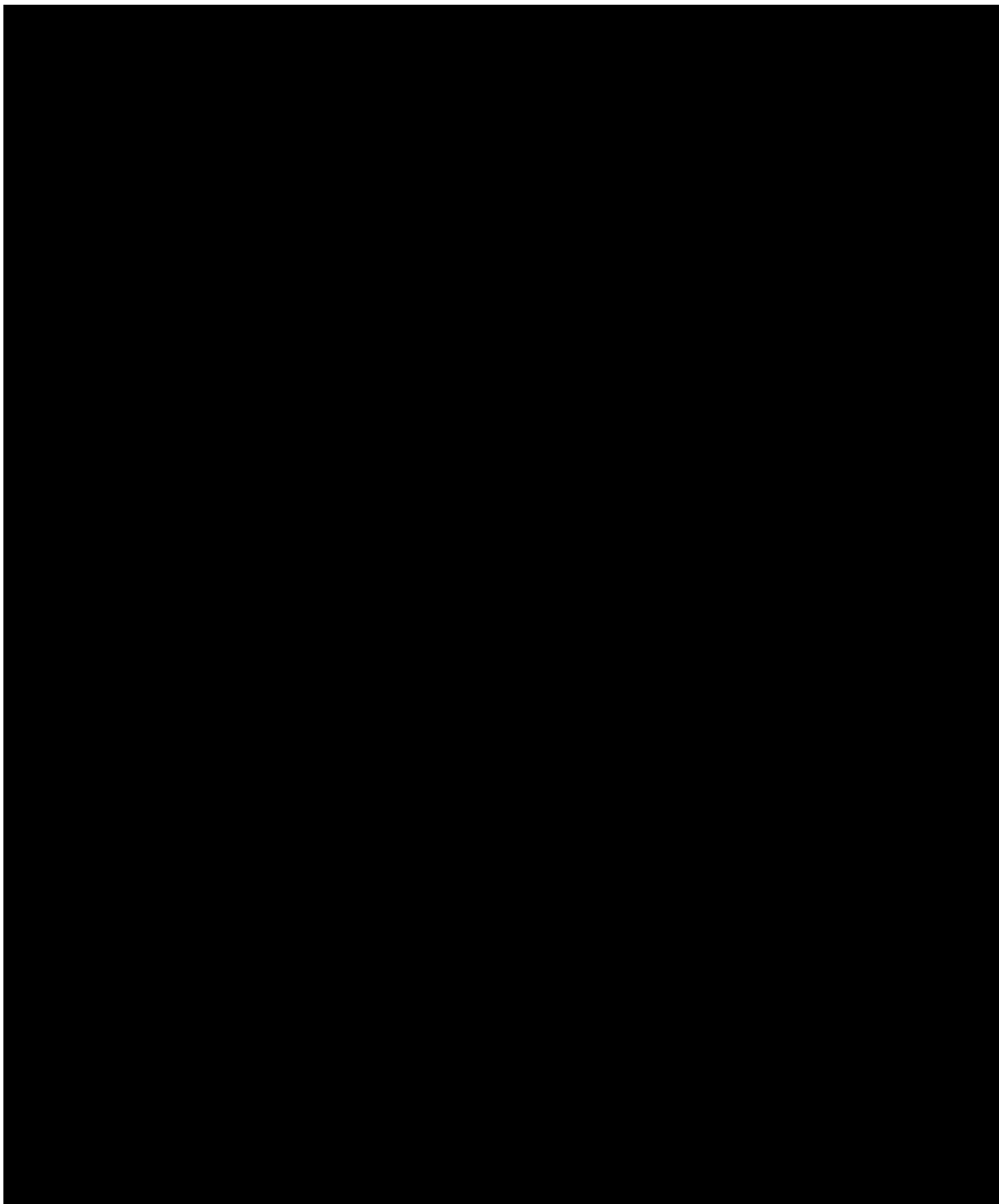
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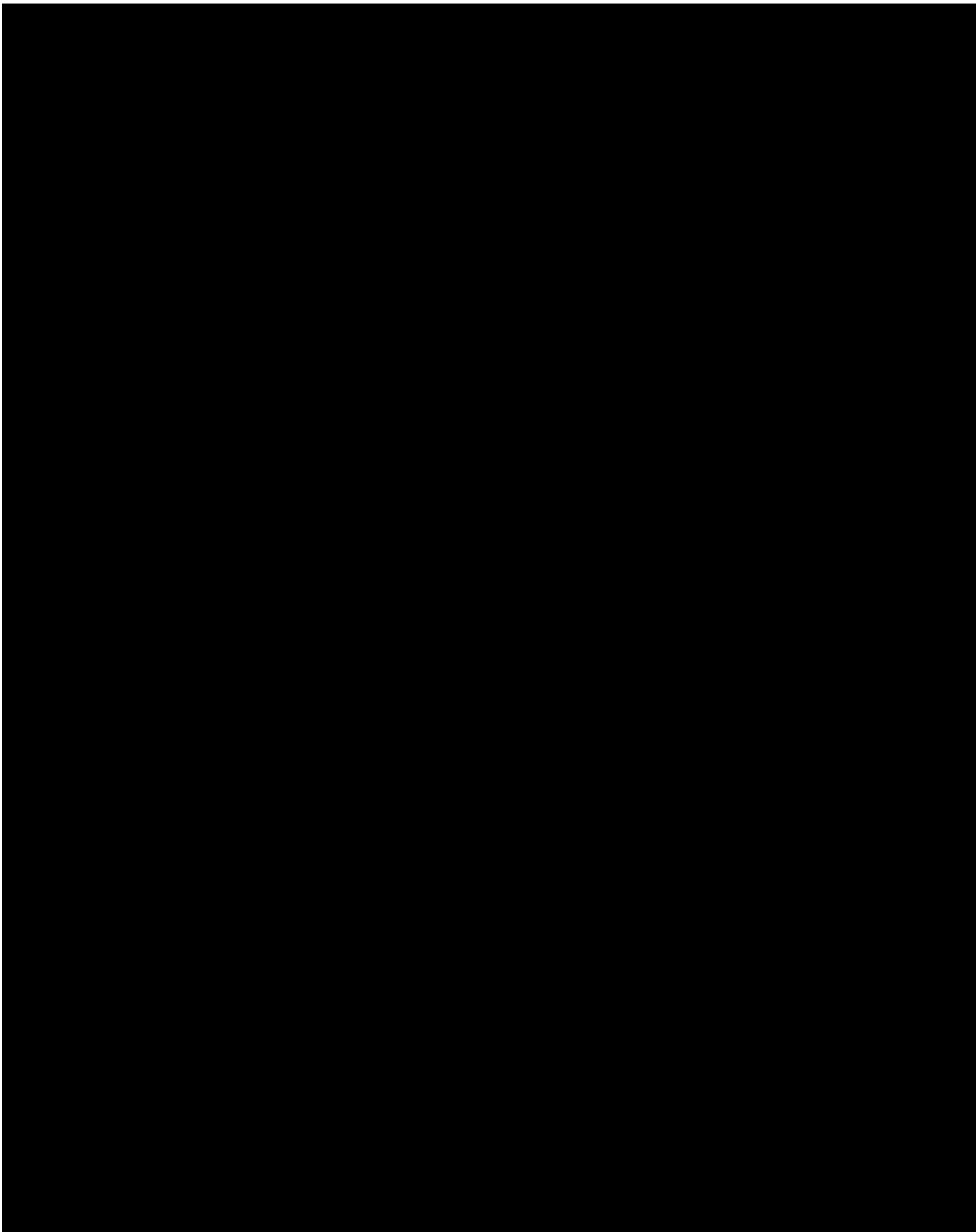
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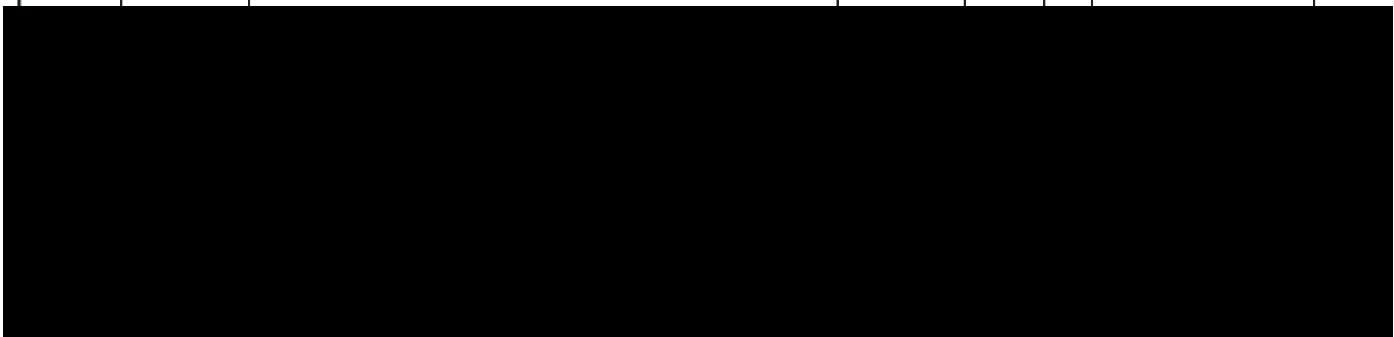
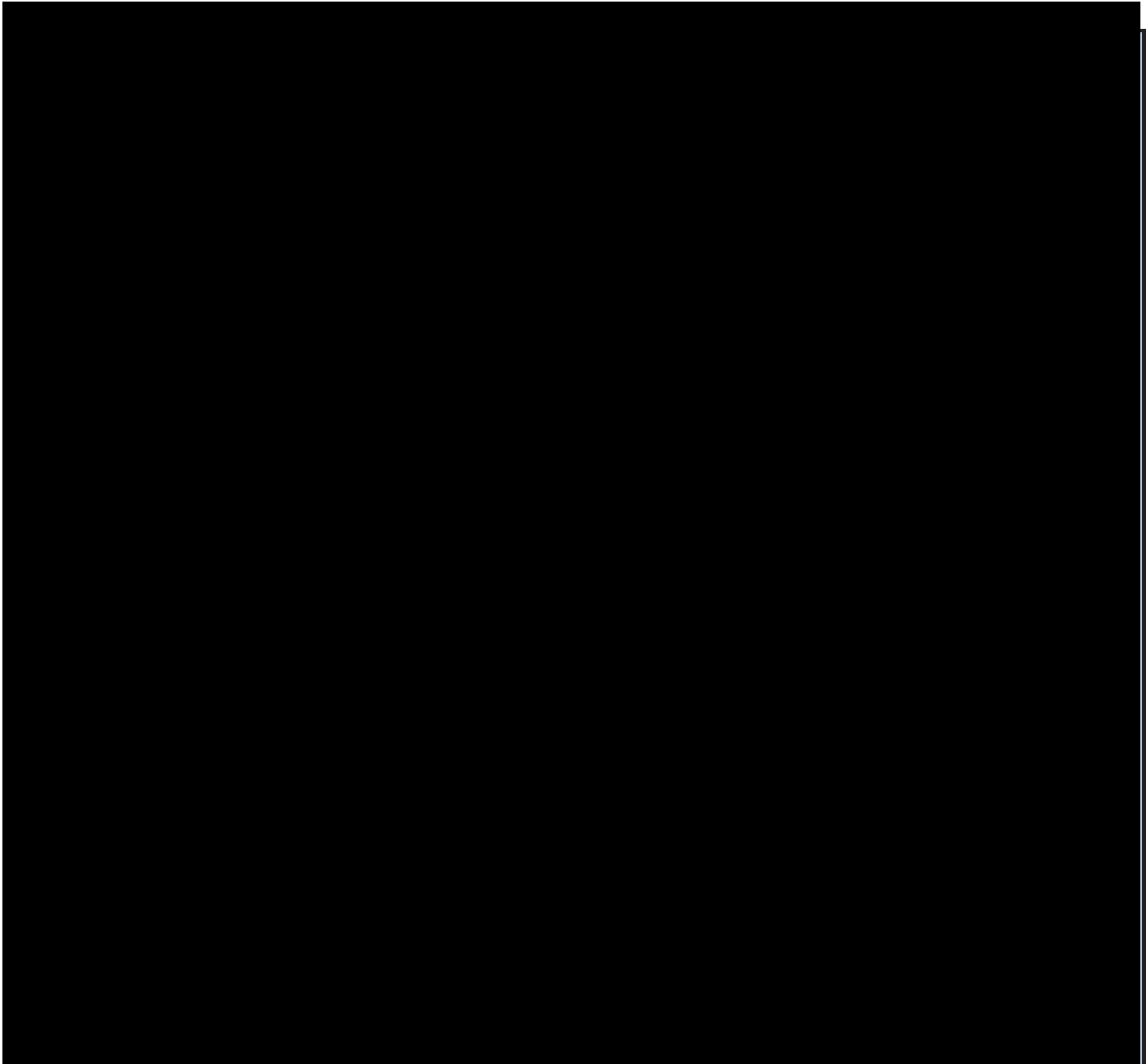


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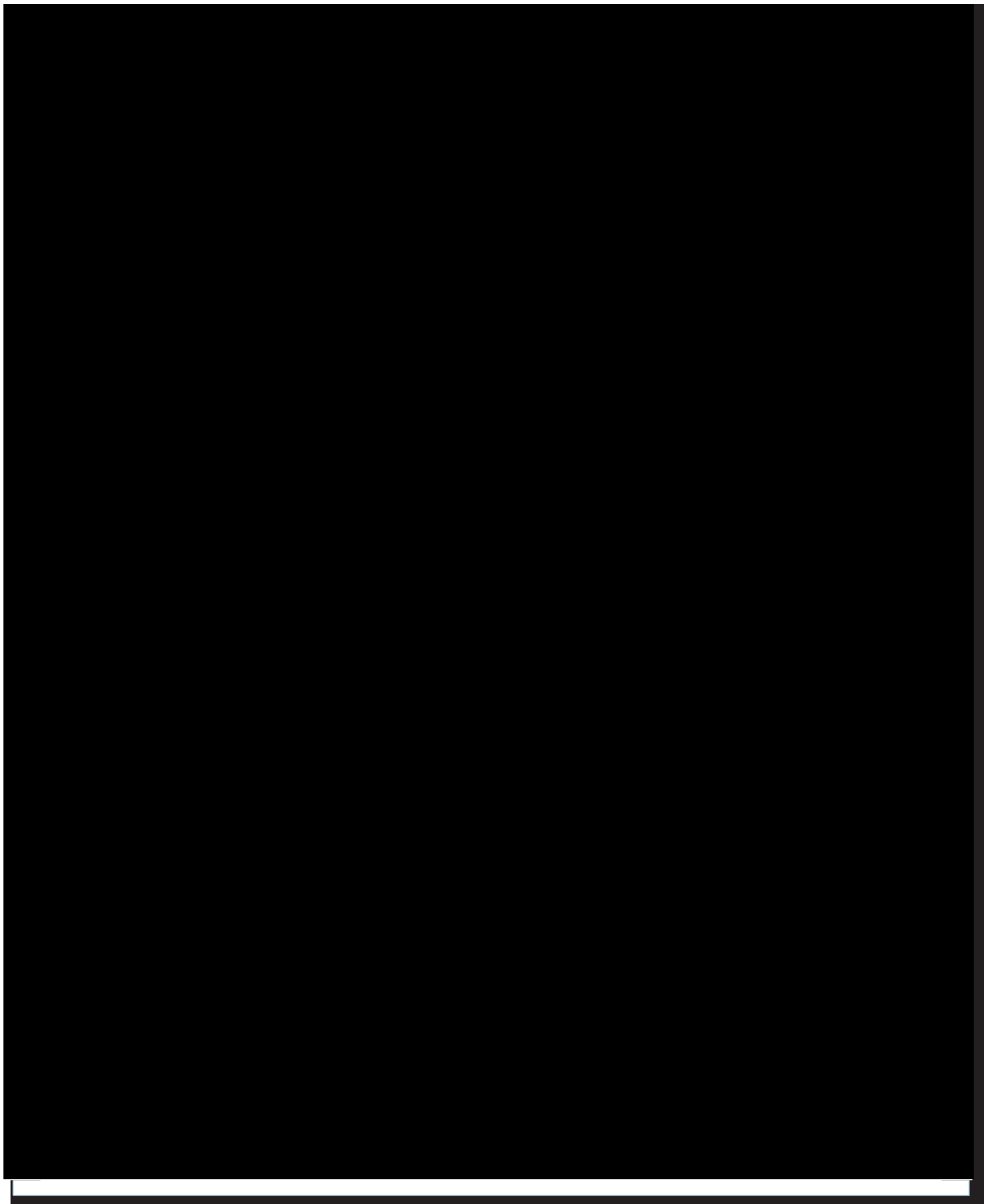
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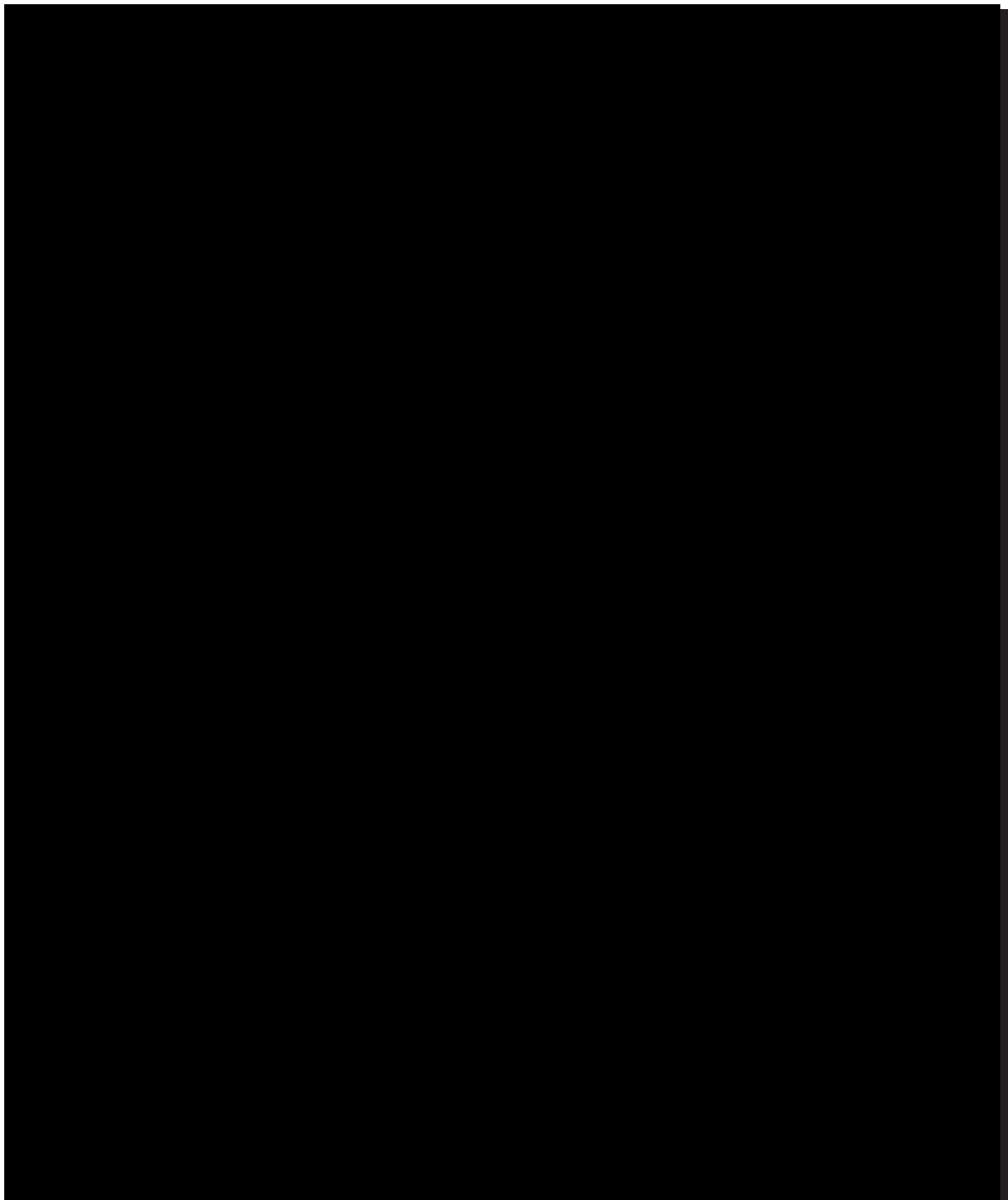
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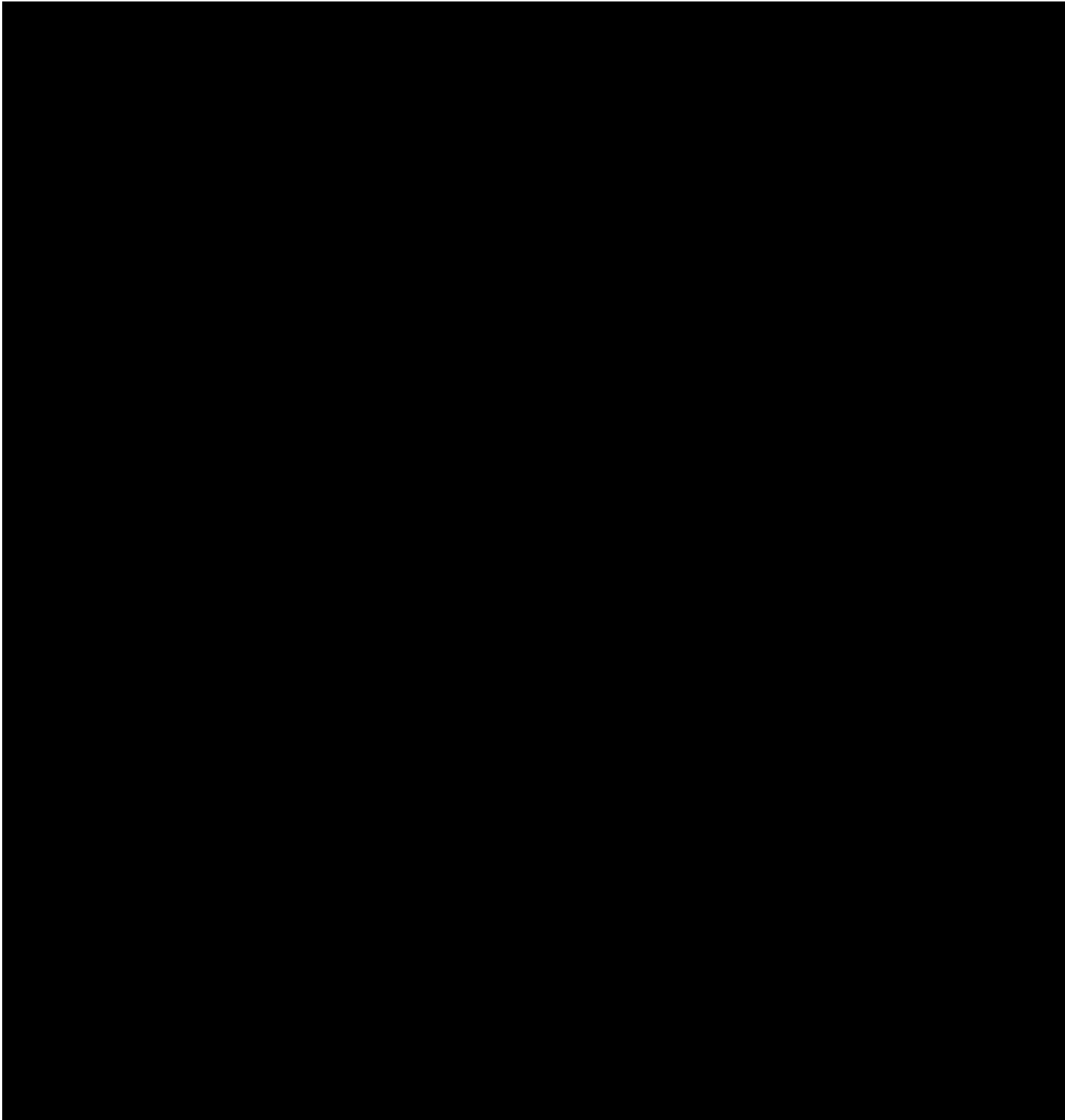
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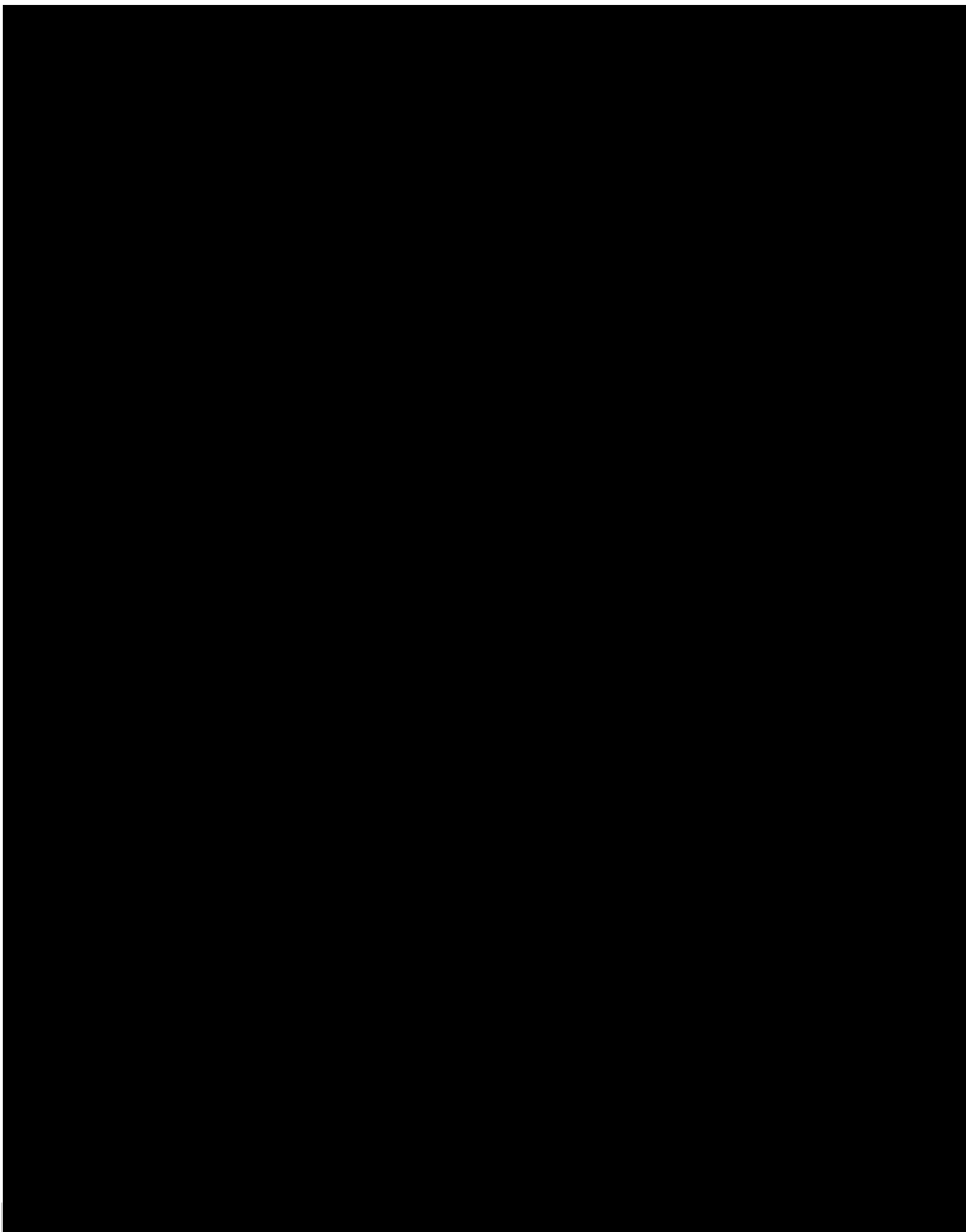
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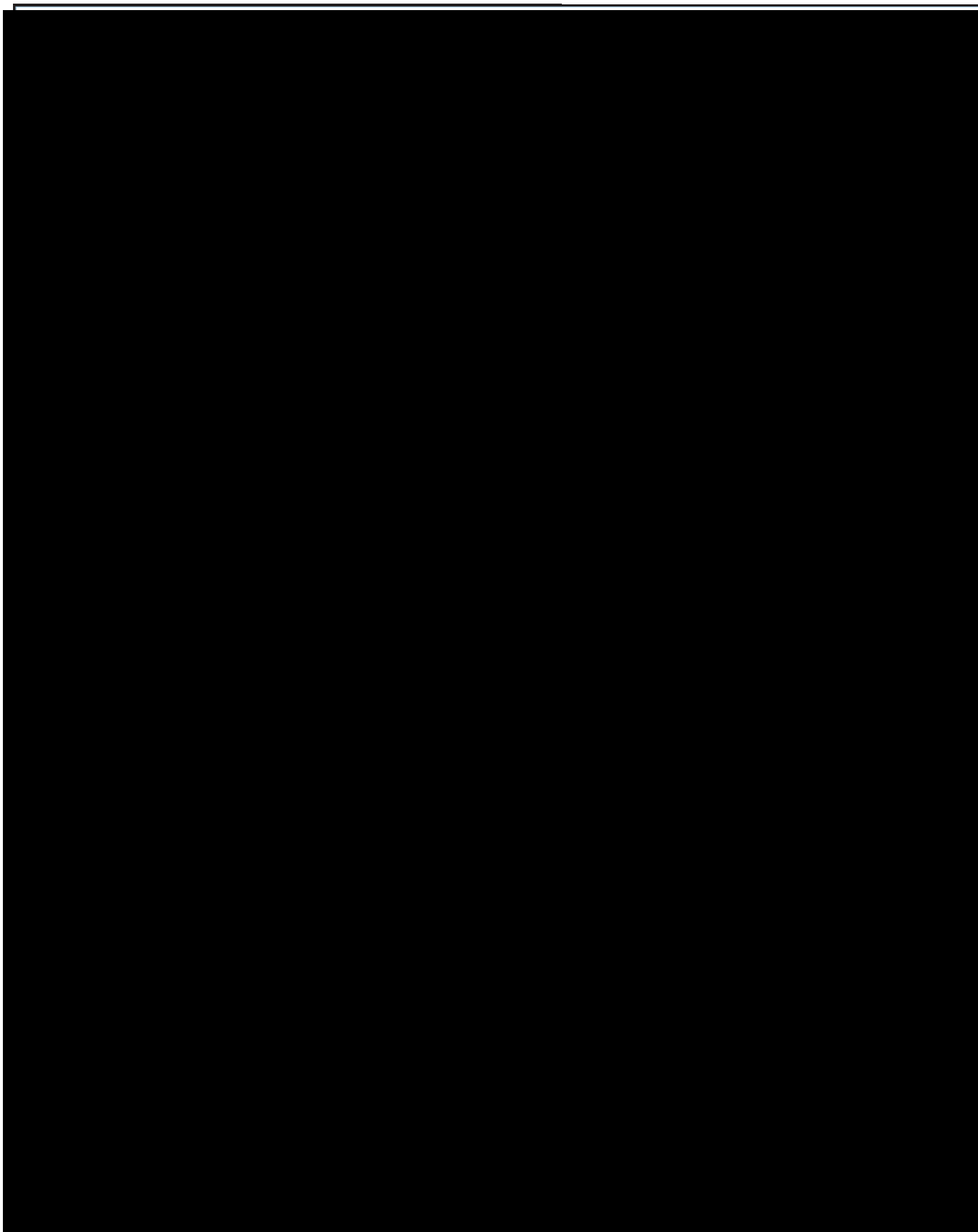
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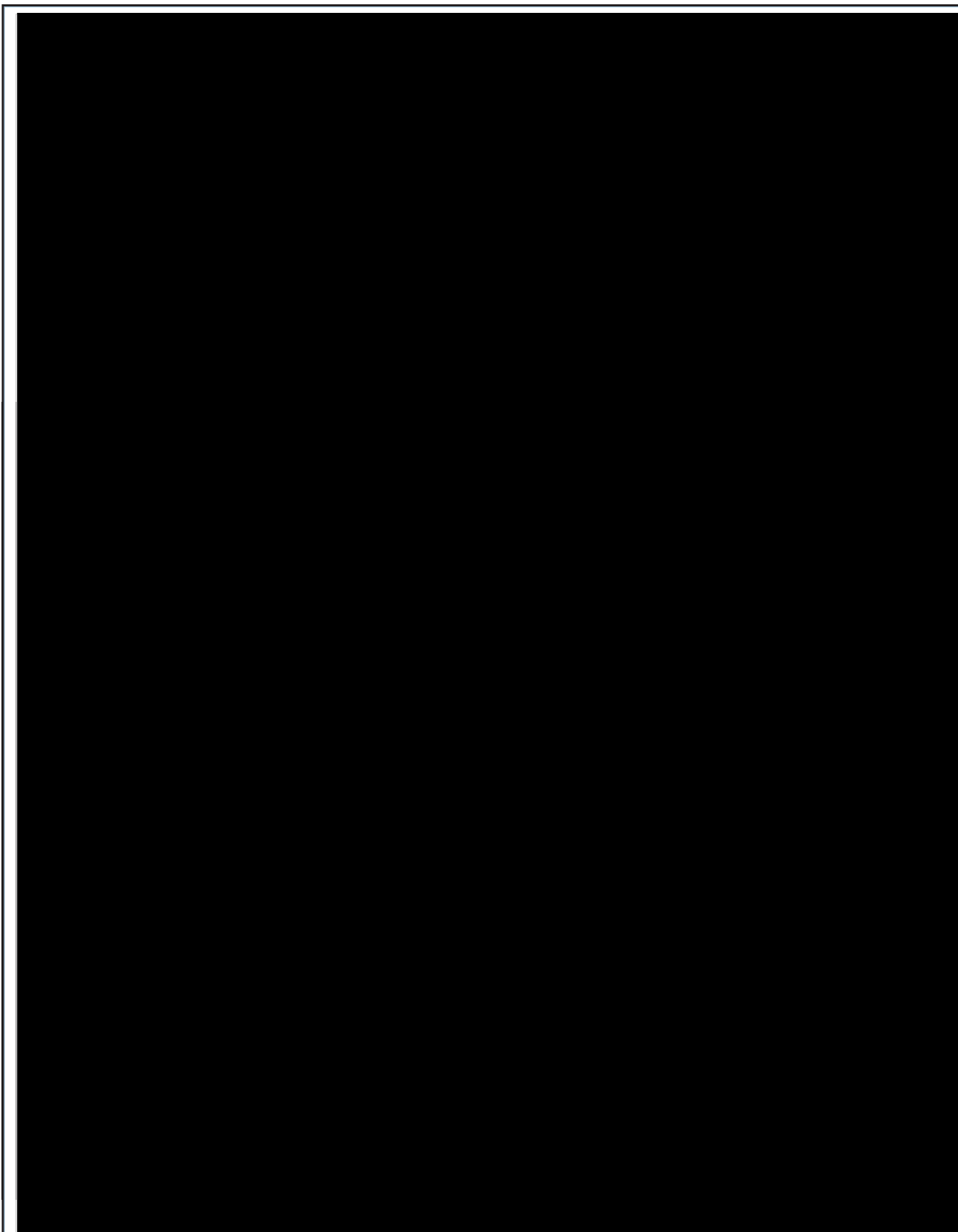
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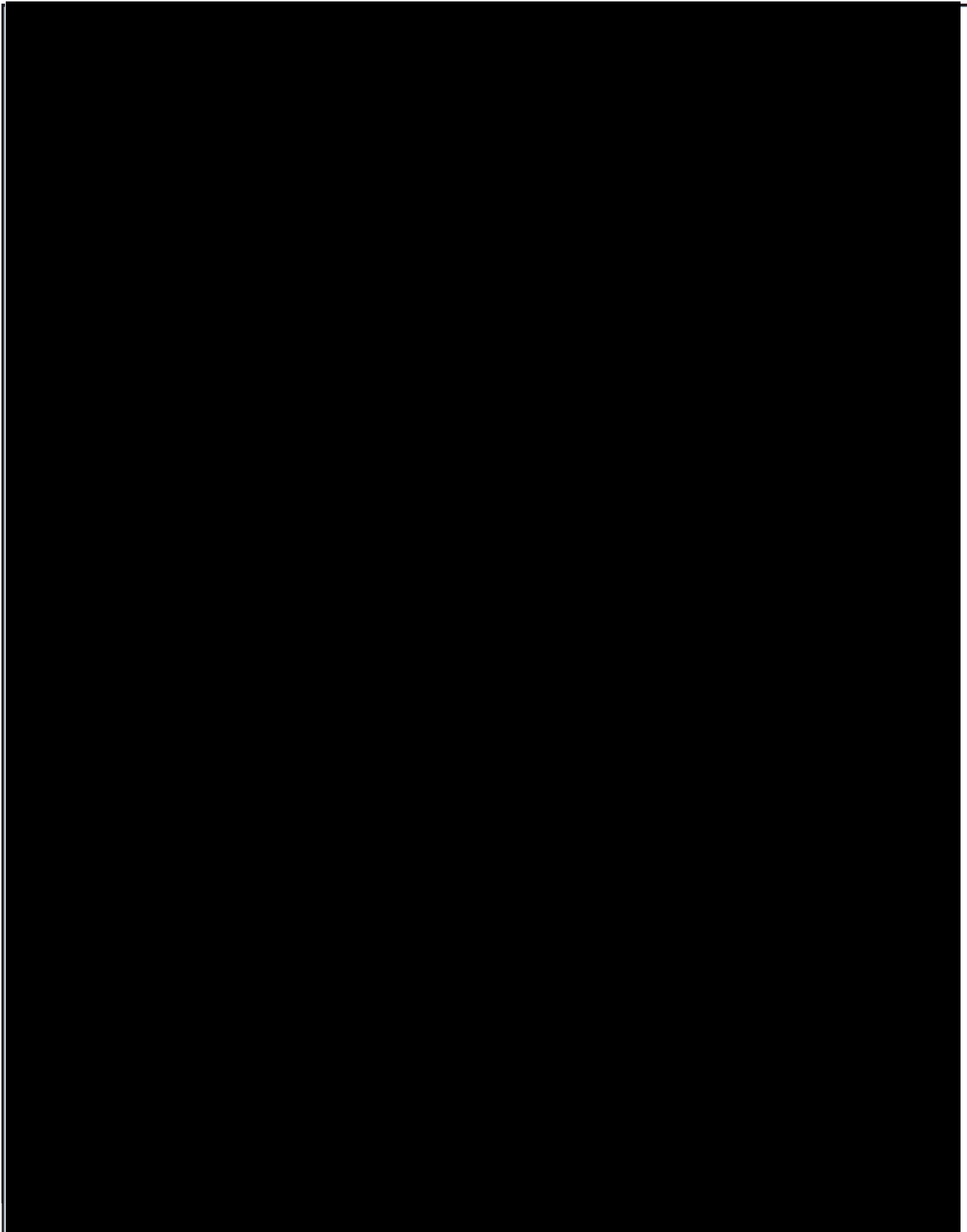


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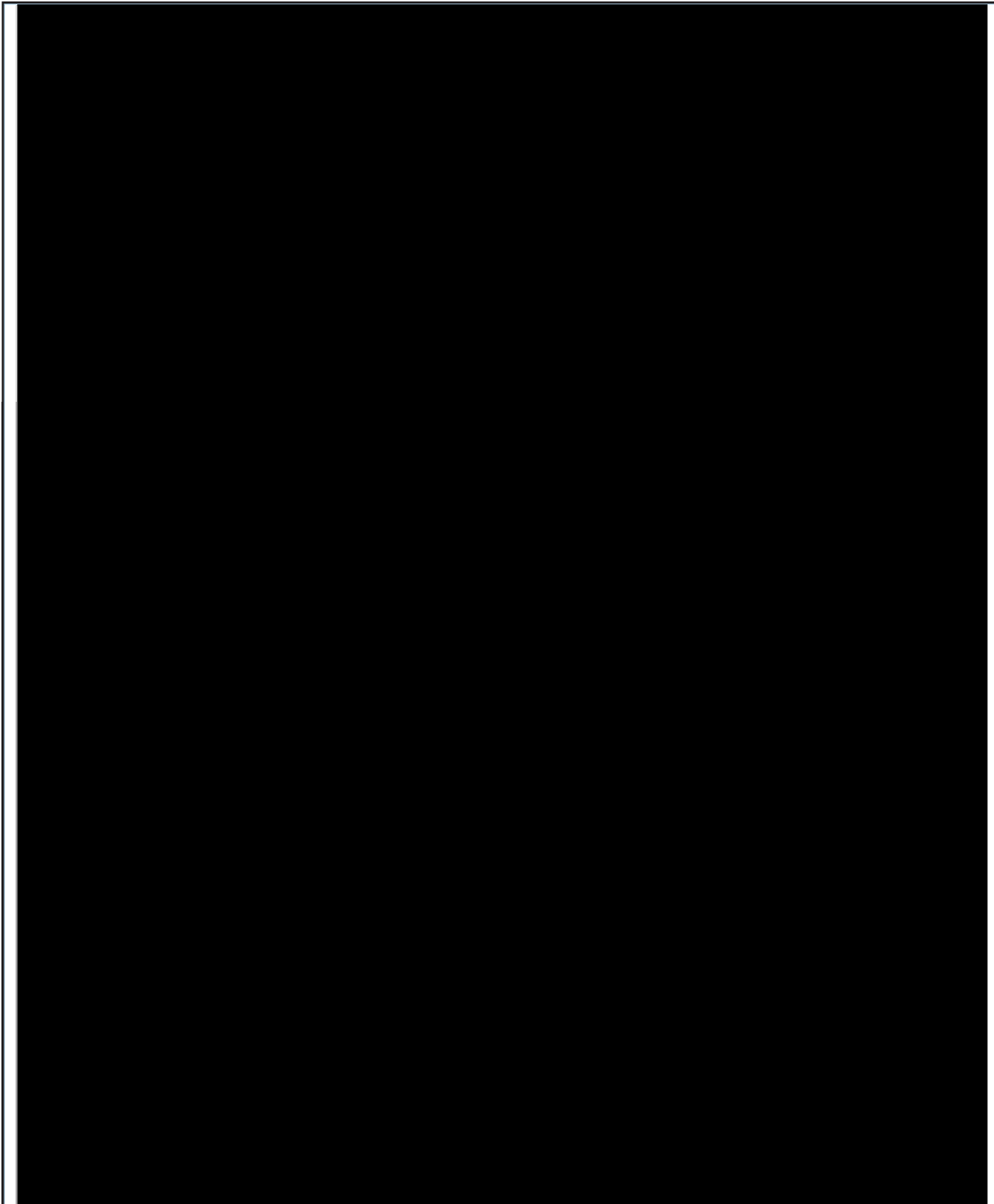


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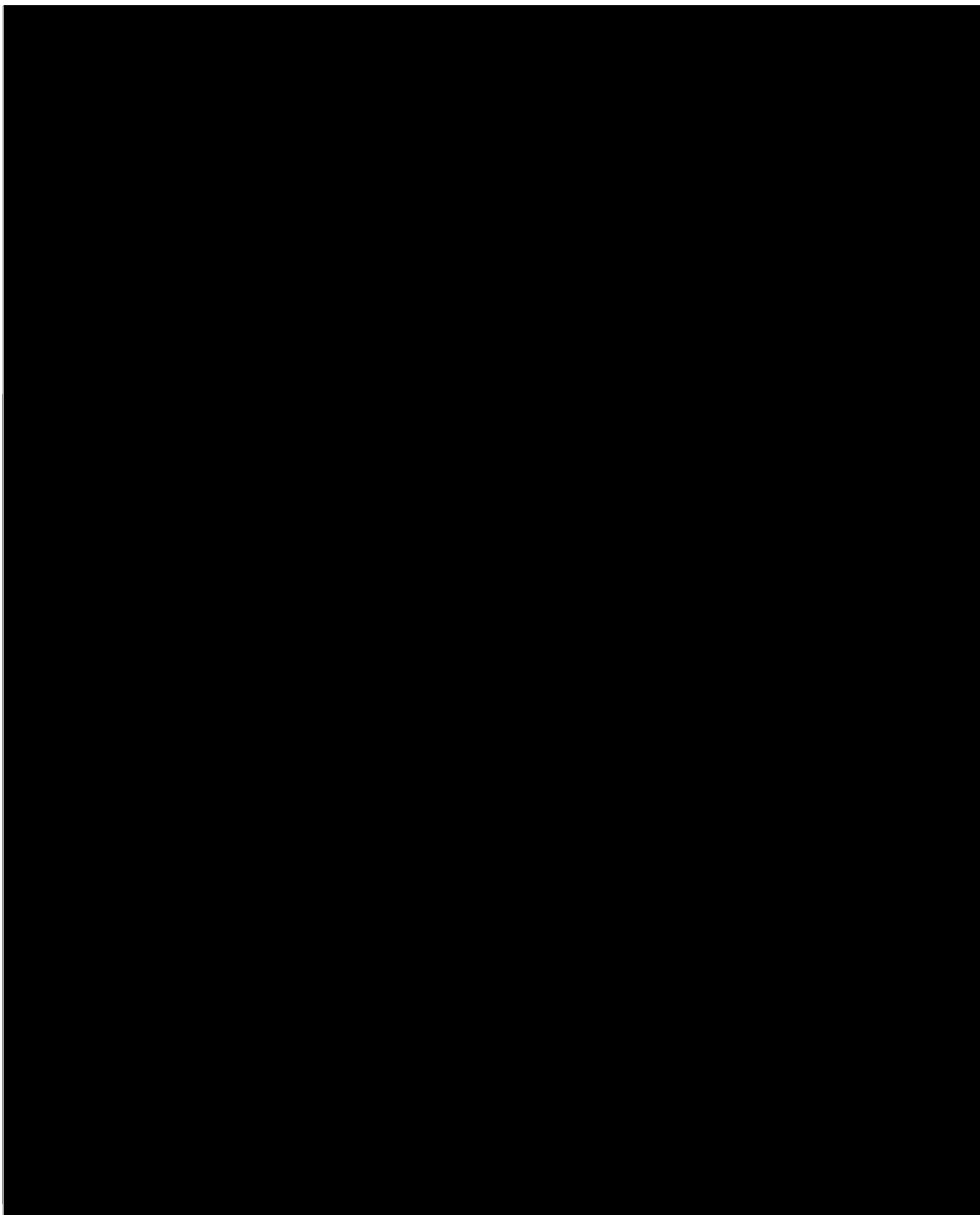
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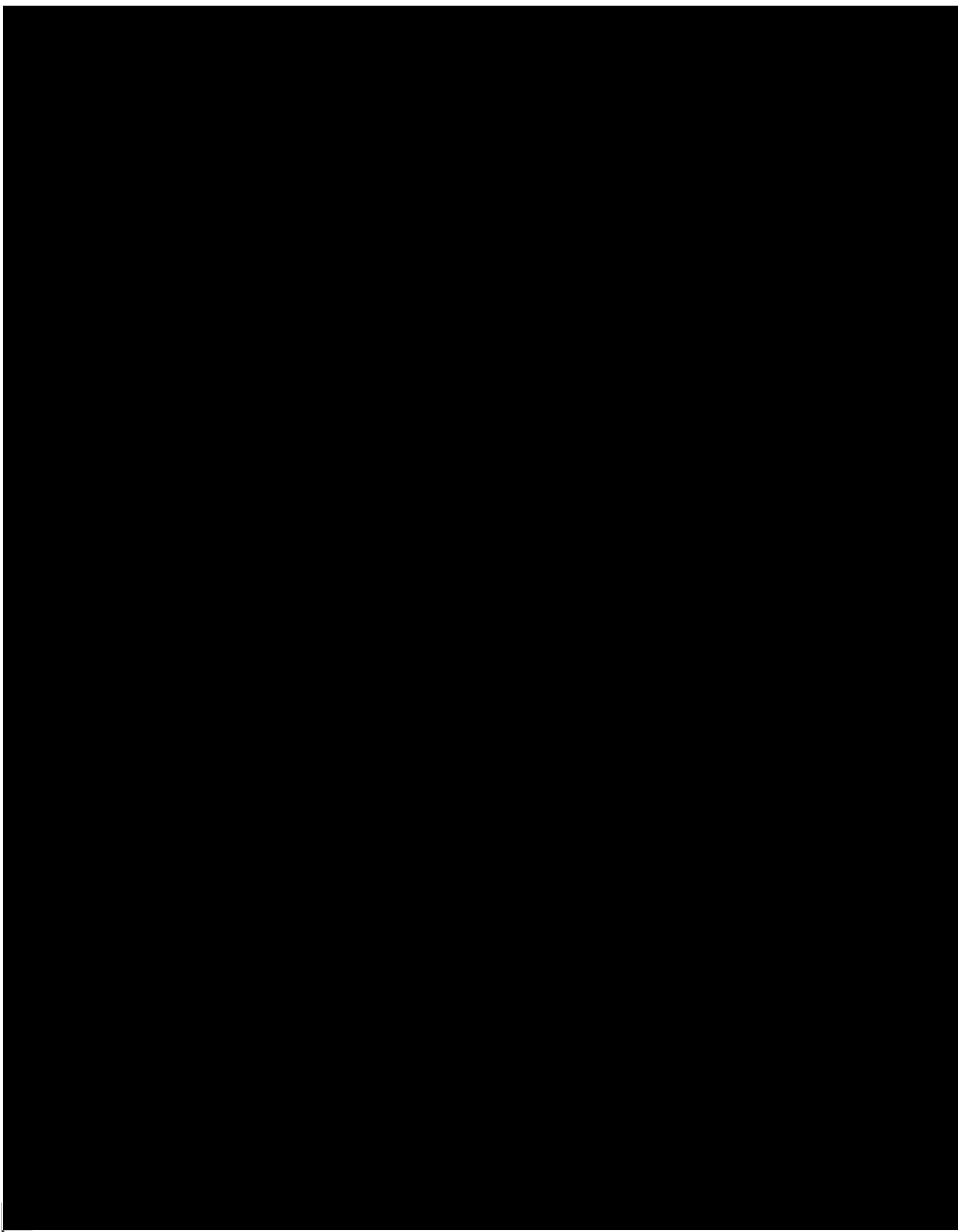
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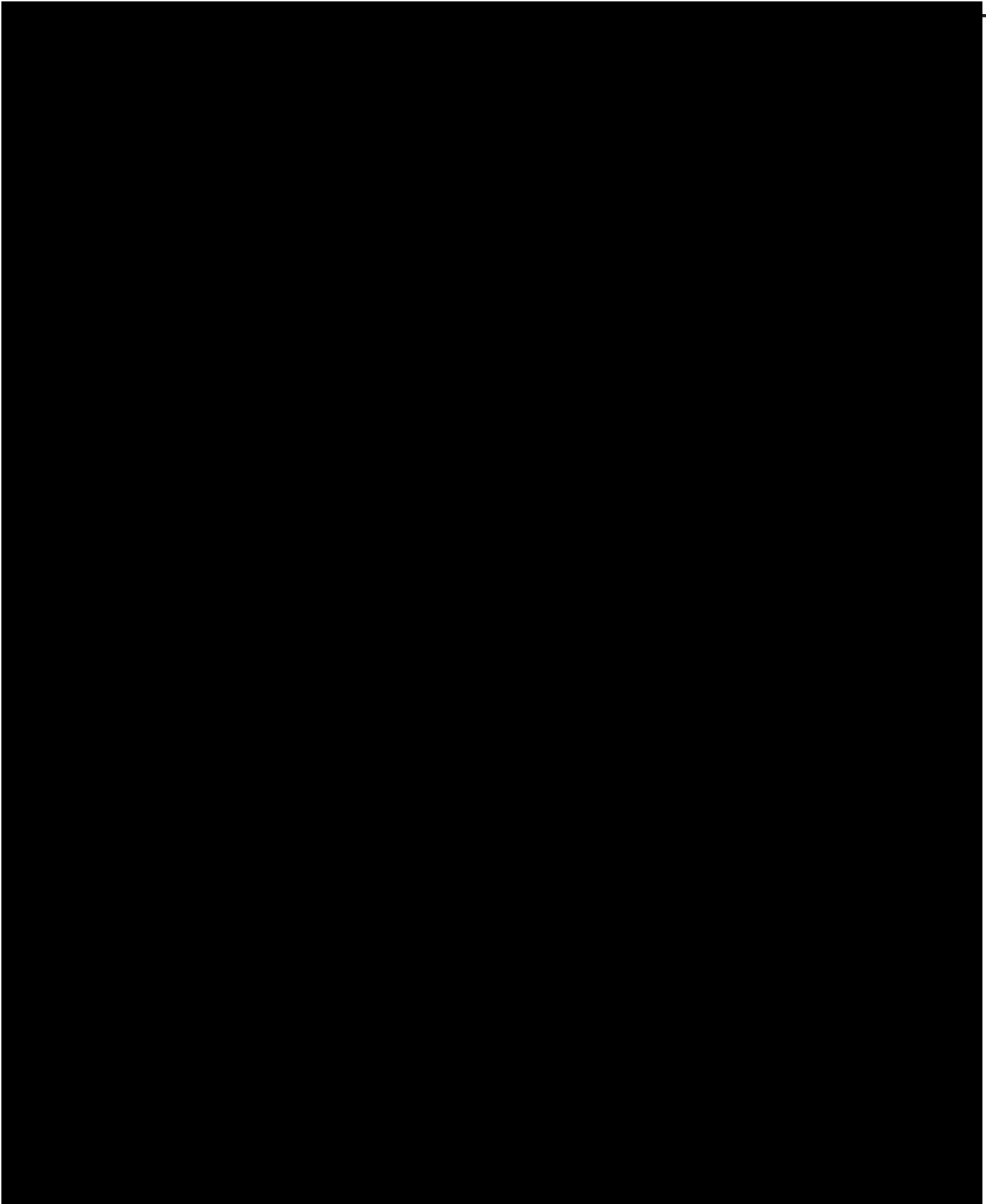
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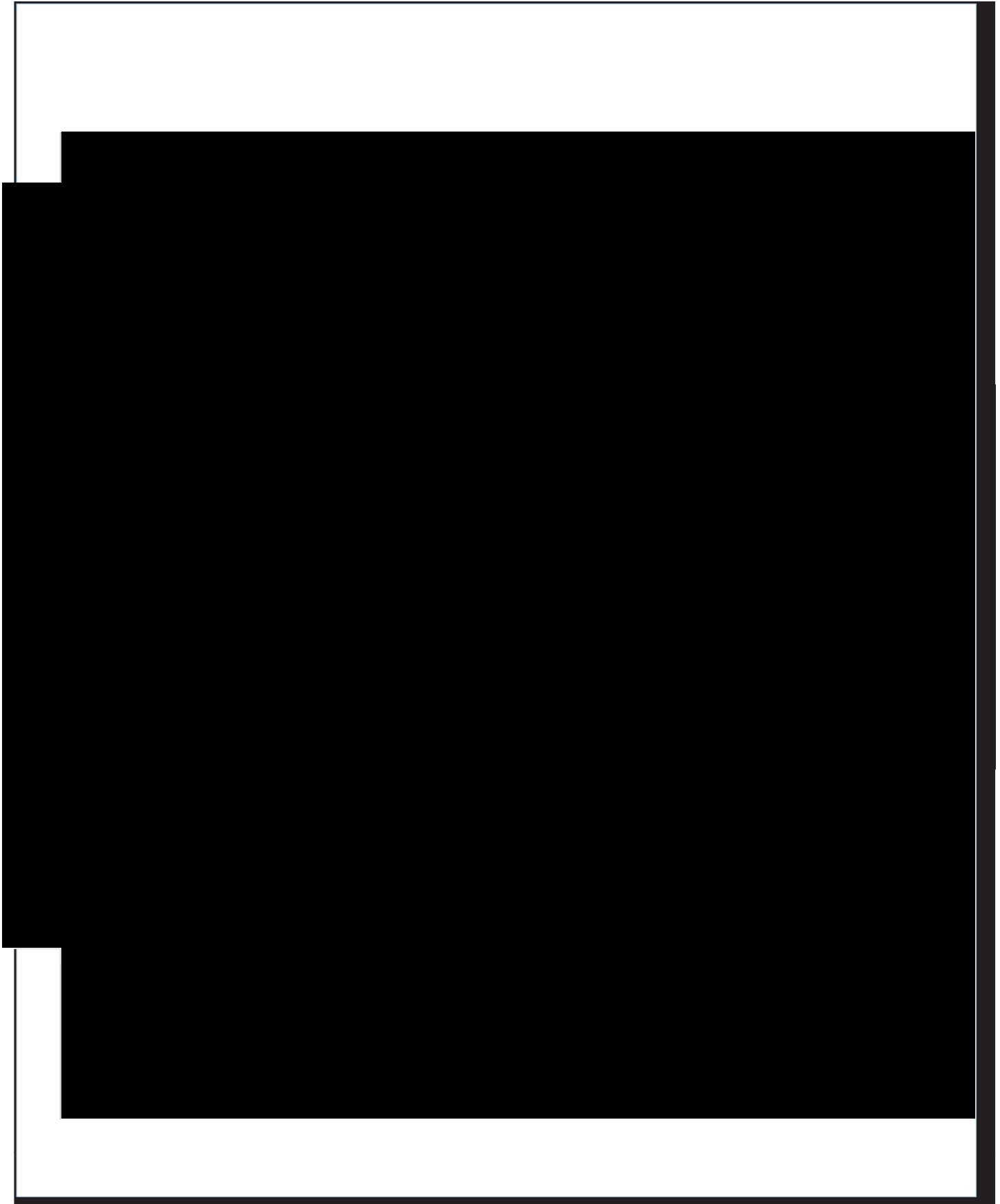


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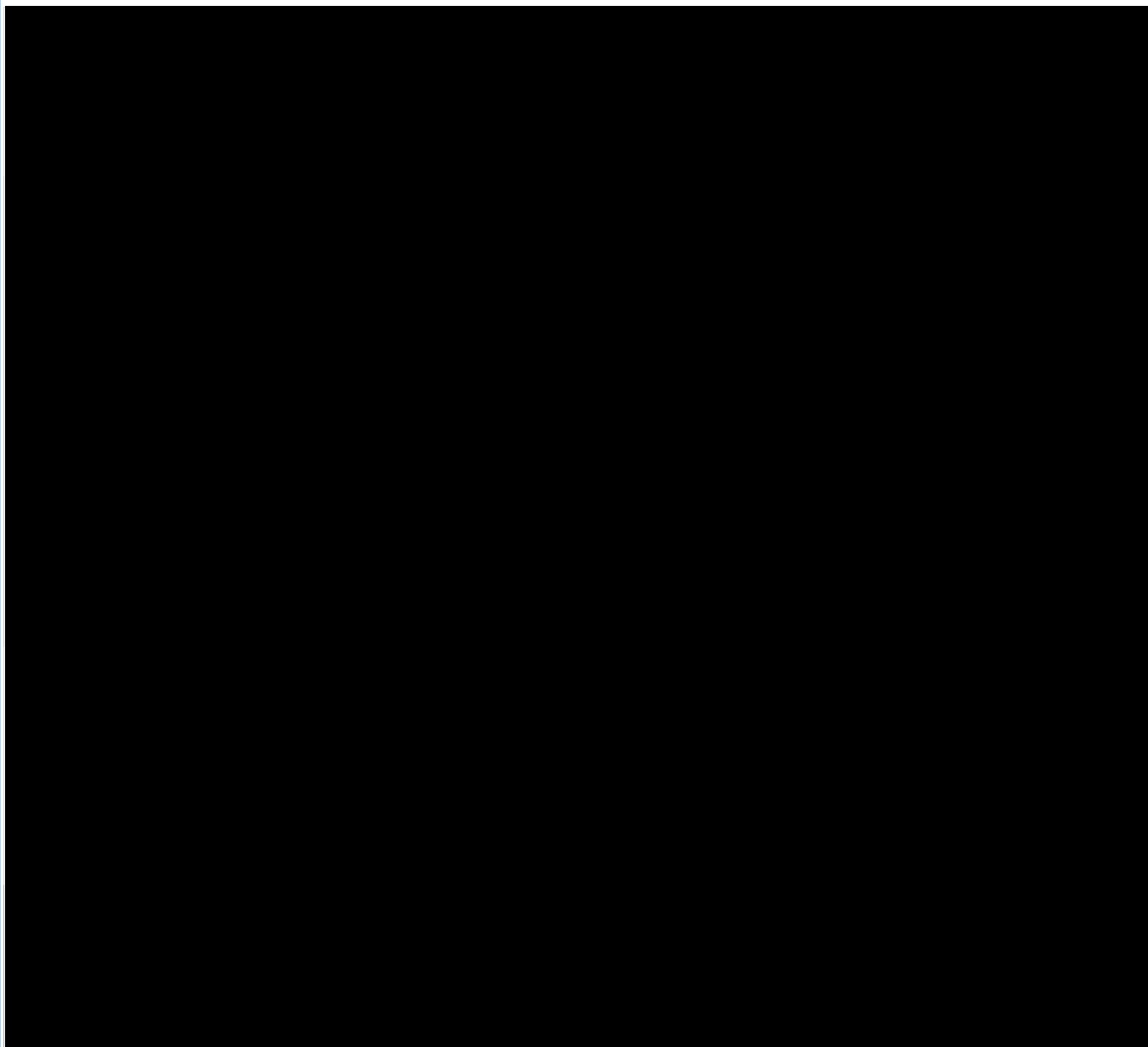


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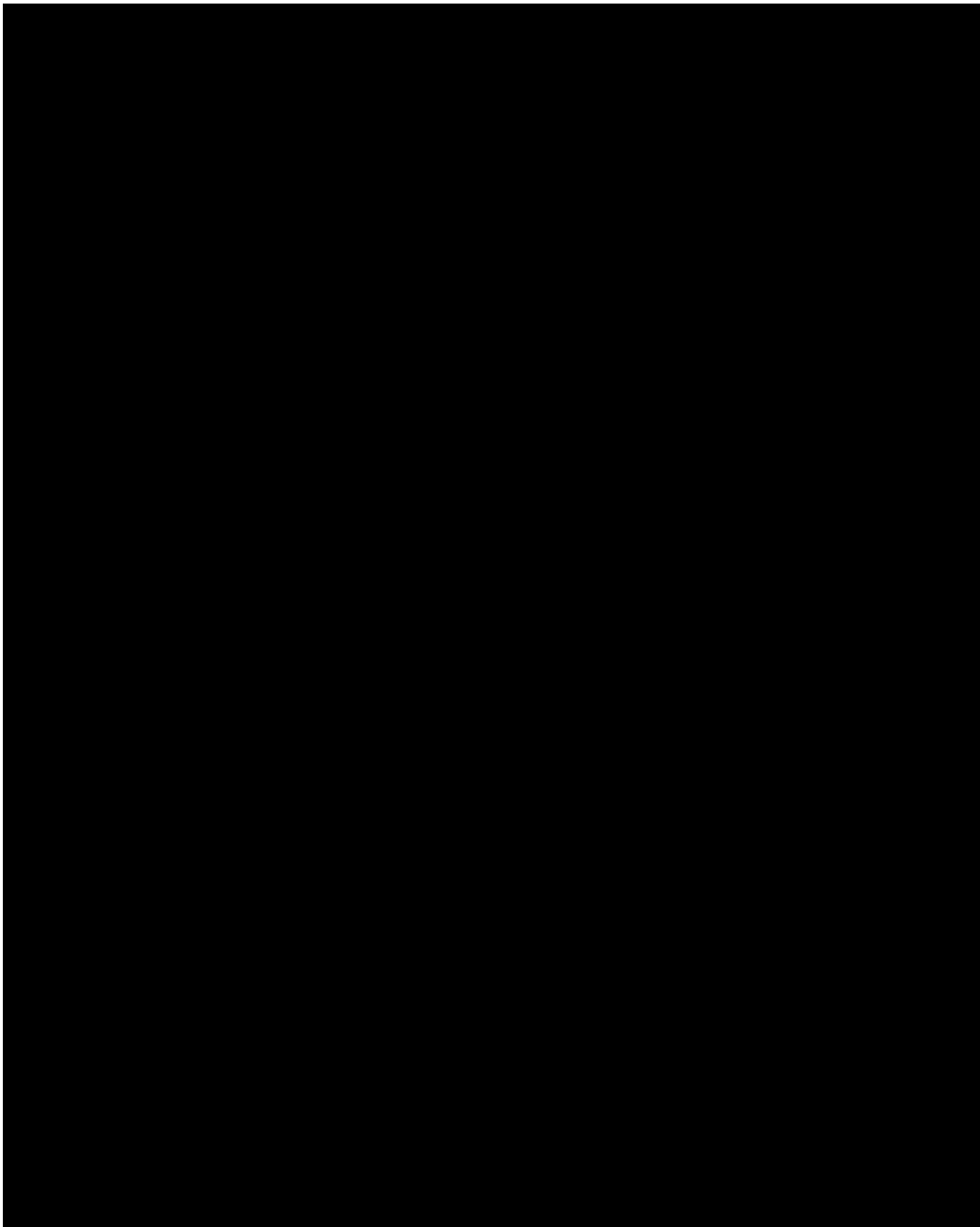


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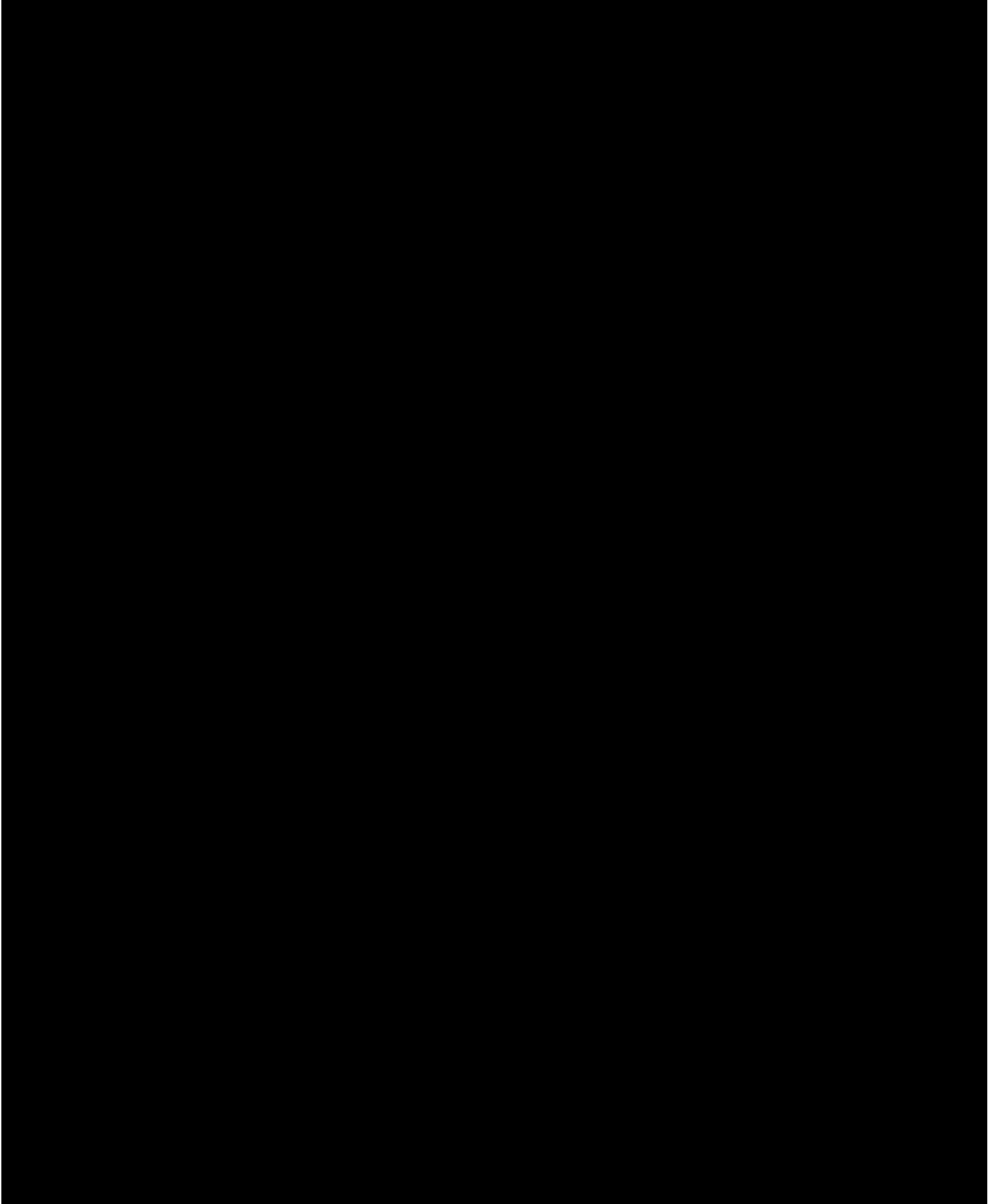


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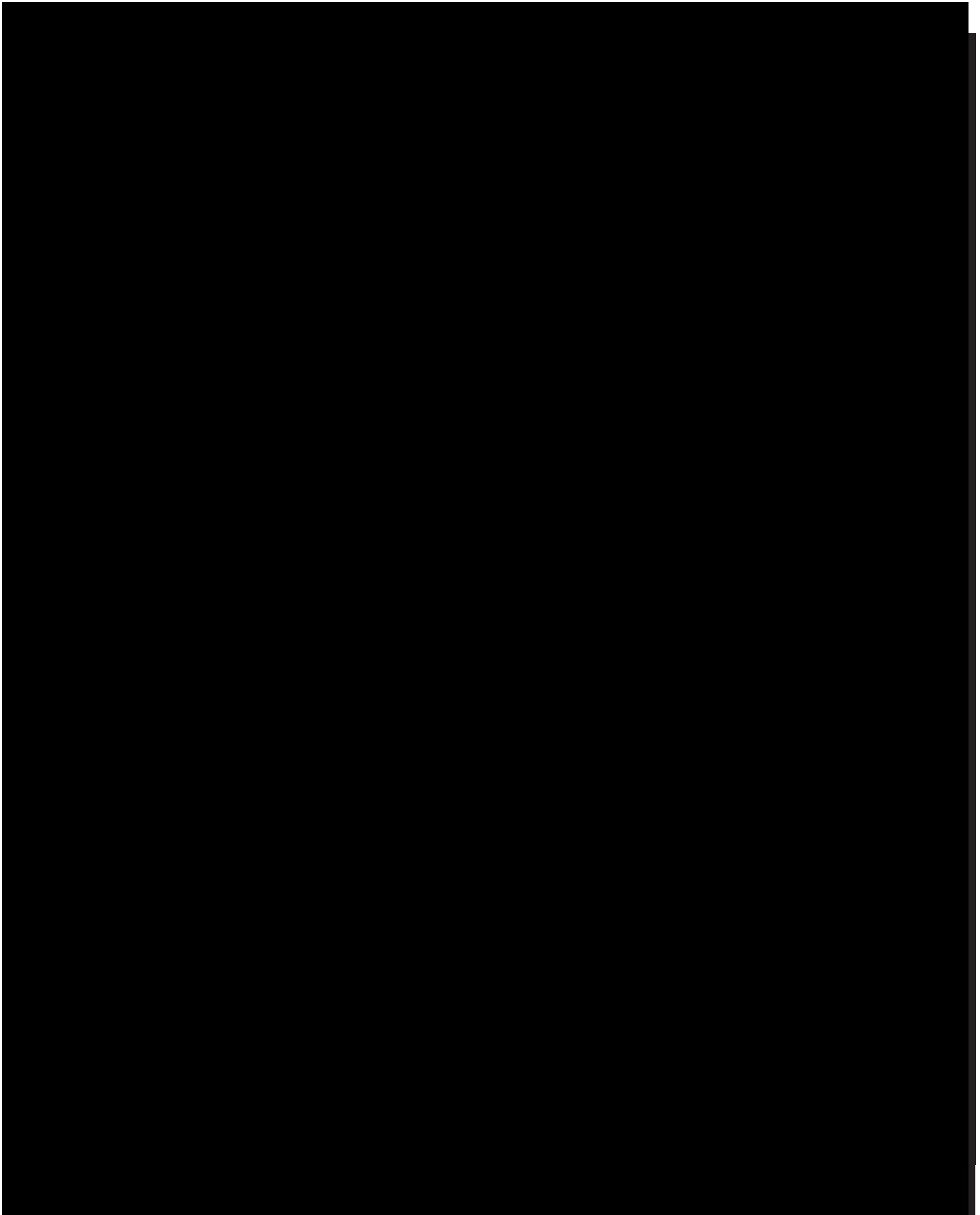
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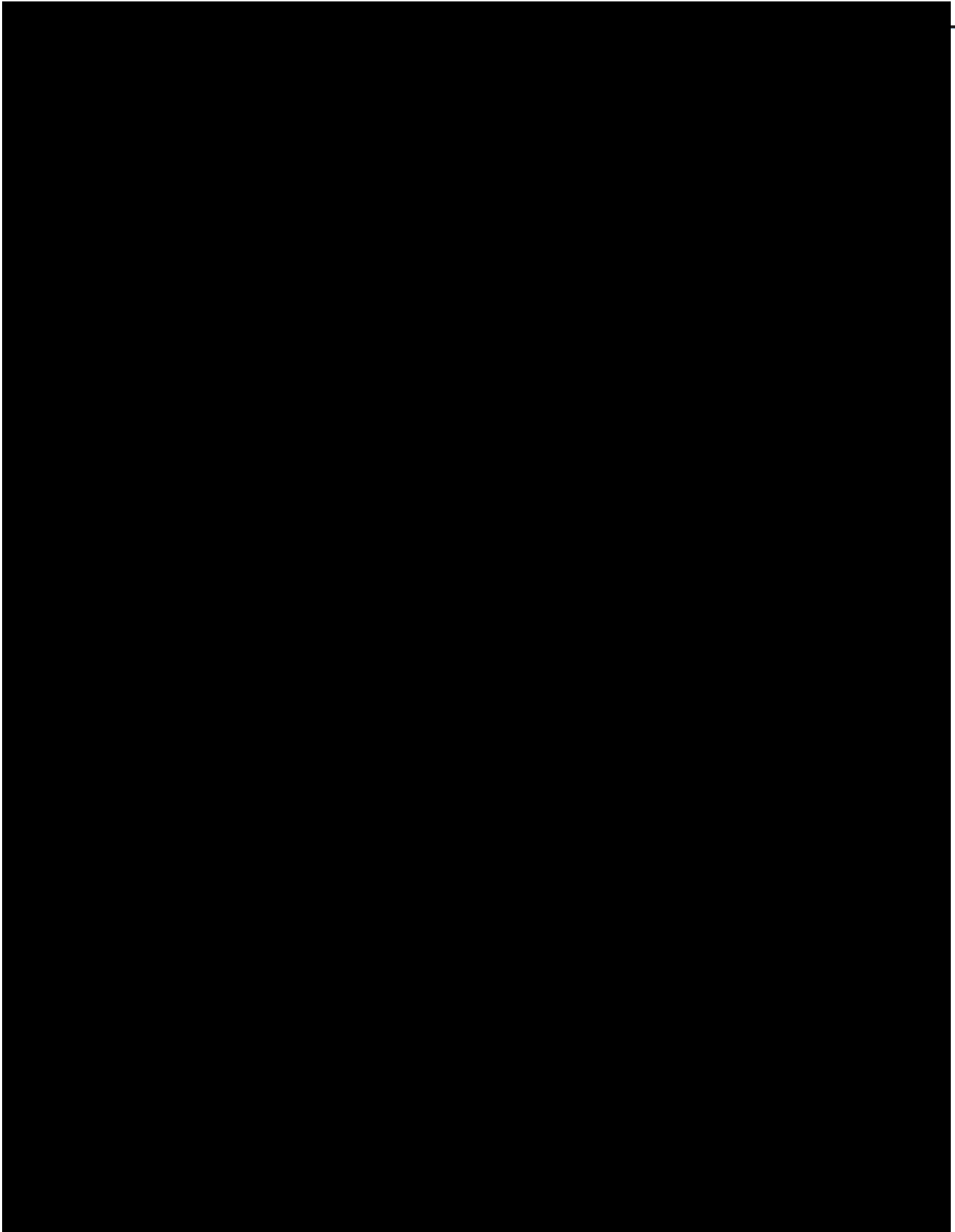
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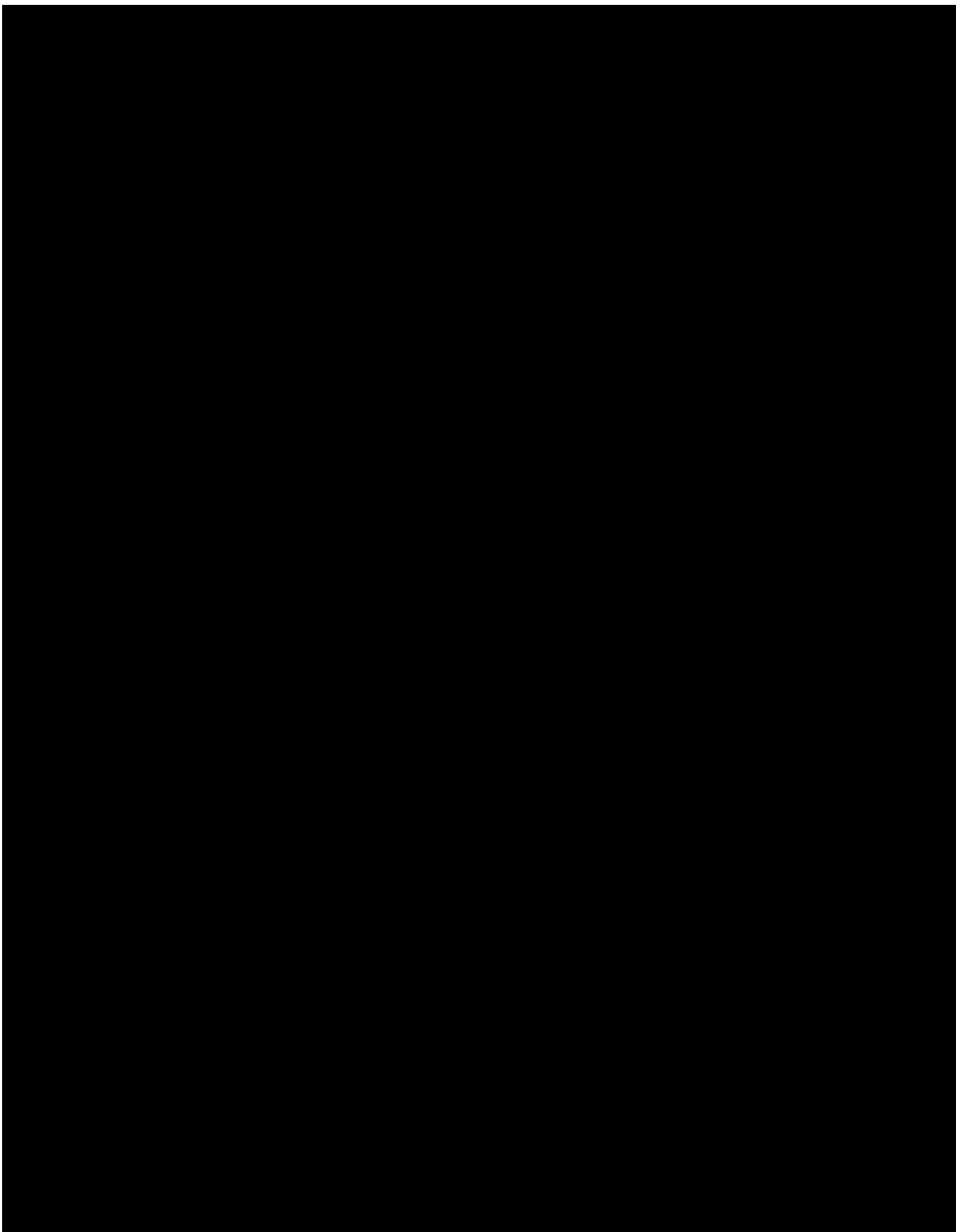


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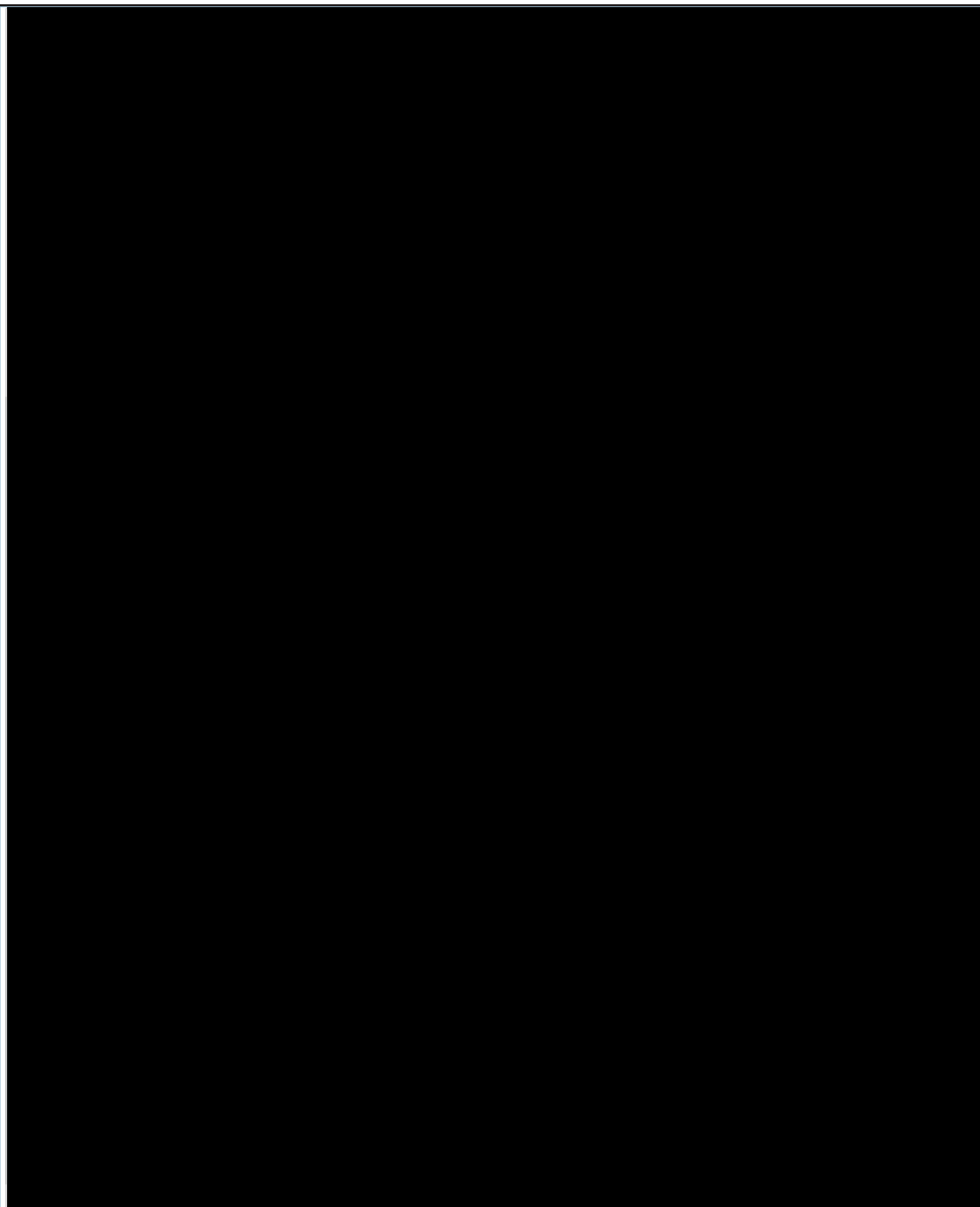


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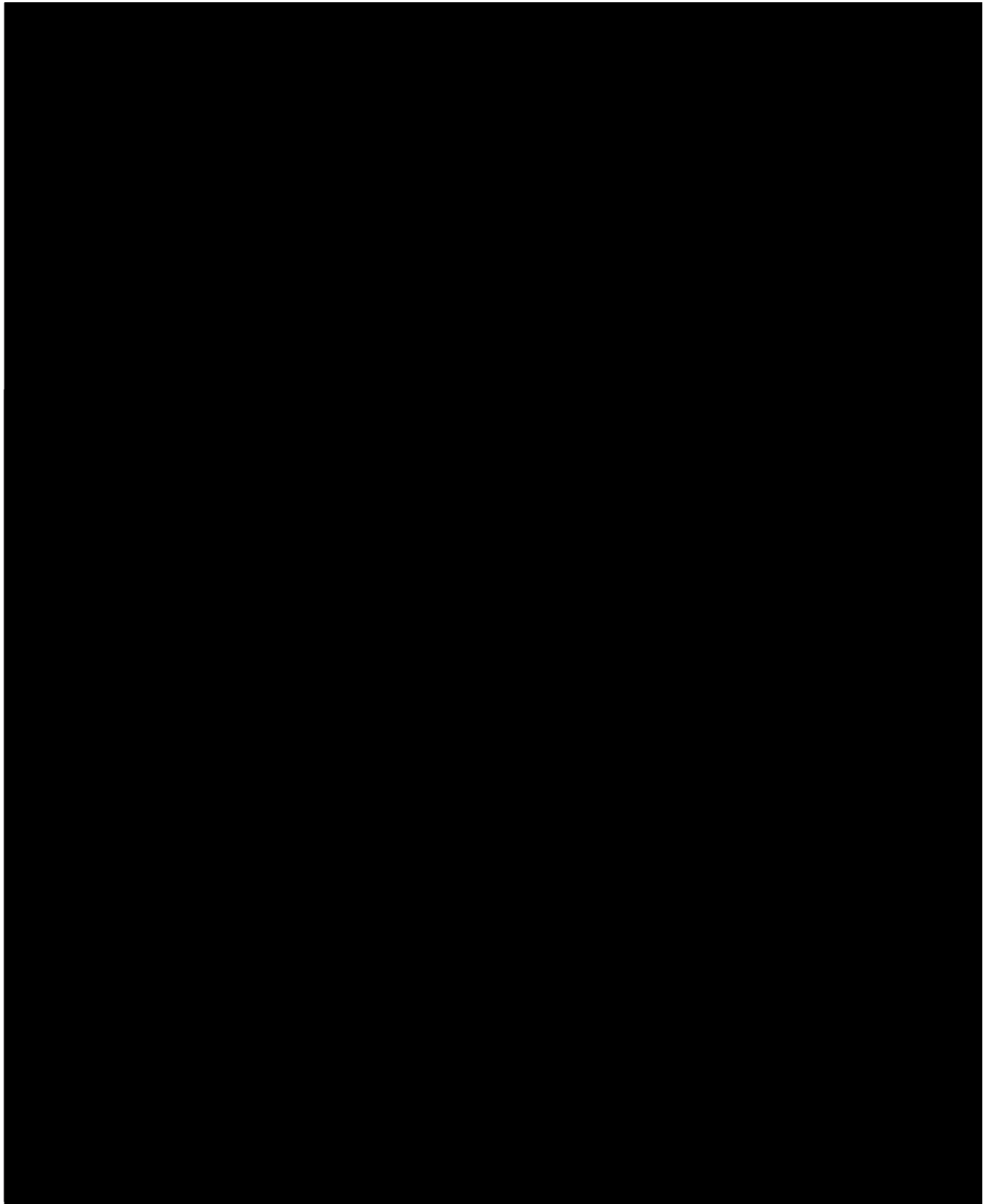
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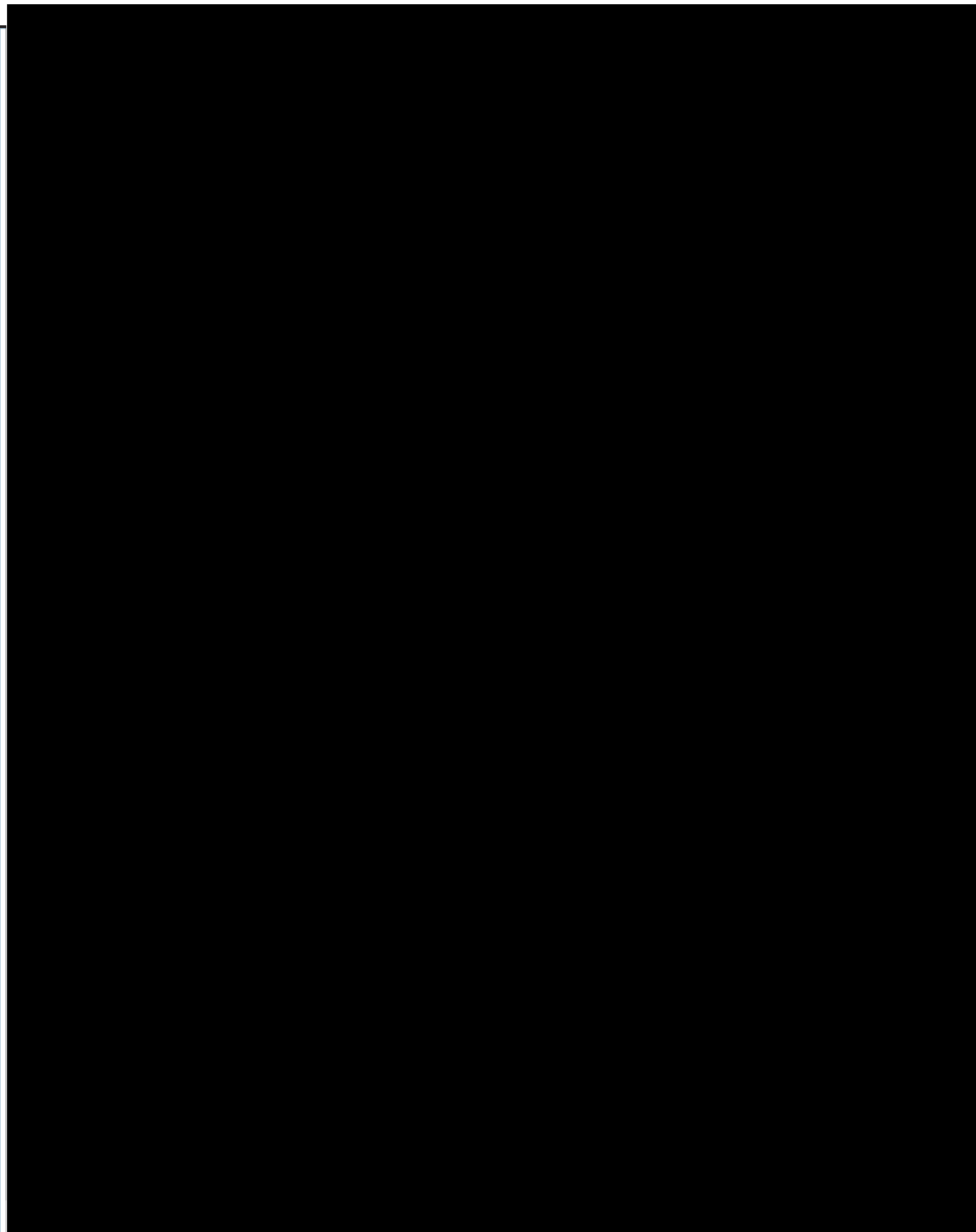
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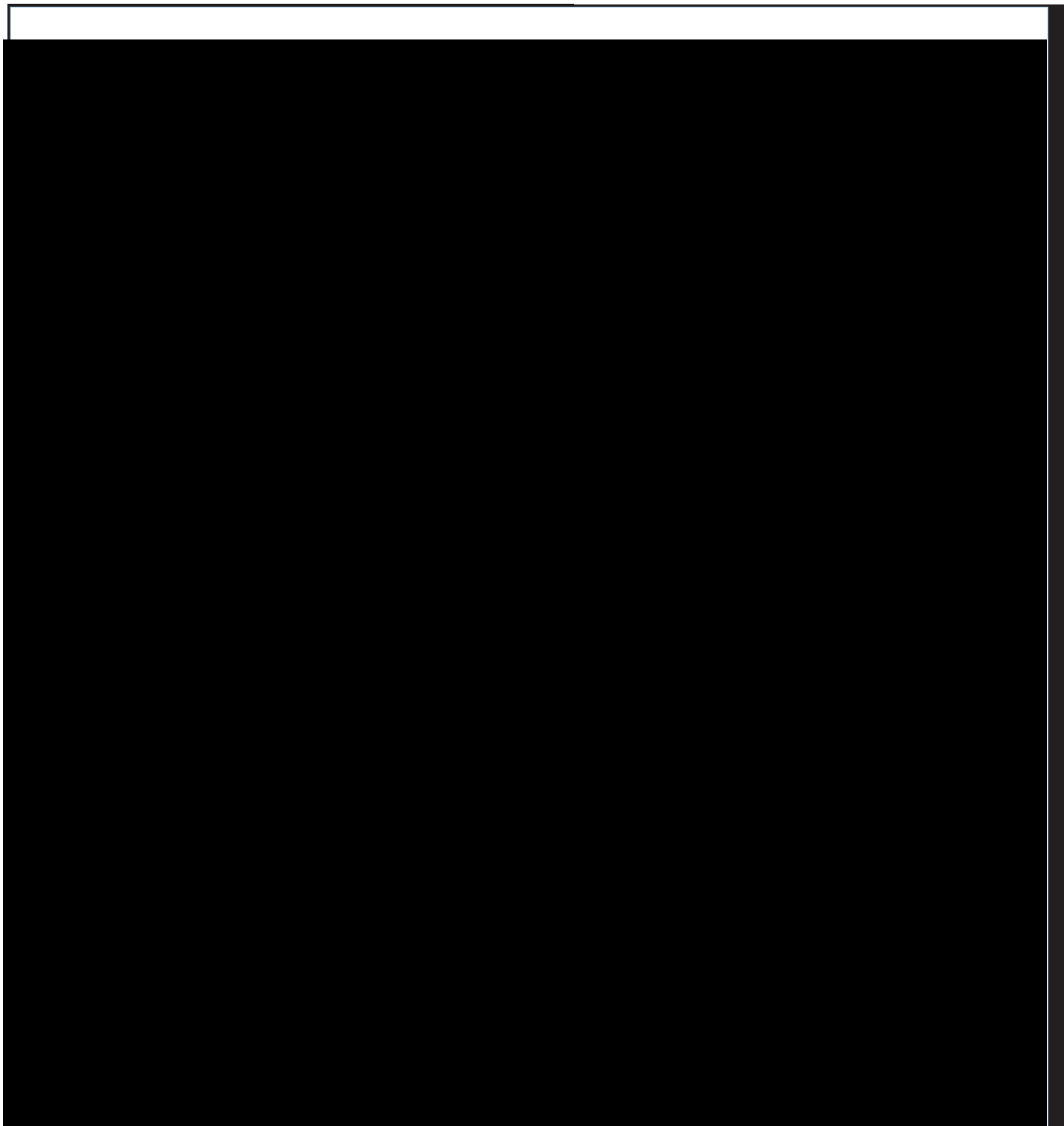
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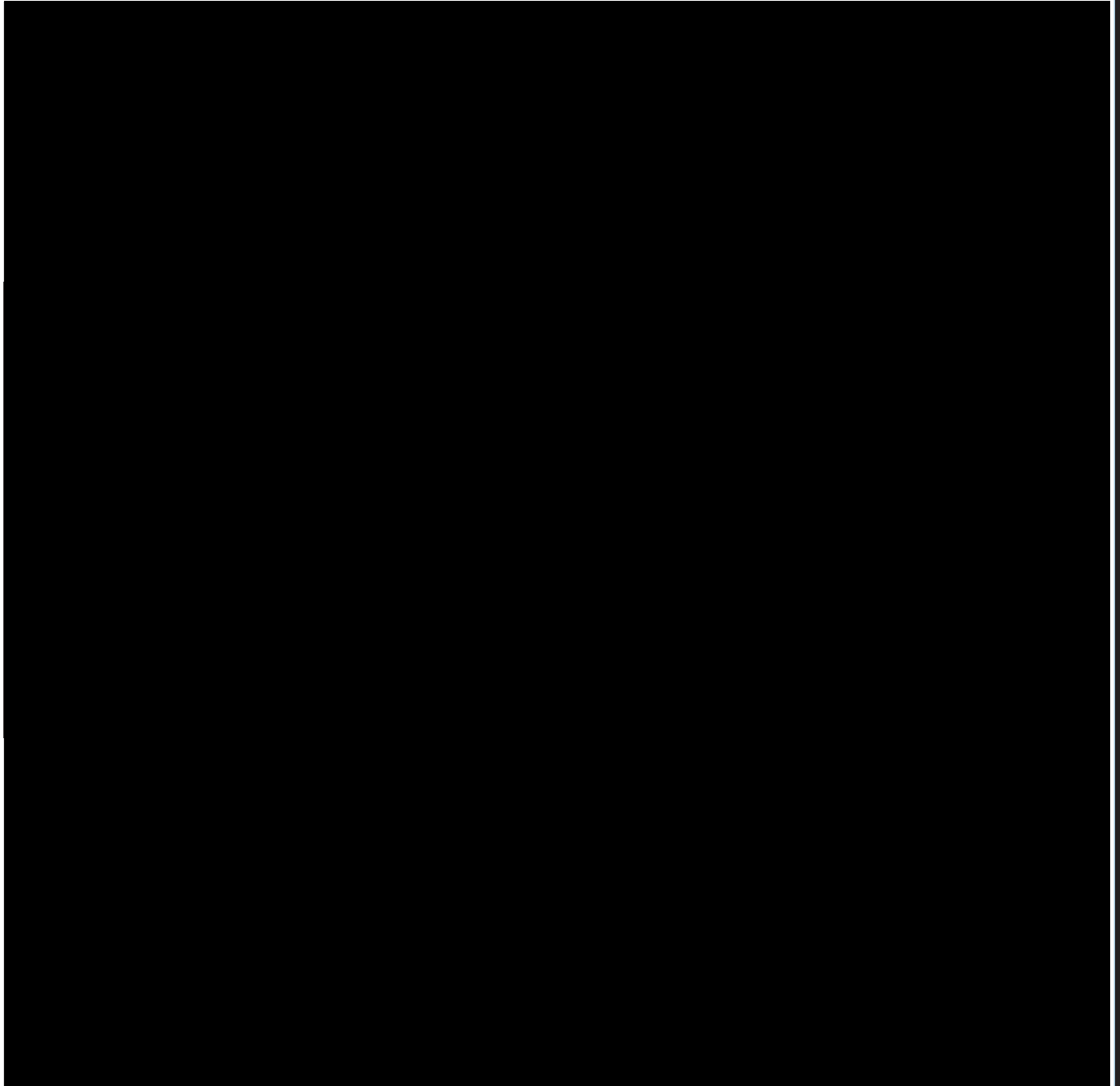


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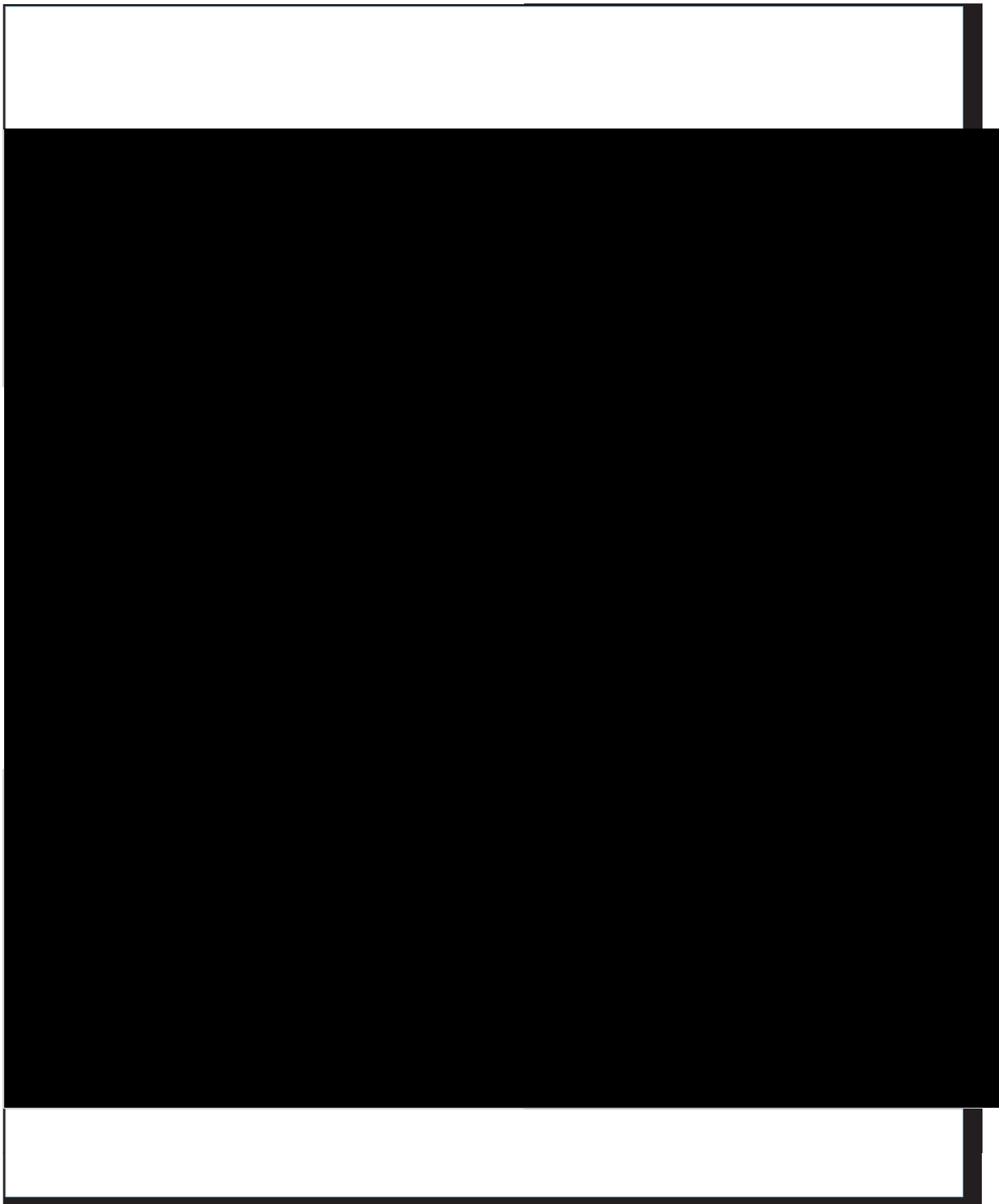
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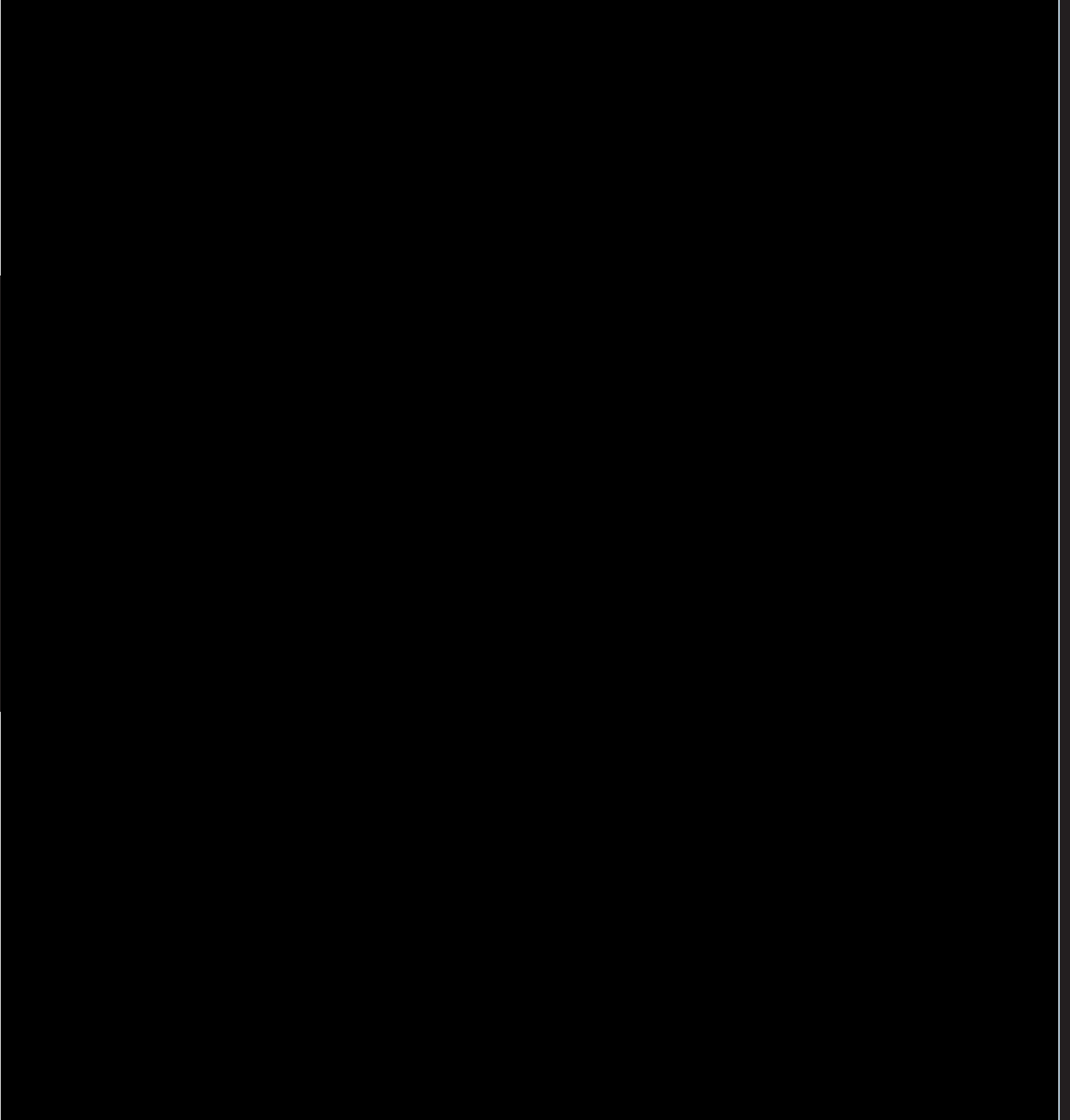
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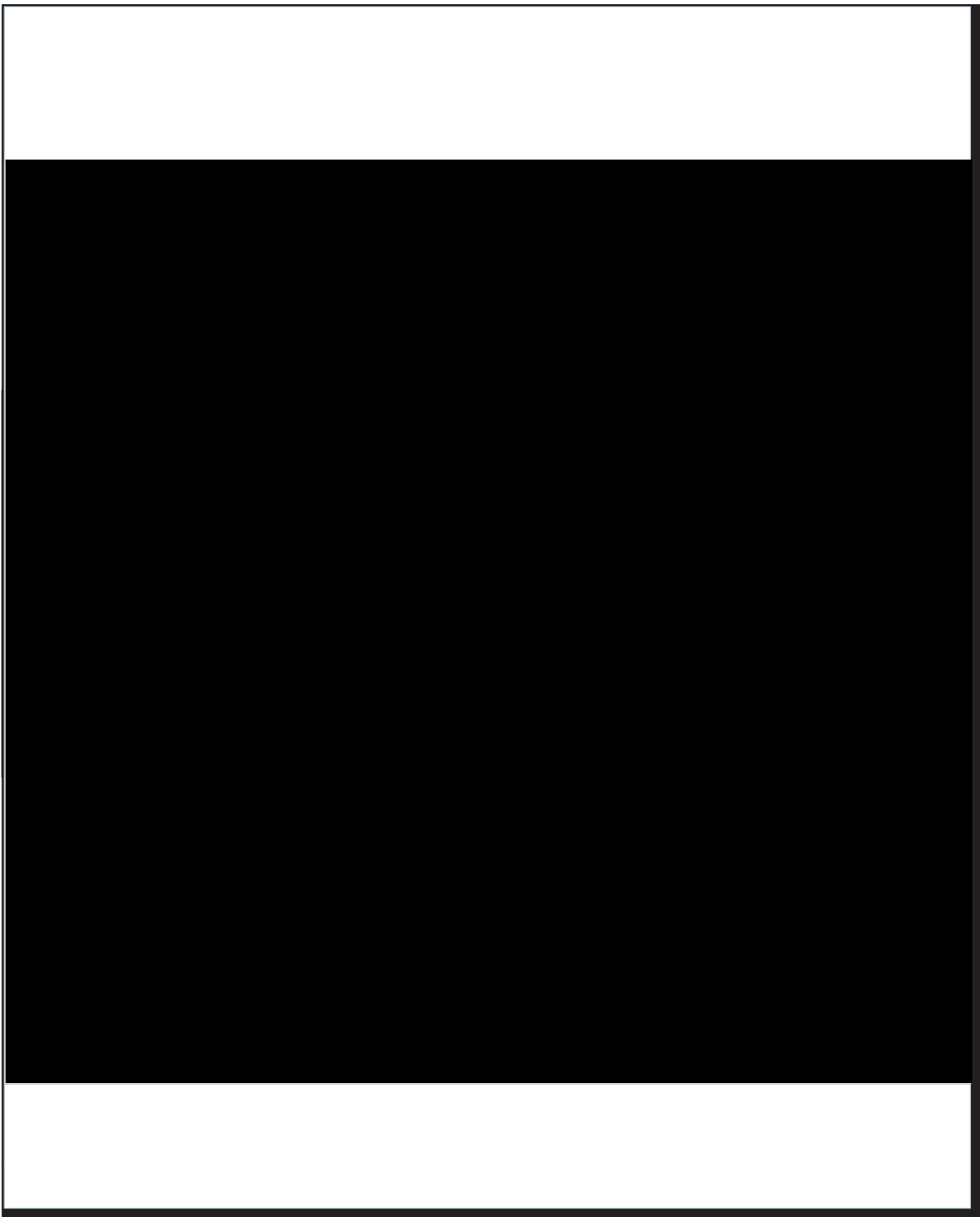


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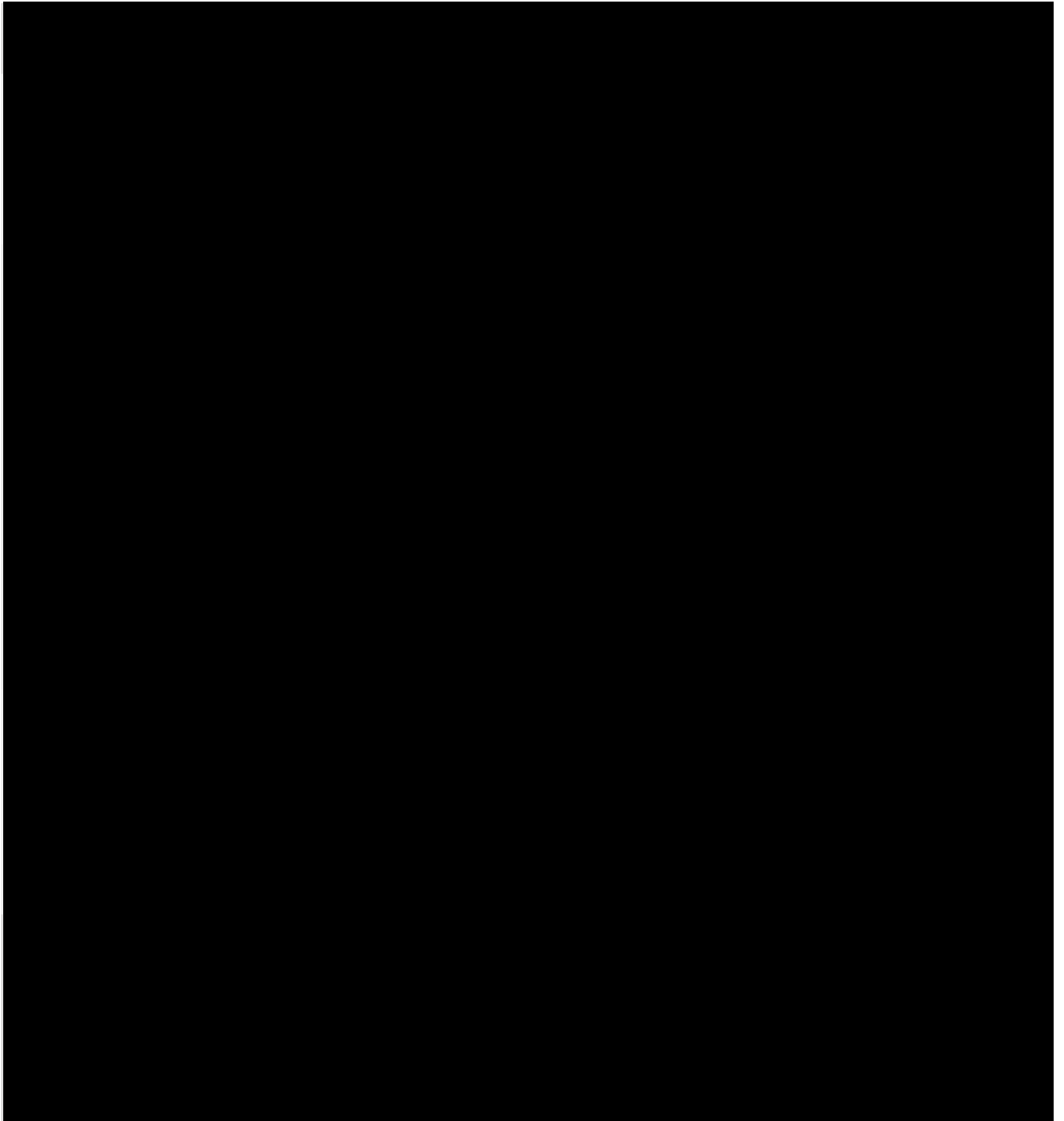


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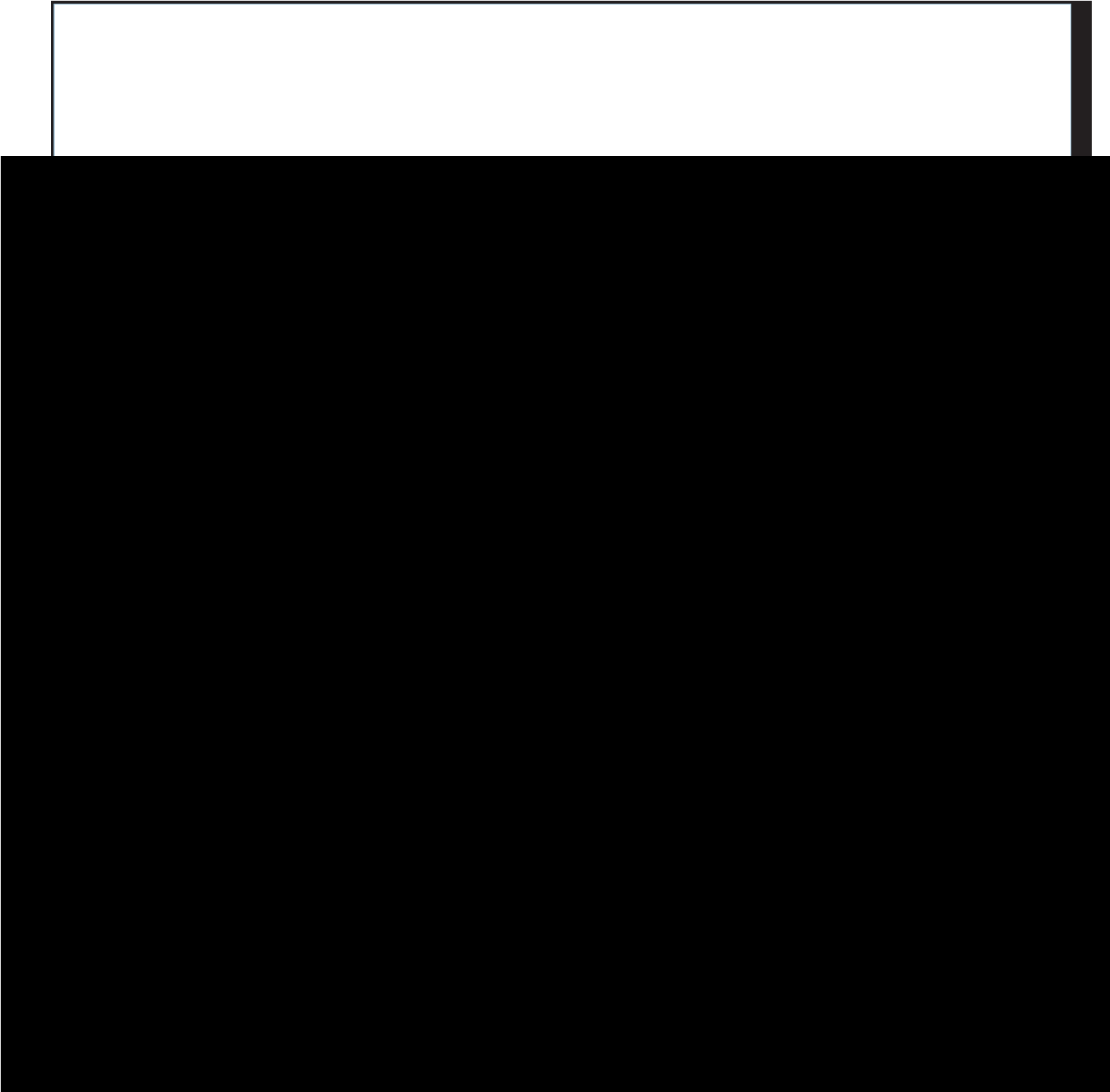
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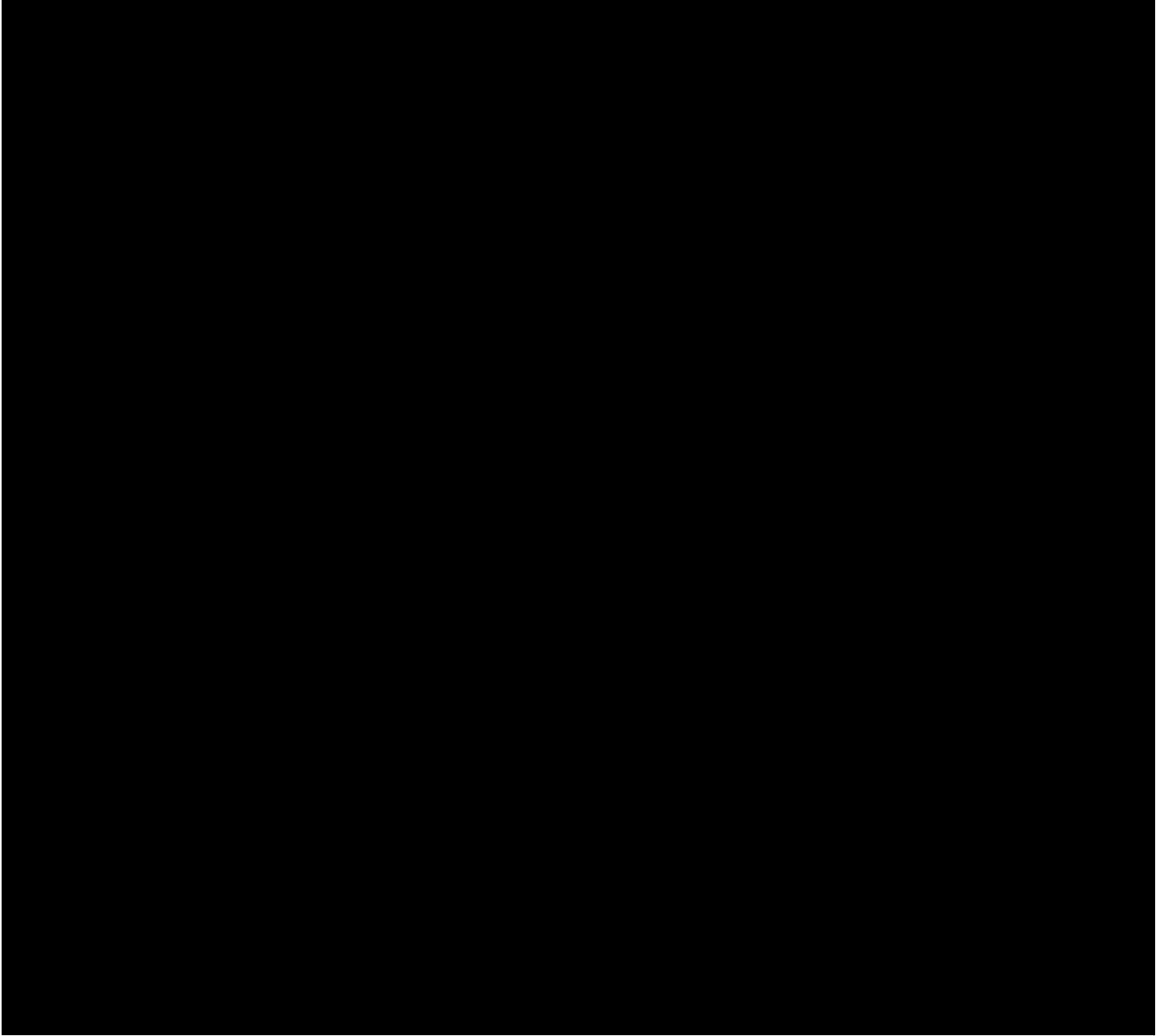


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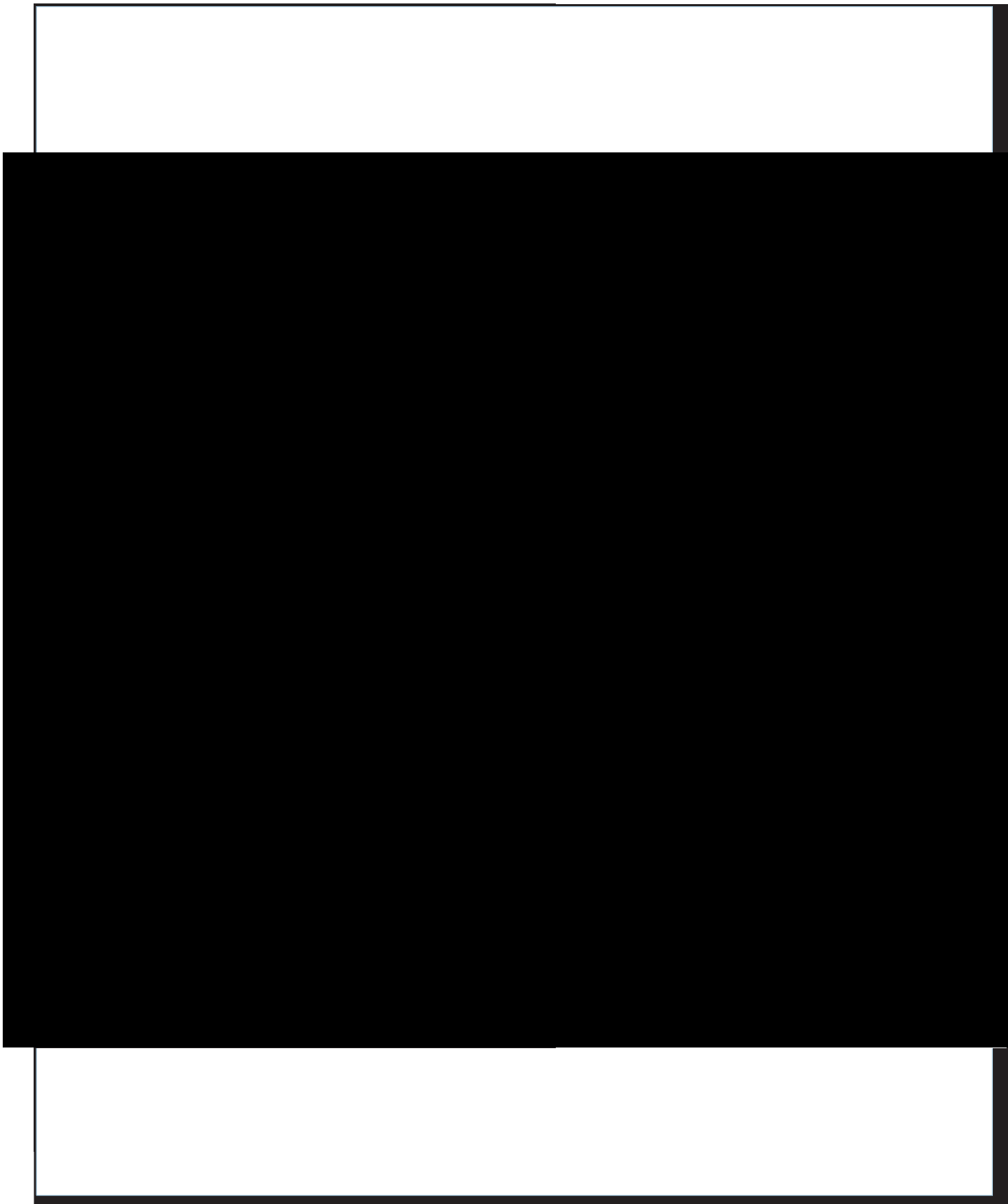
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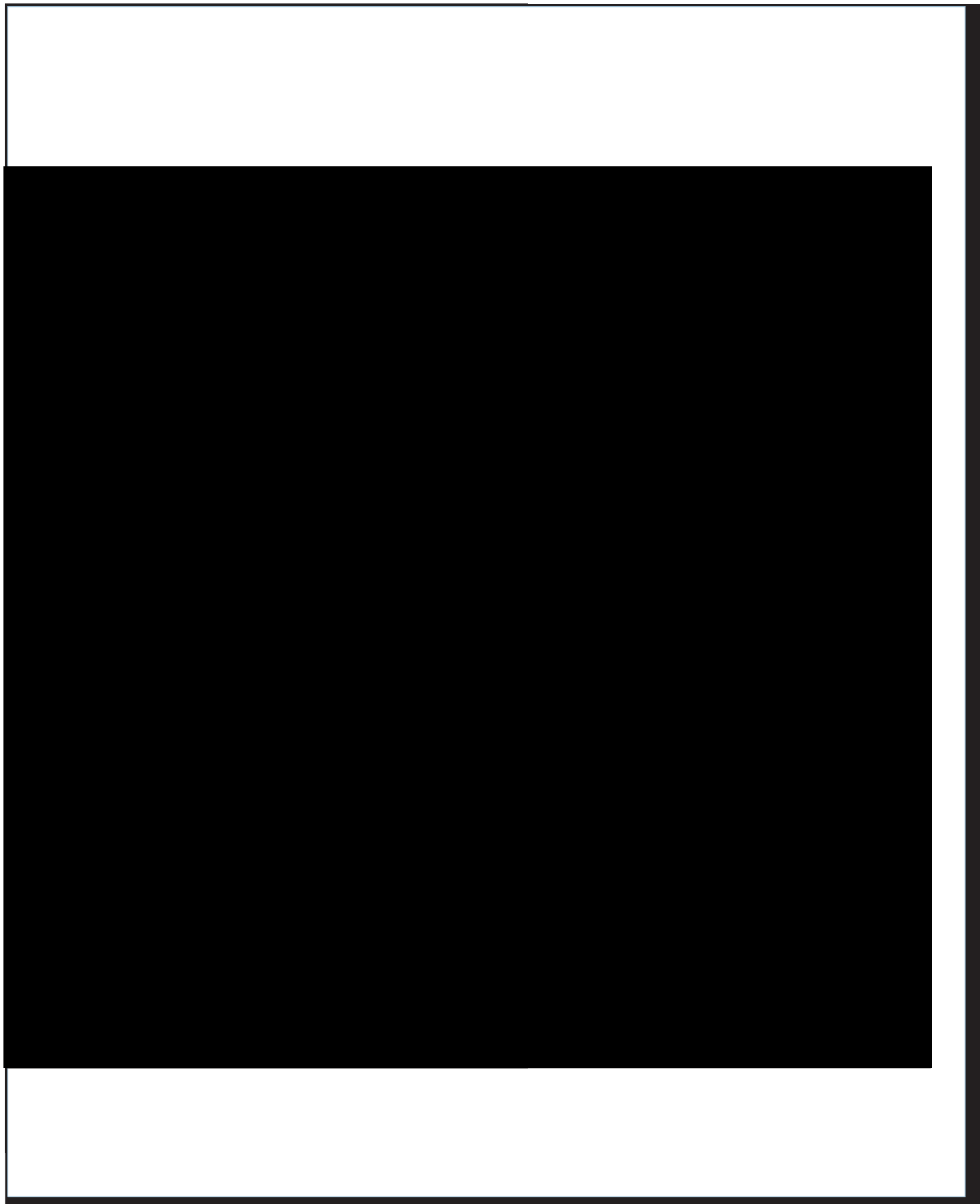
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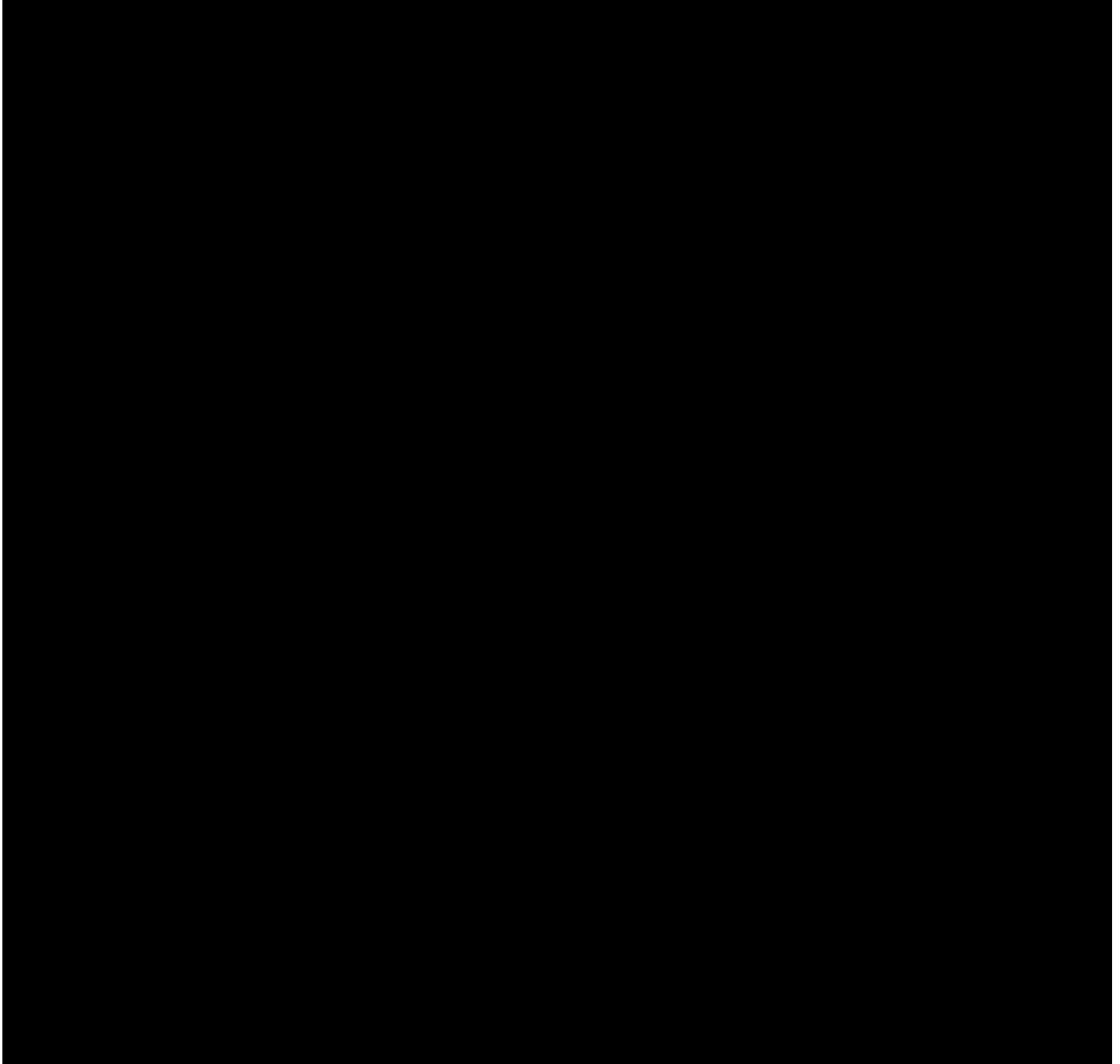


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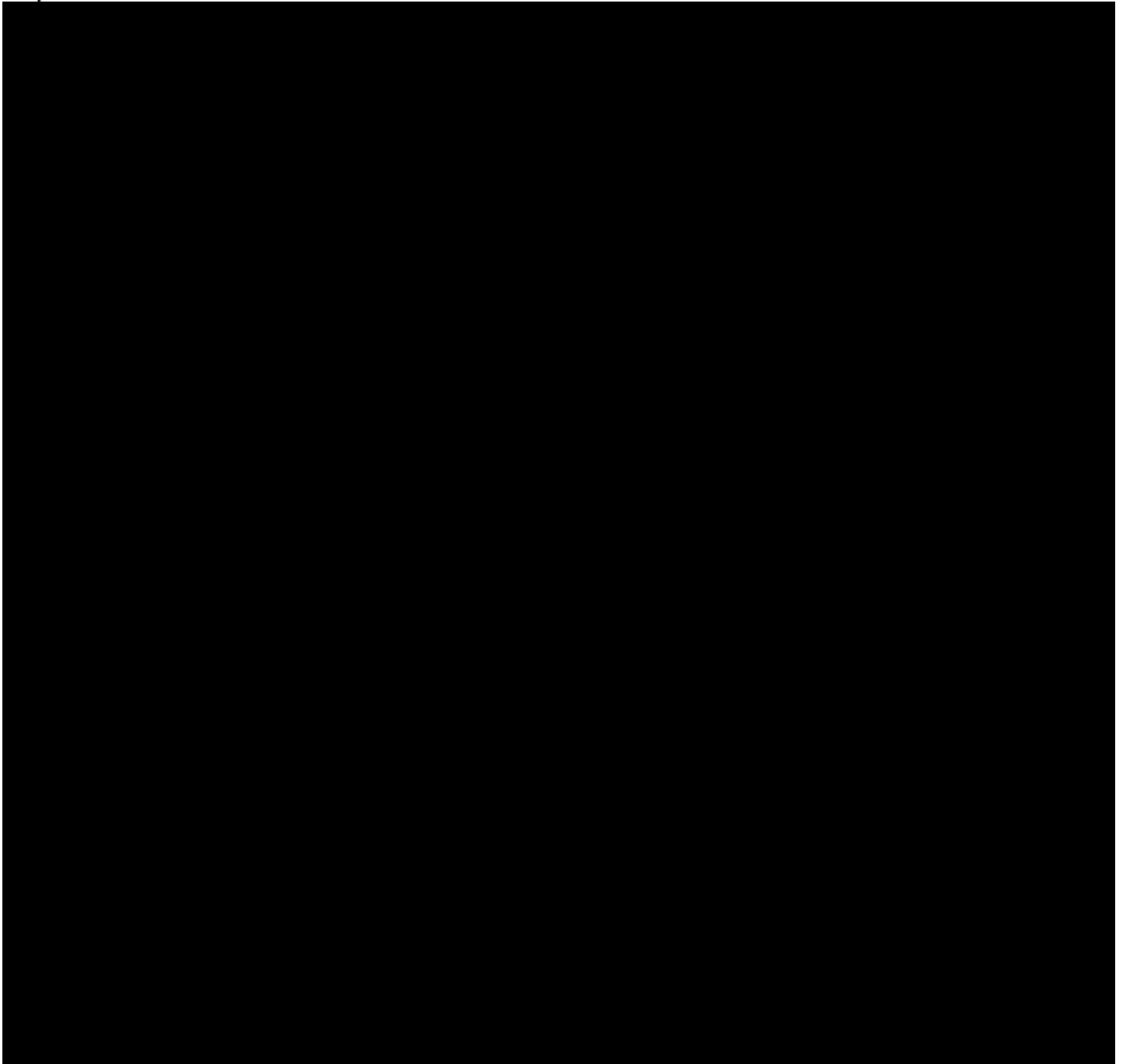
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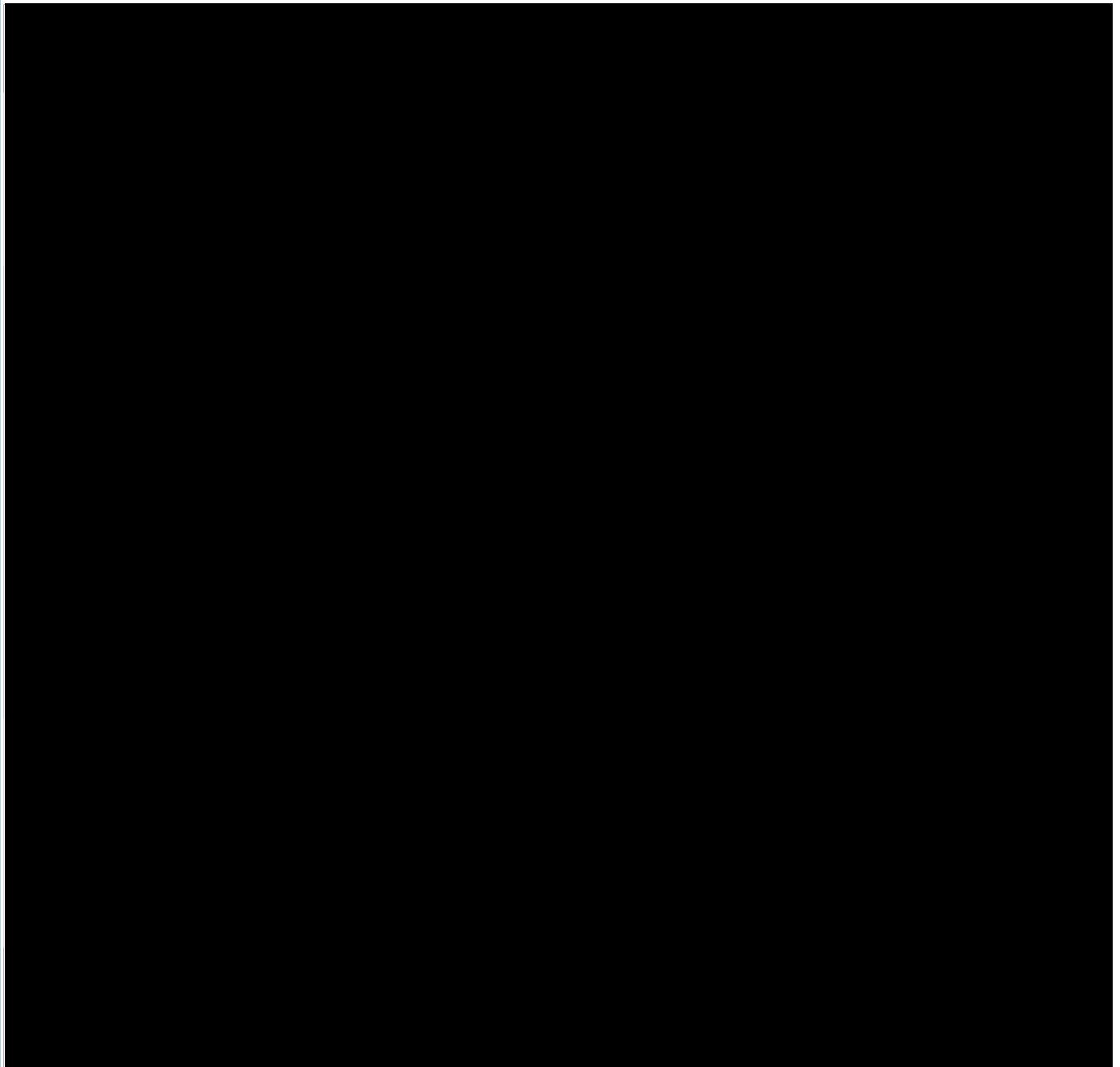
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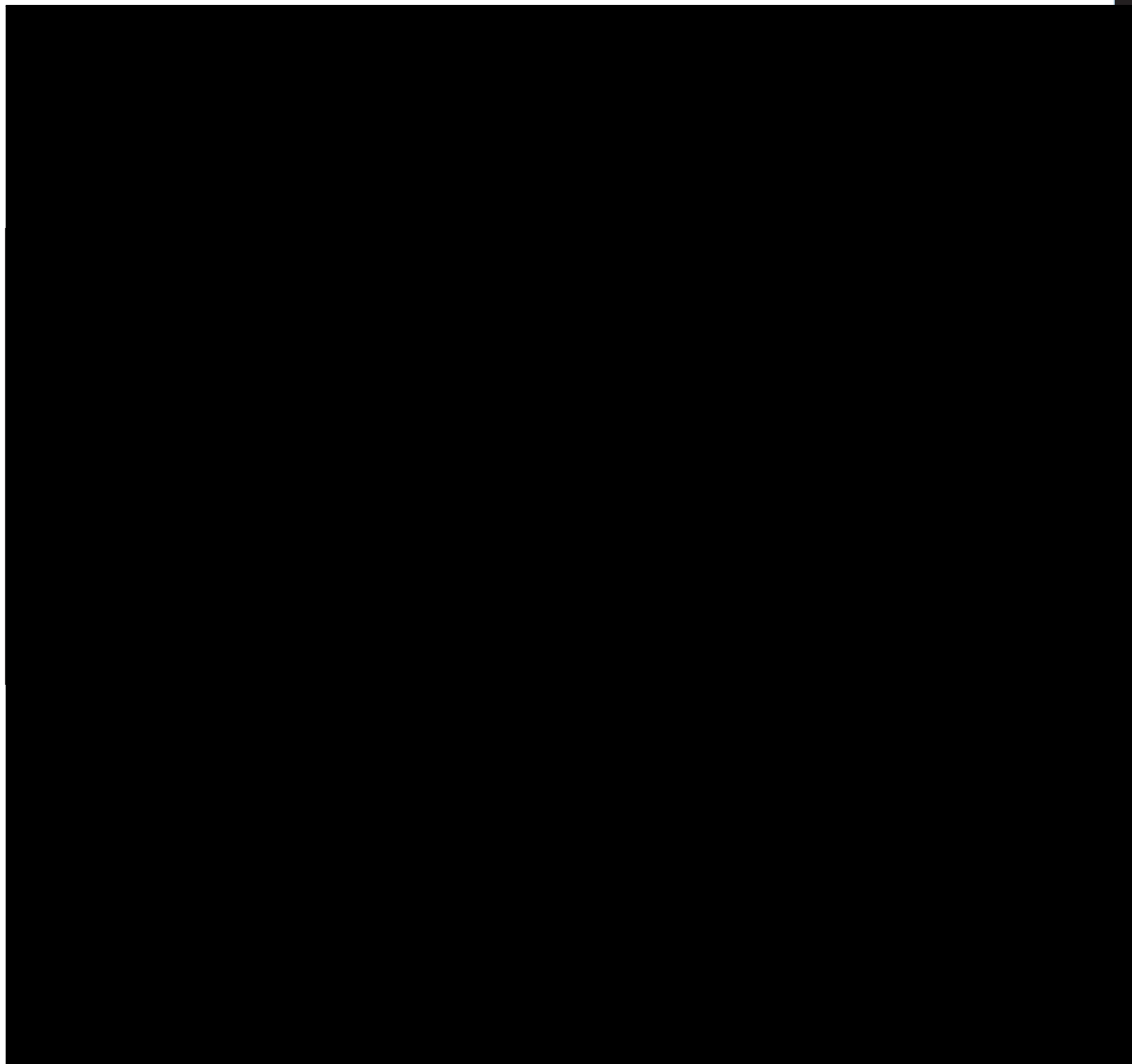
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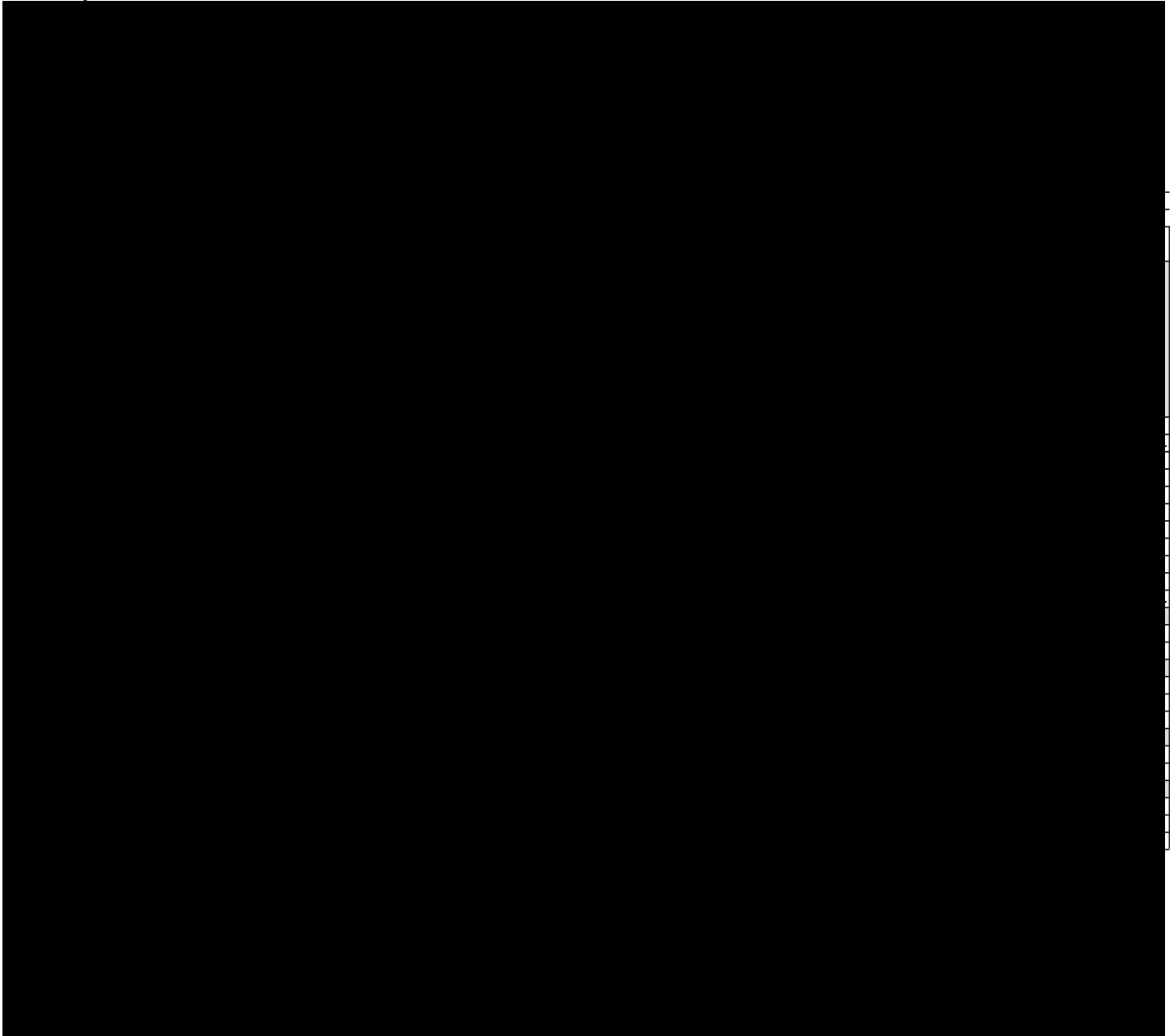
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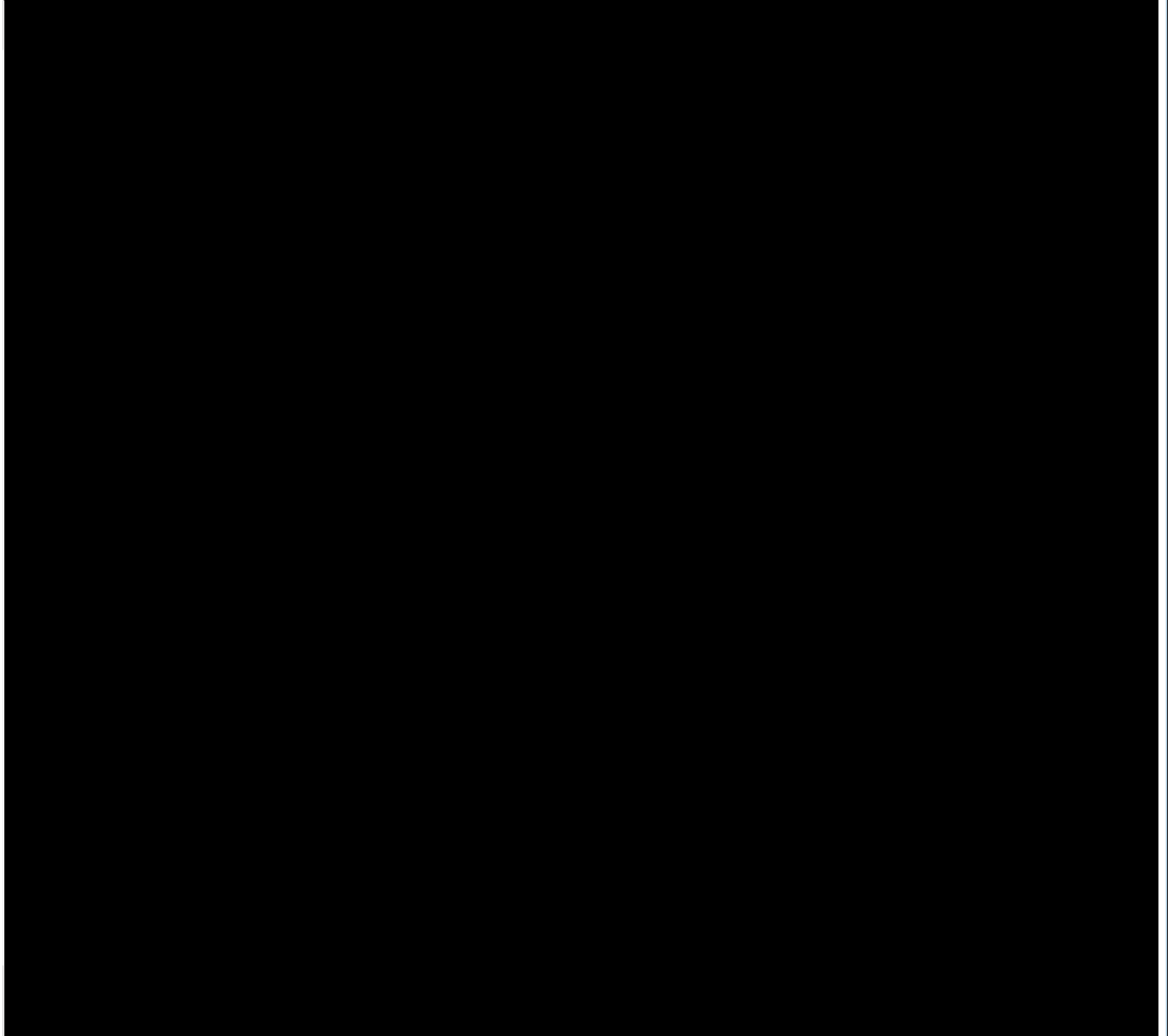
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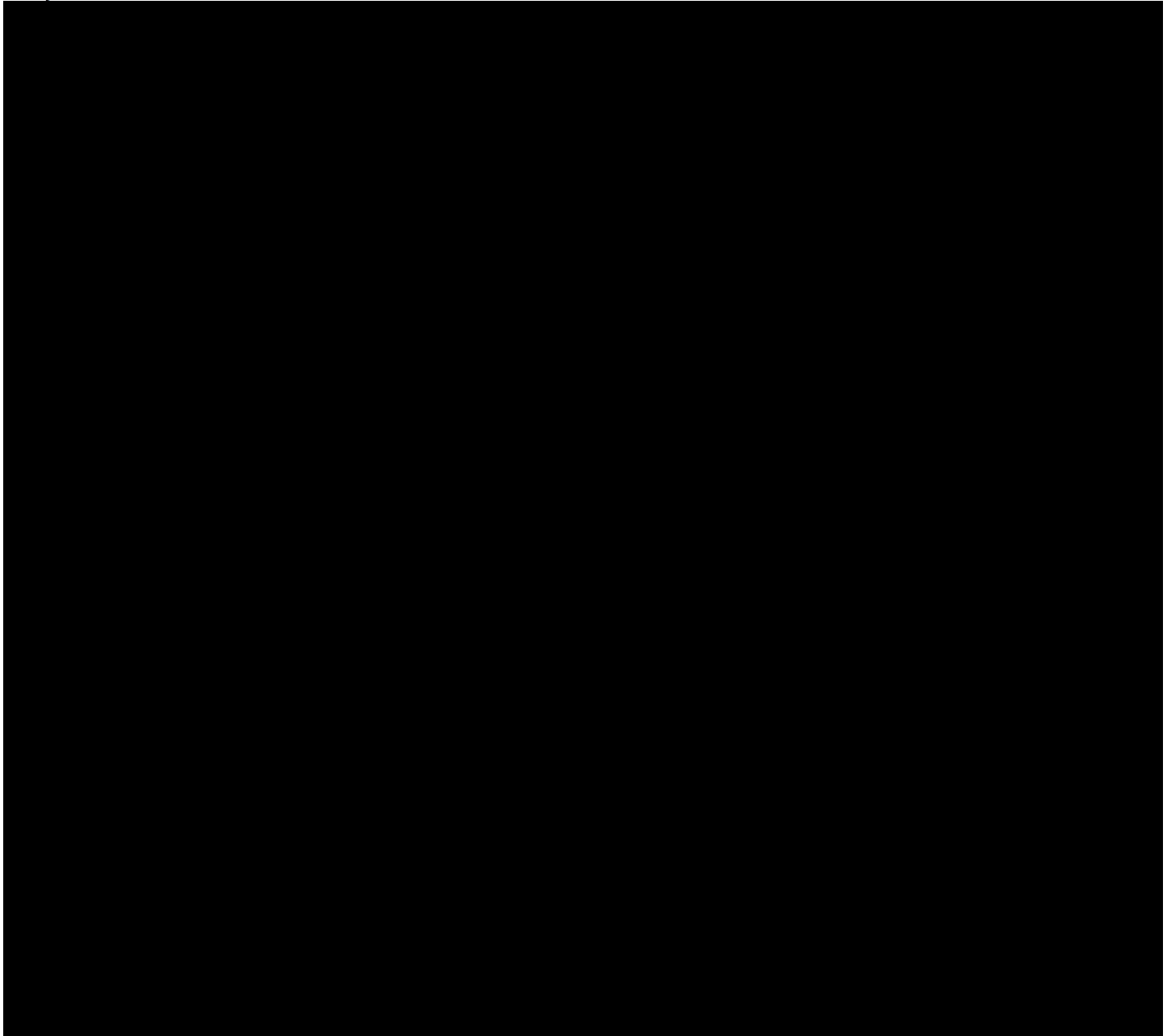


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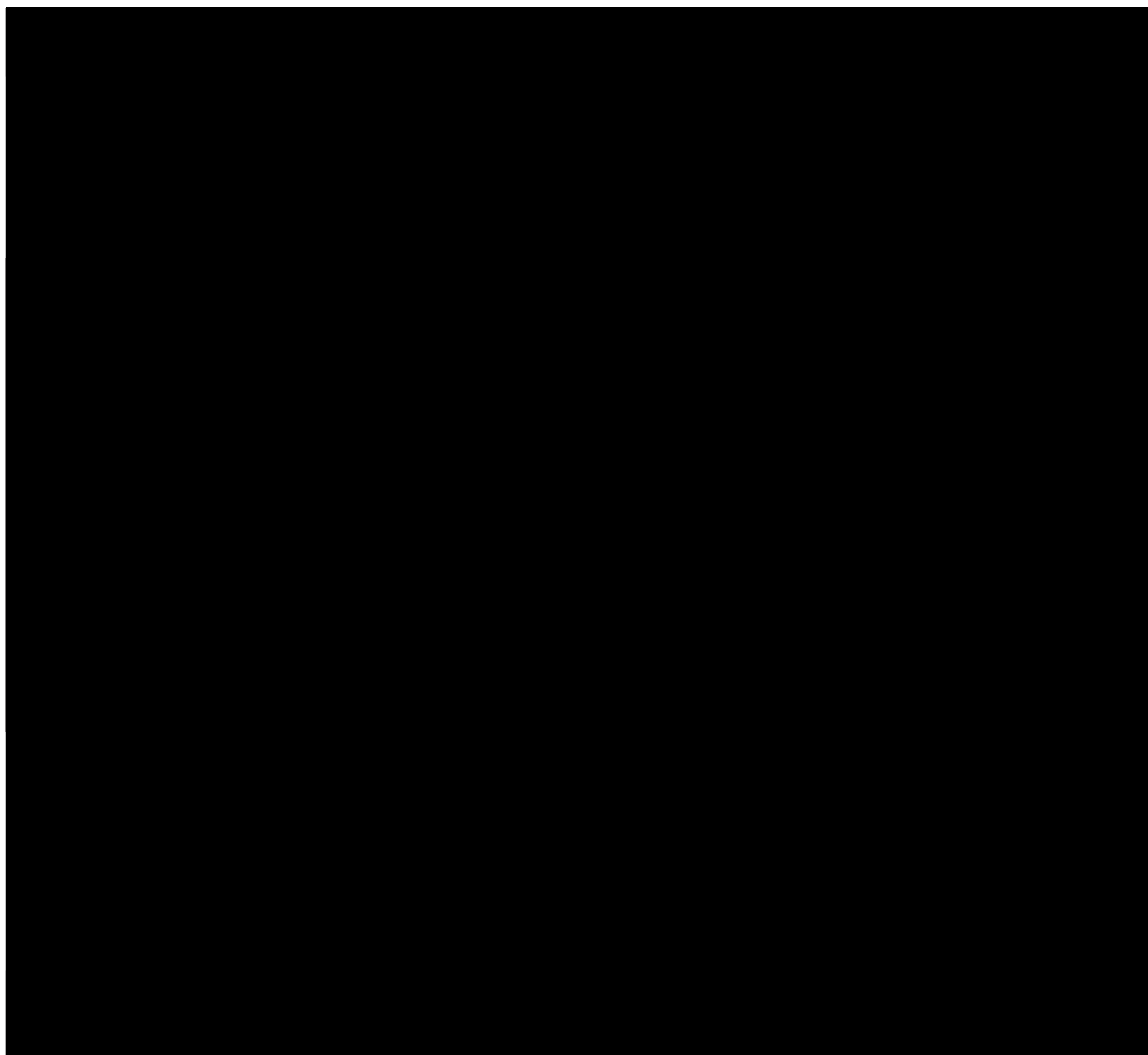


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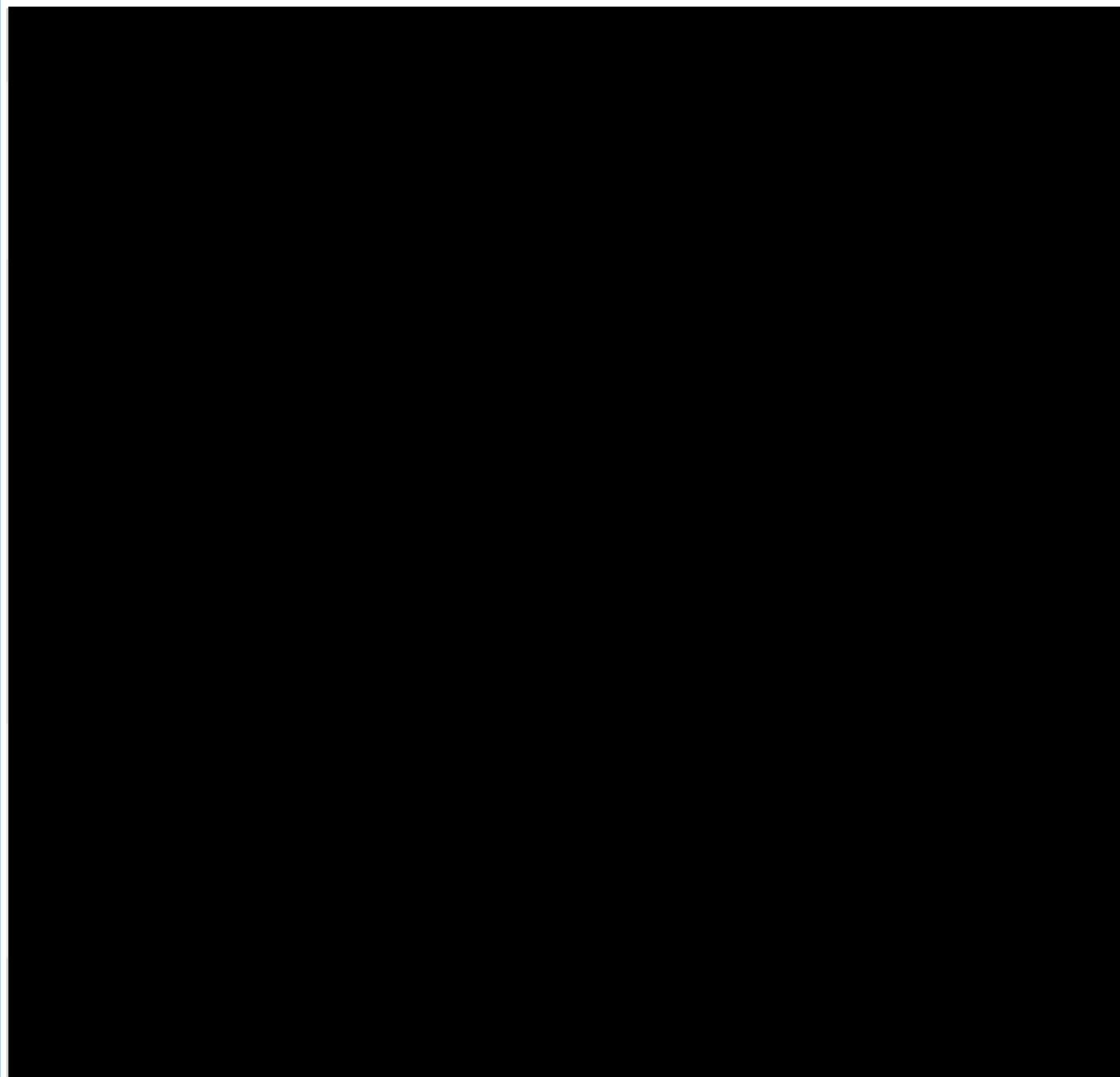


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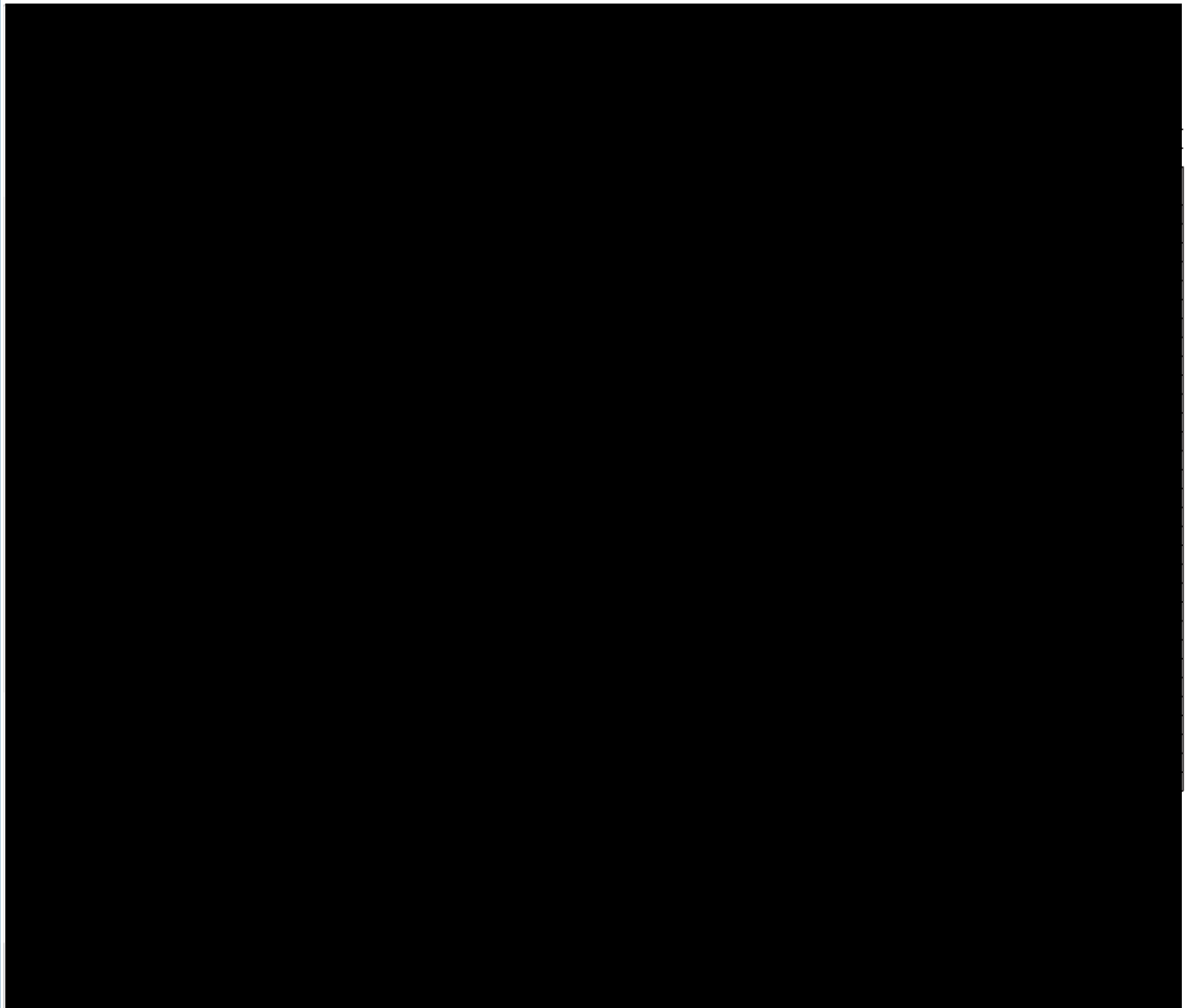


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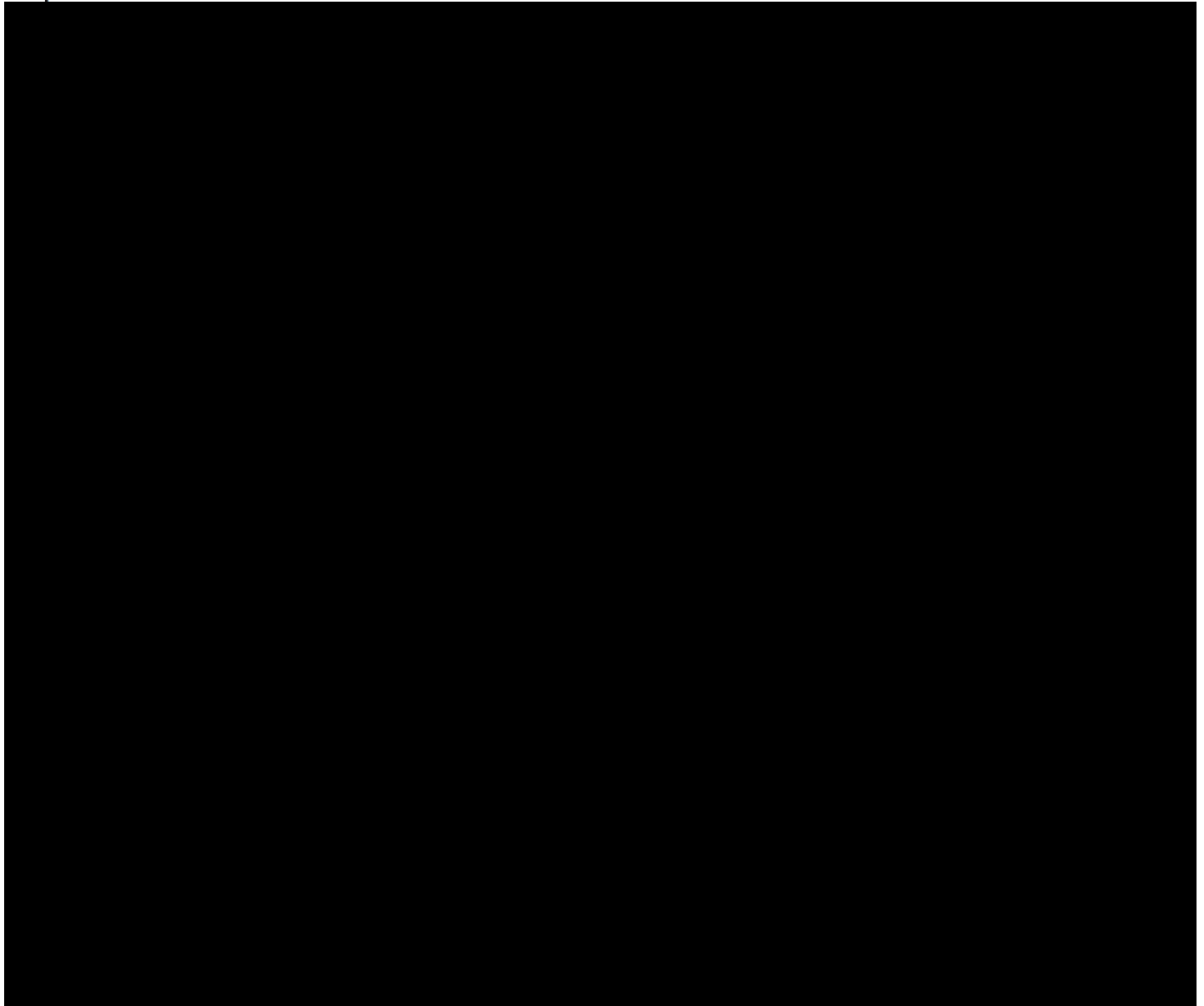


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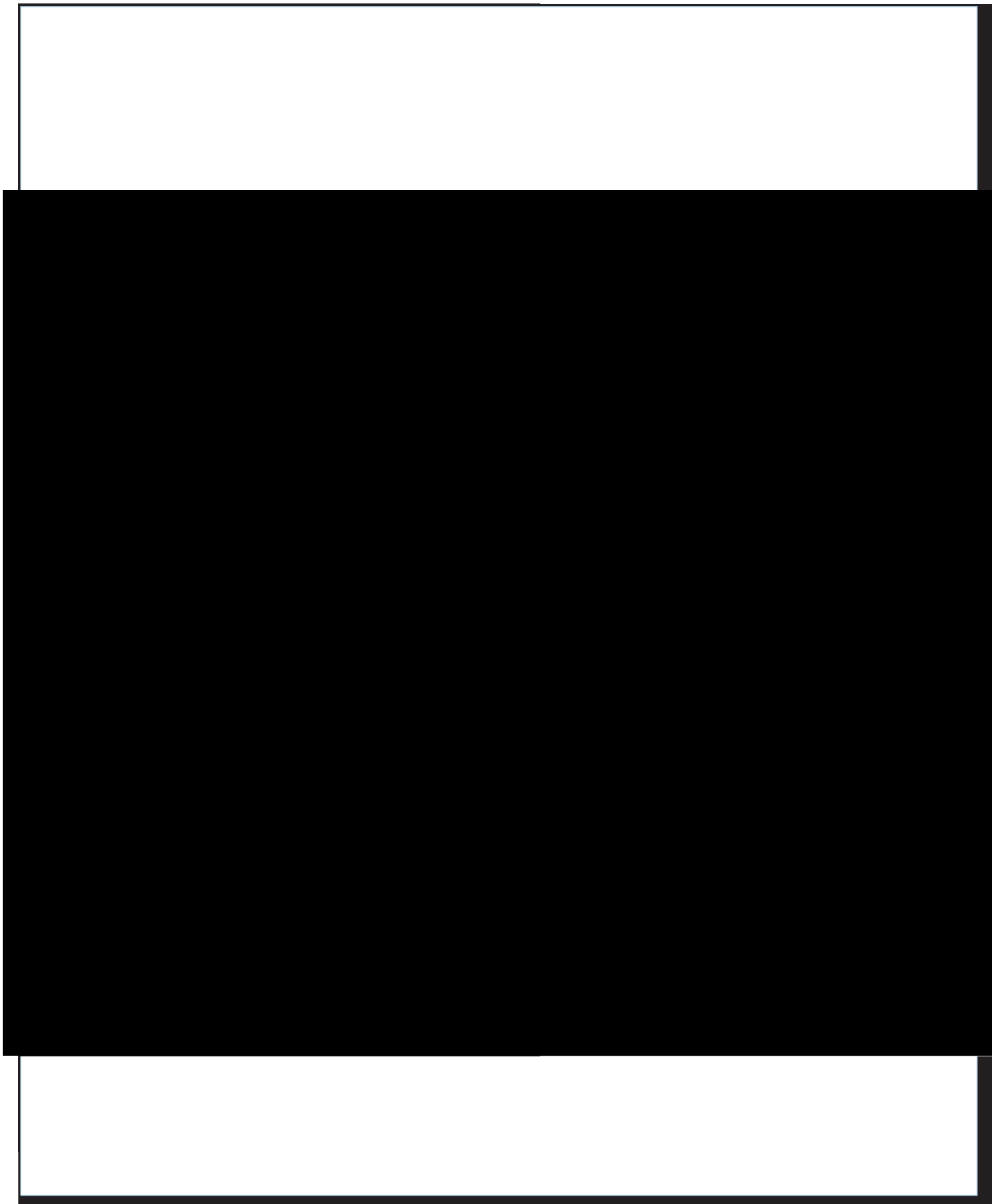


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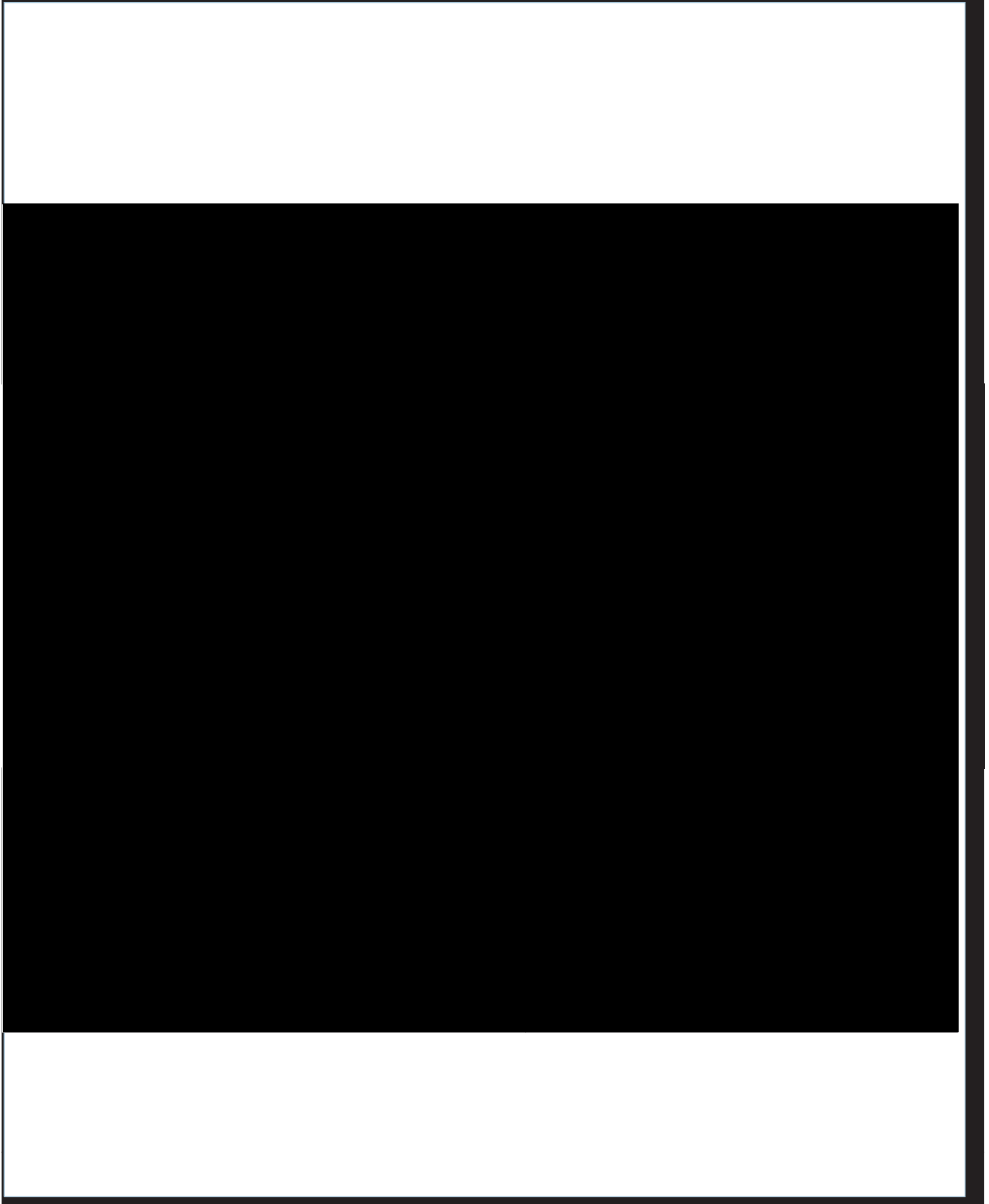
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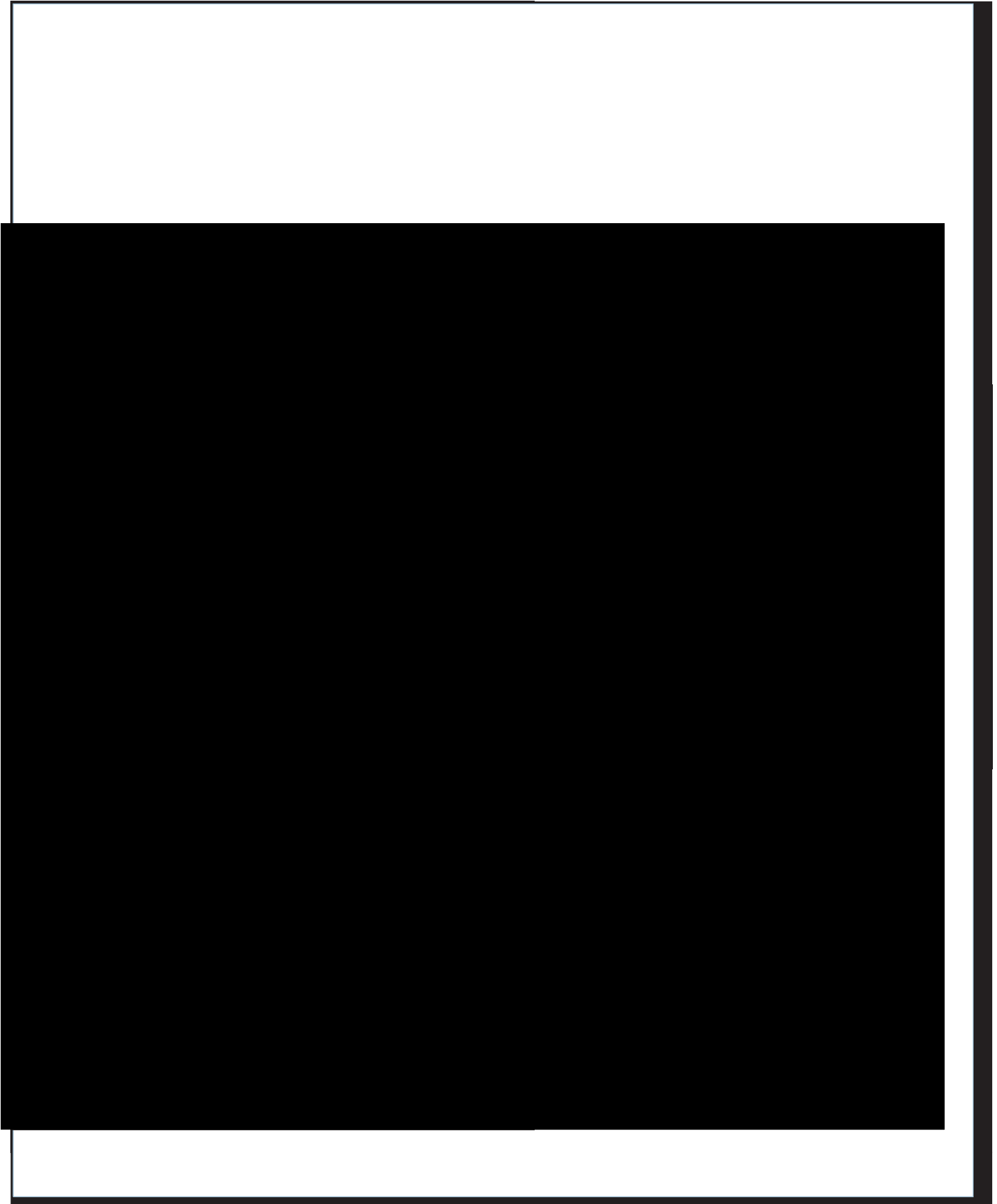
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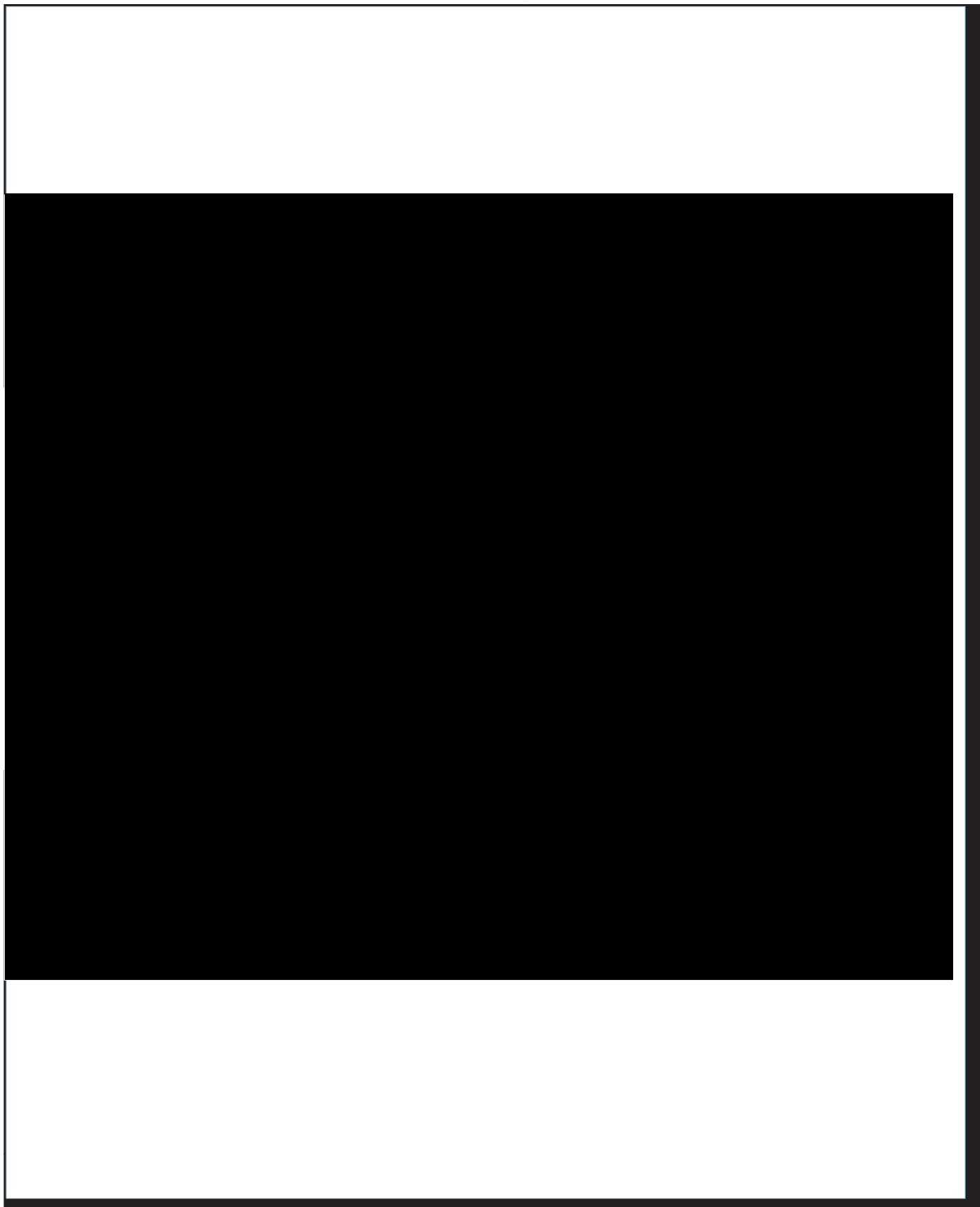
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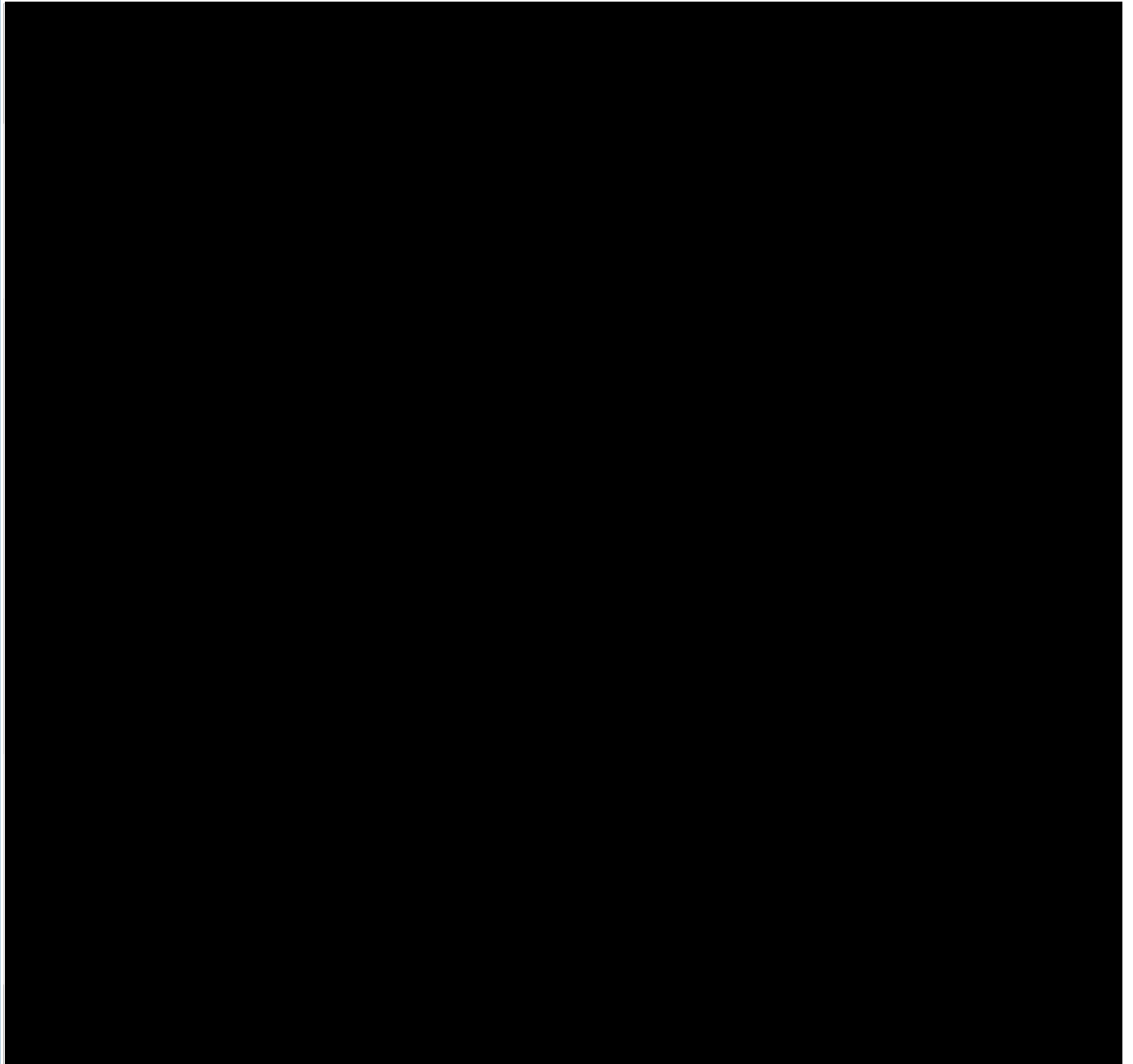
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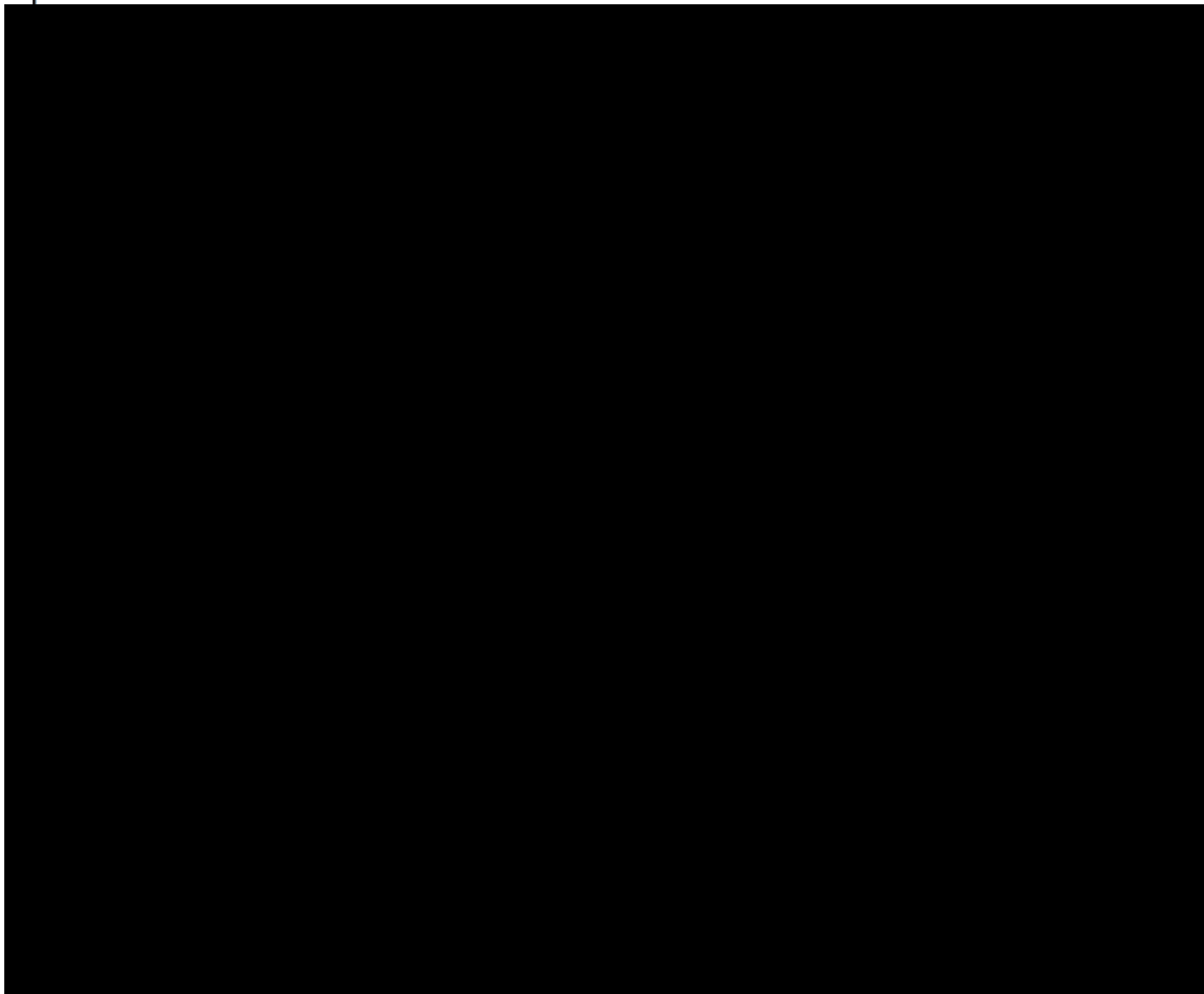


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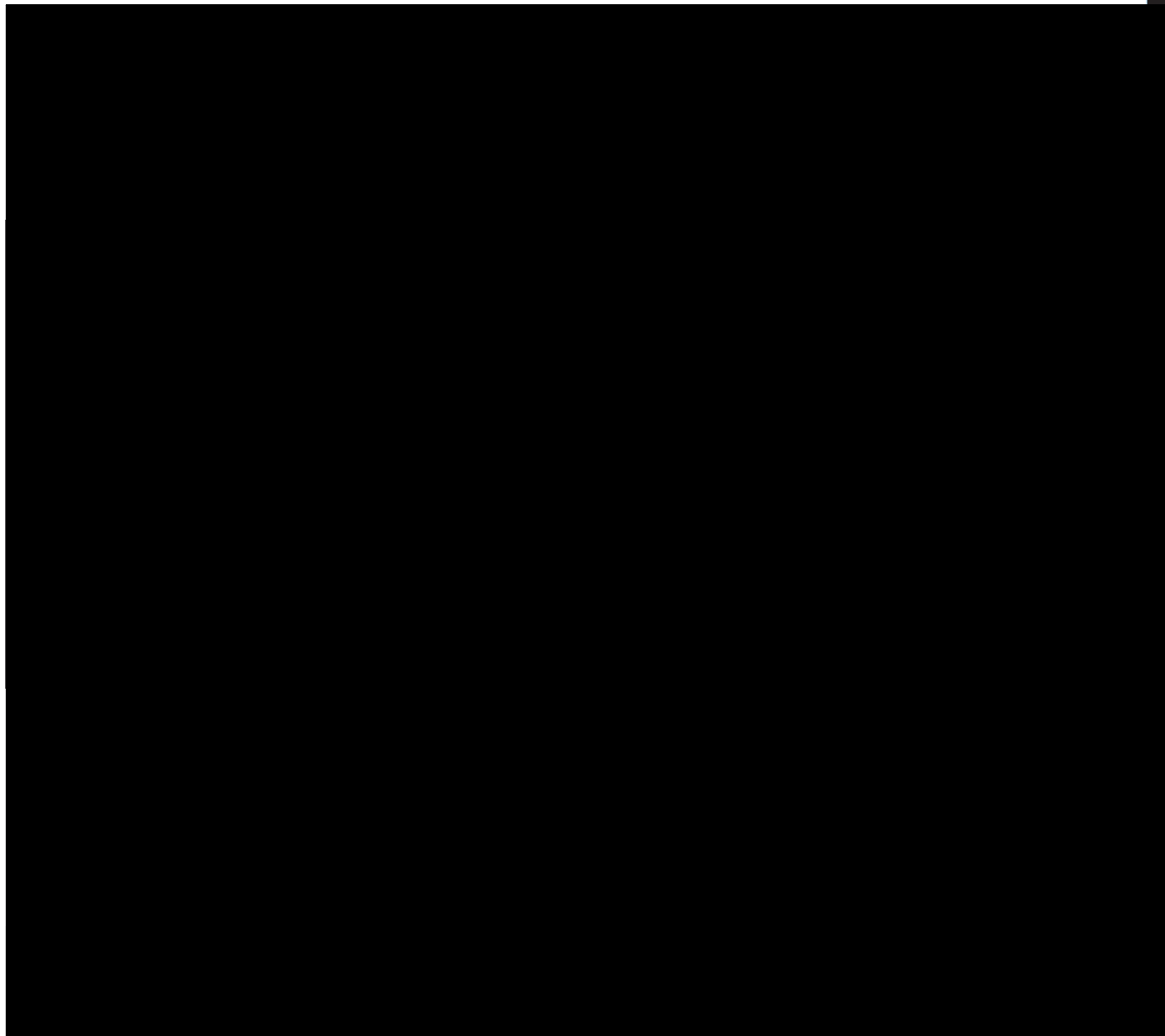


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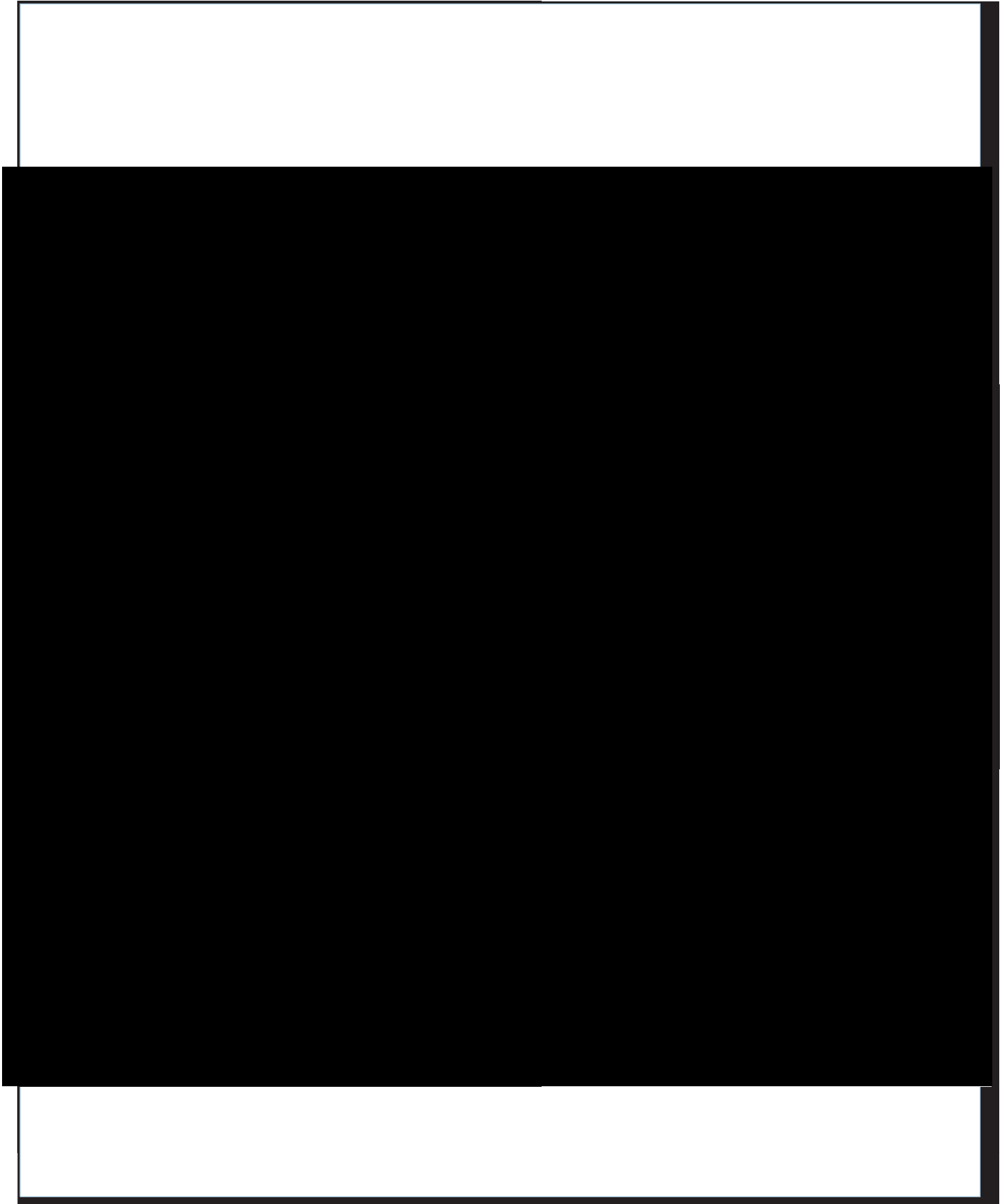
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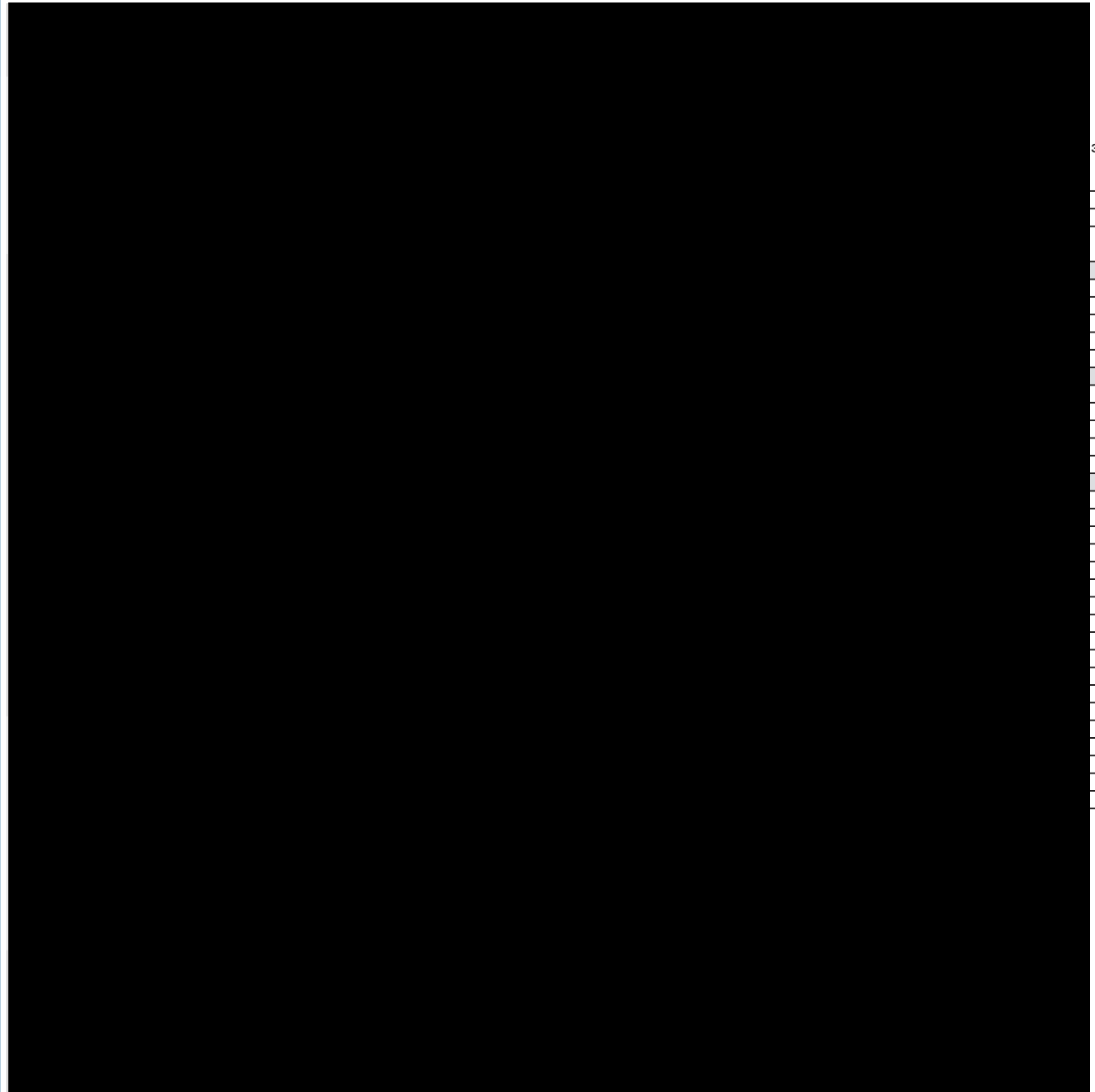
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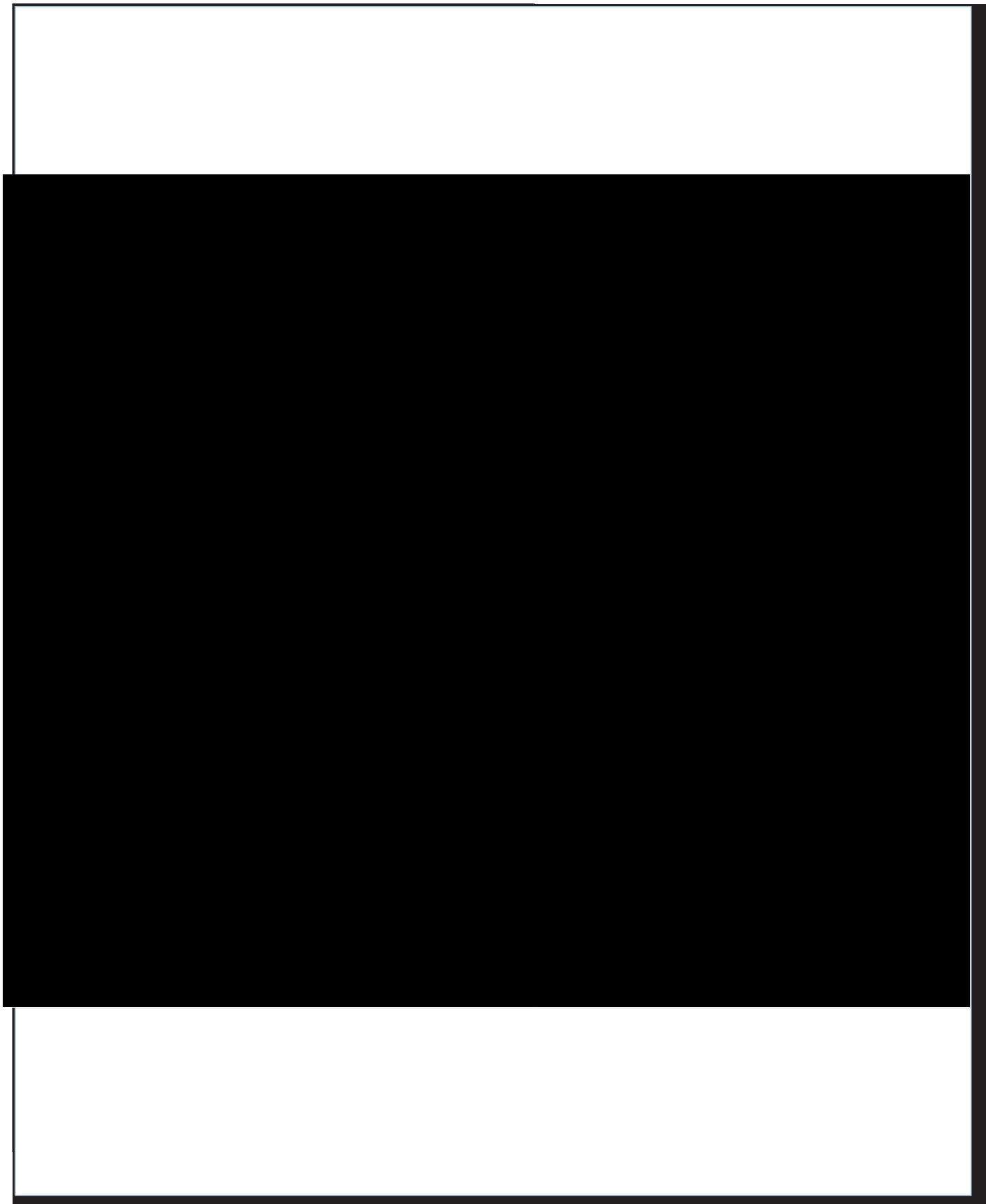


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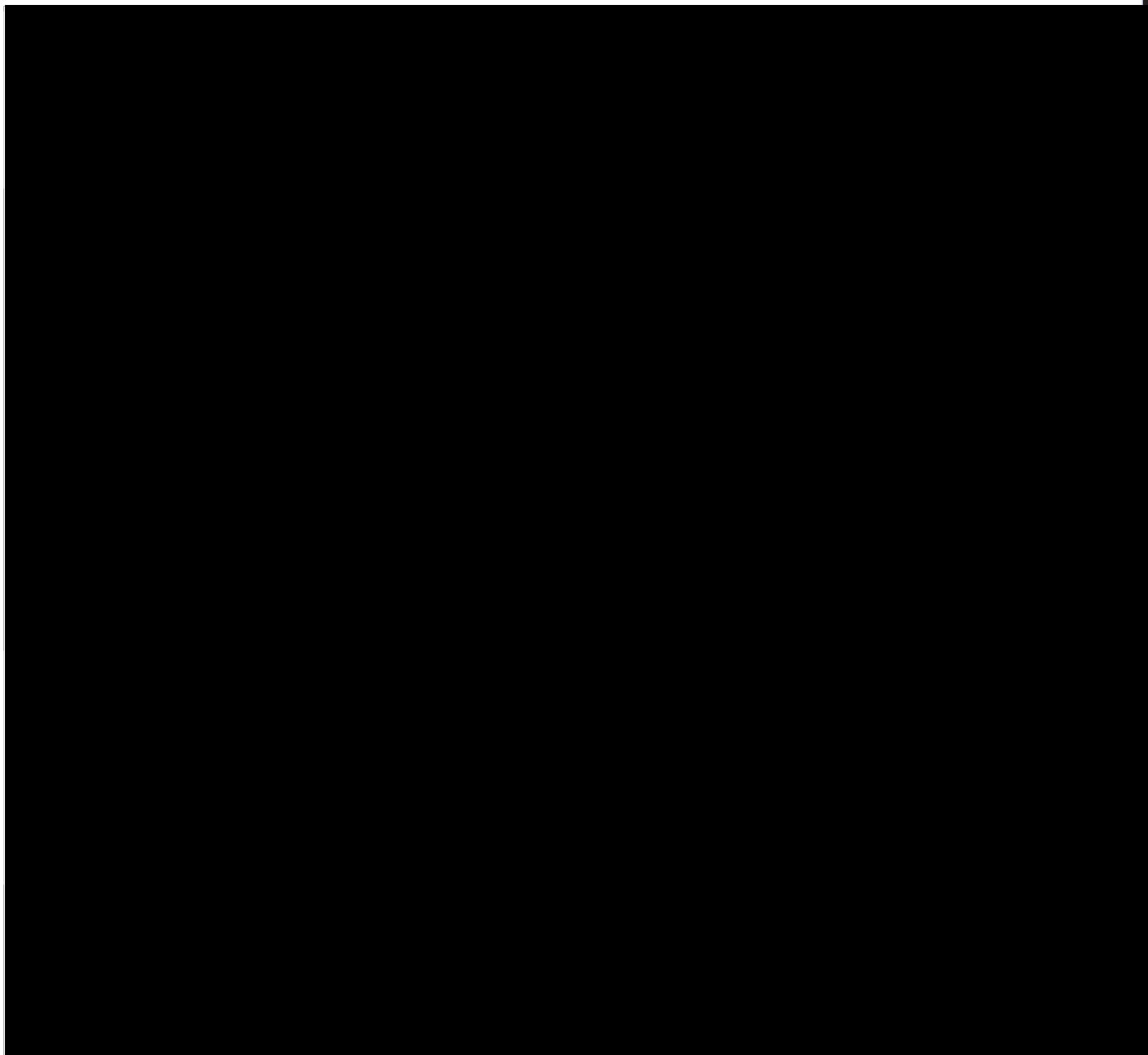
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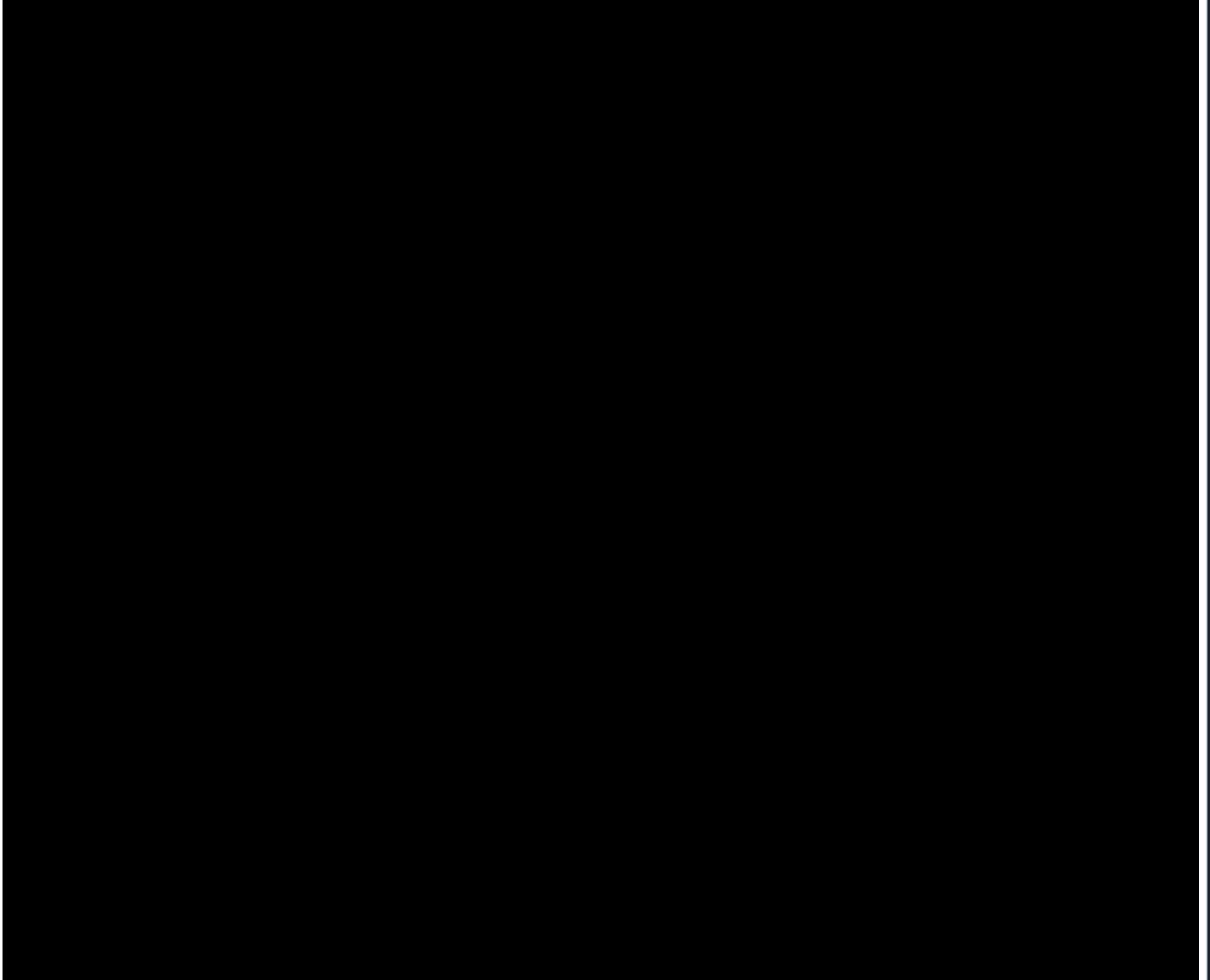


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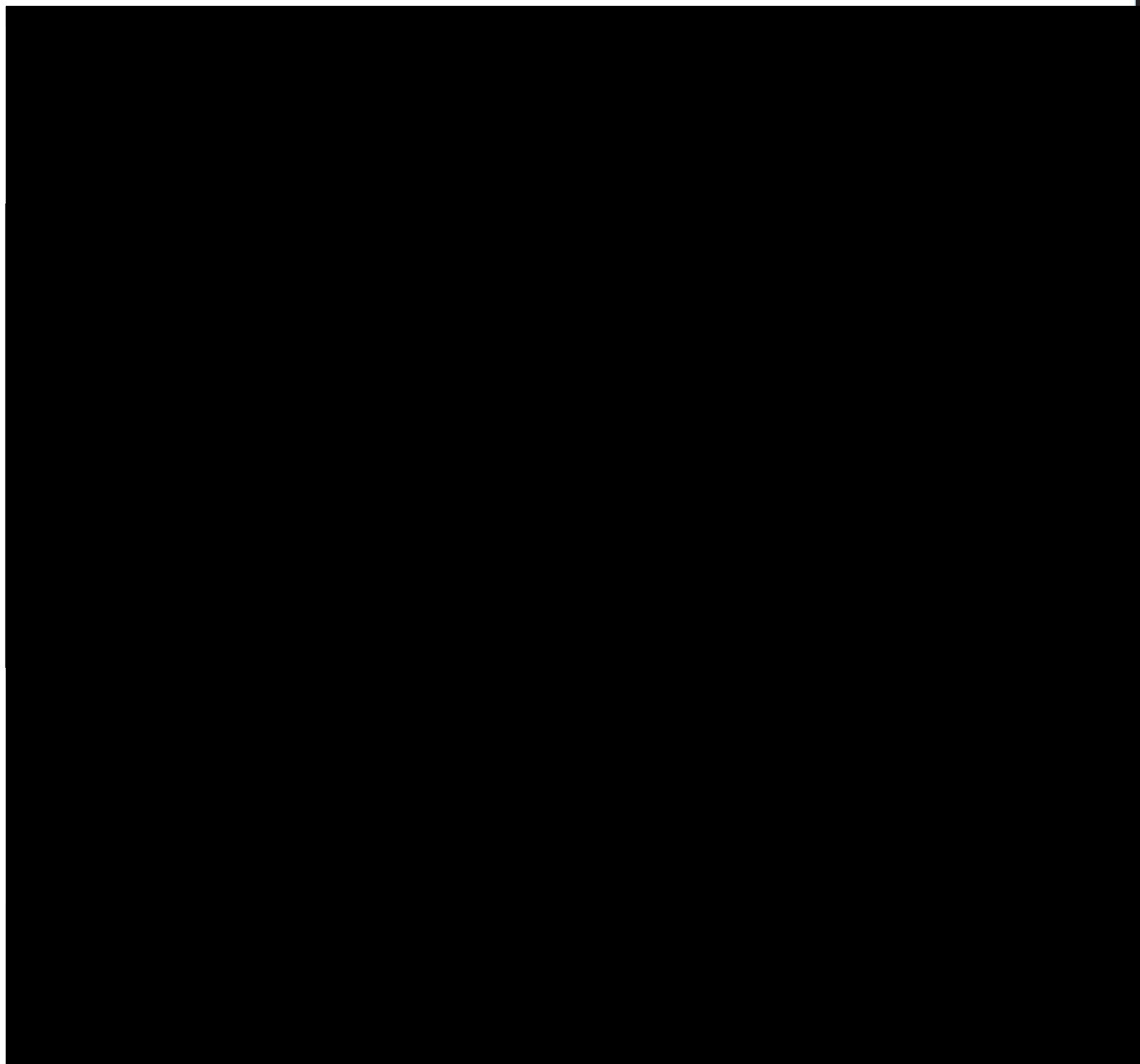
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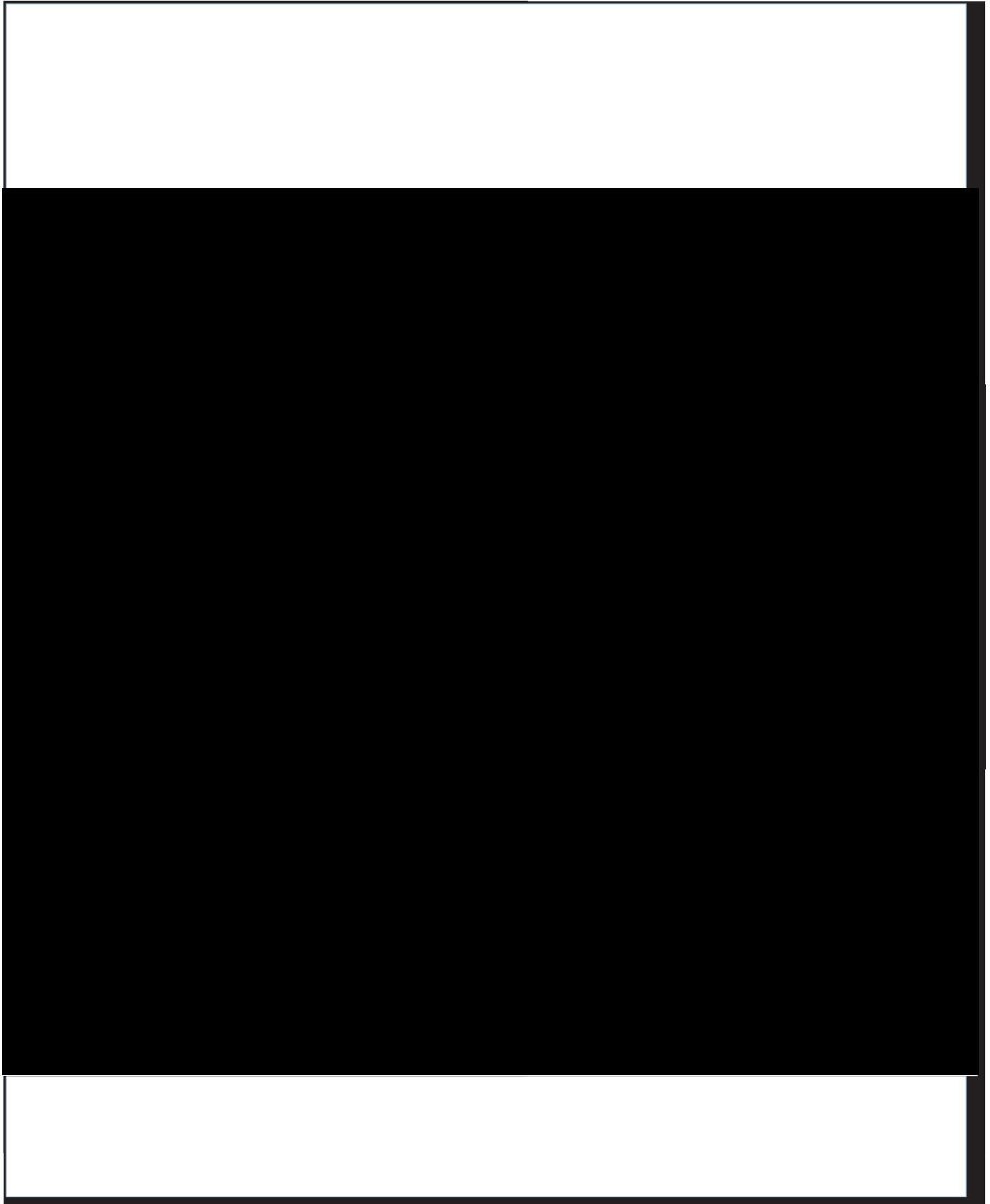
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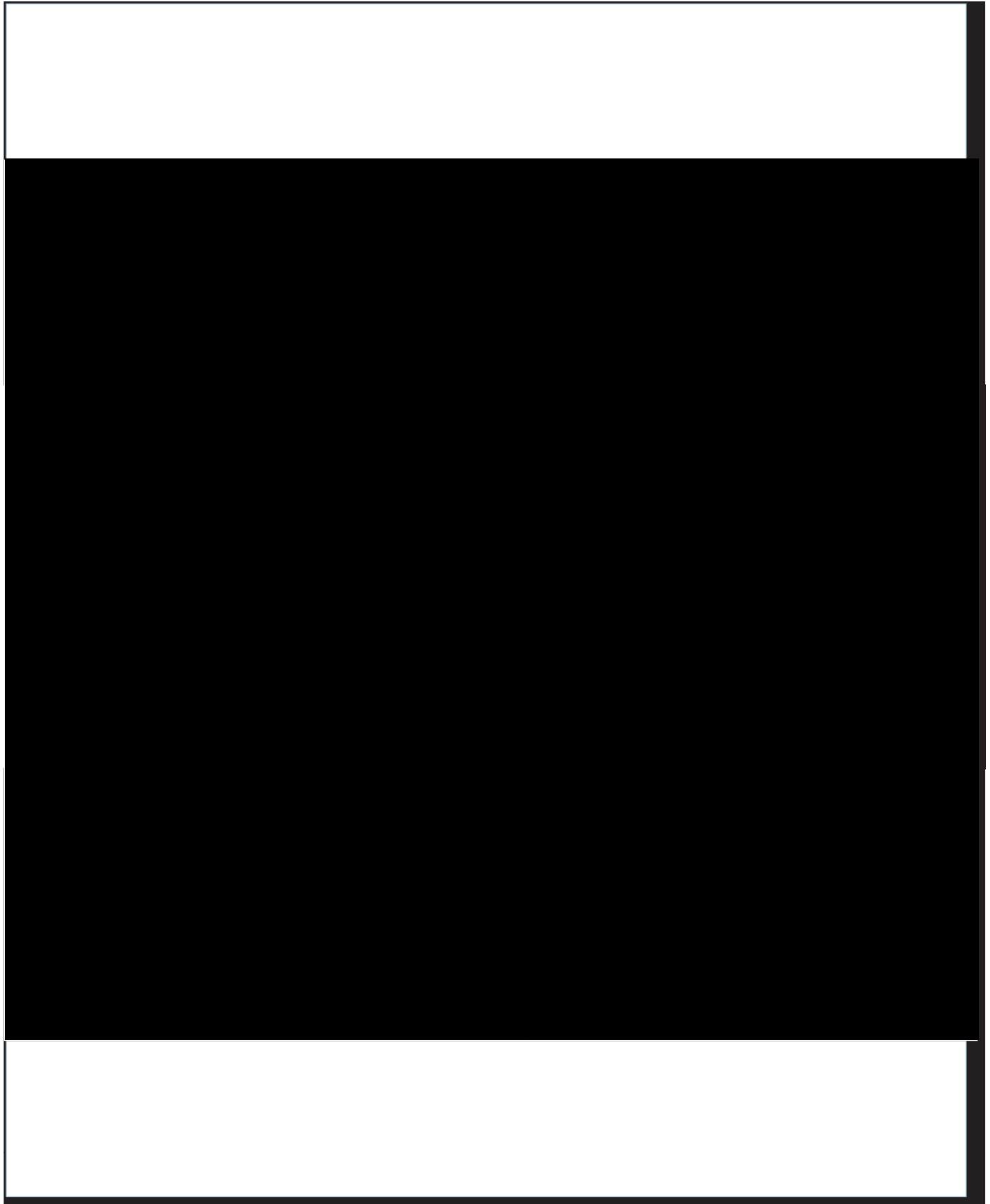


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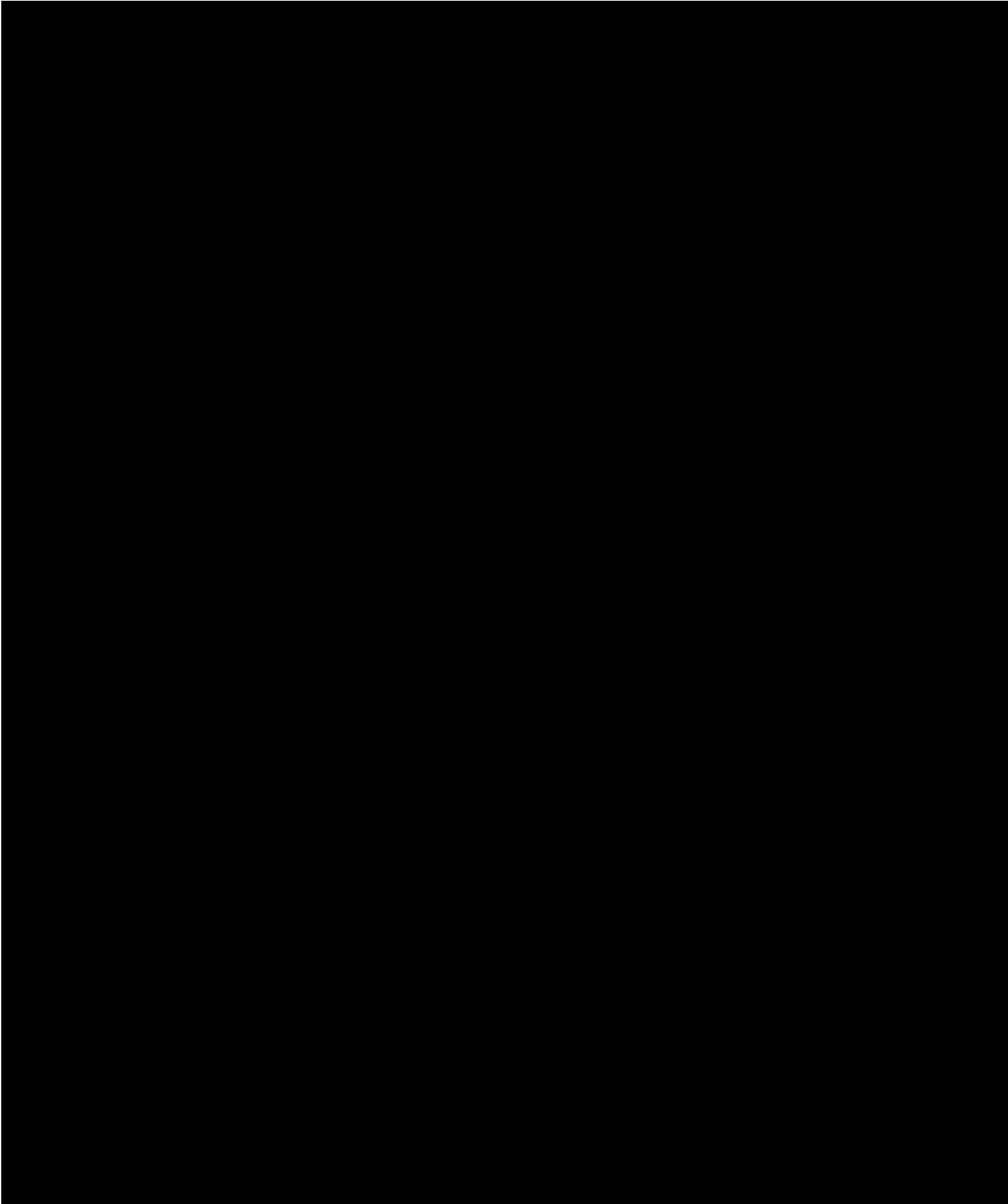
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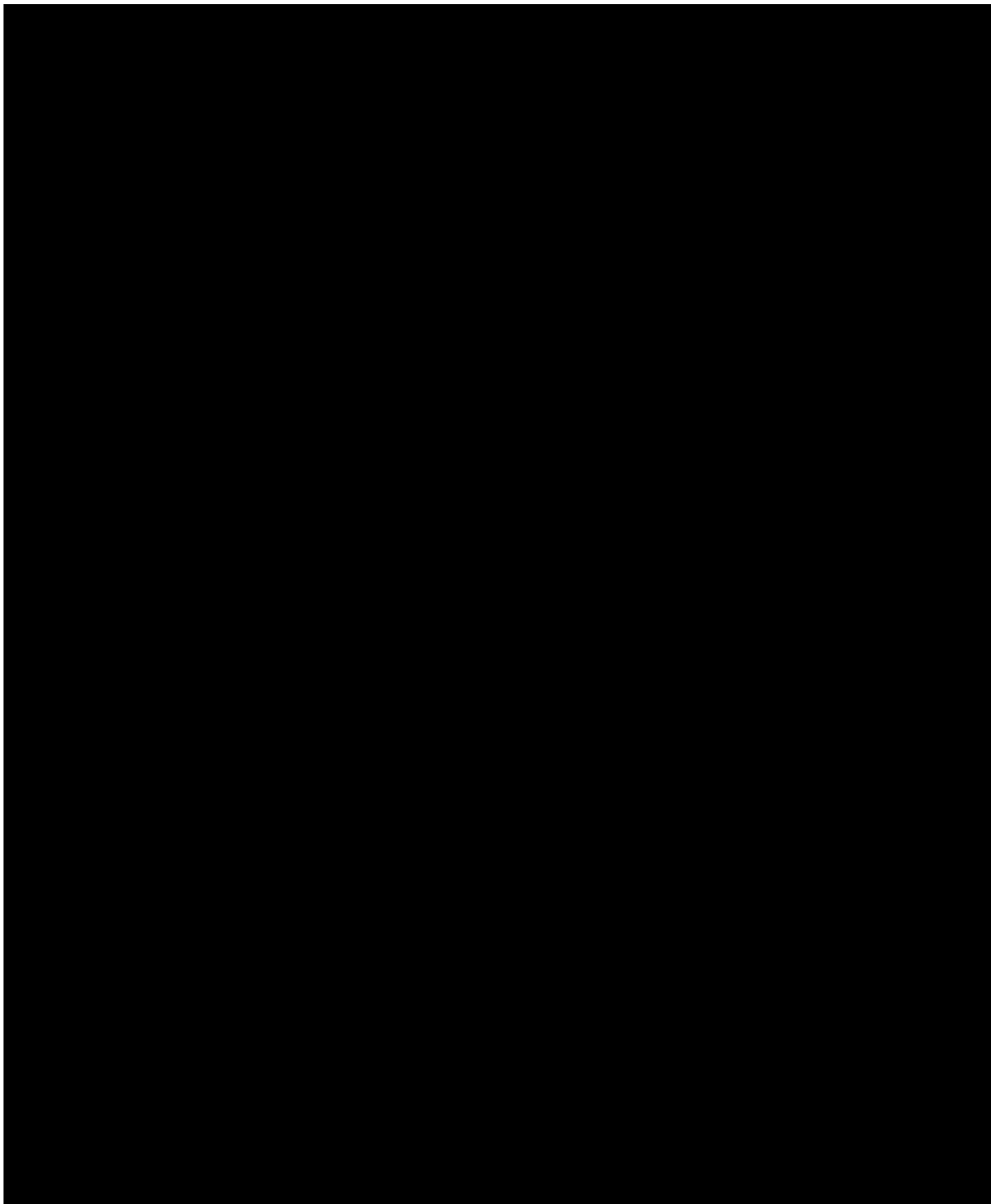
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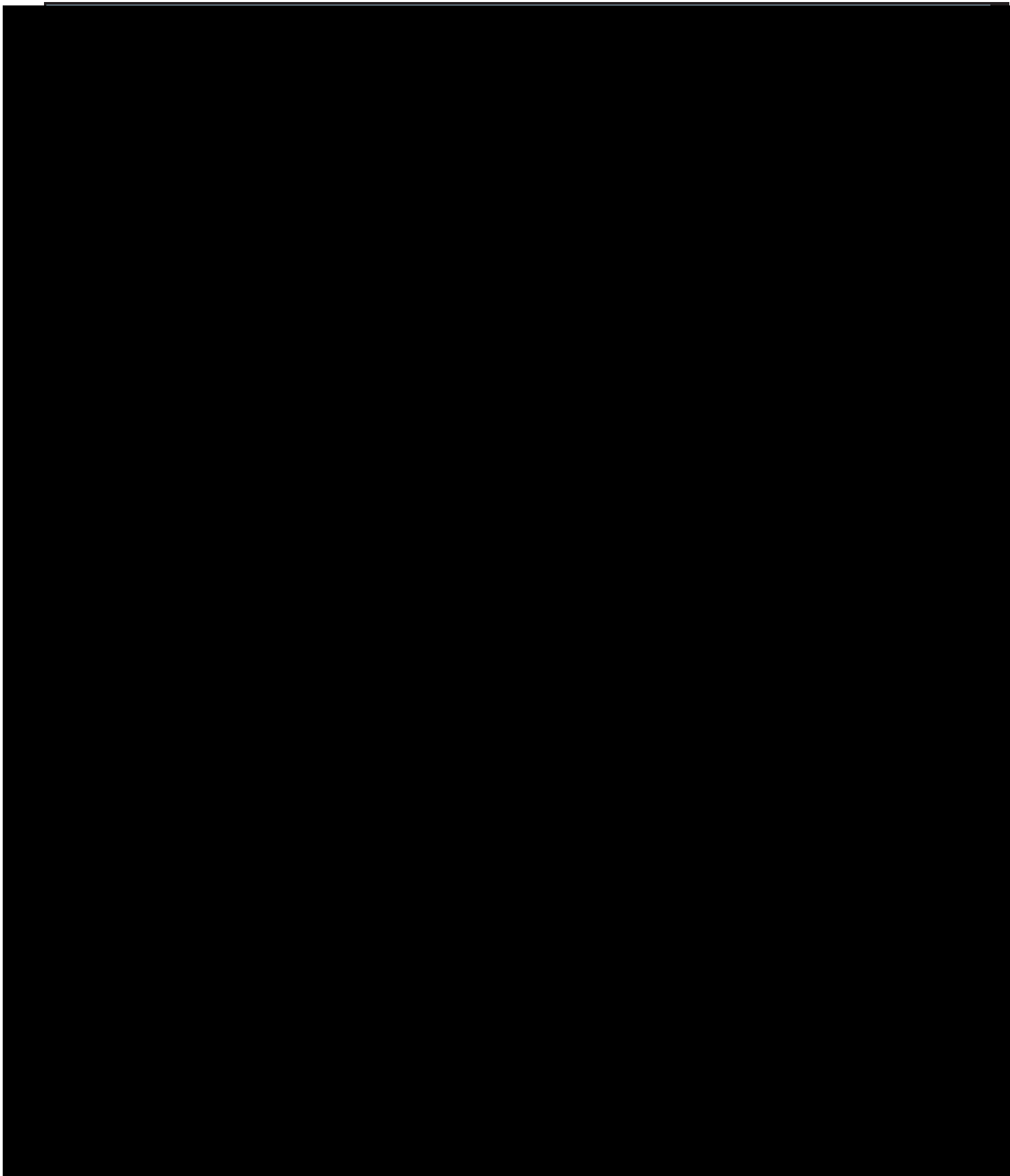
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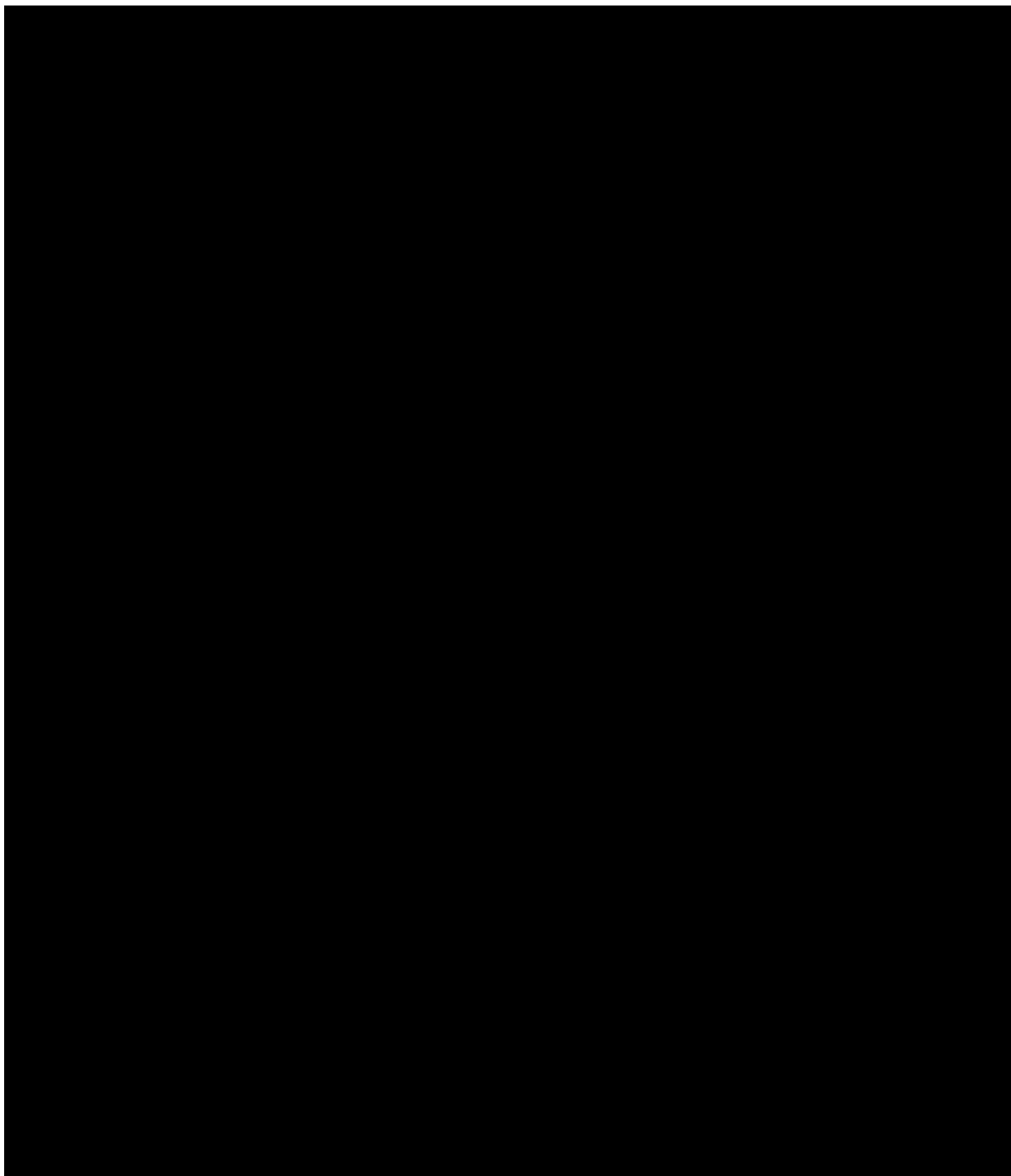


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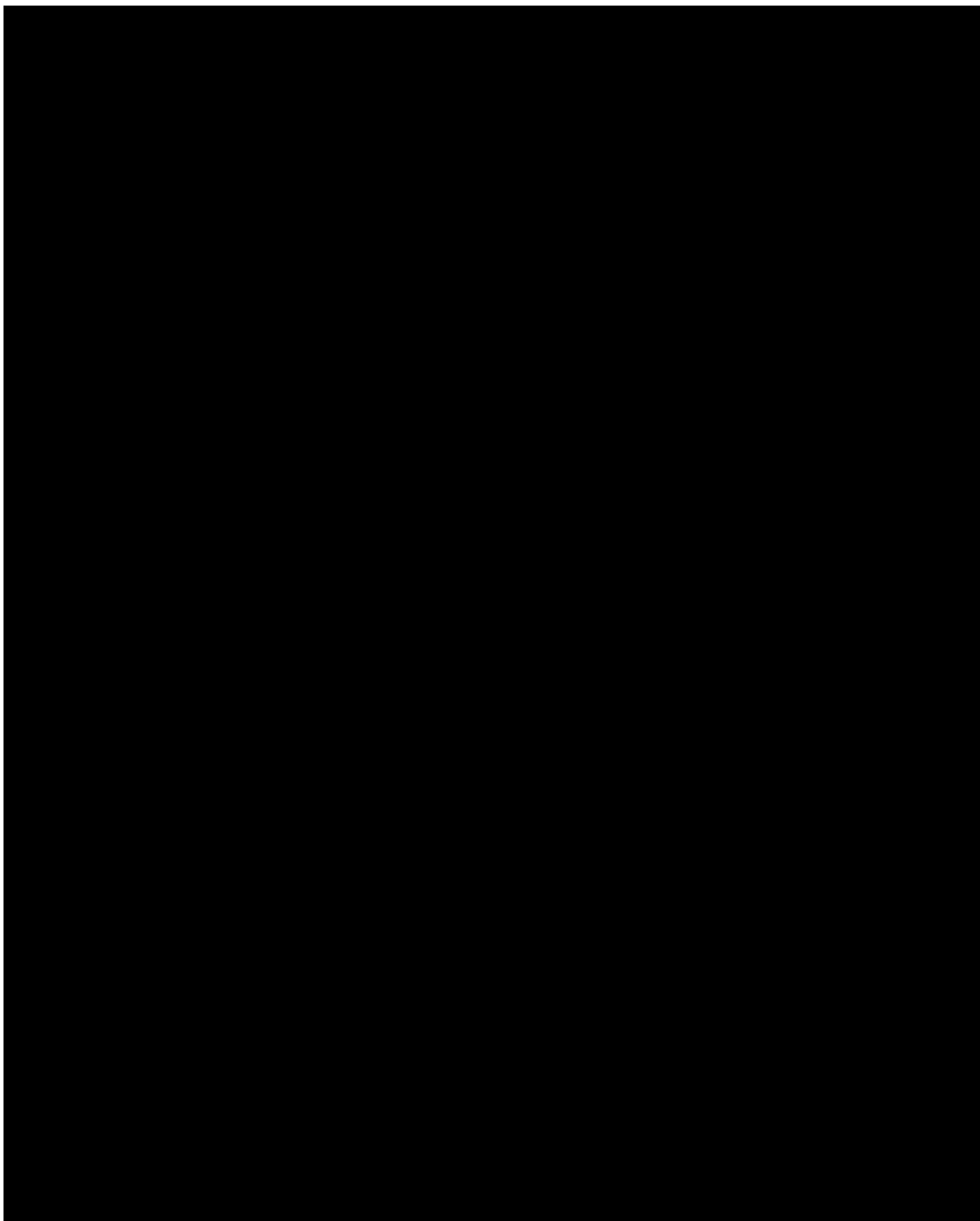
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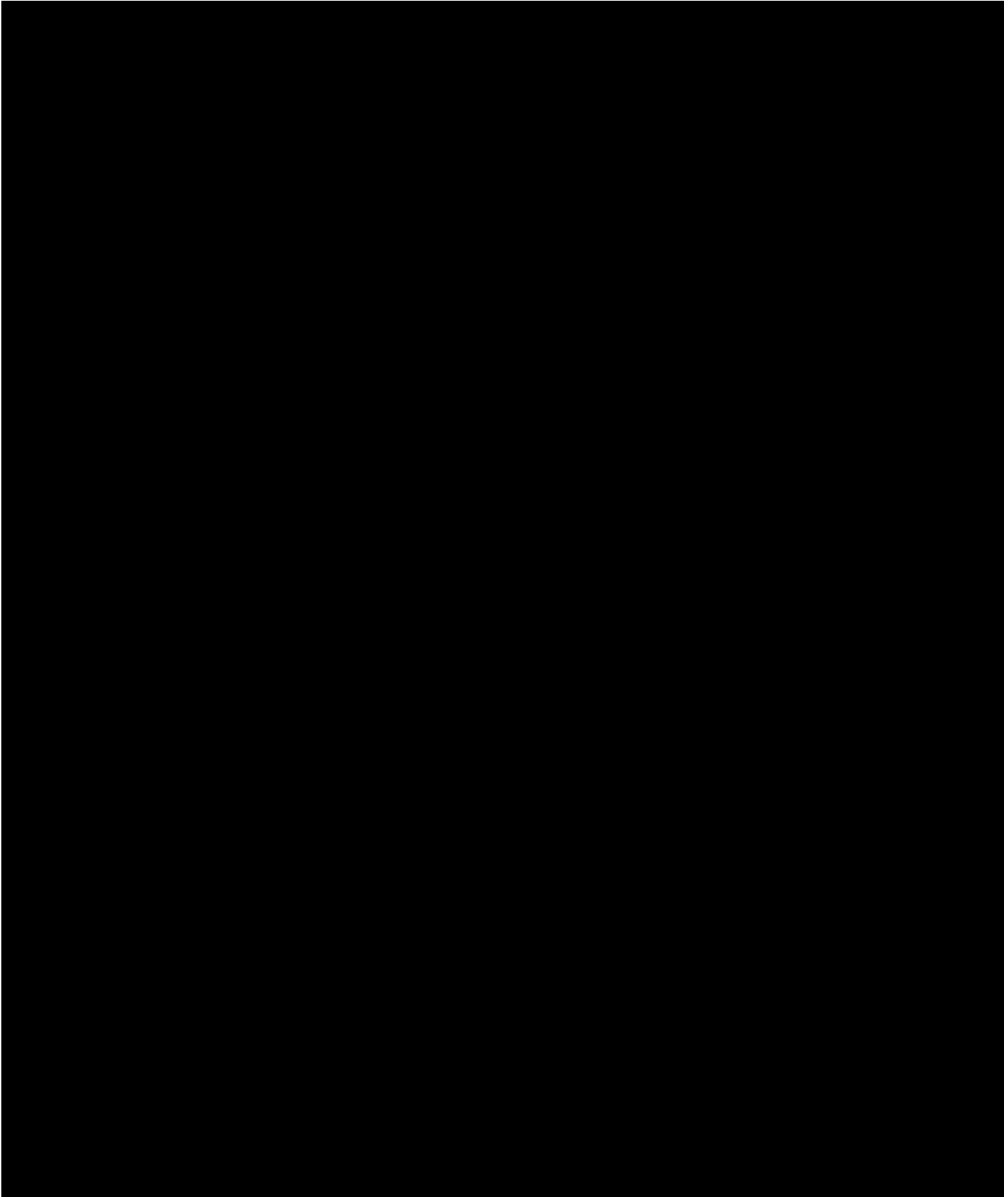
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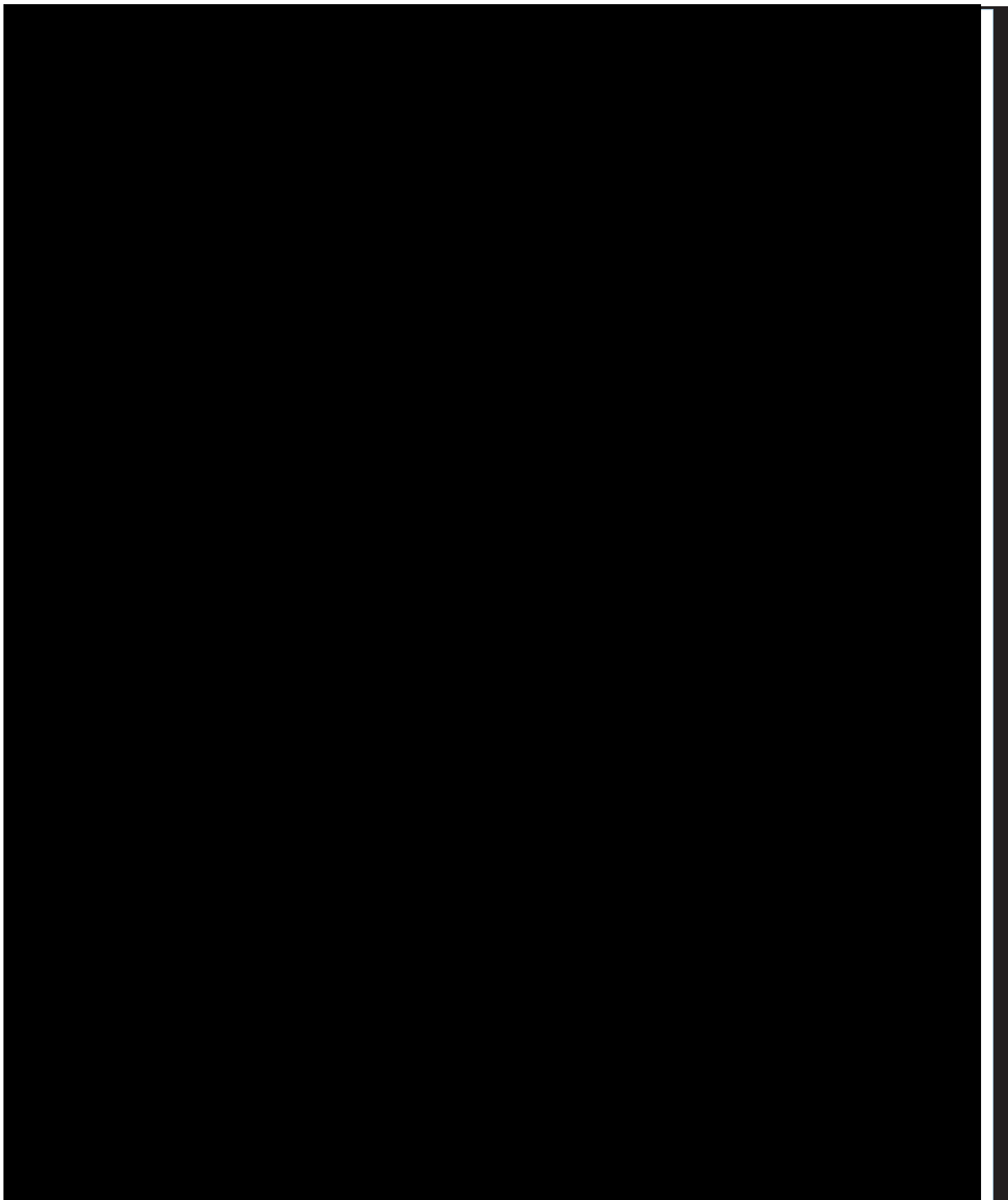
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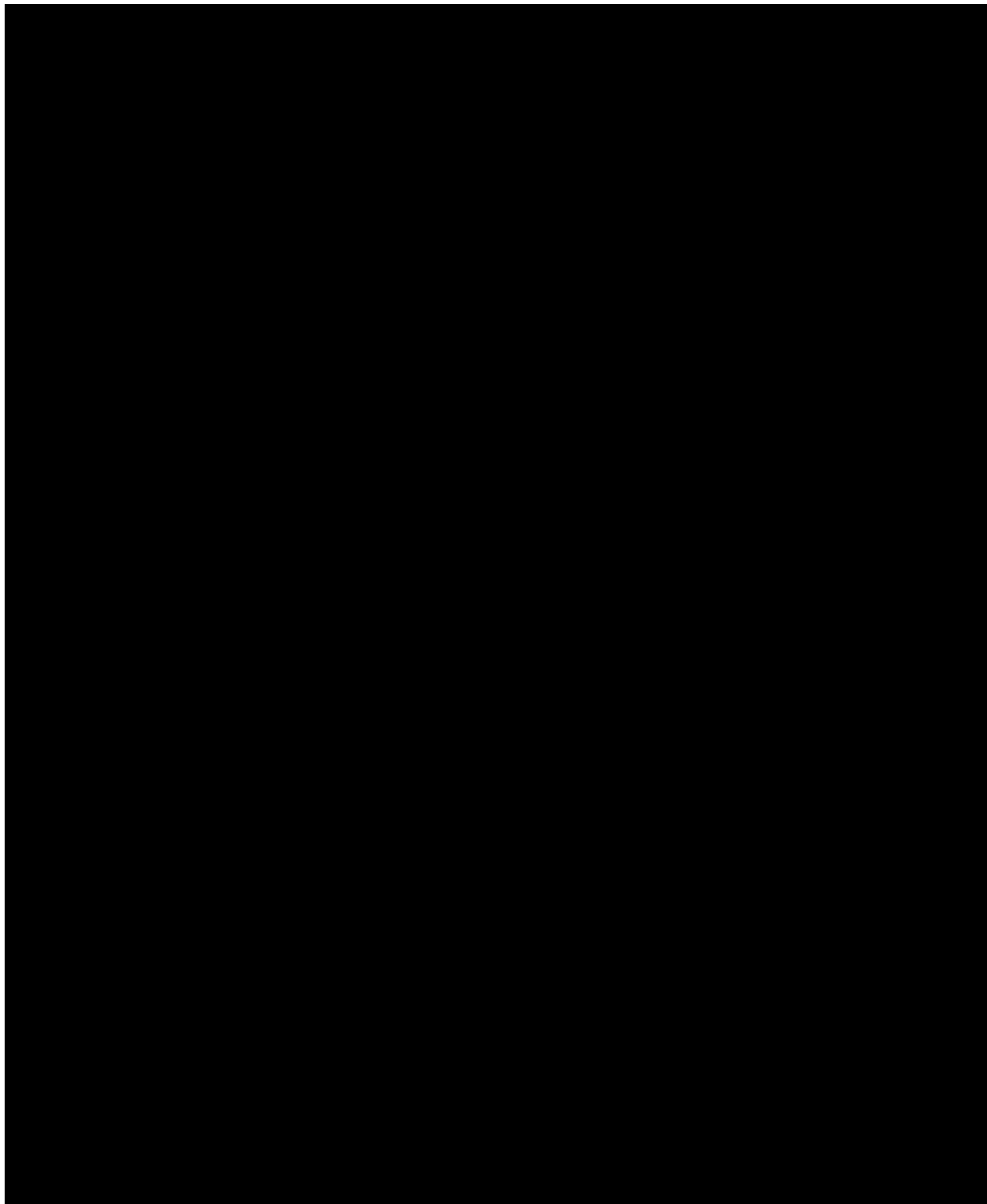
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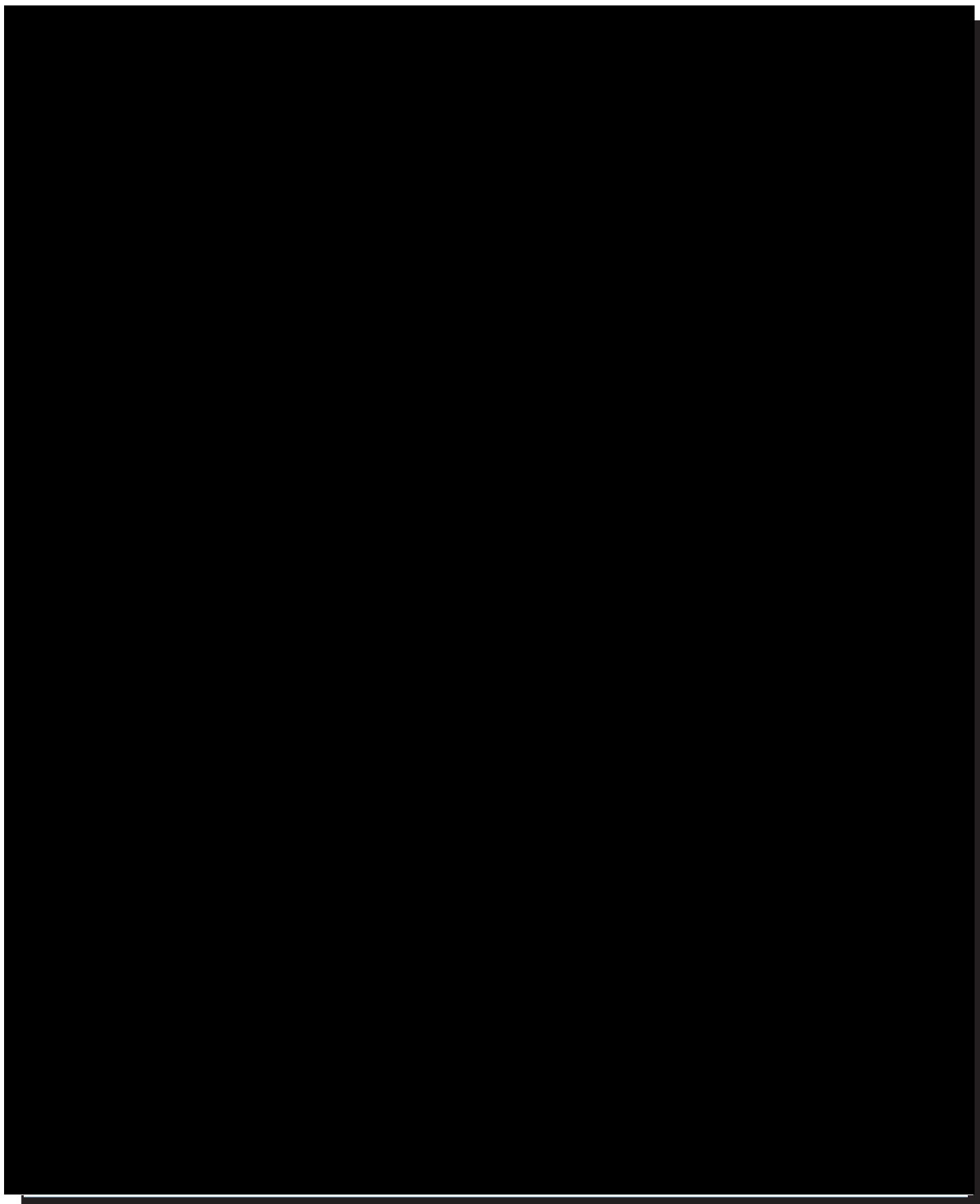
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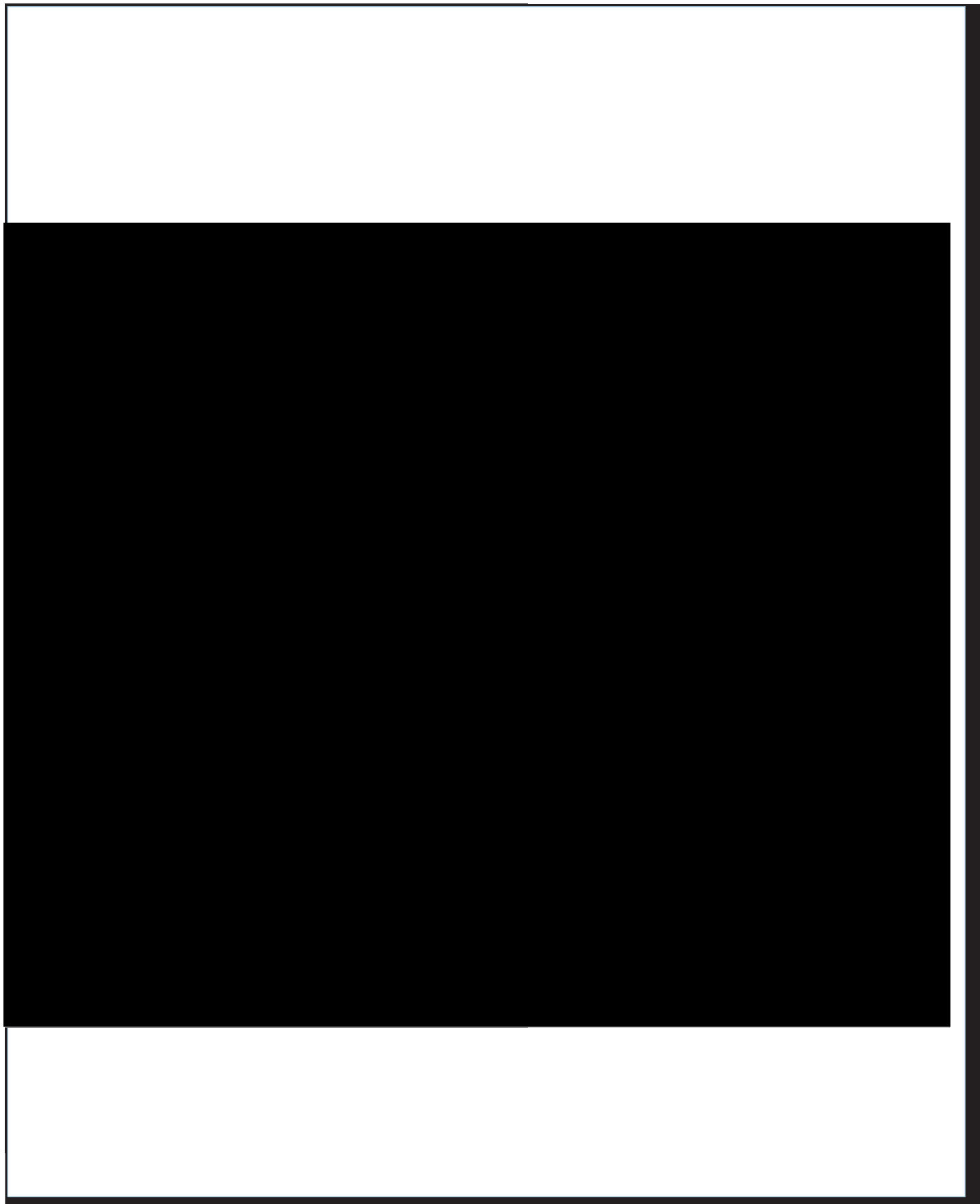
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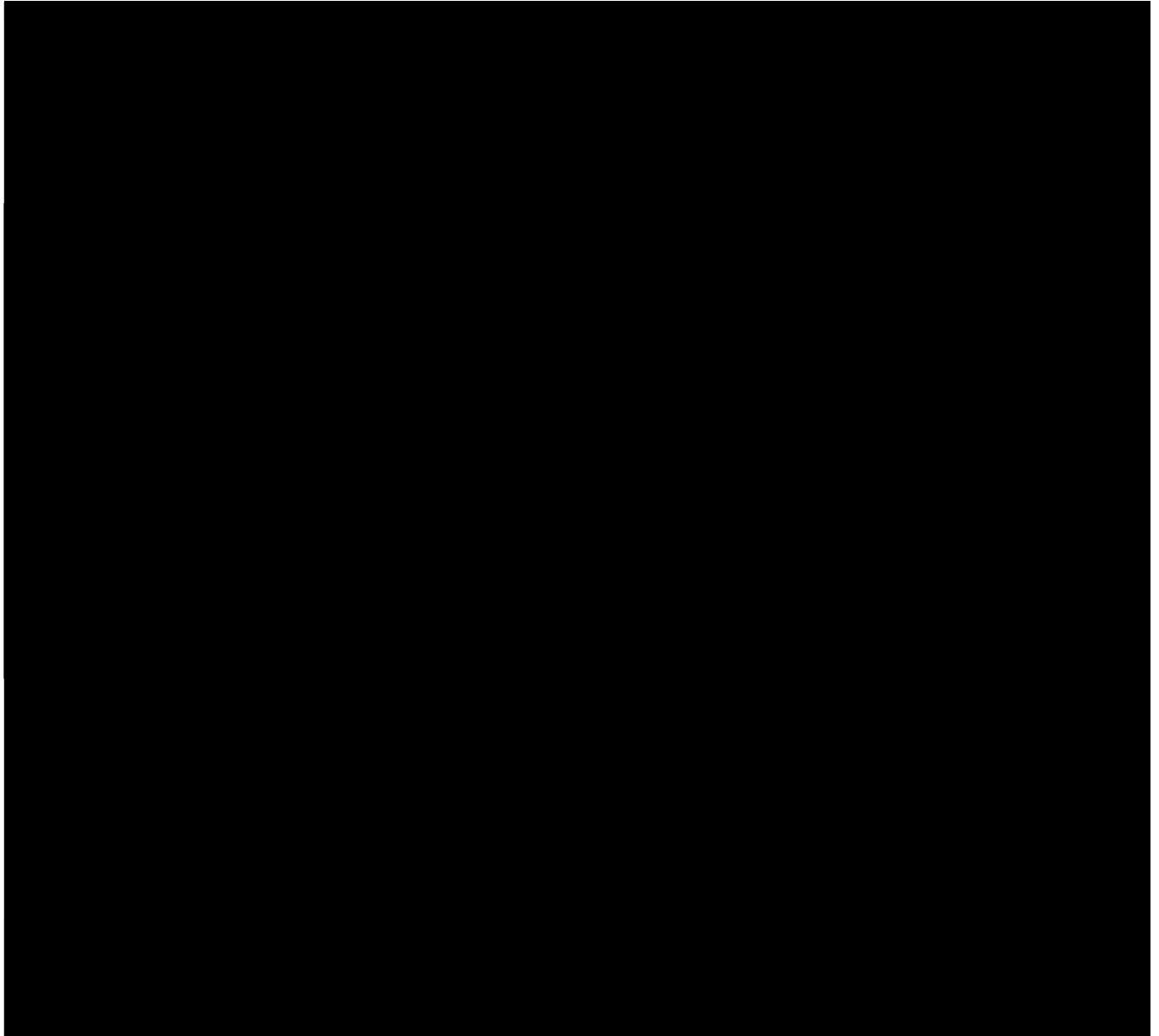


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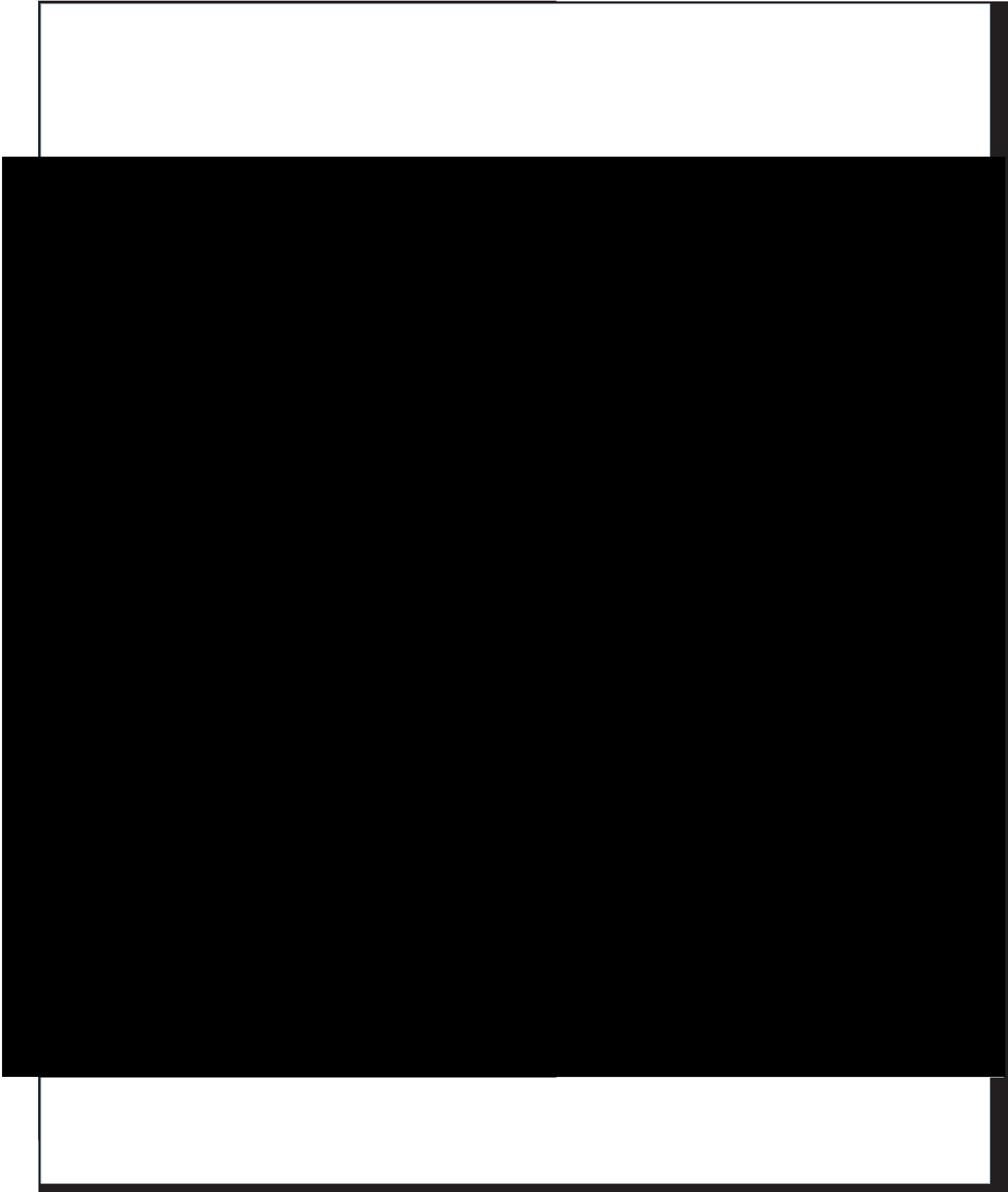
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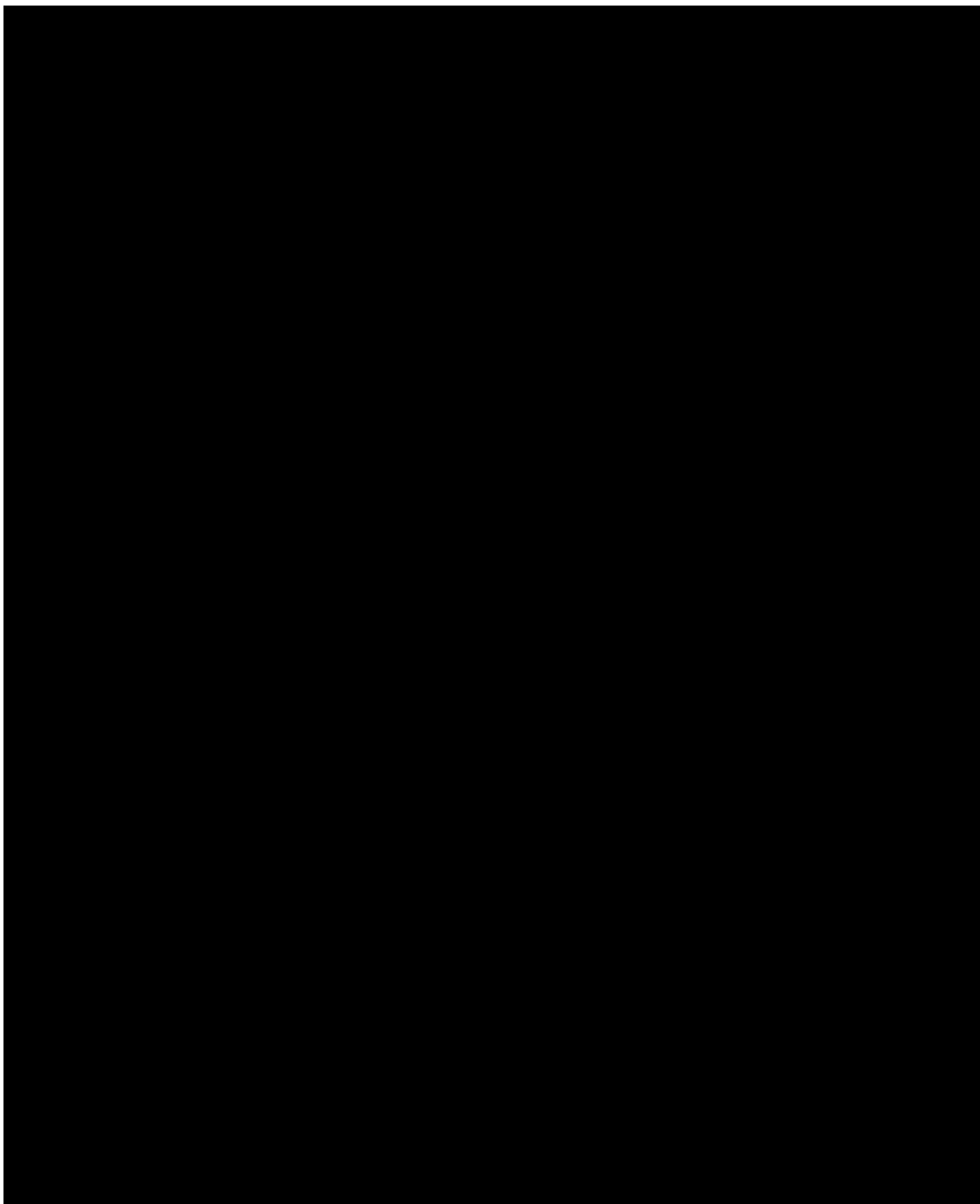


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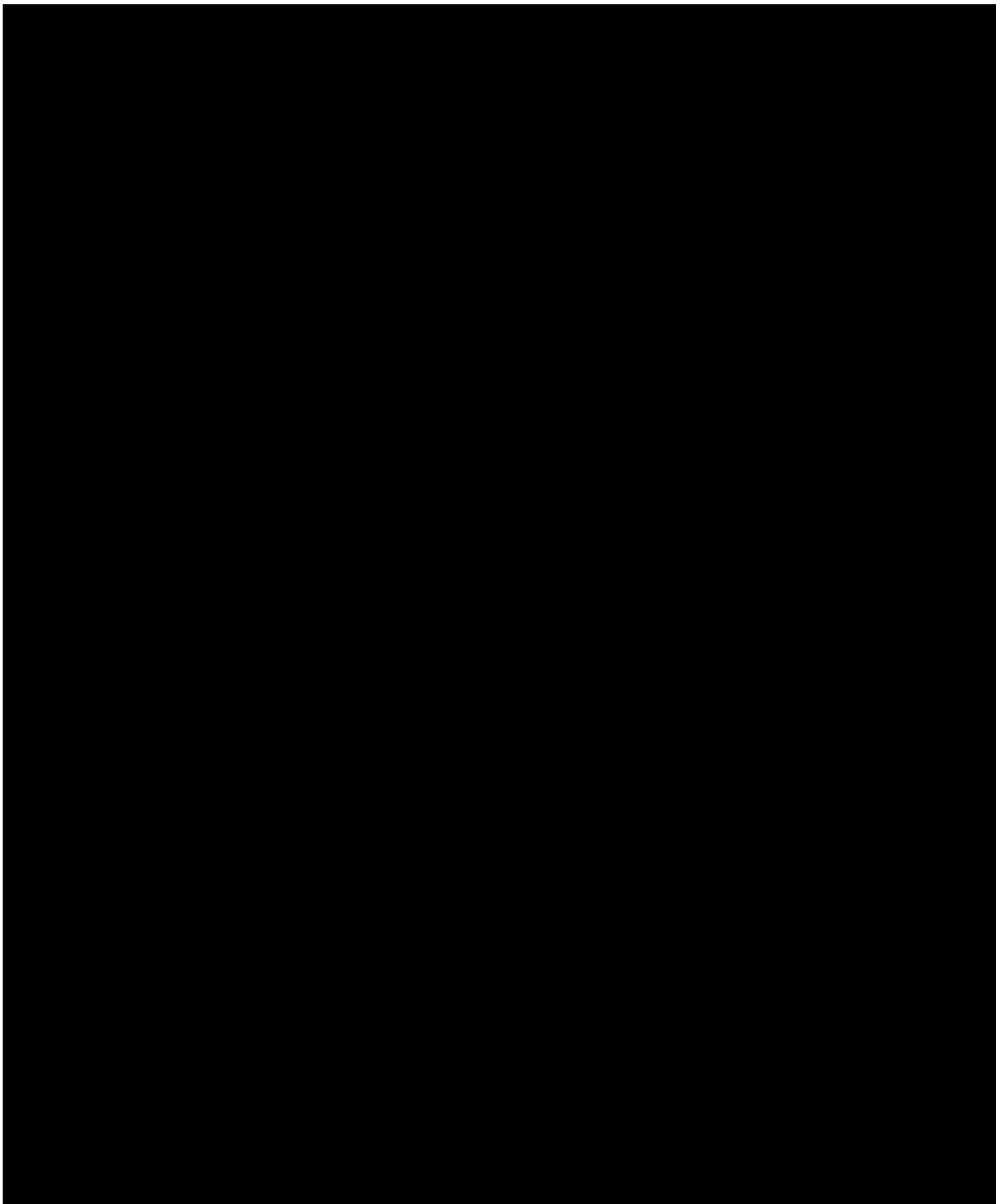
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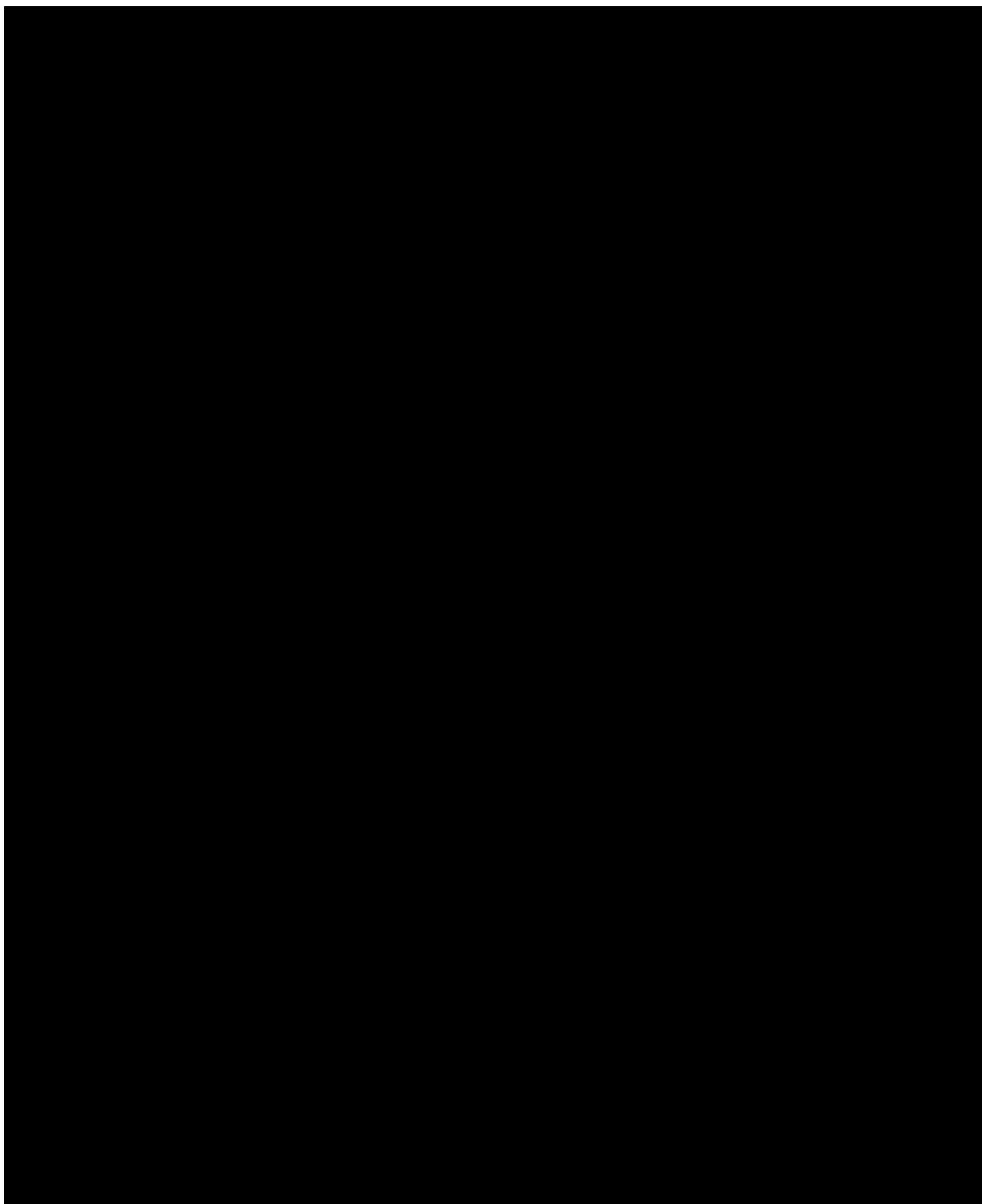
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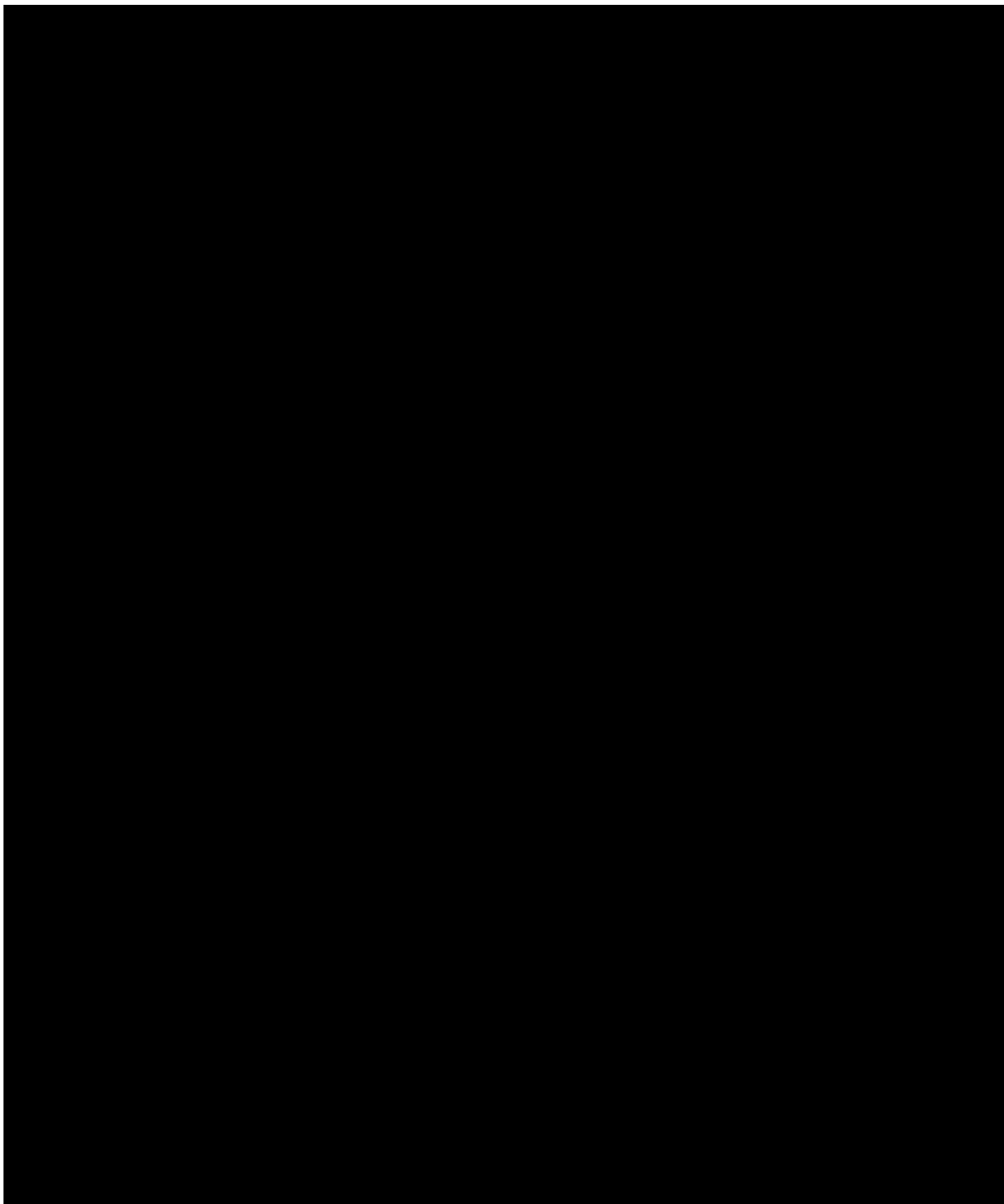
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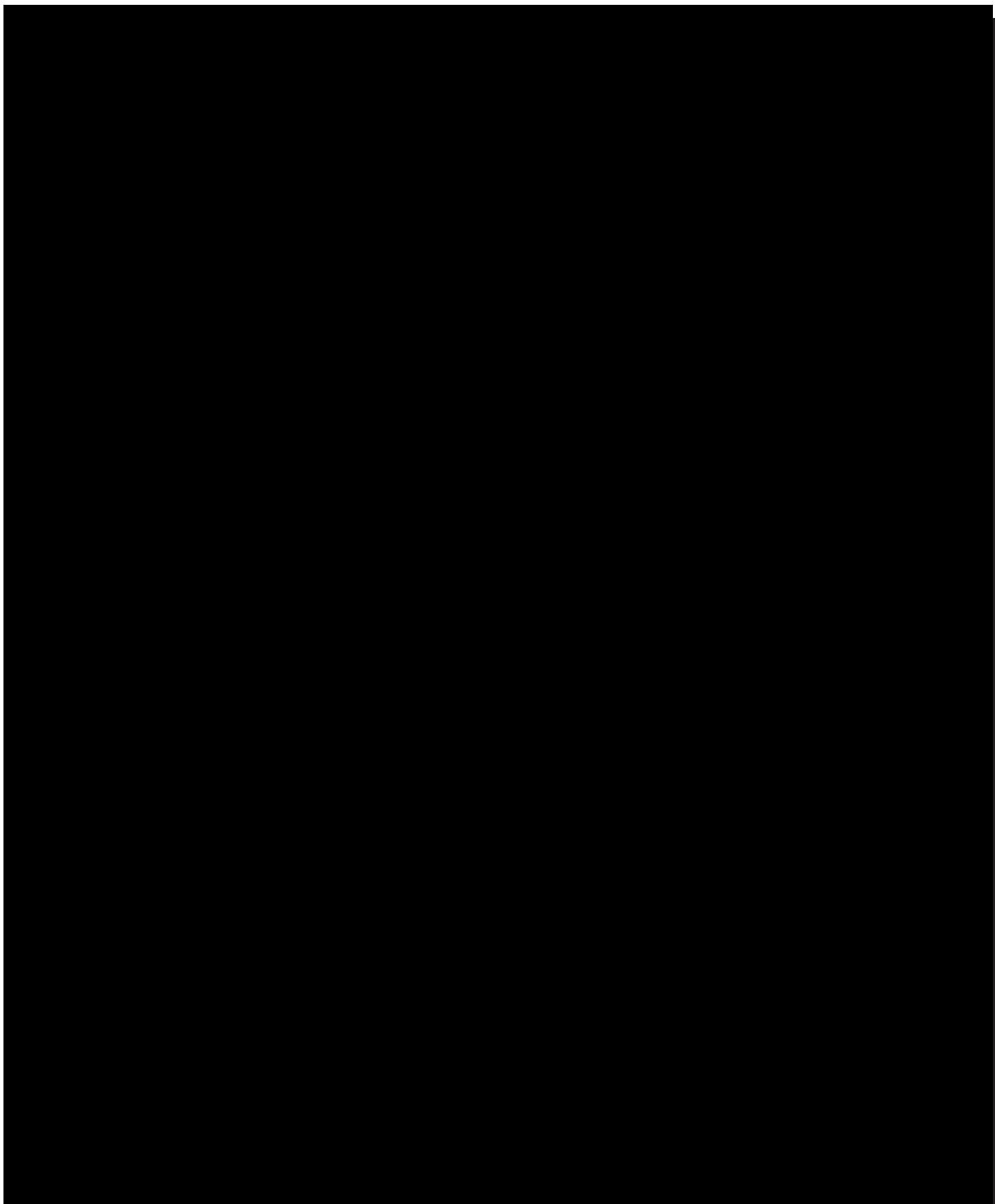
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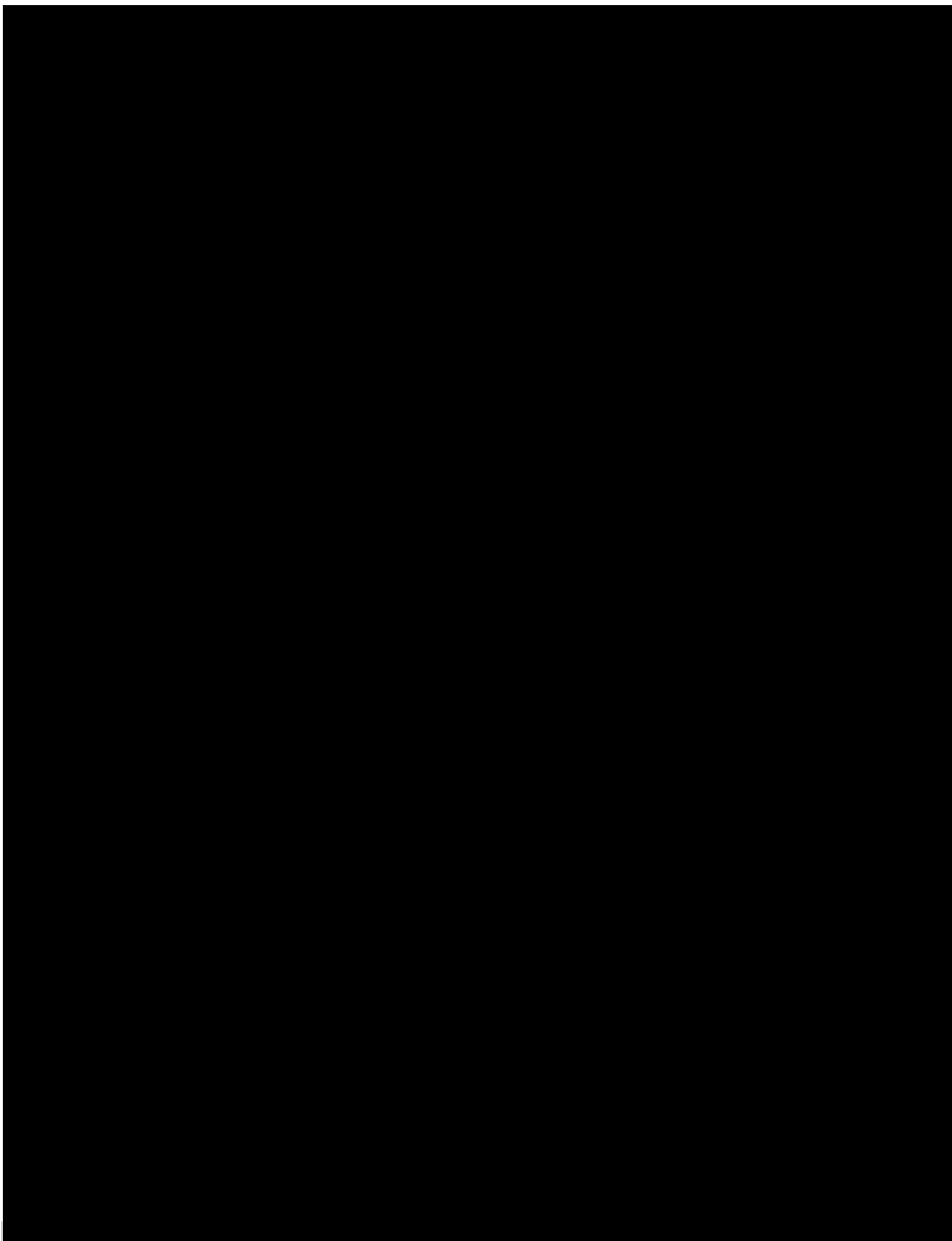
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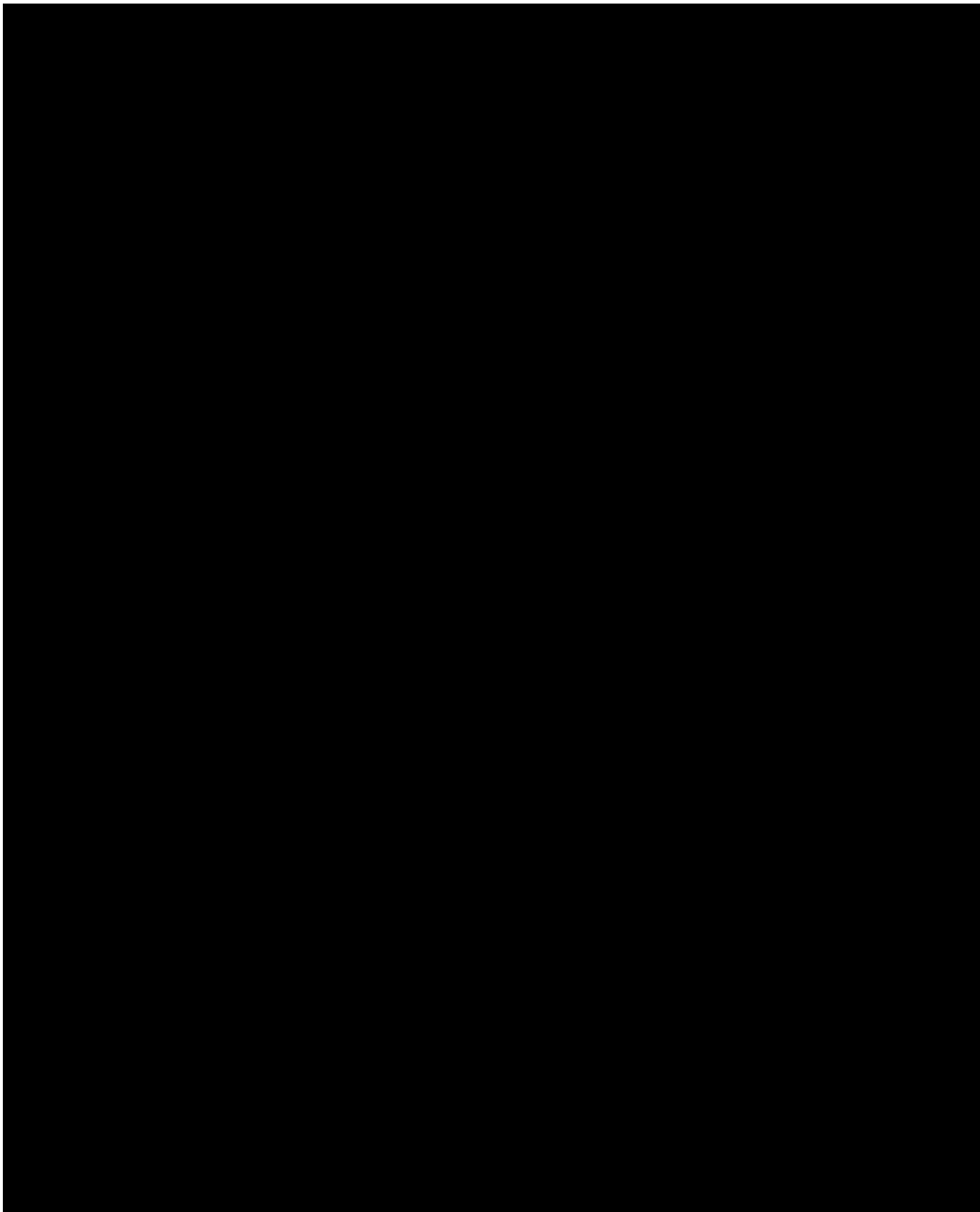
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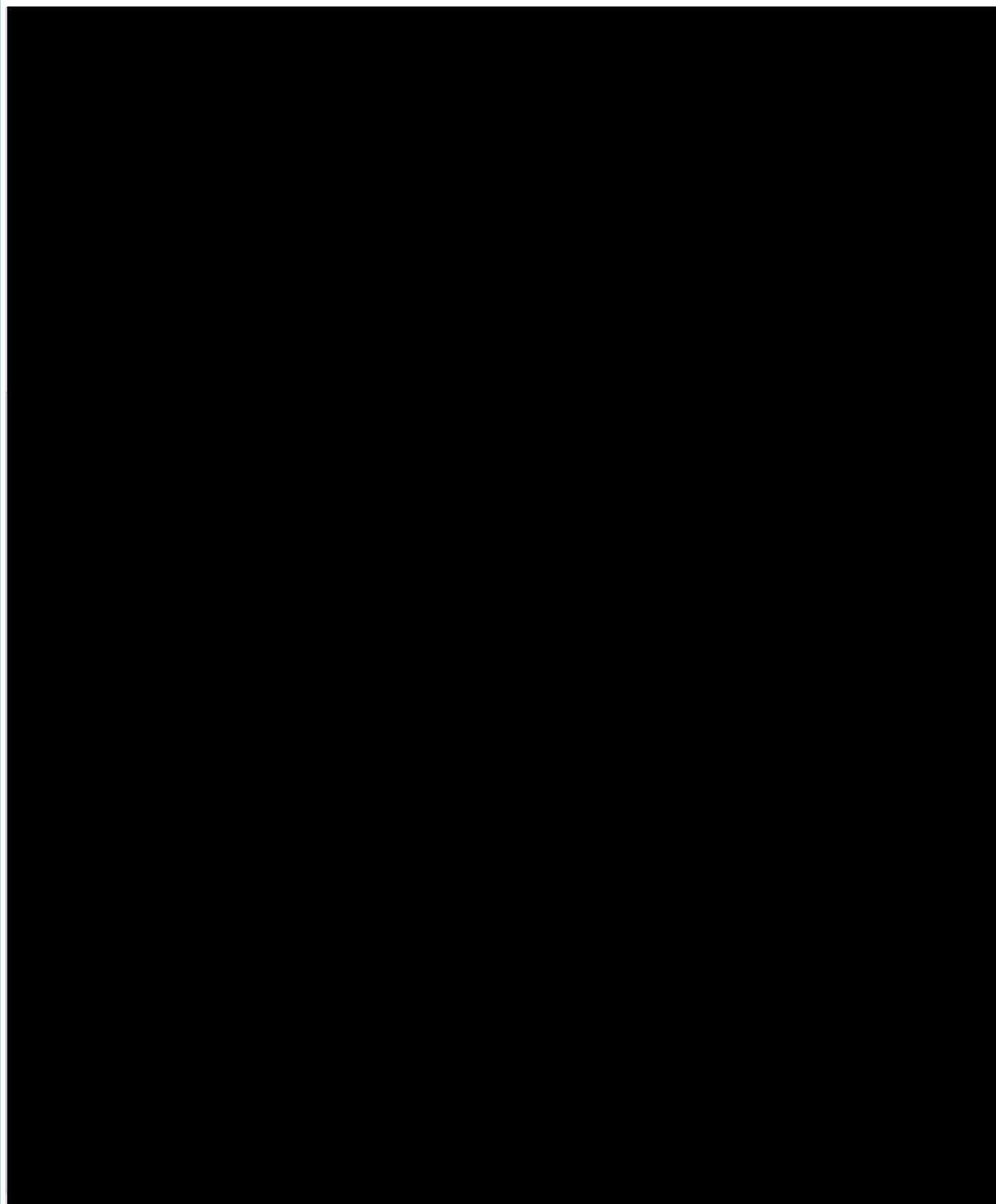
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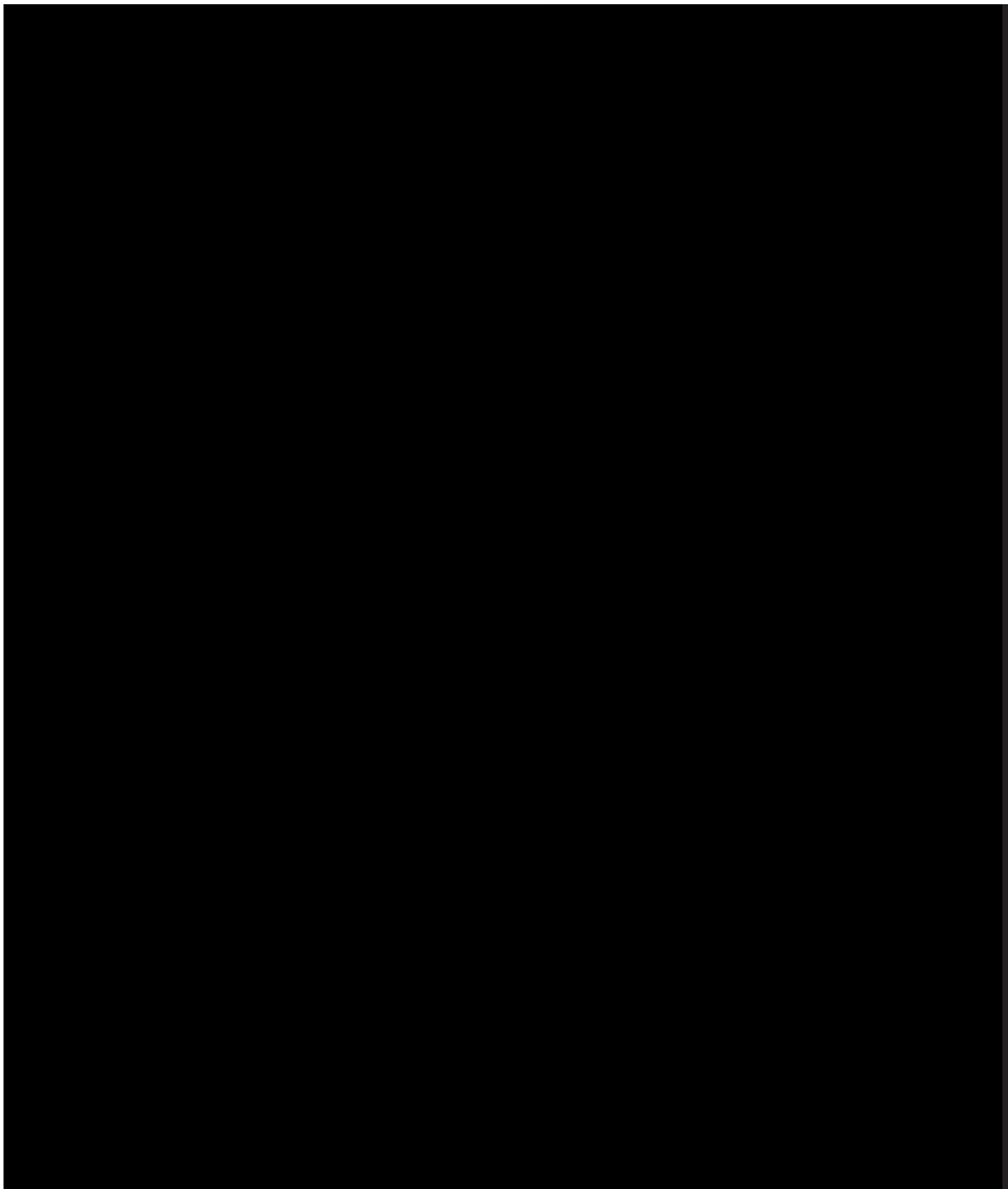
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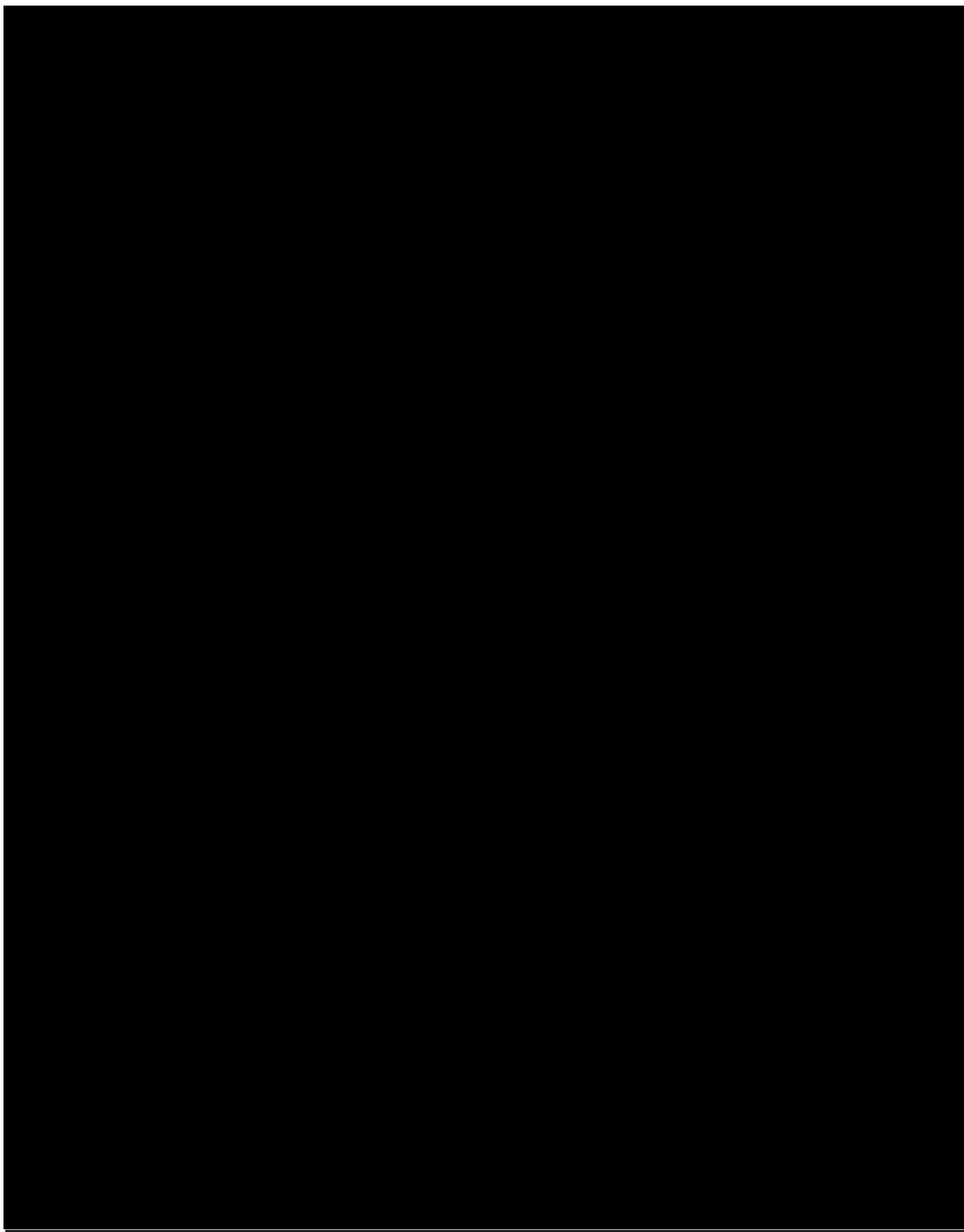
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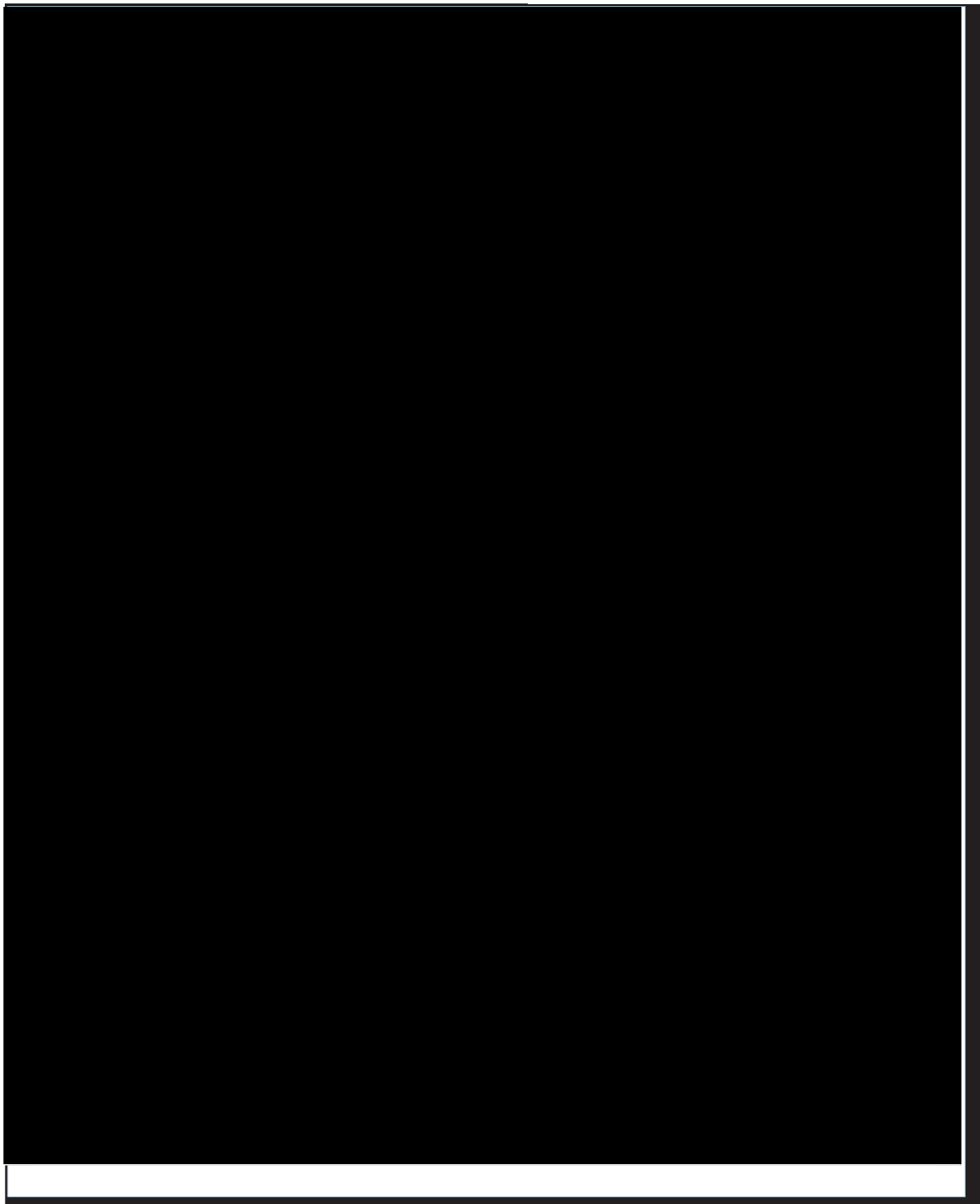
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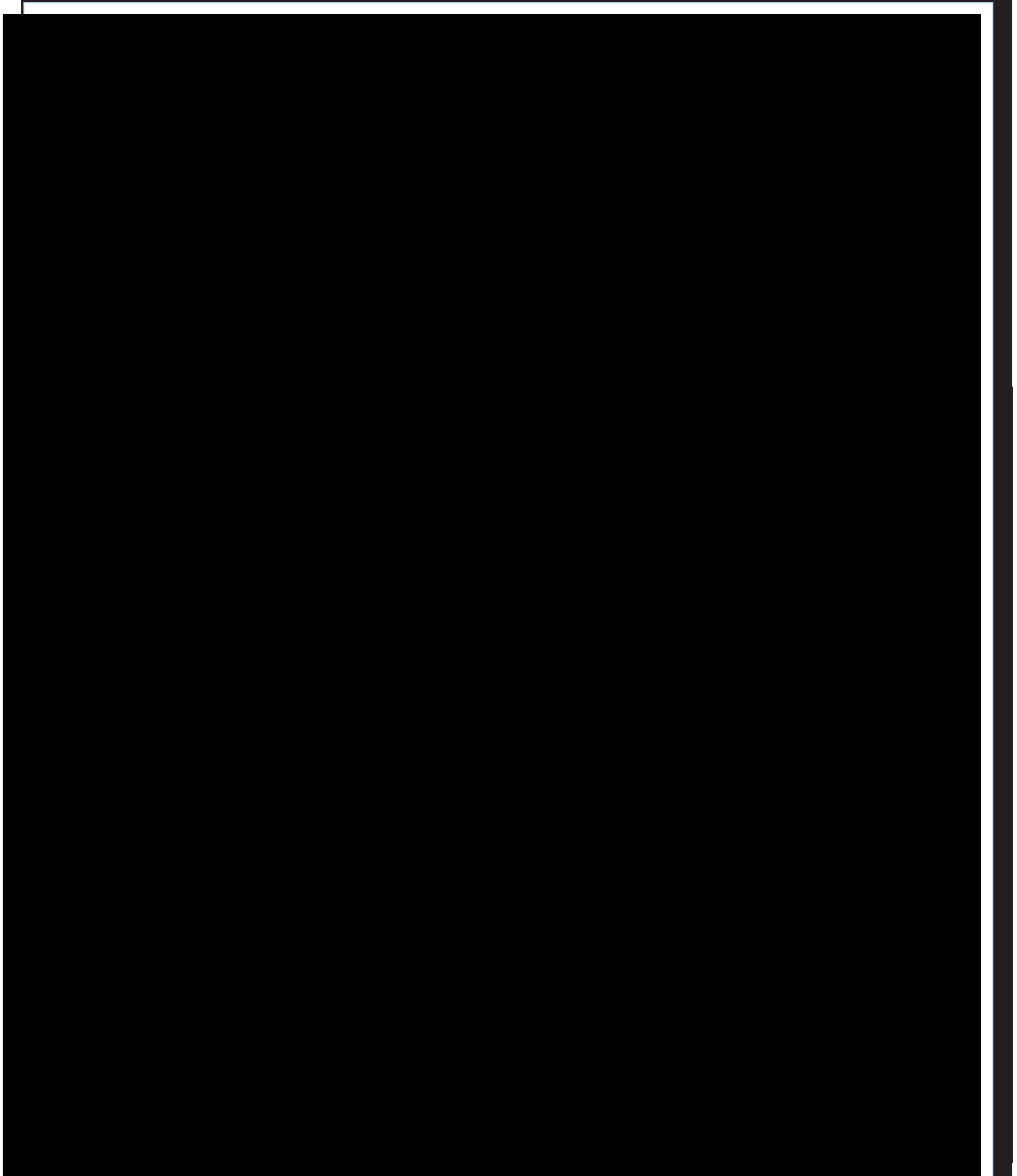
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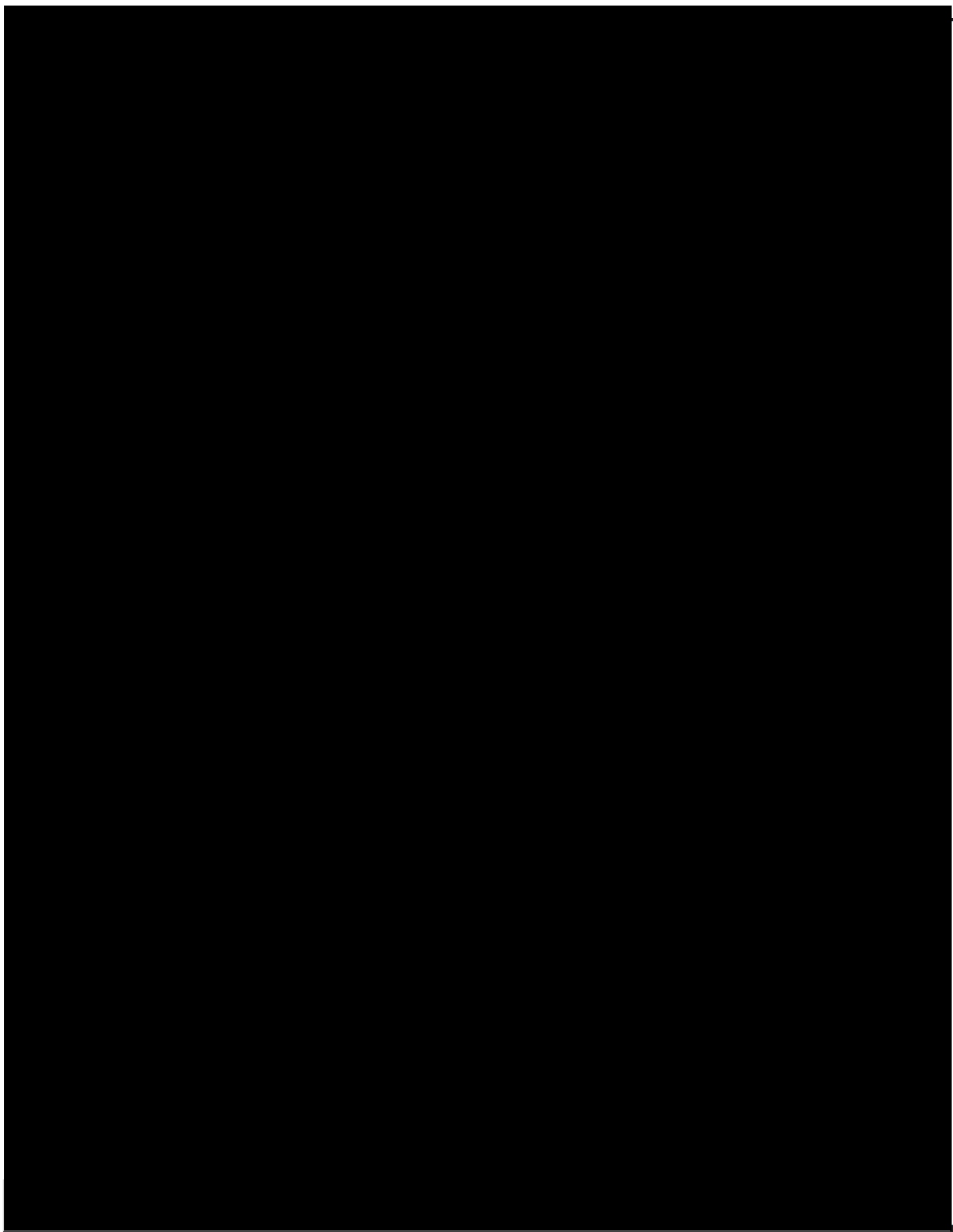
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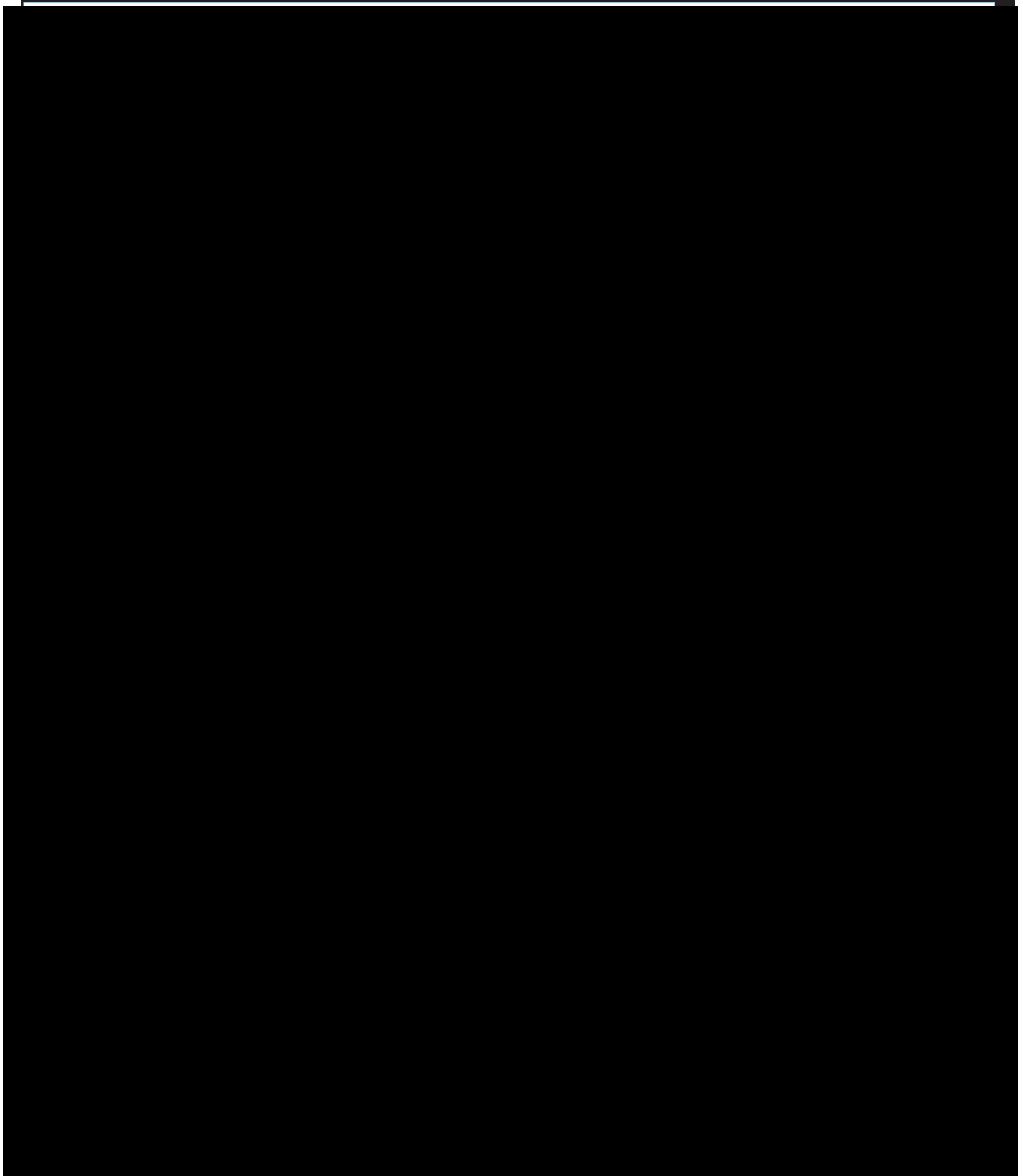
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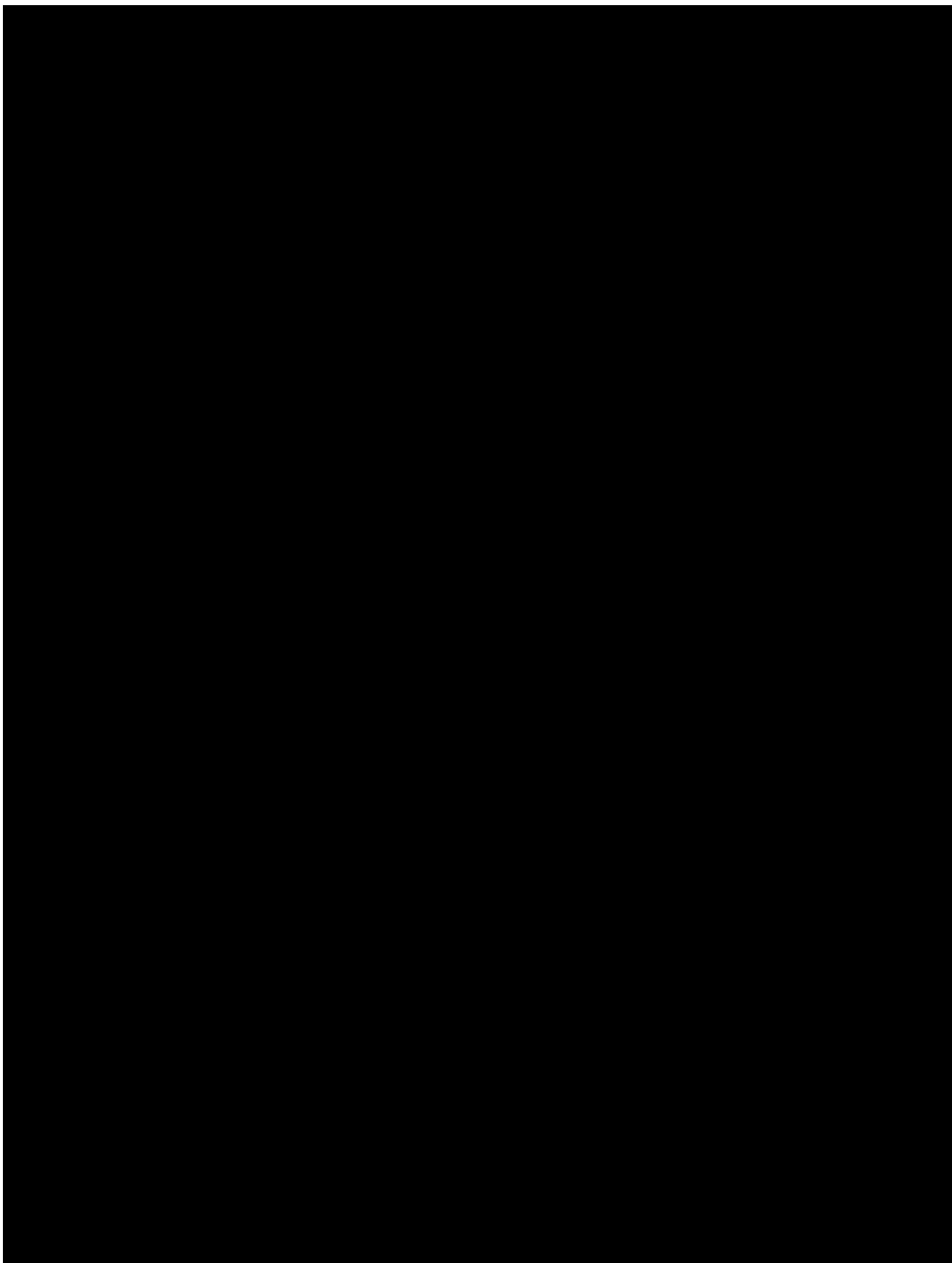
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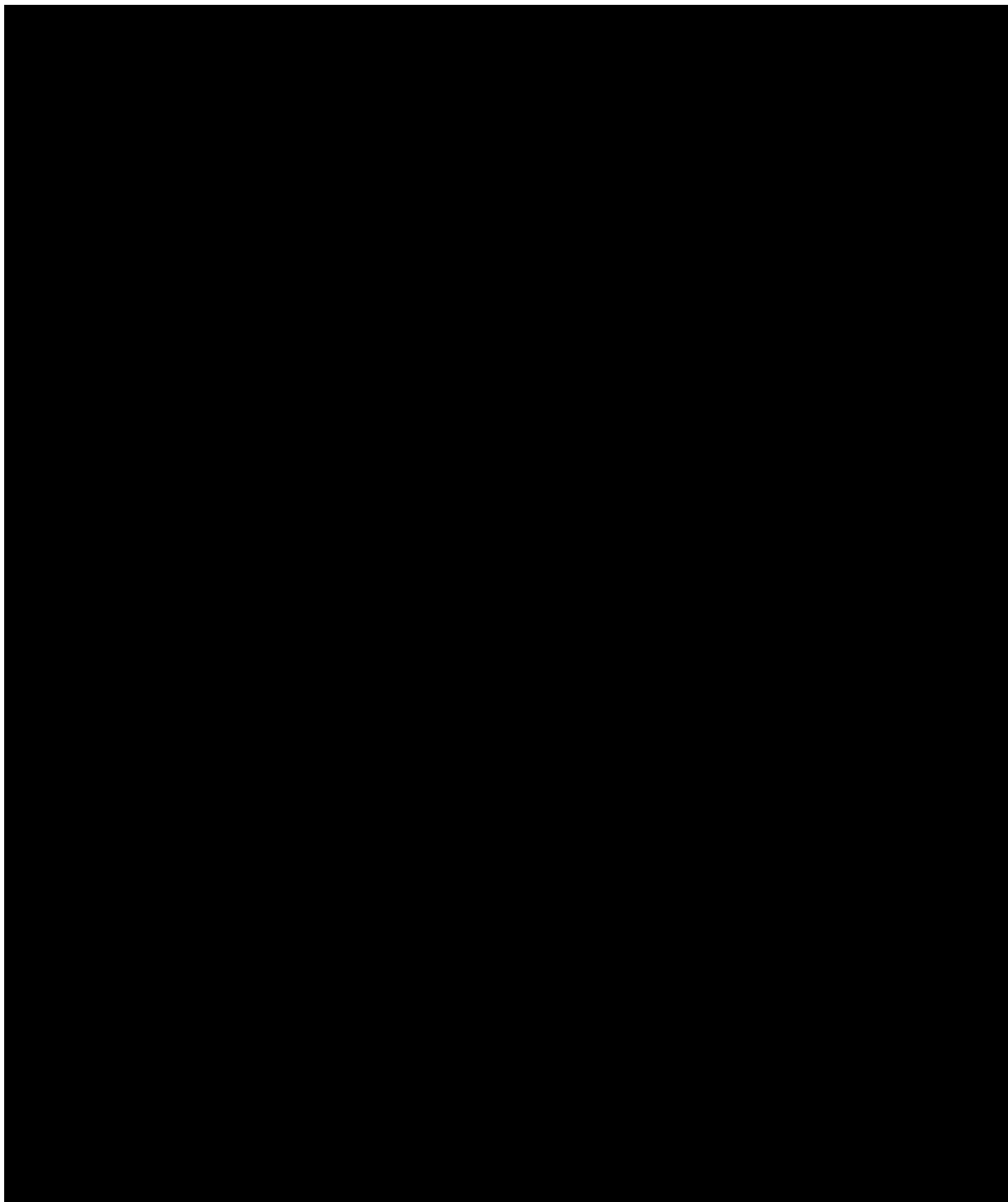
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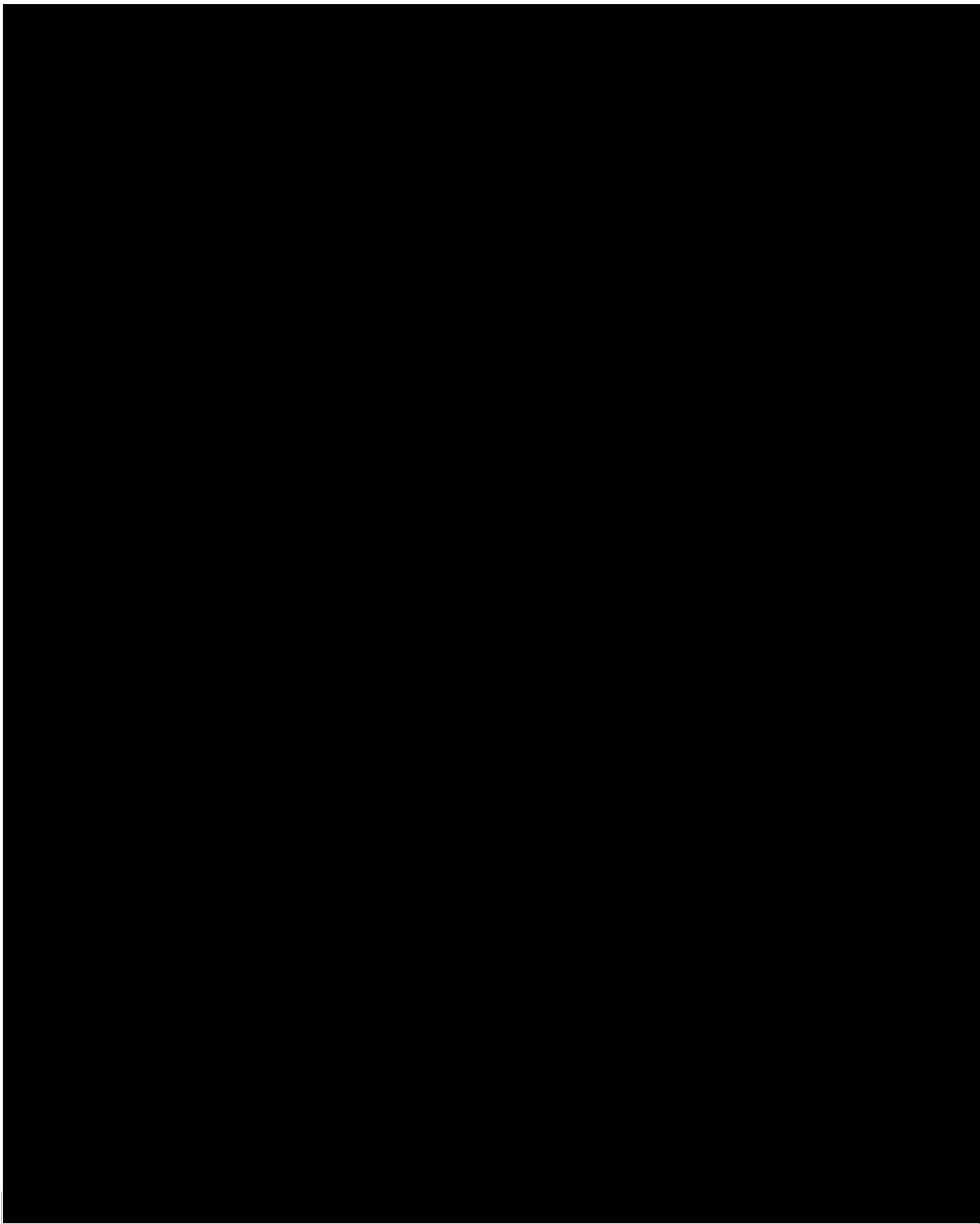
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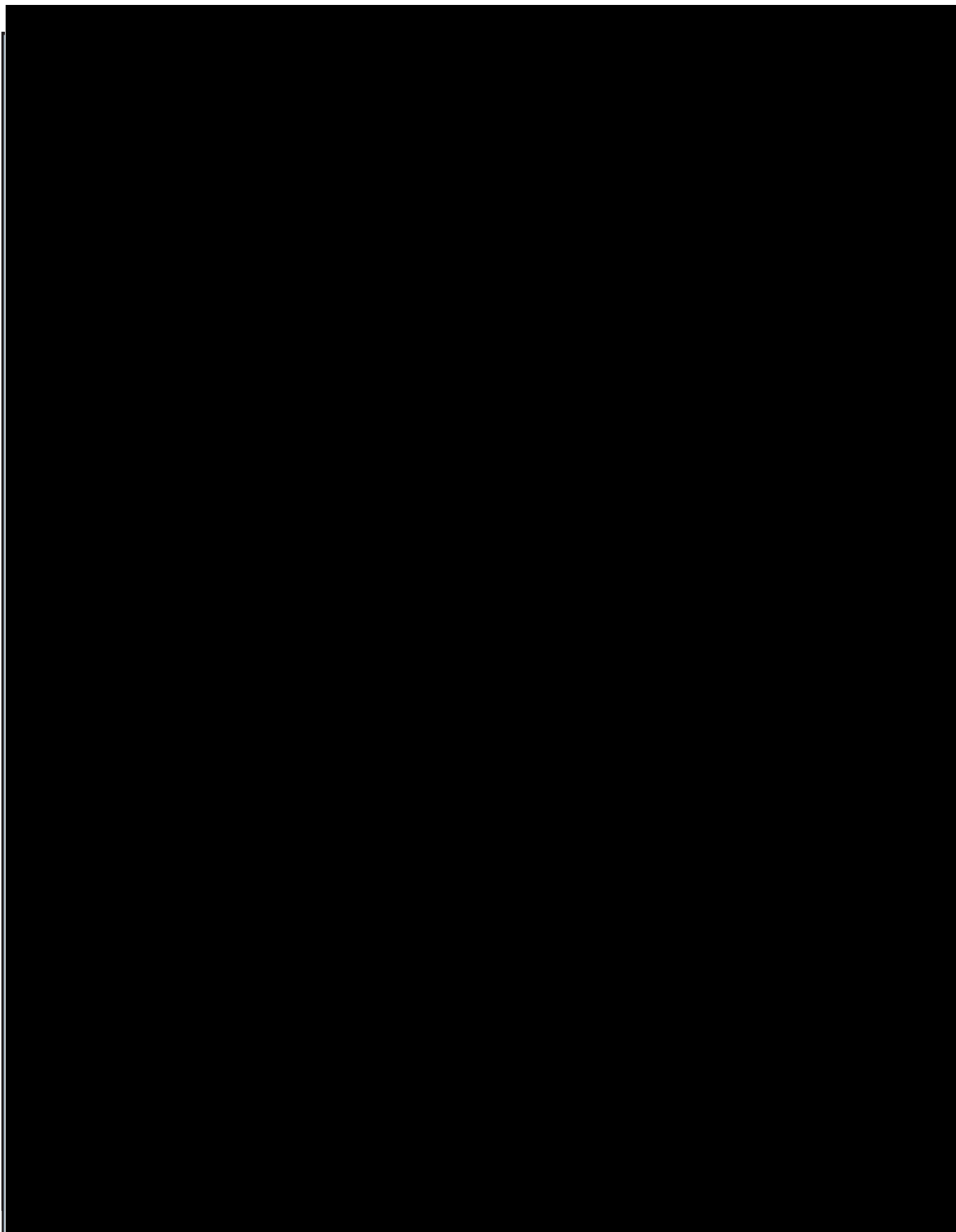
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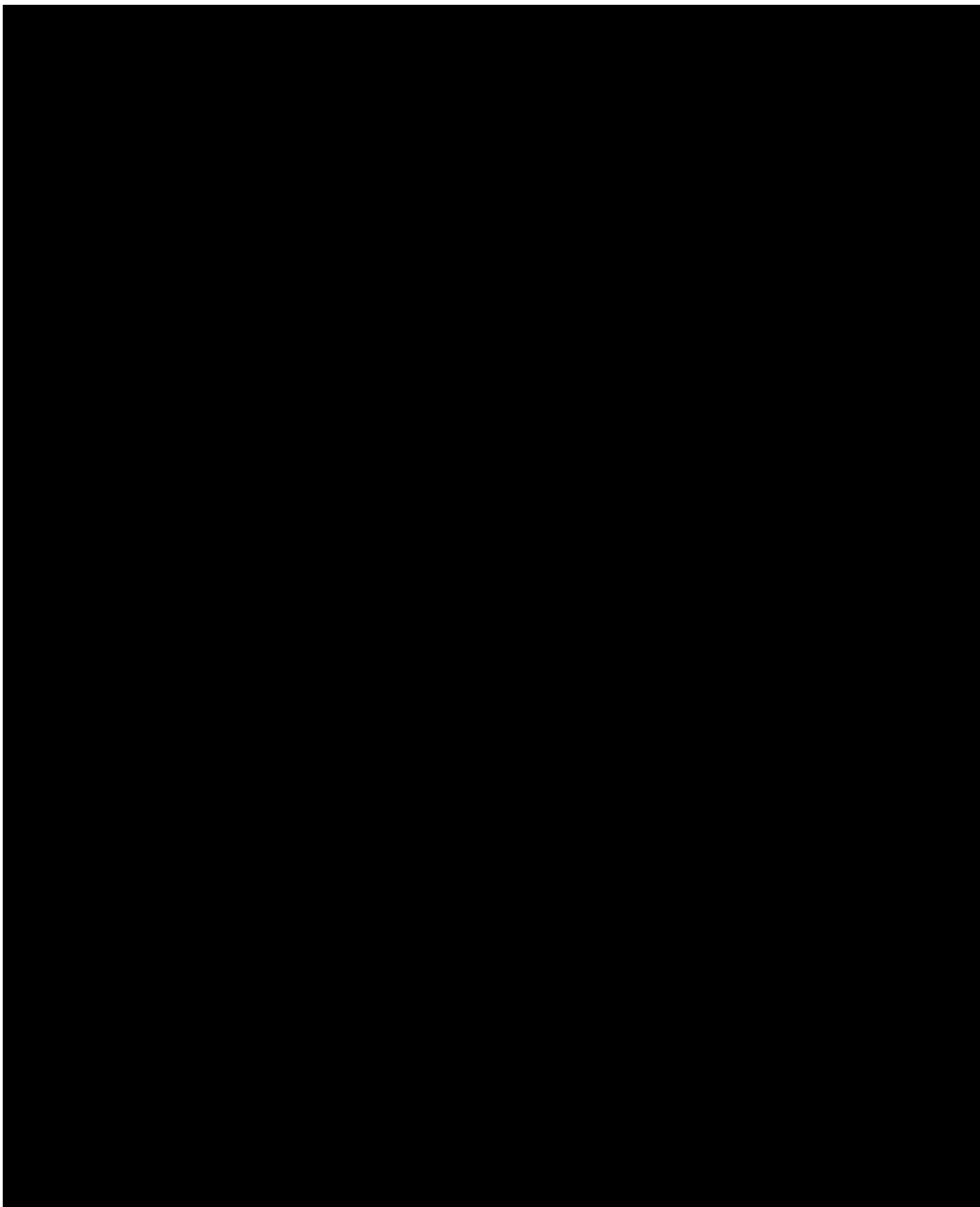
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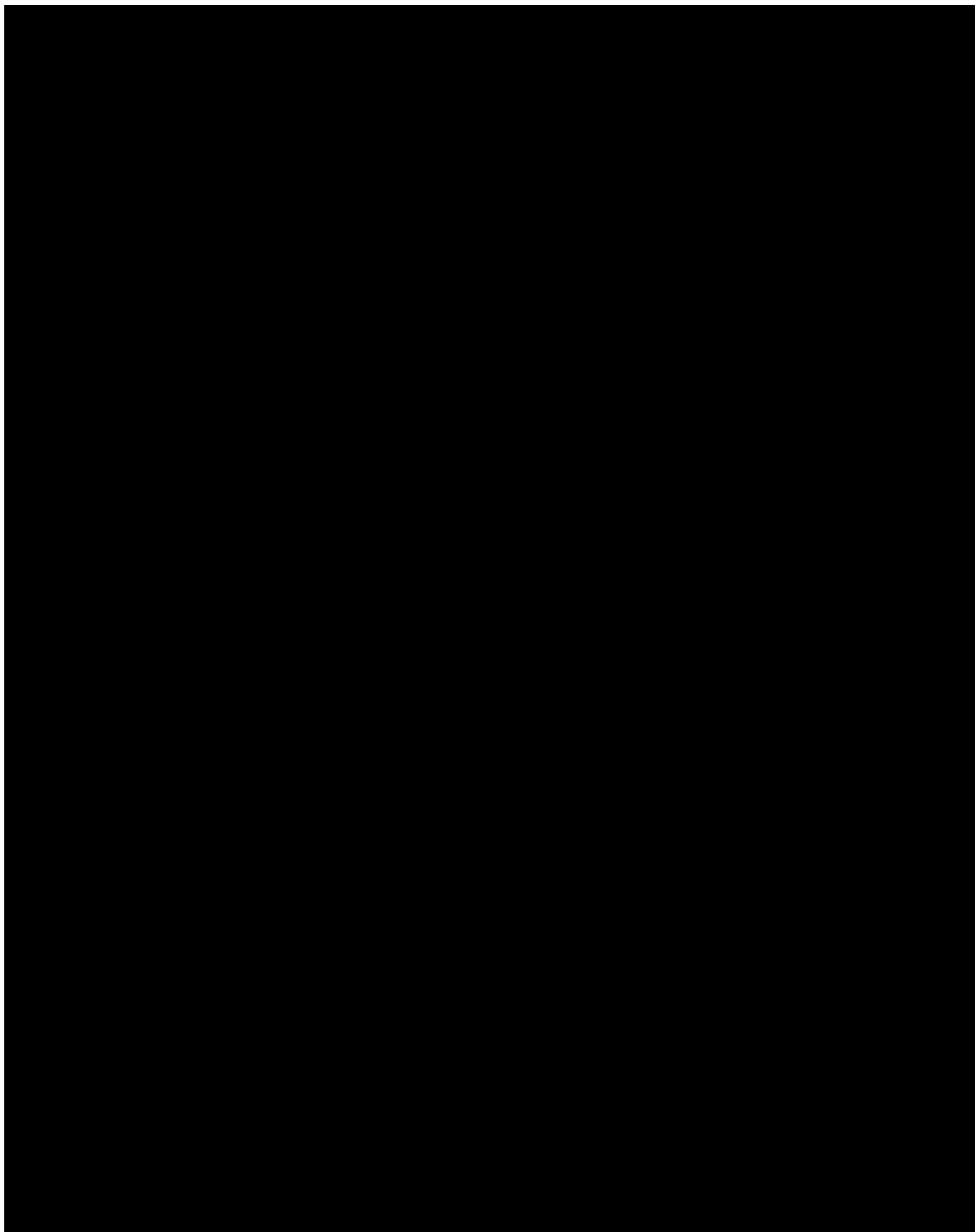
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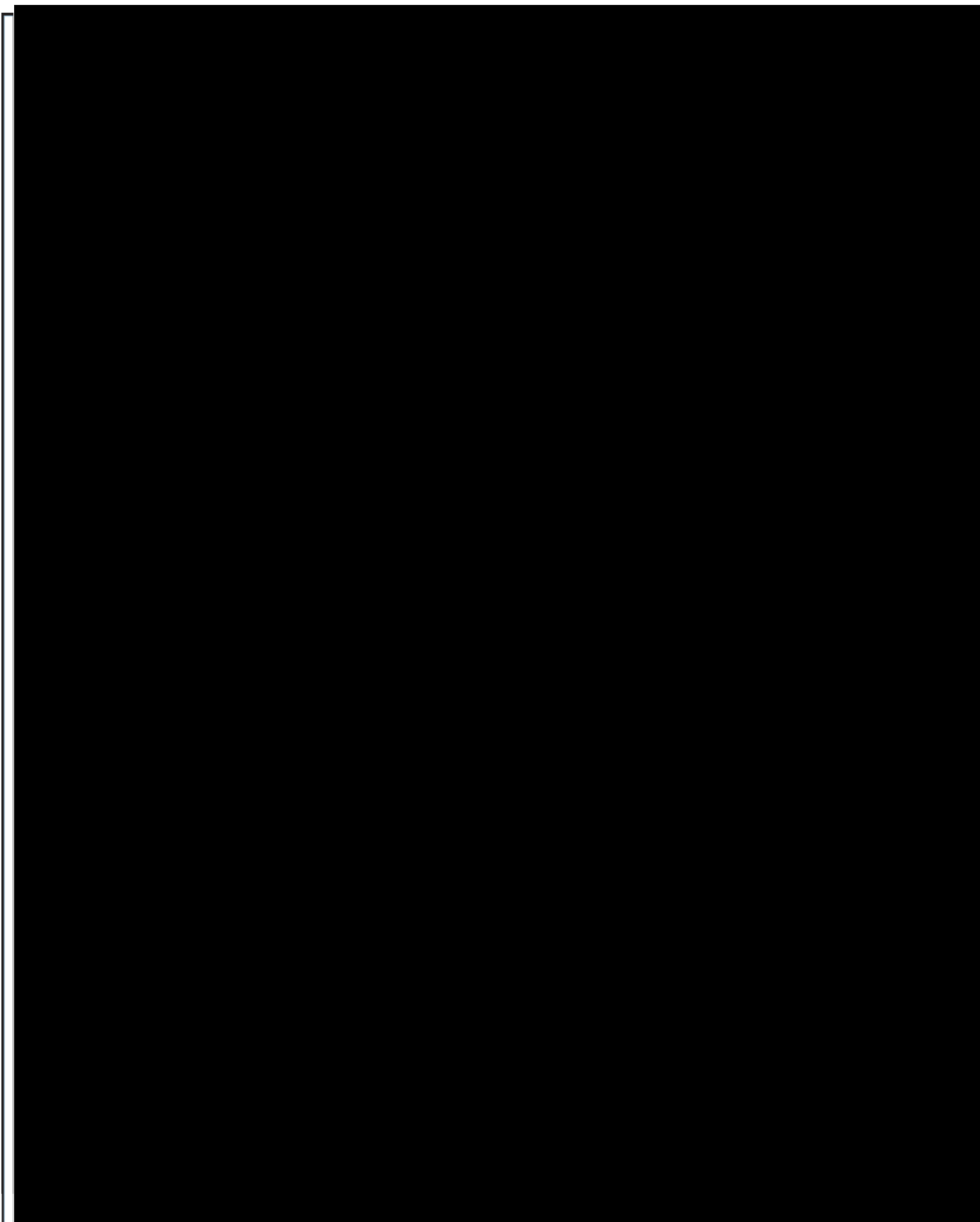
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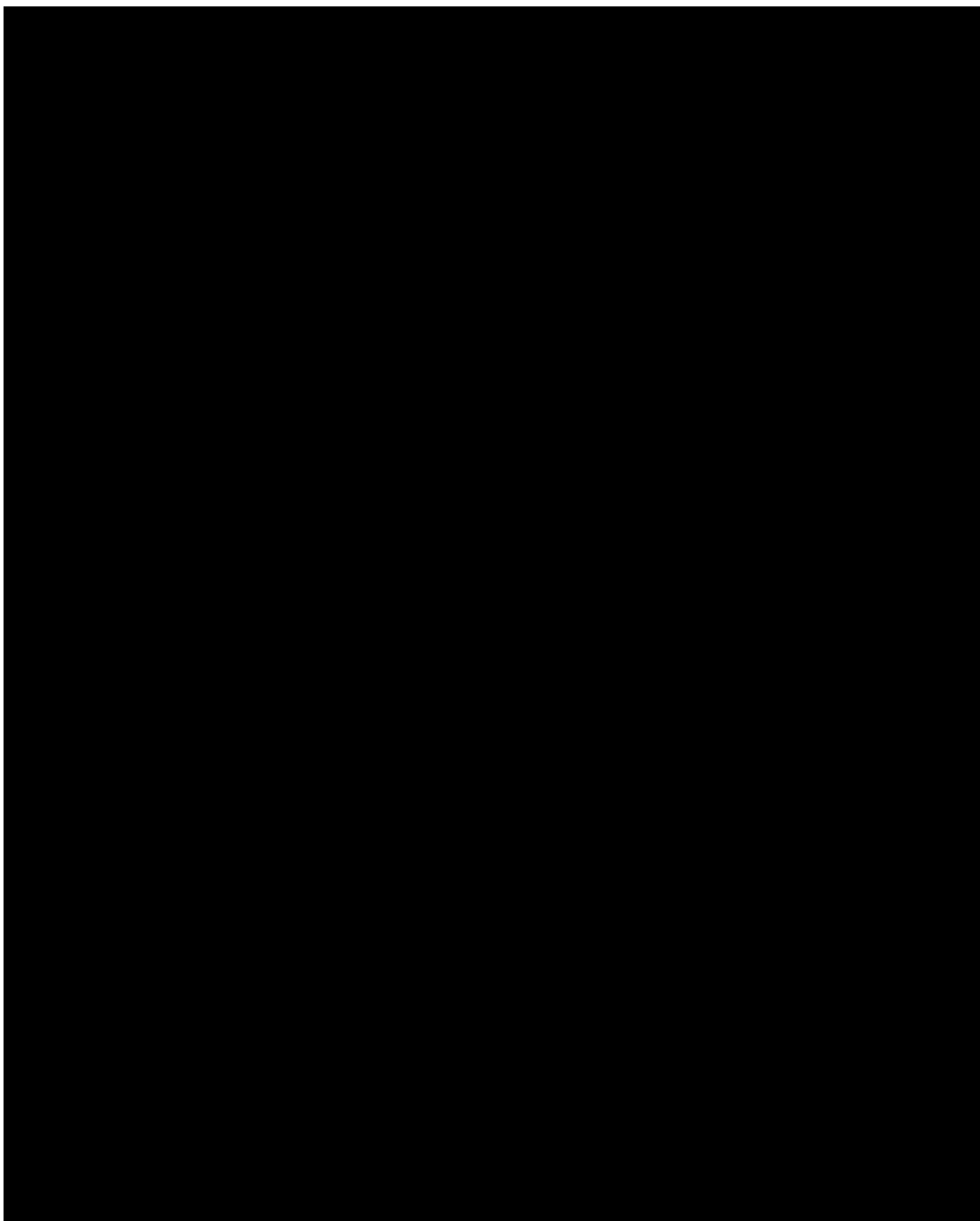
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ORGANIZATIONAL STRUCTURE**

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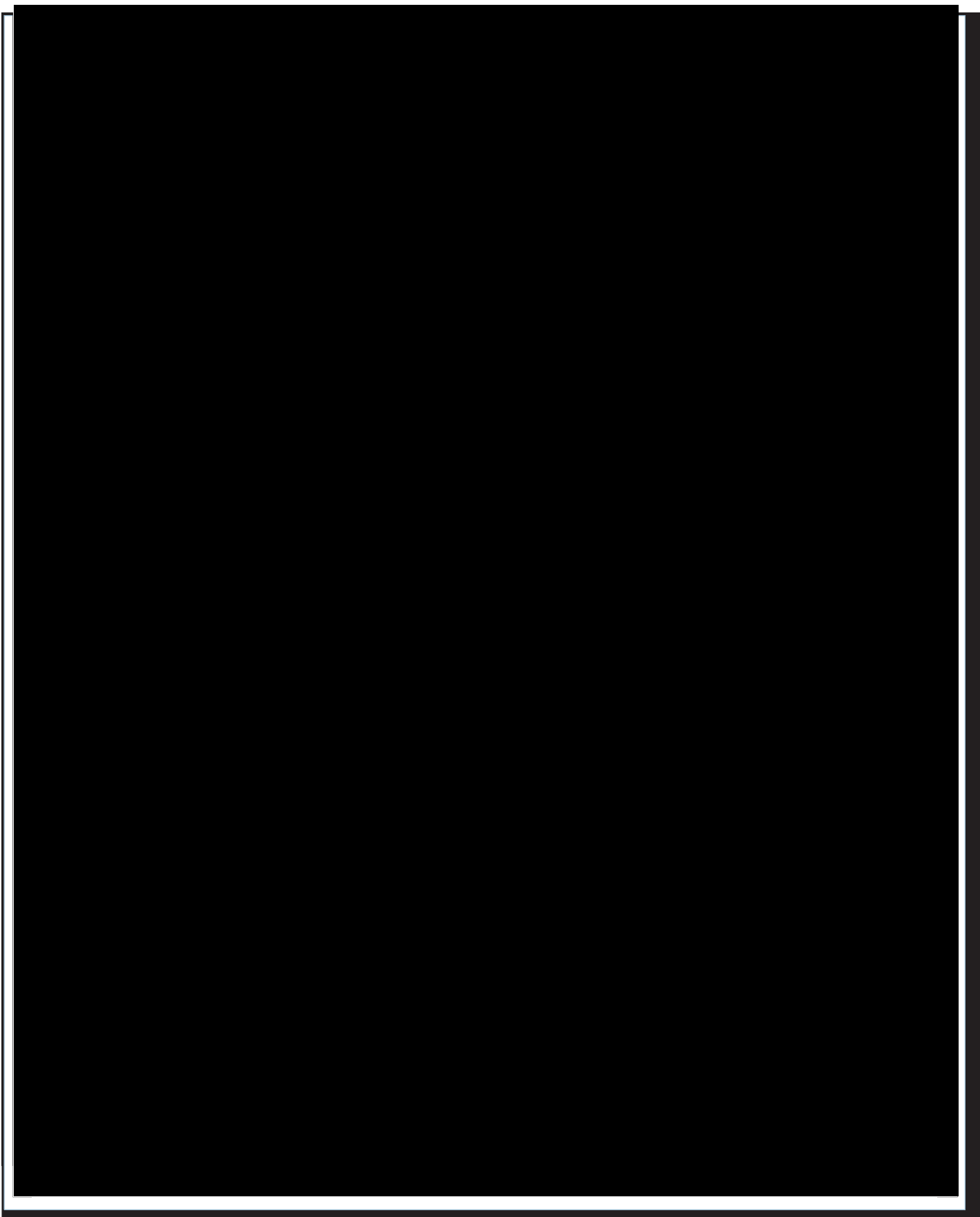
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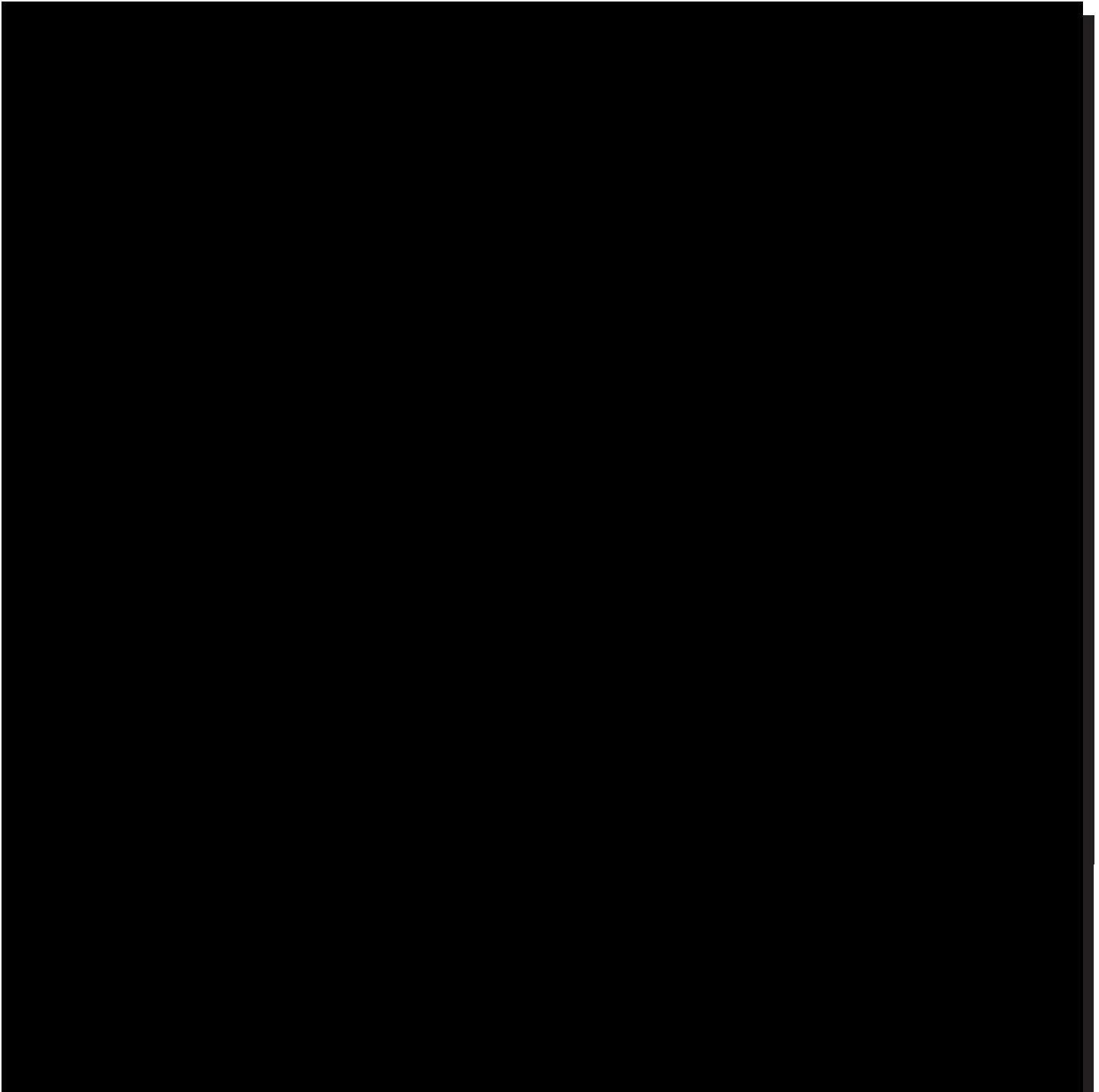
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ORGANIZATIONAL STRUCTURE**

FEDERAL, STATE AND FOREIGN TAX RETURNS (BACKERS)



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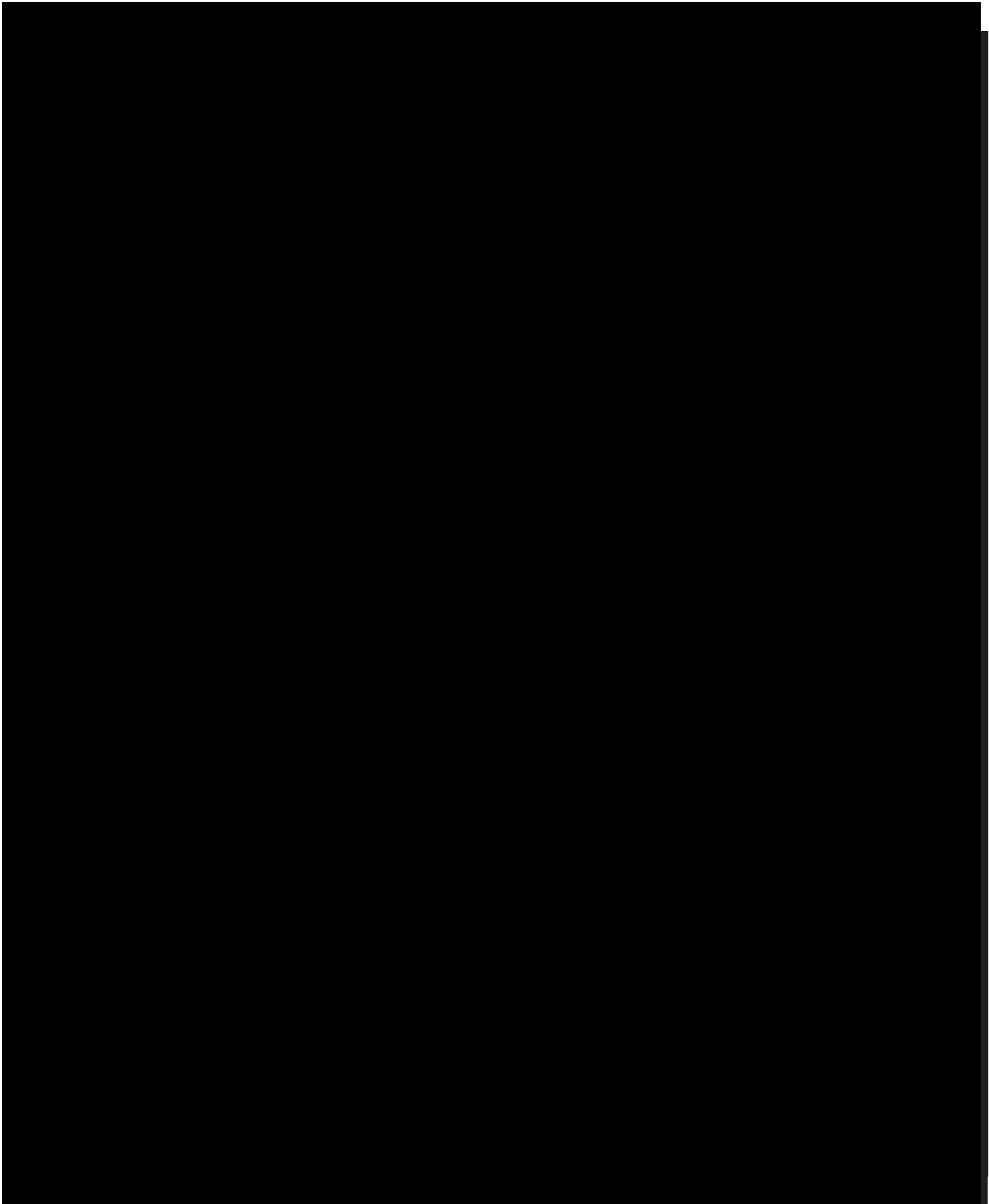
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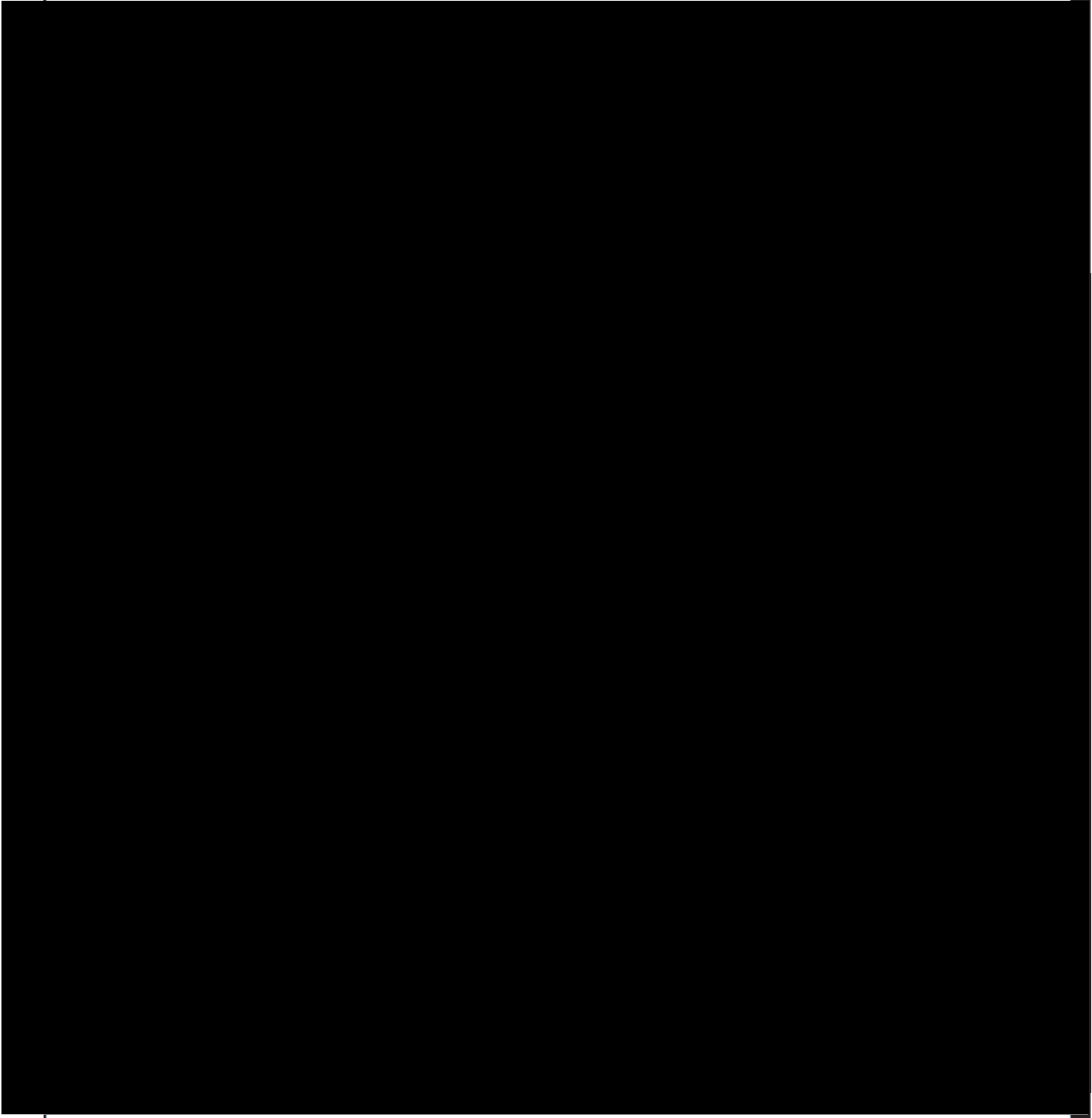
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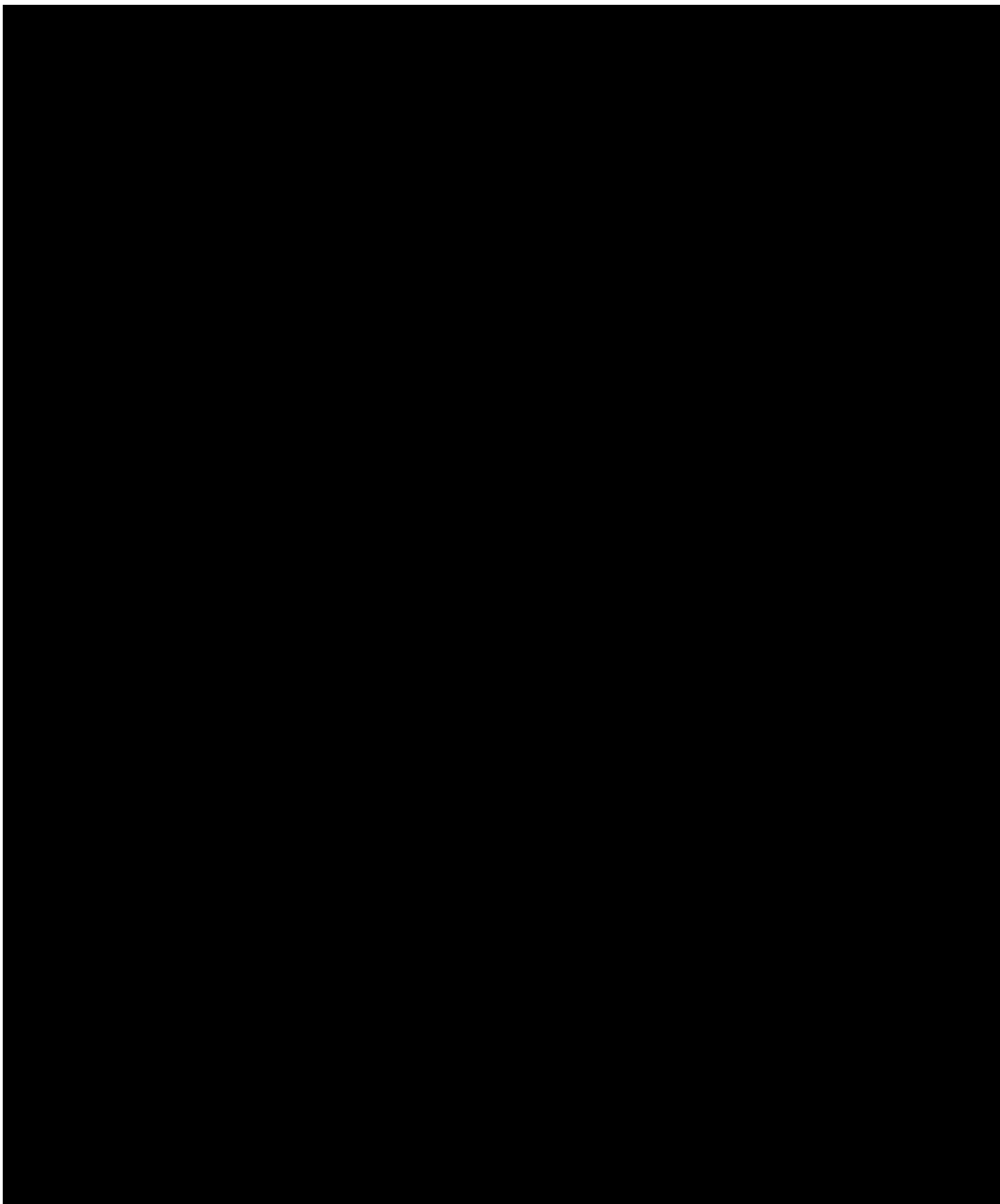
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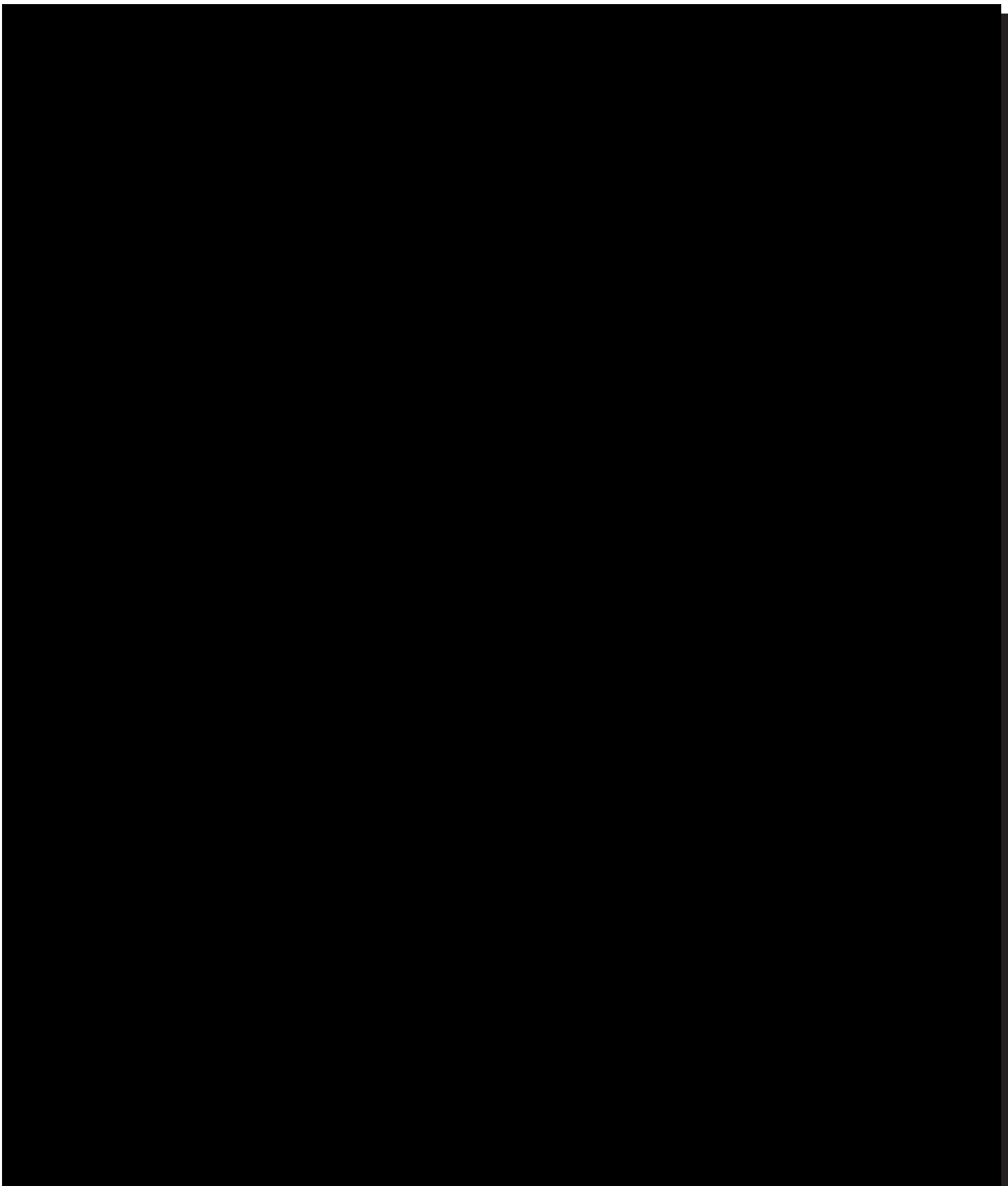


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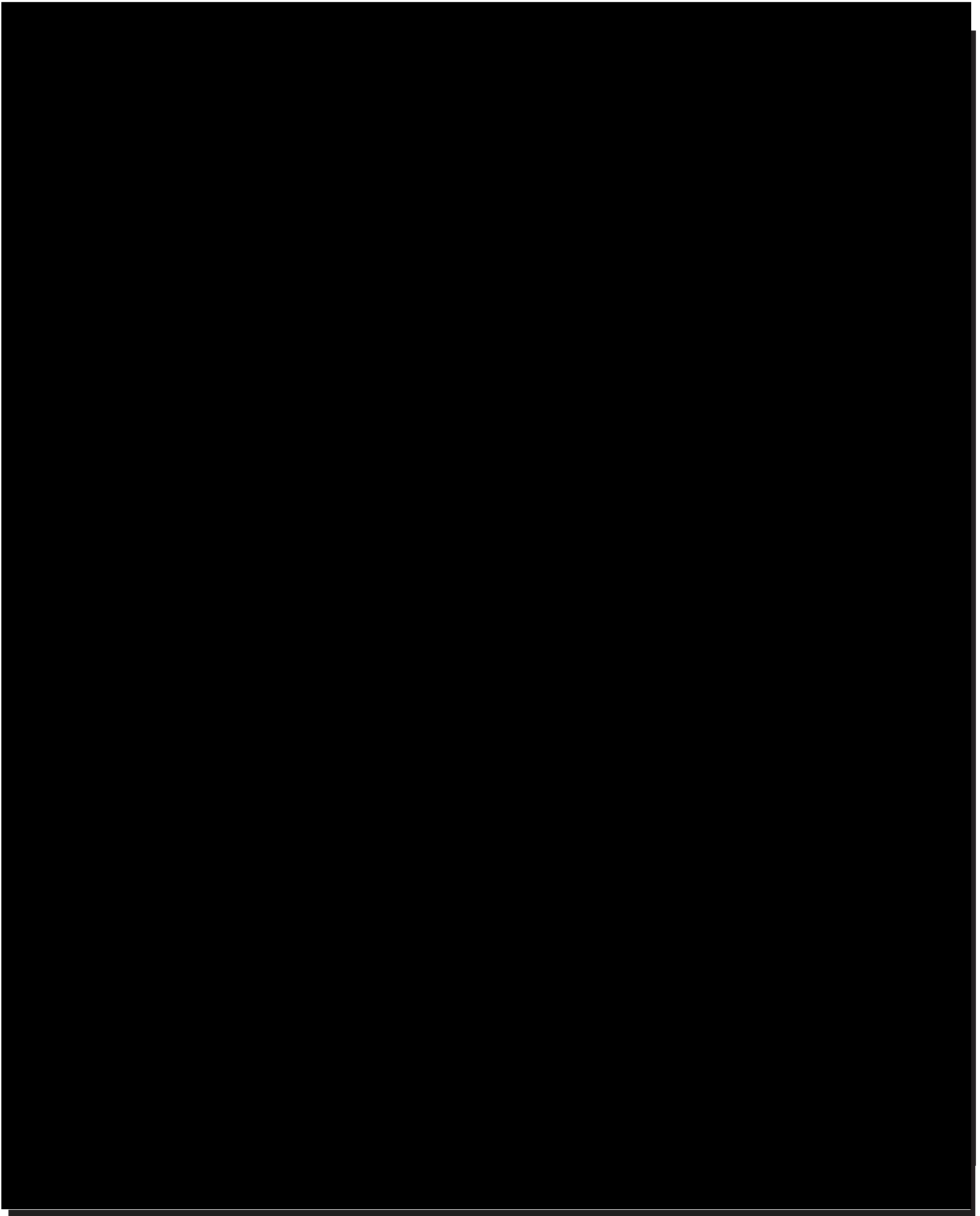


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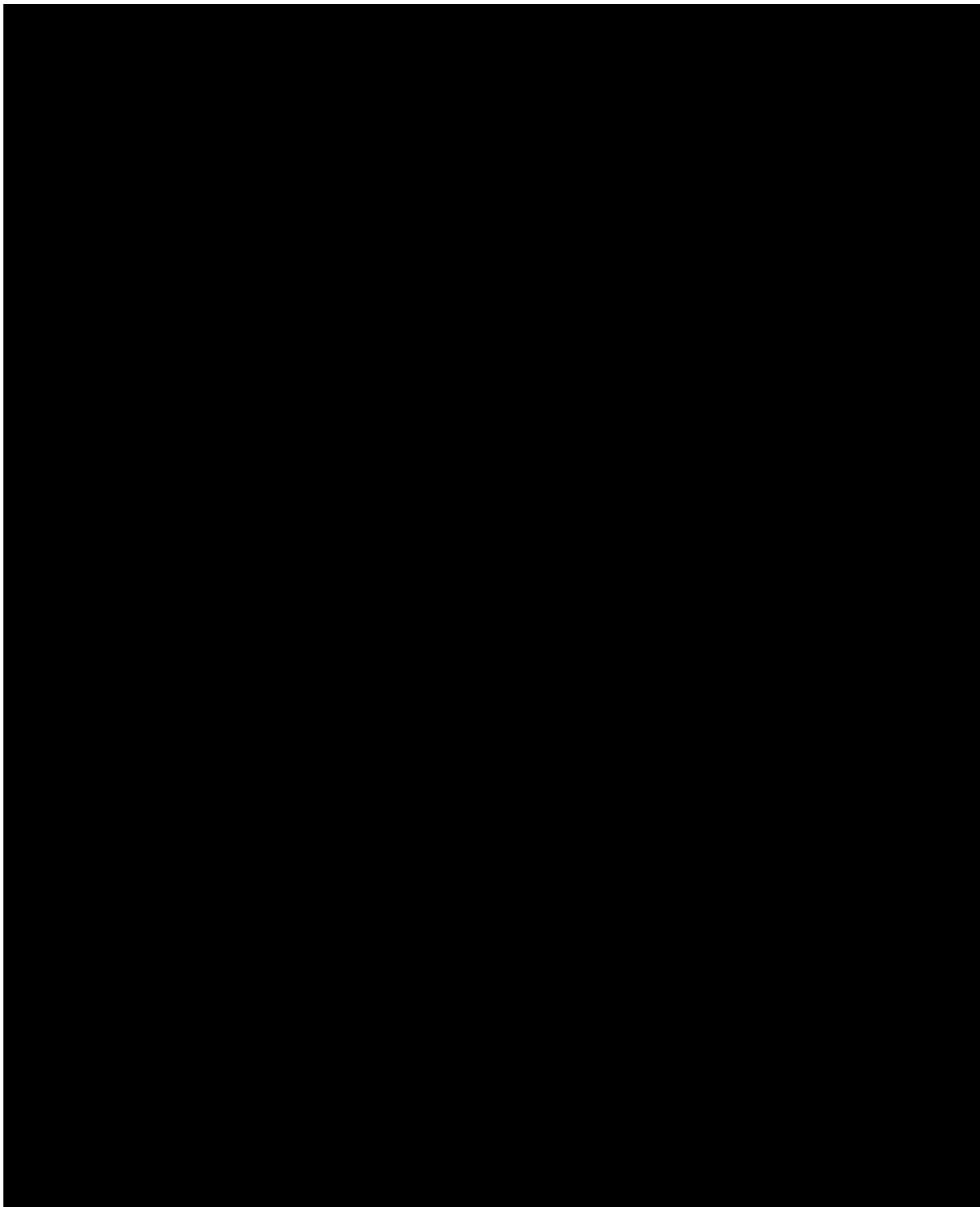


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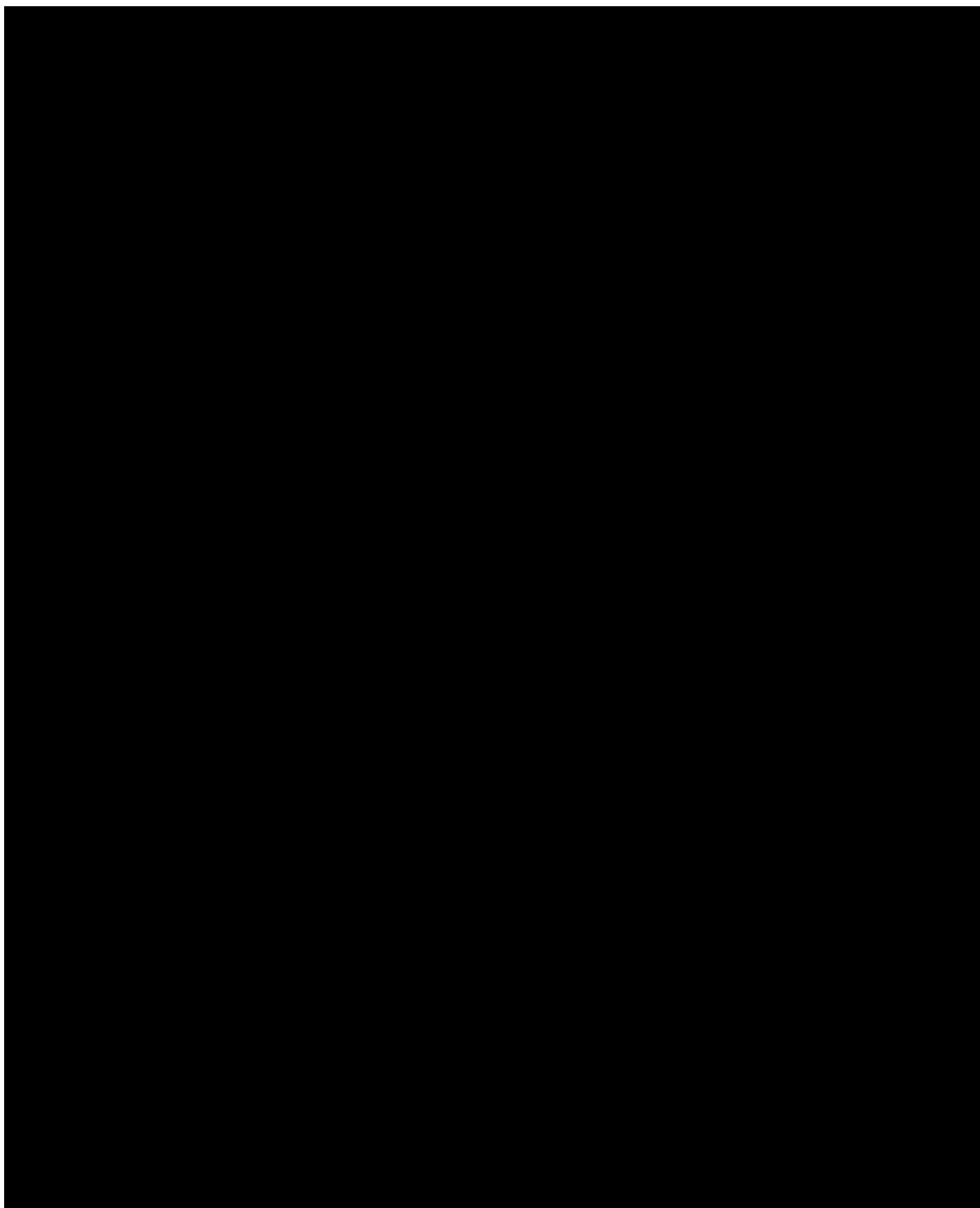
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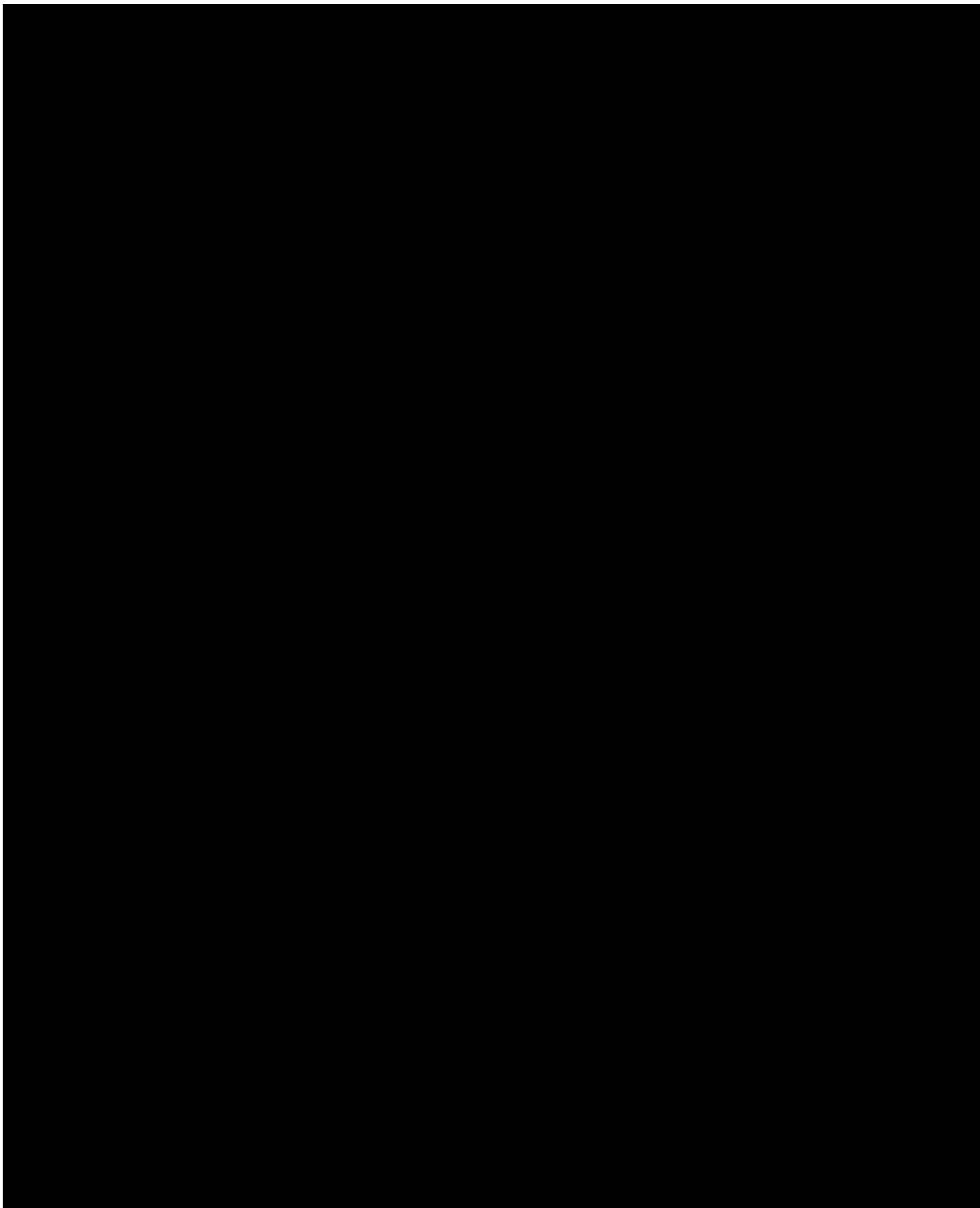
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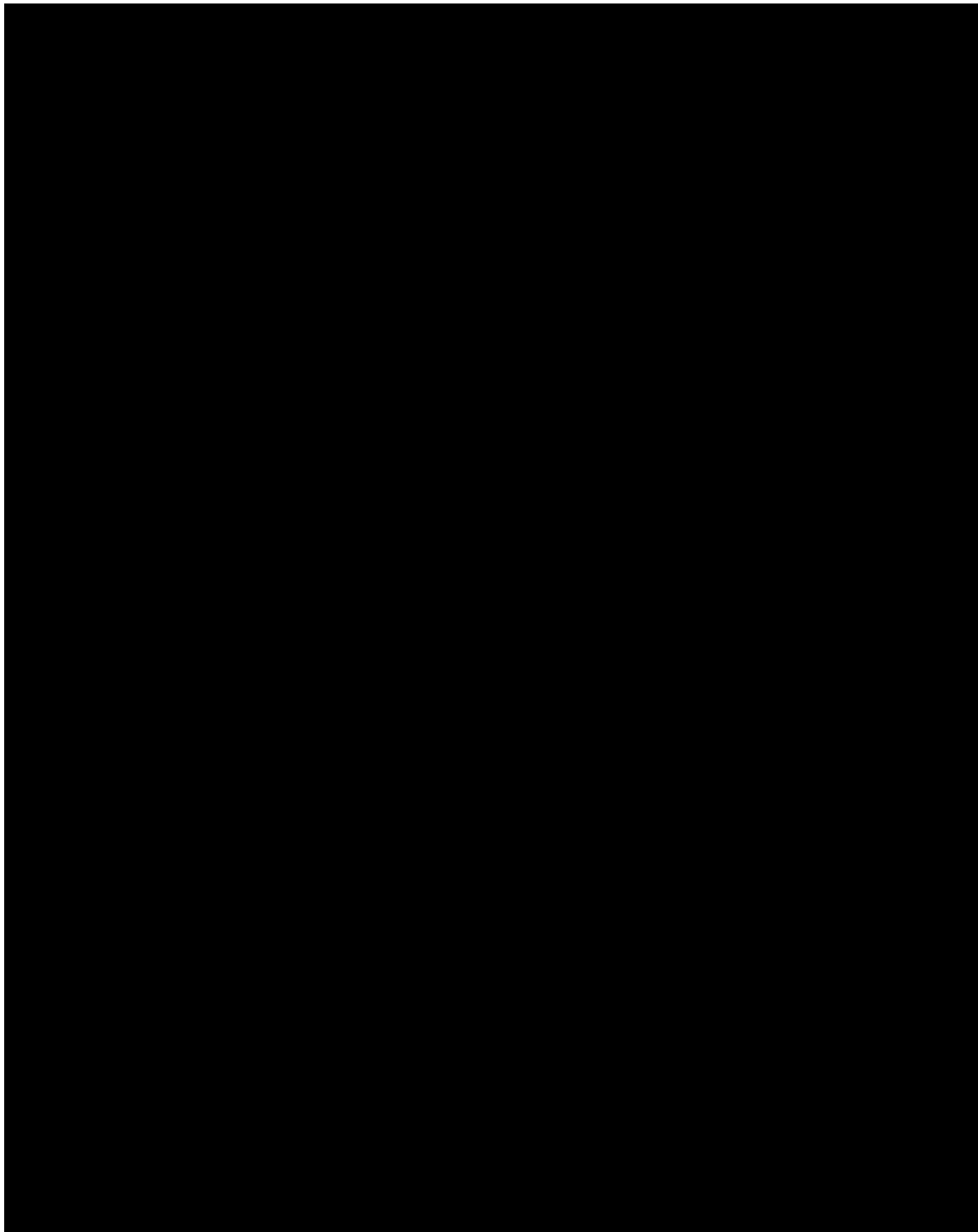
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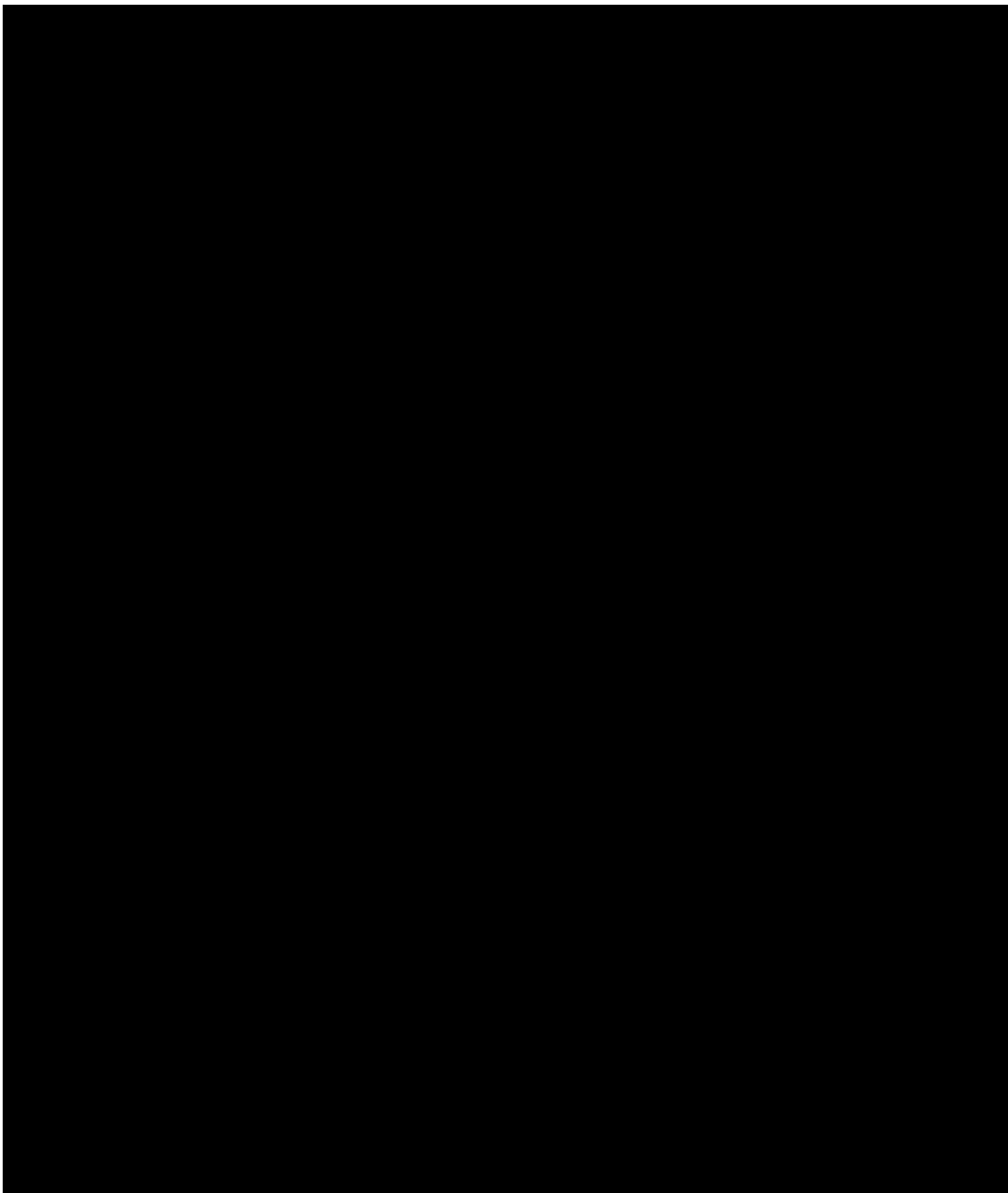
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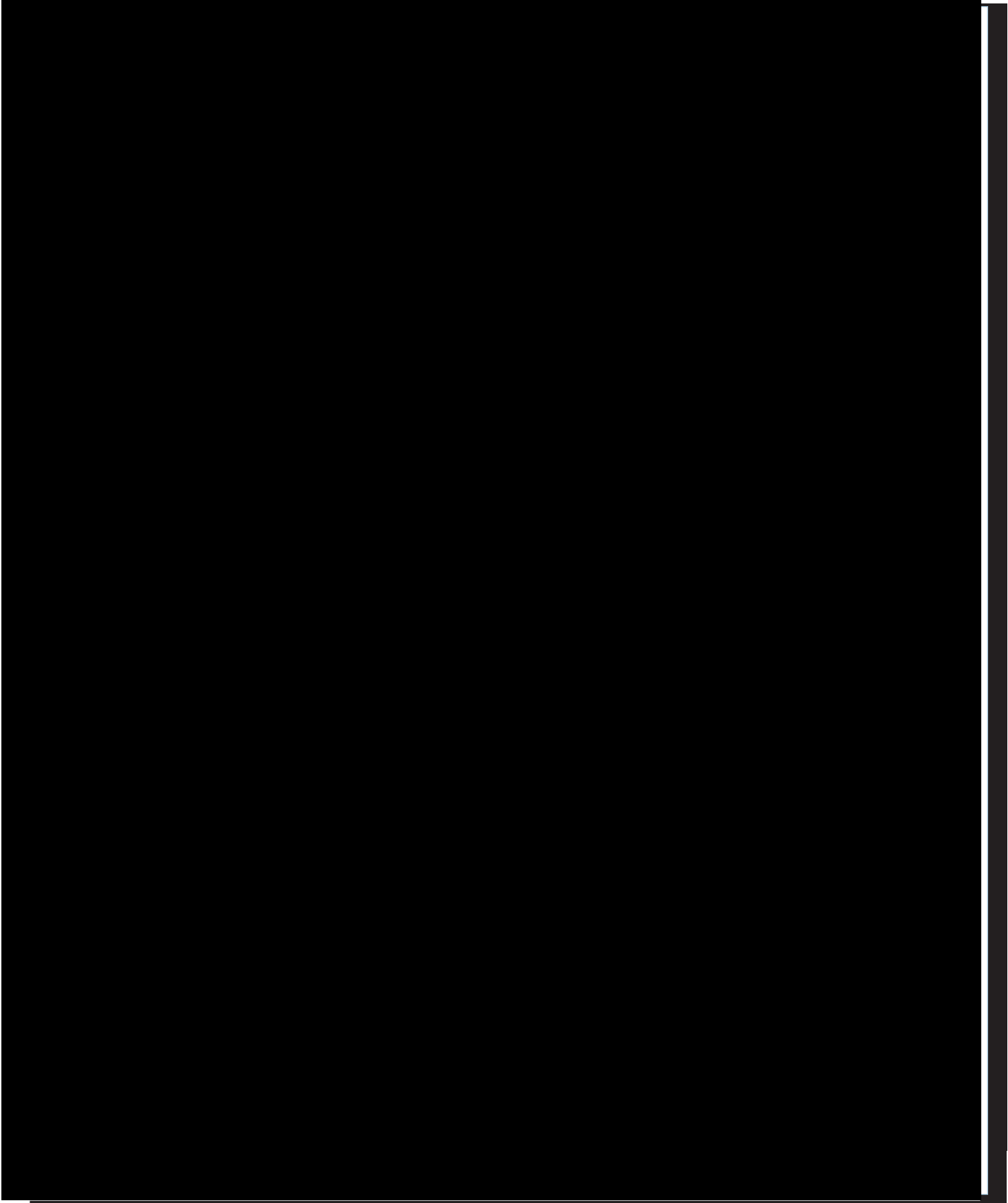
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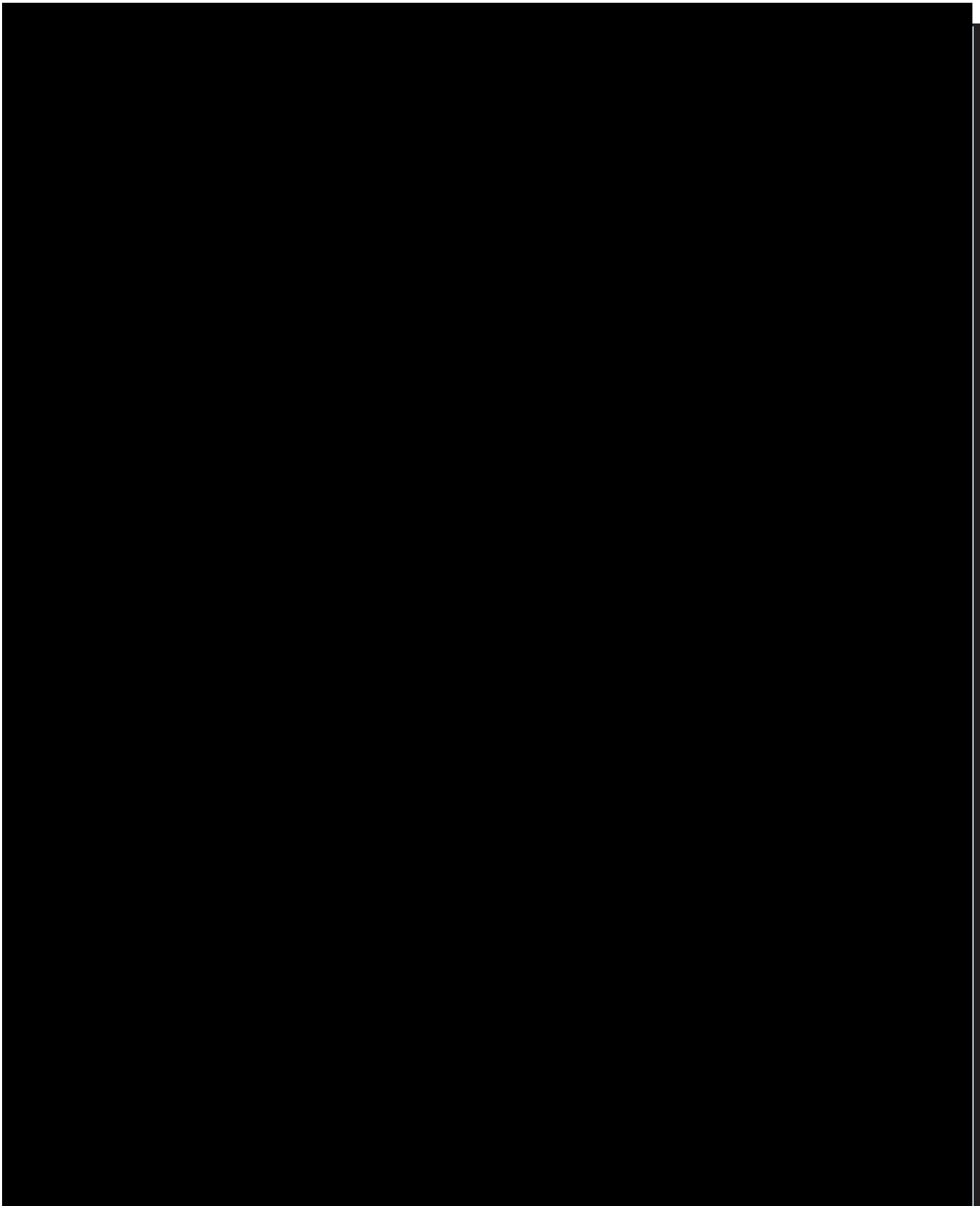
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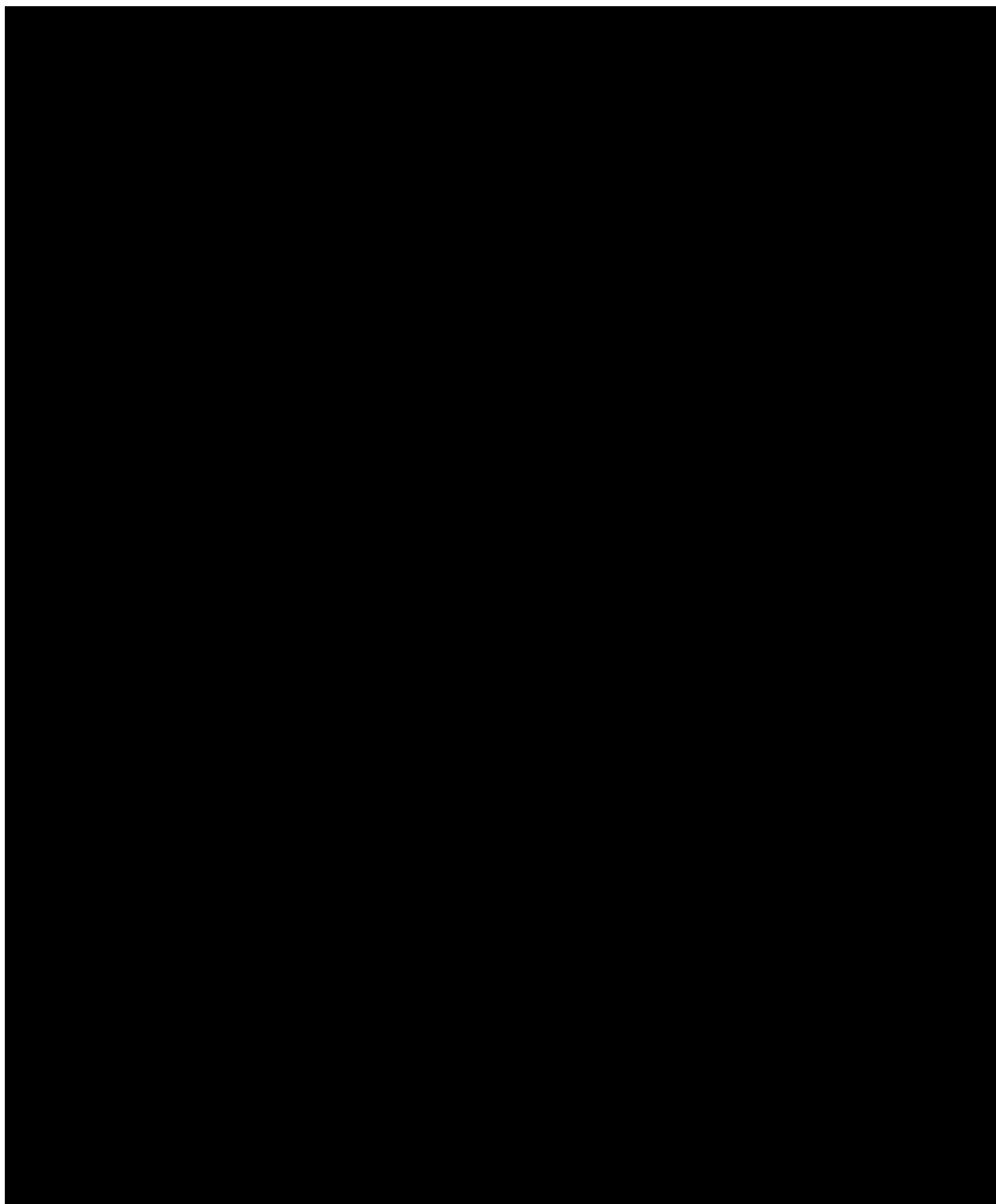
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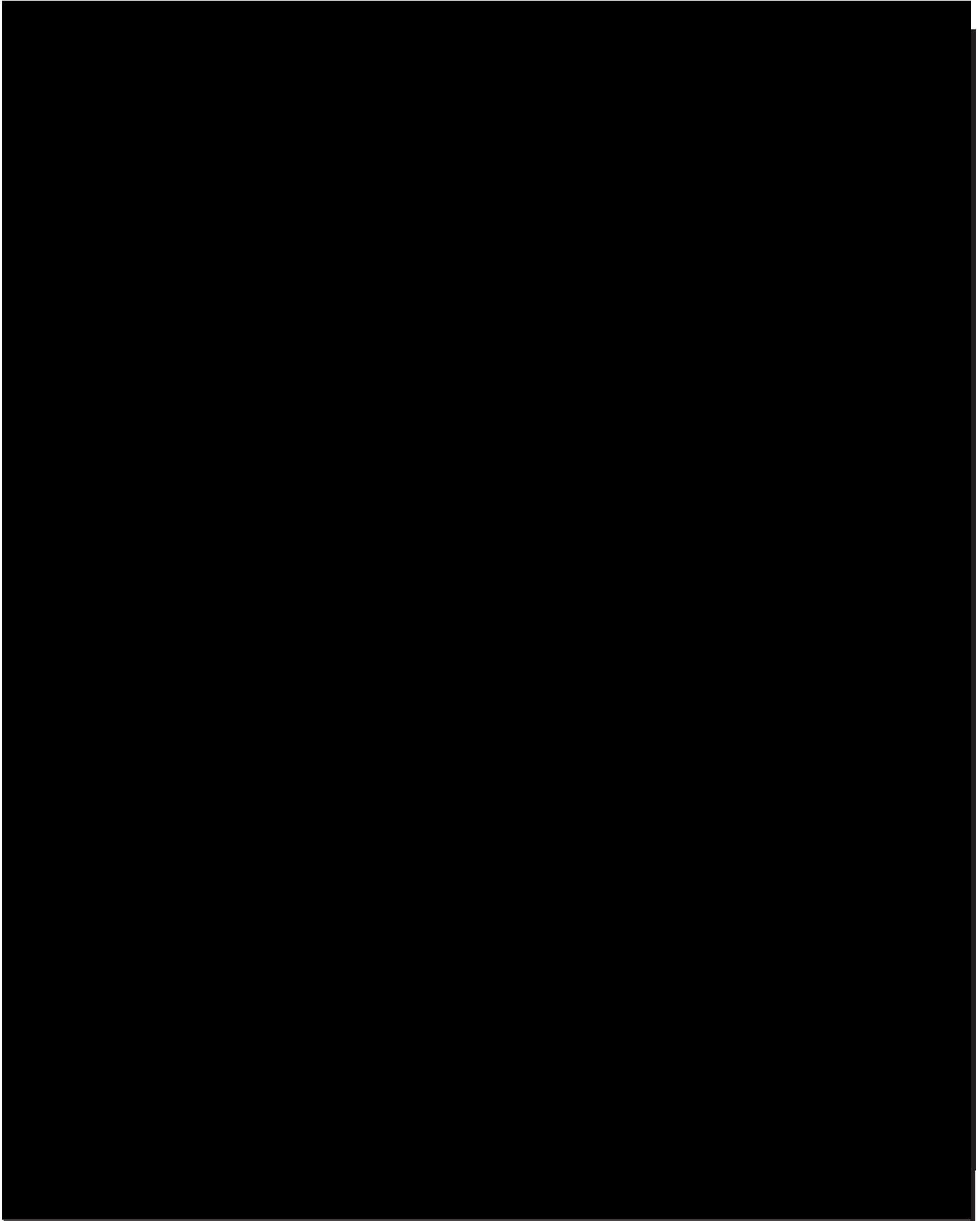
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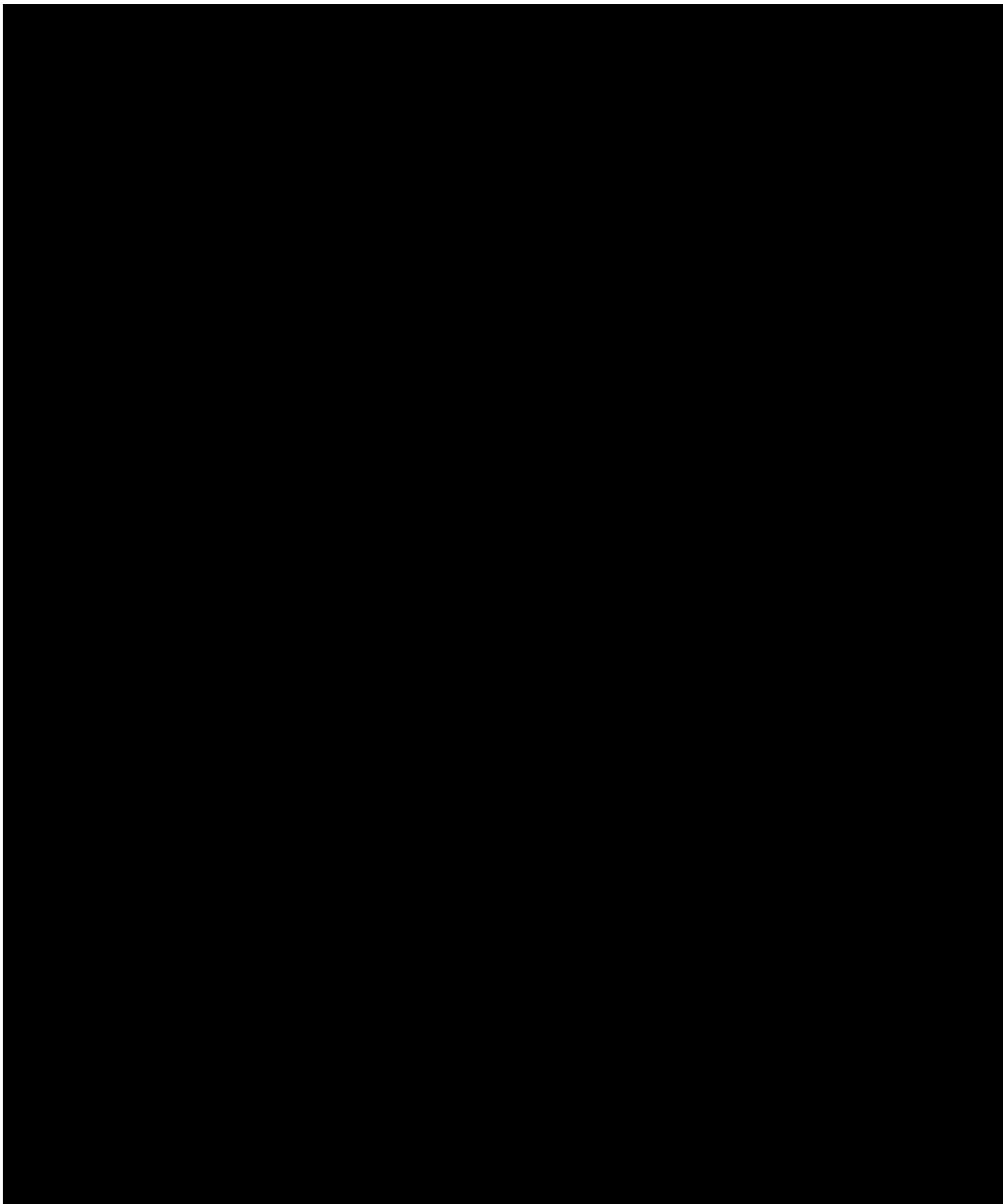
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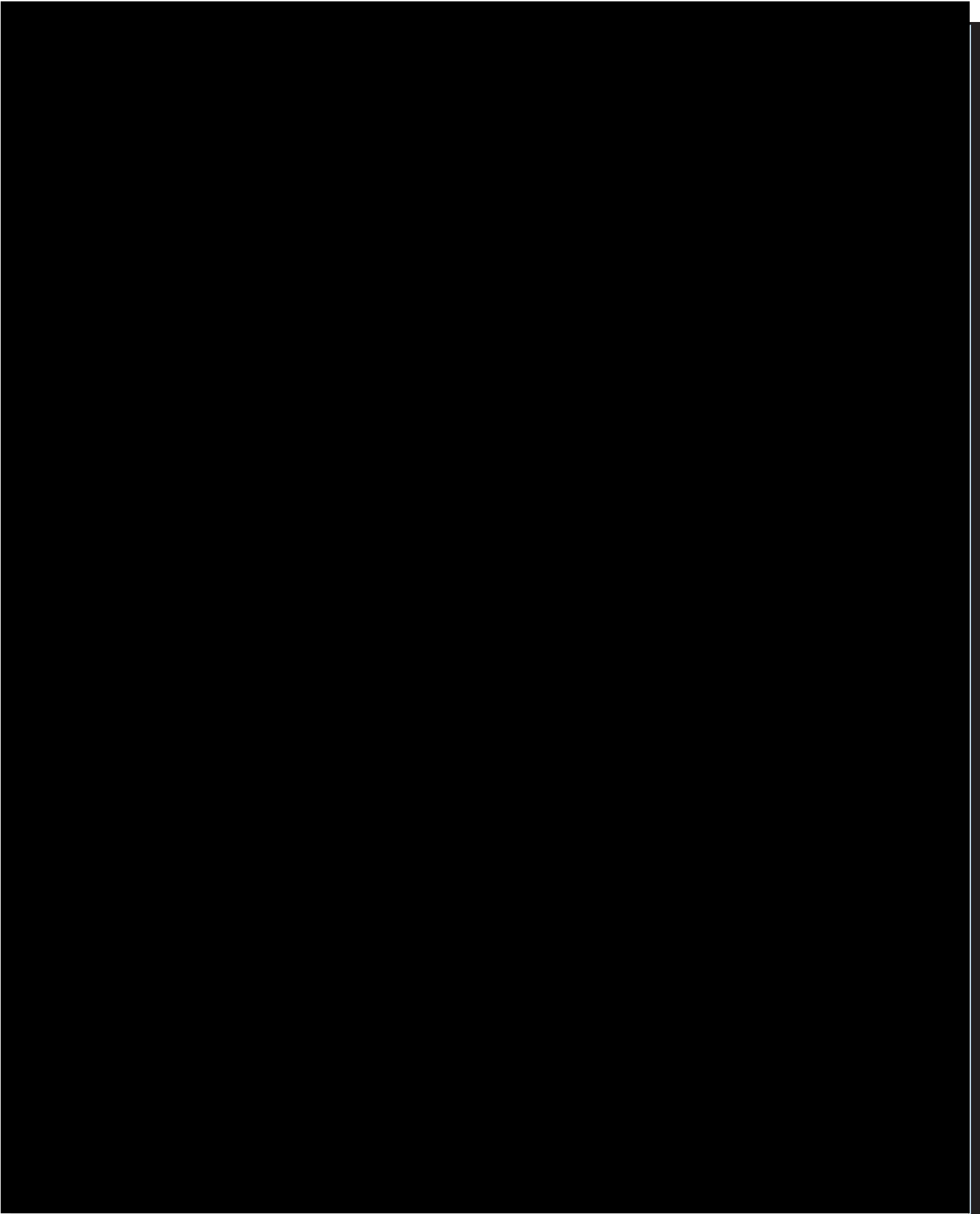
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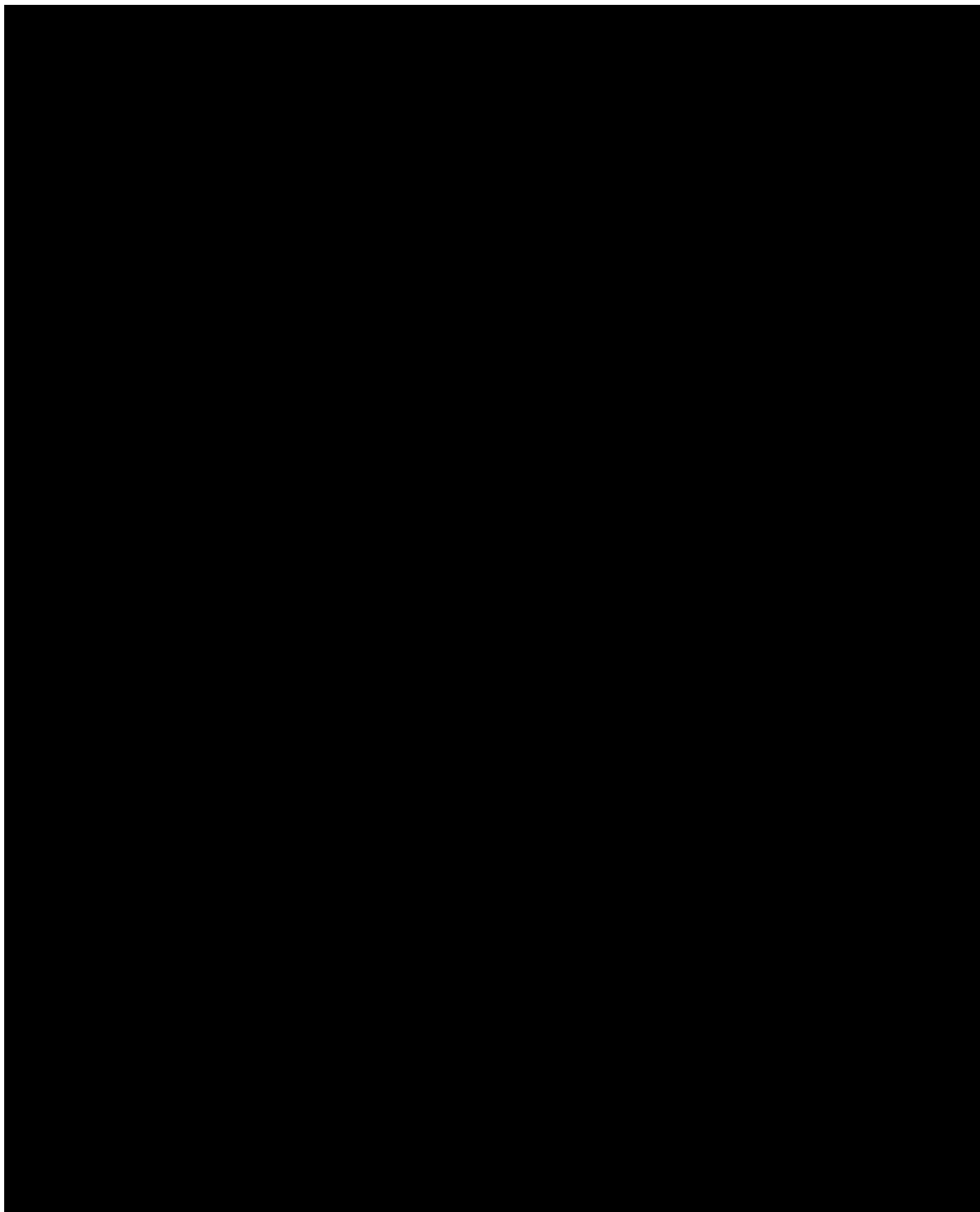
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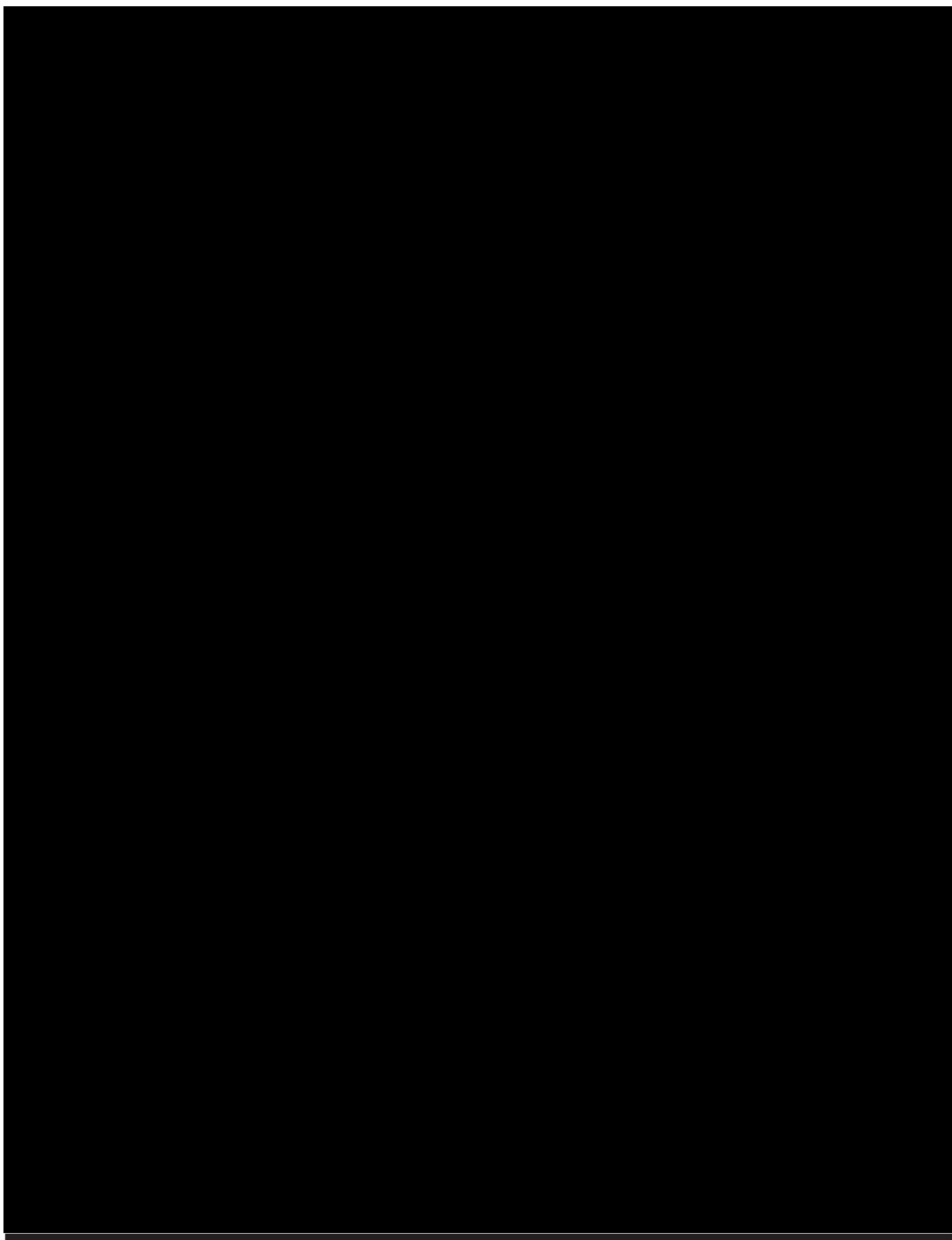
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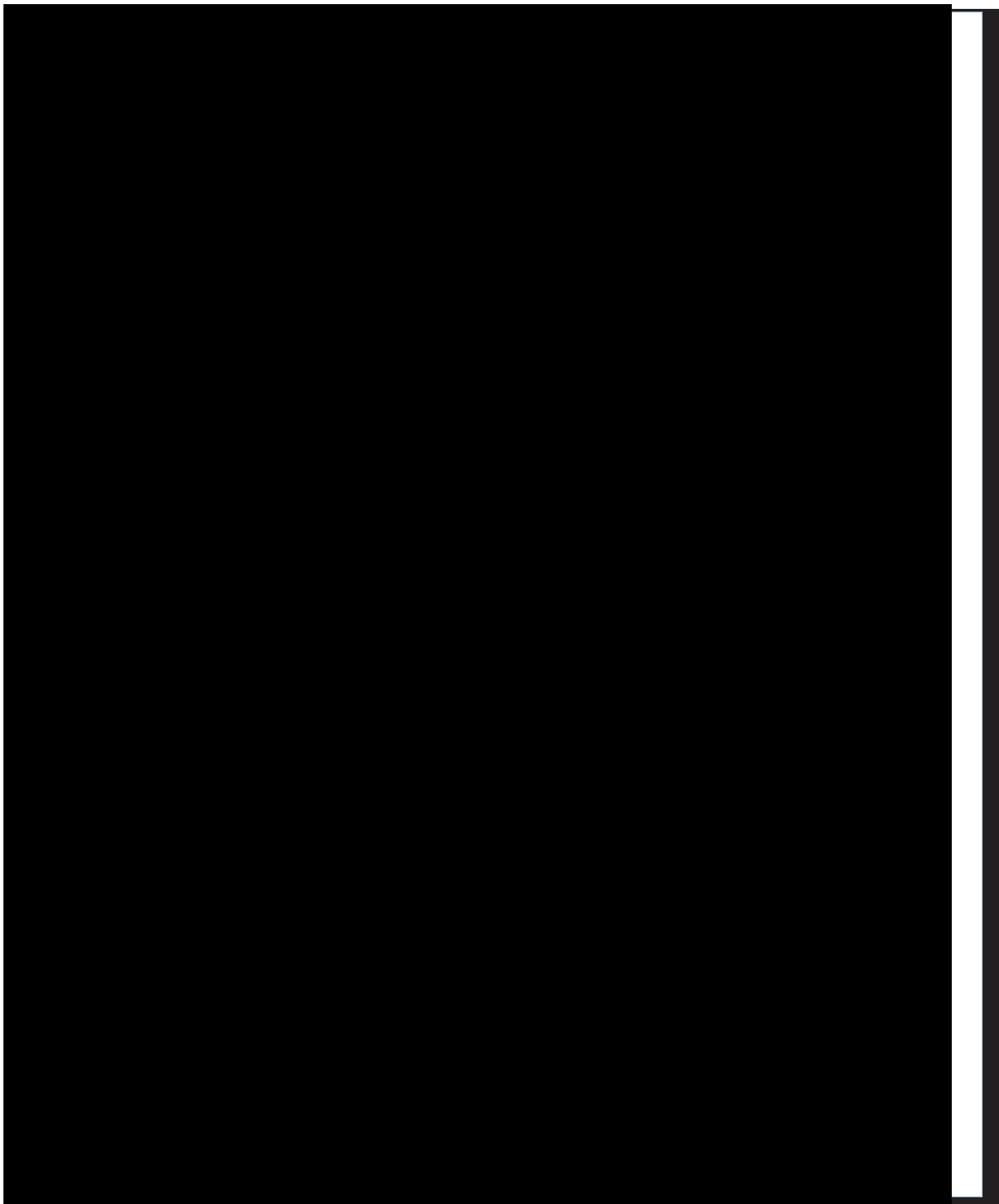
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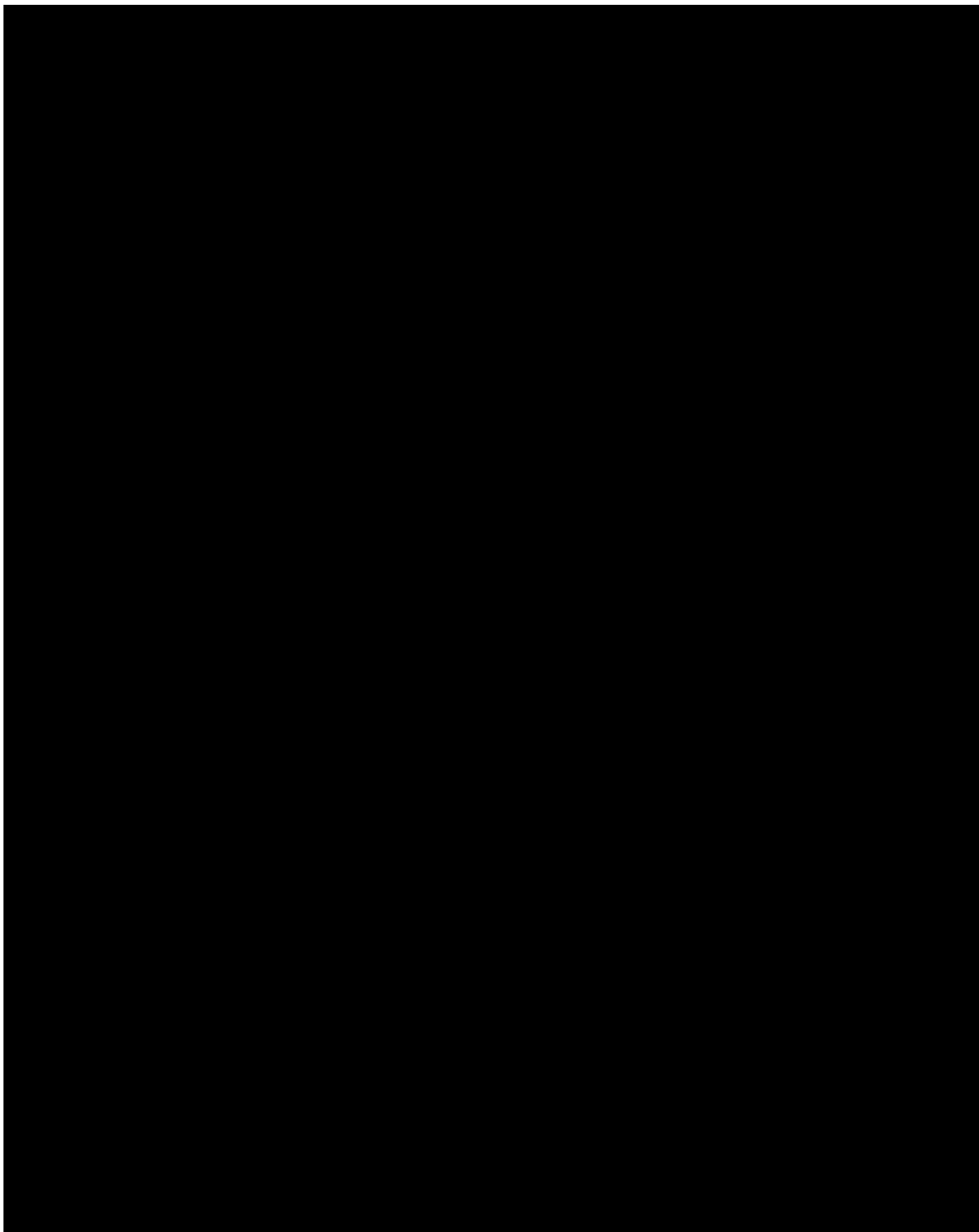
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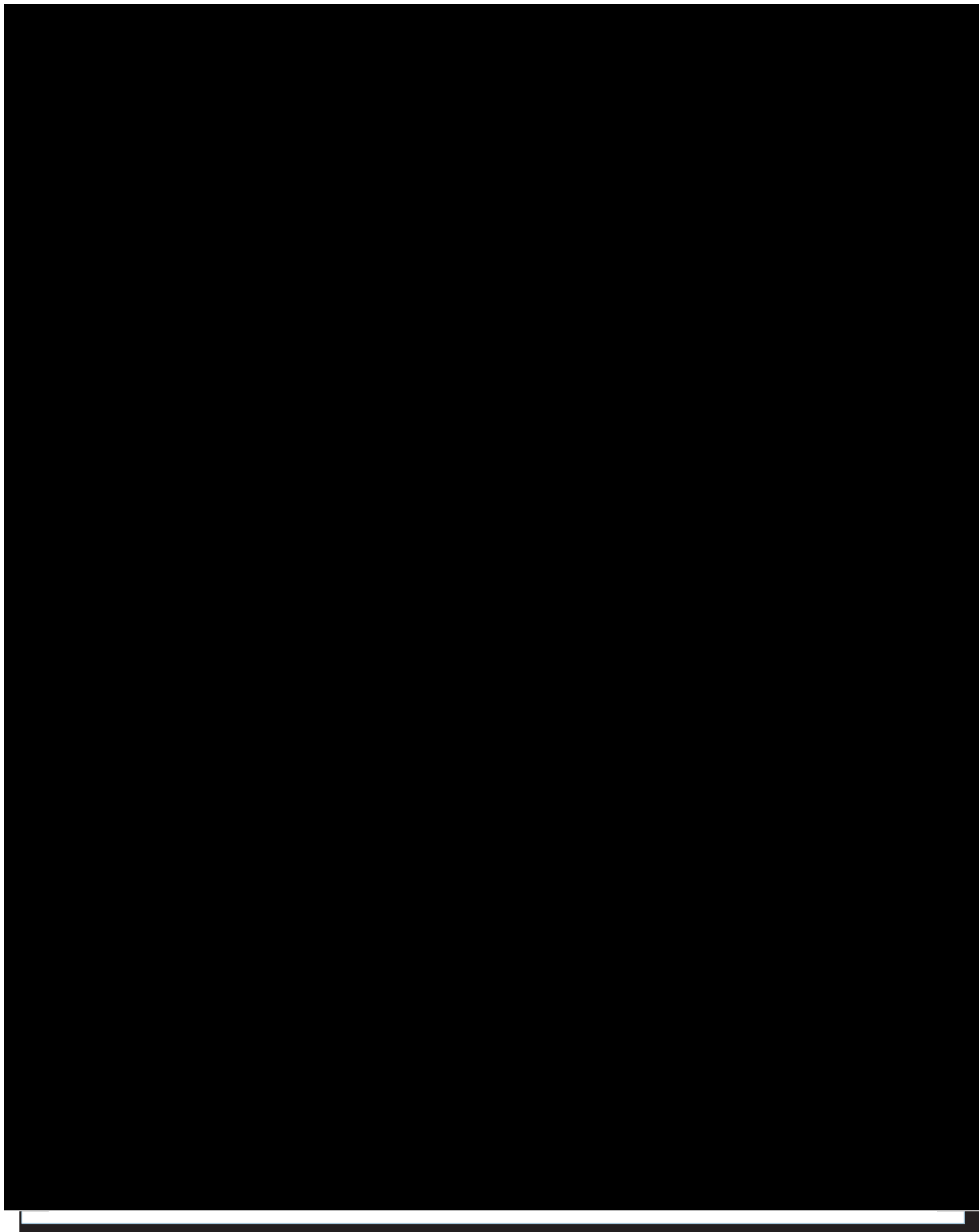
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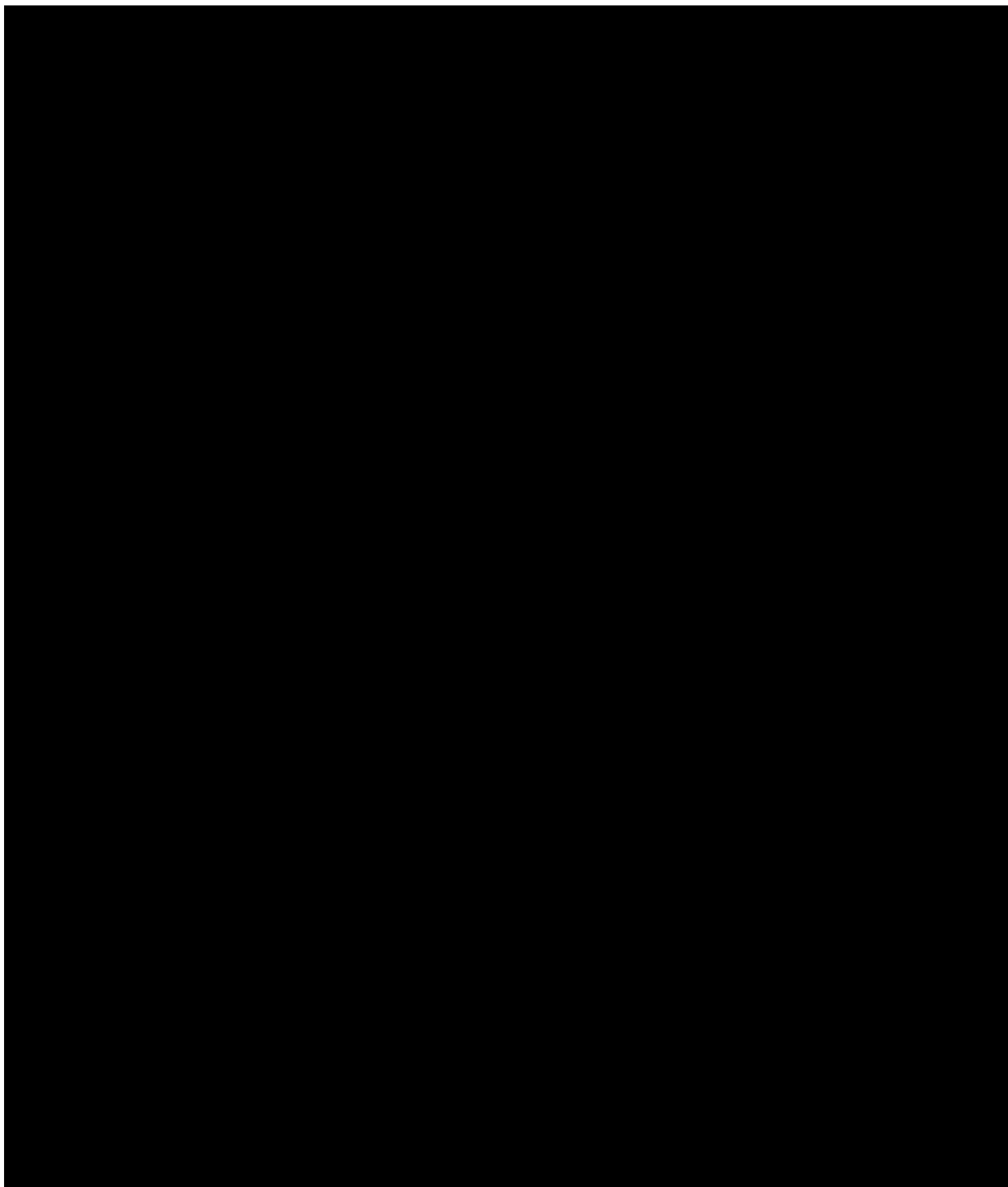
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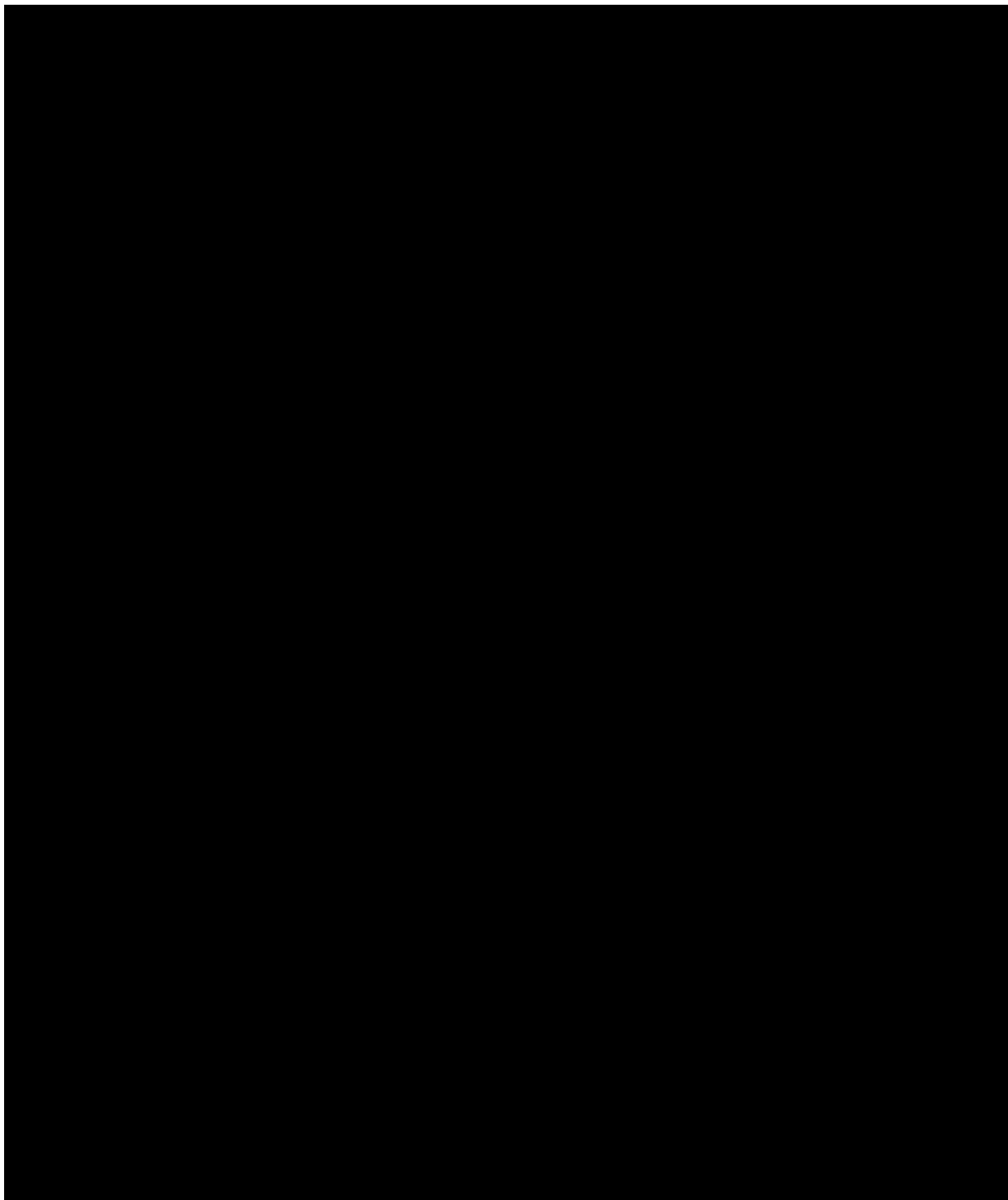
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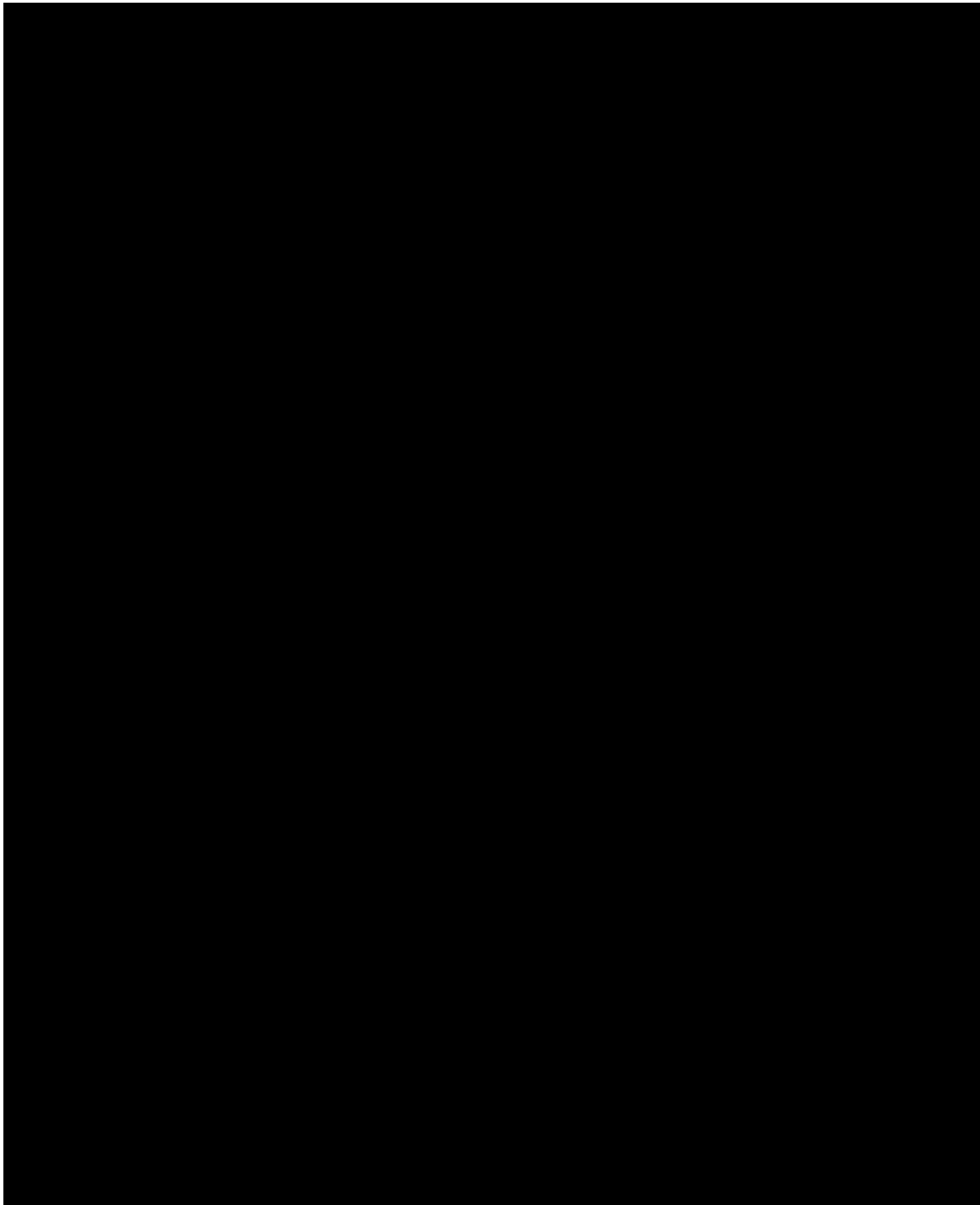
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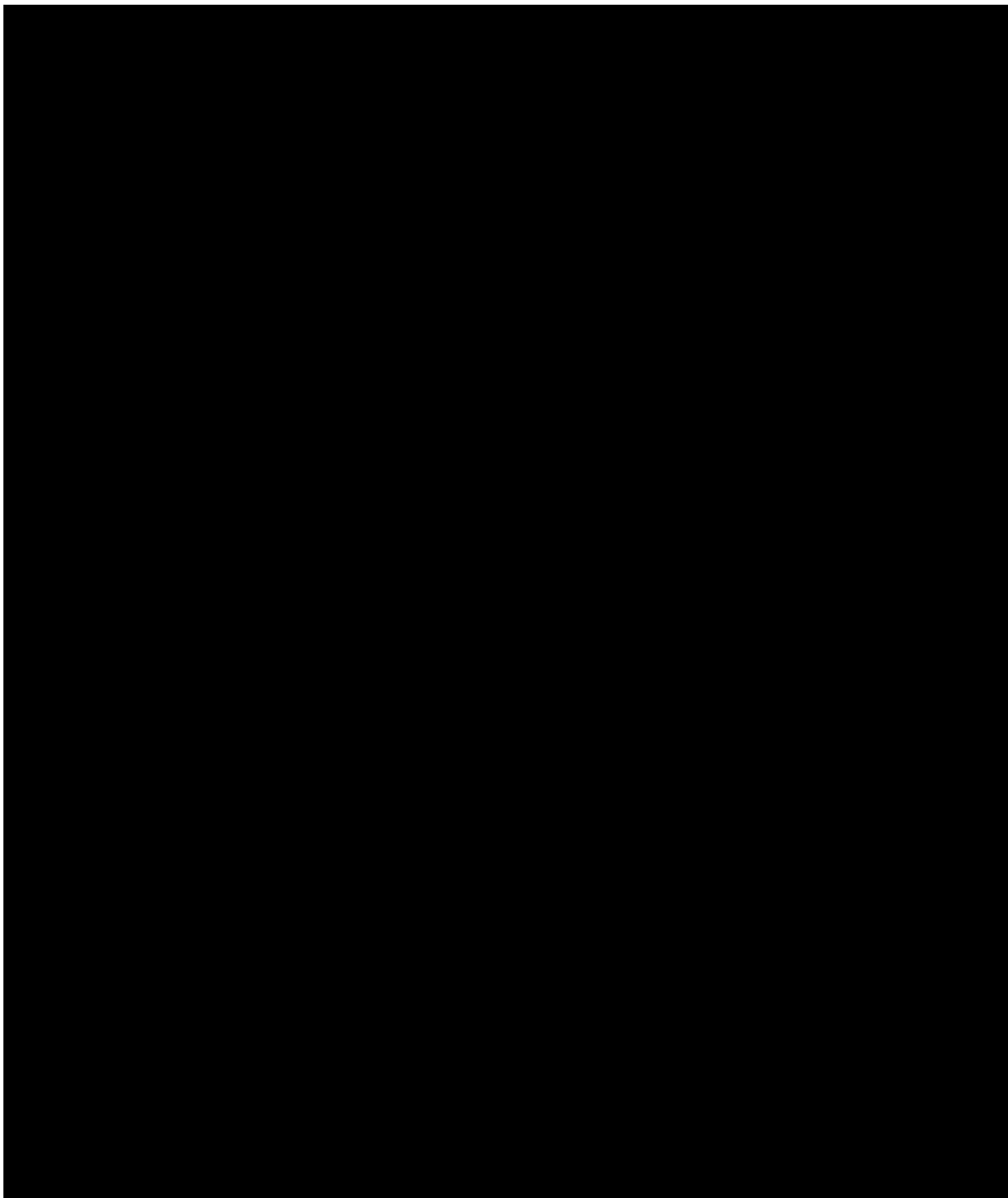
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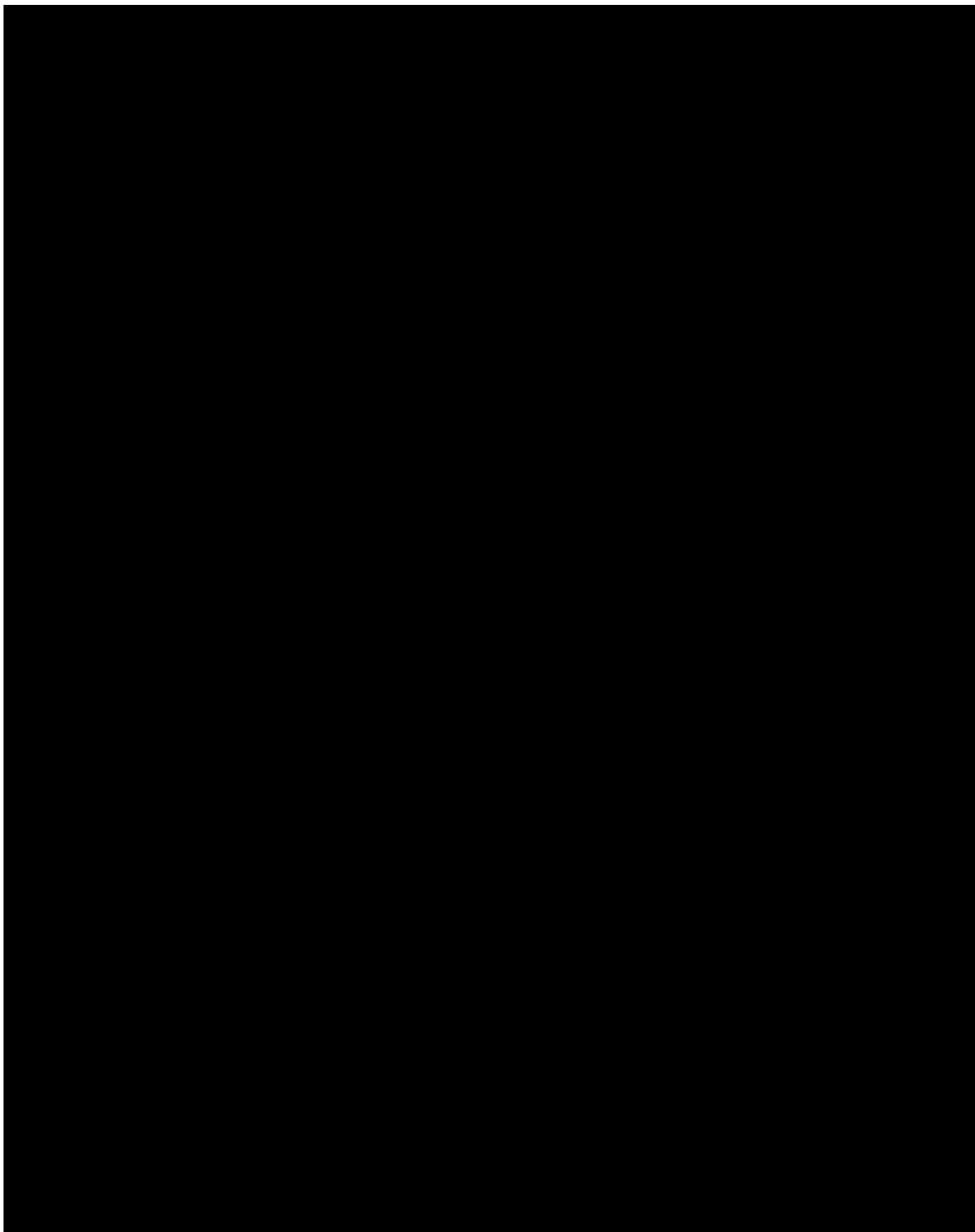
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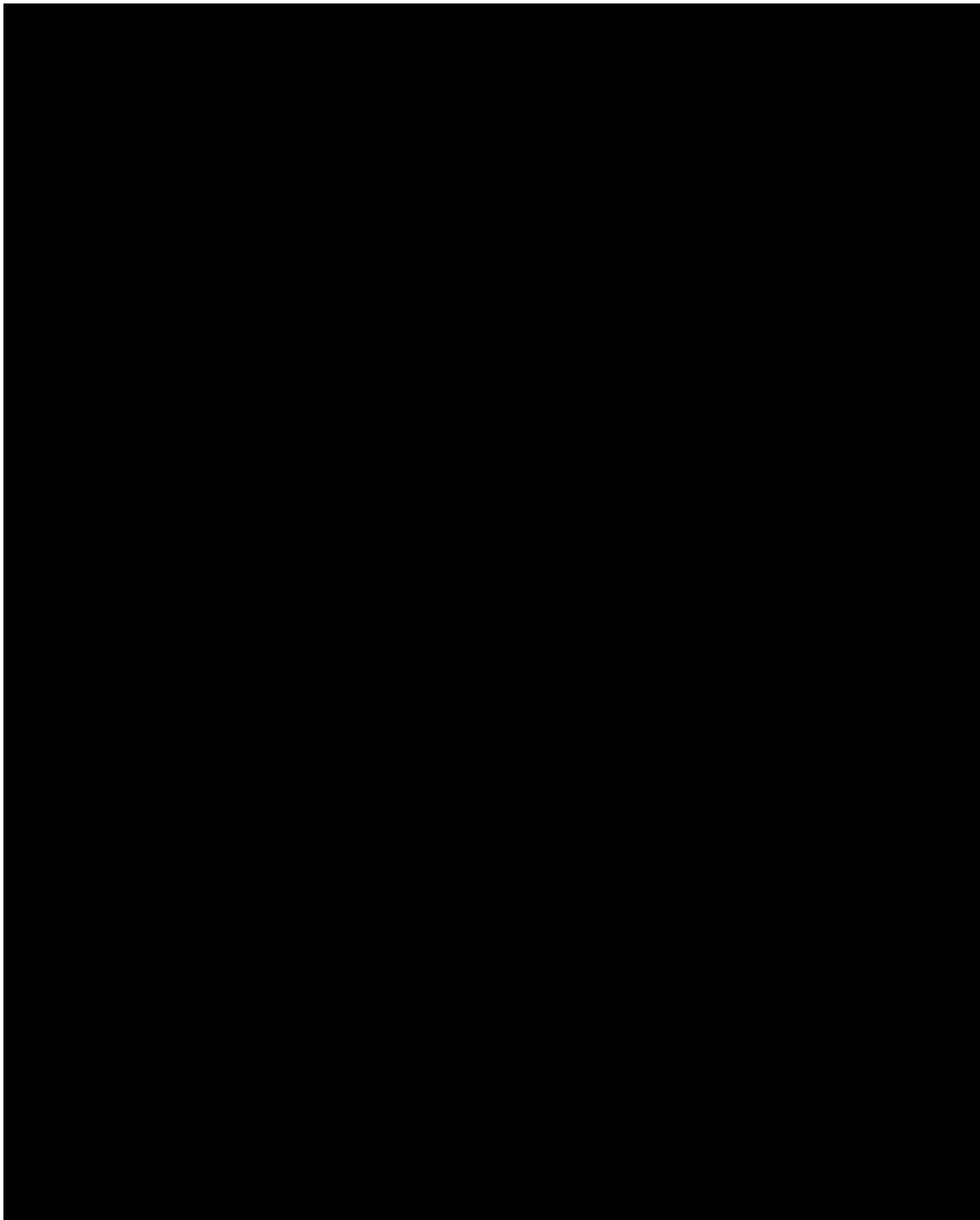
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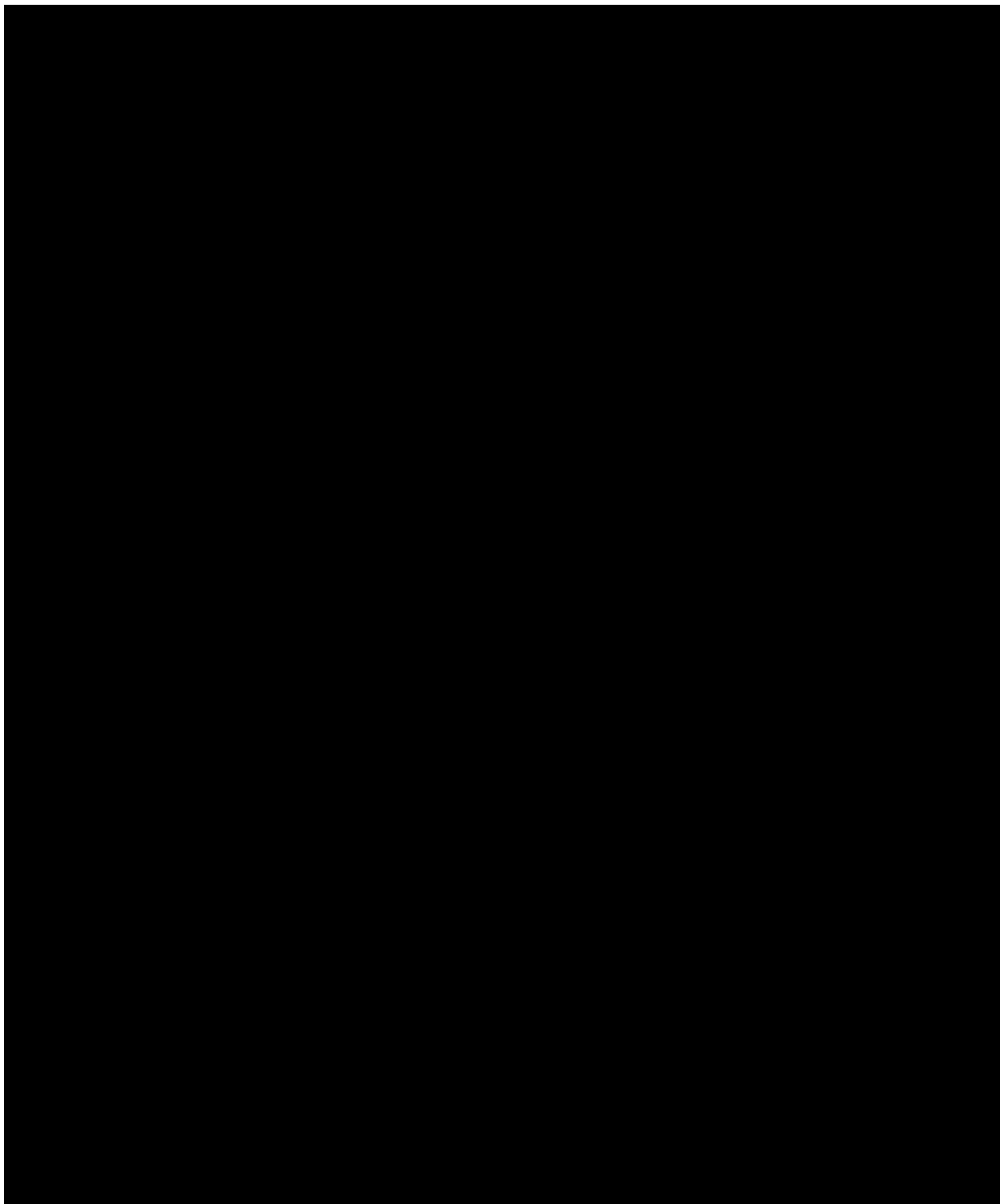
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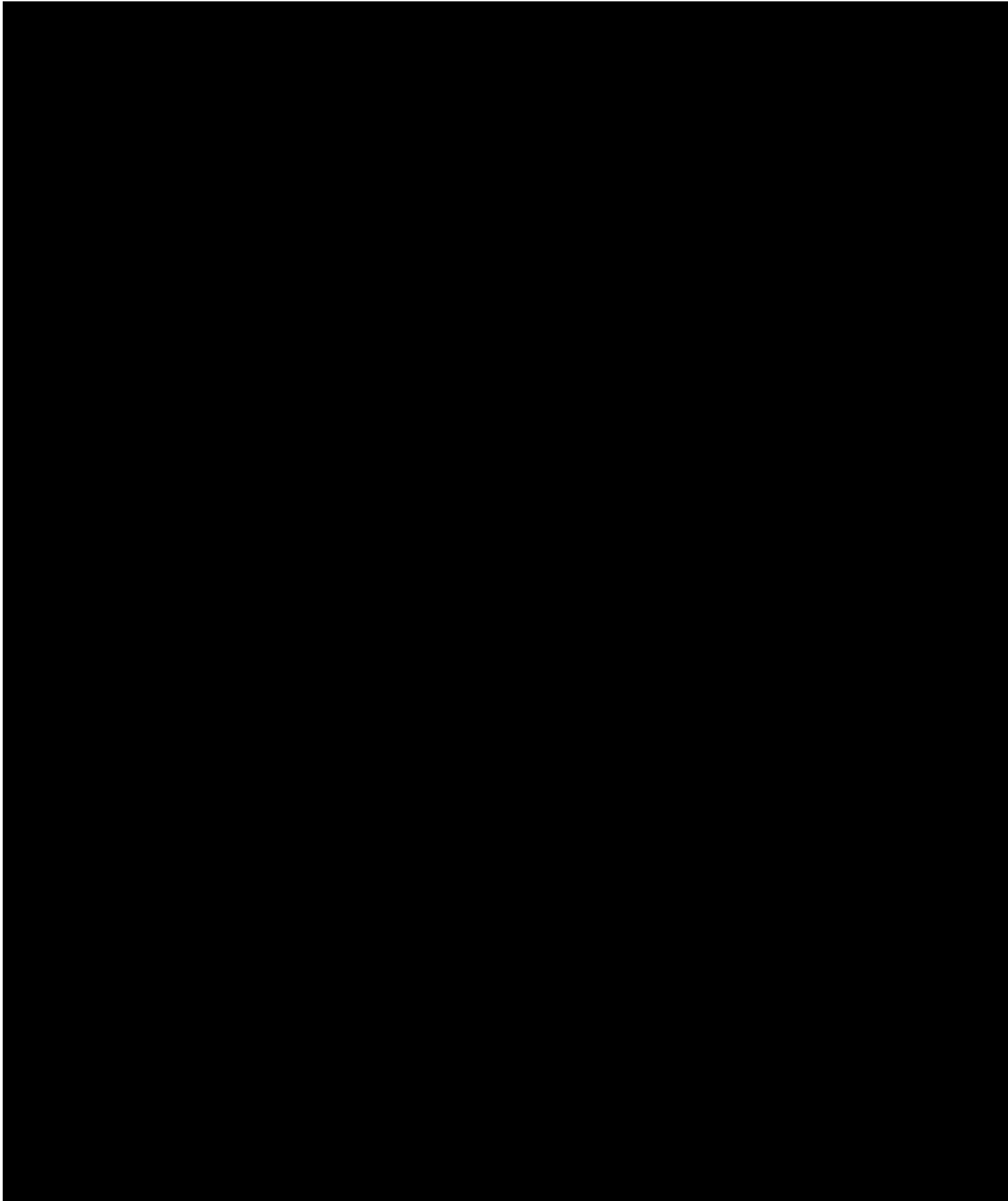
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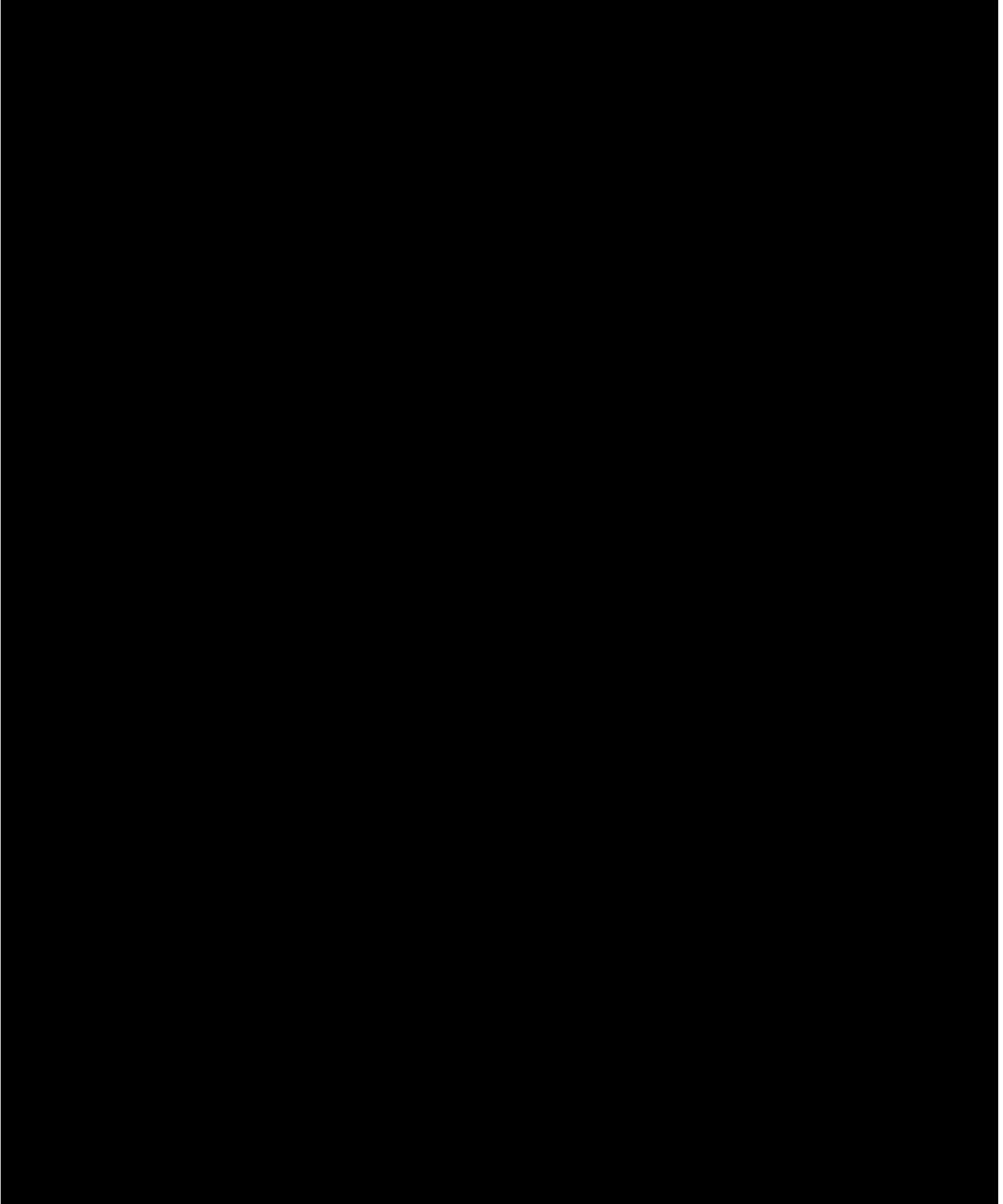


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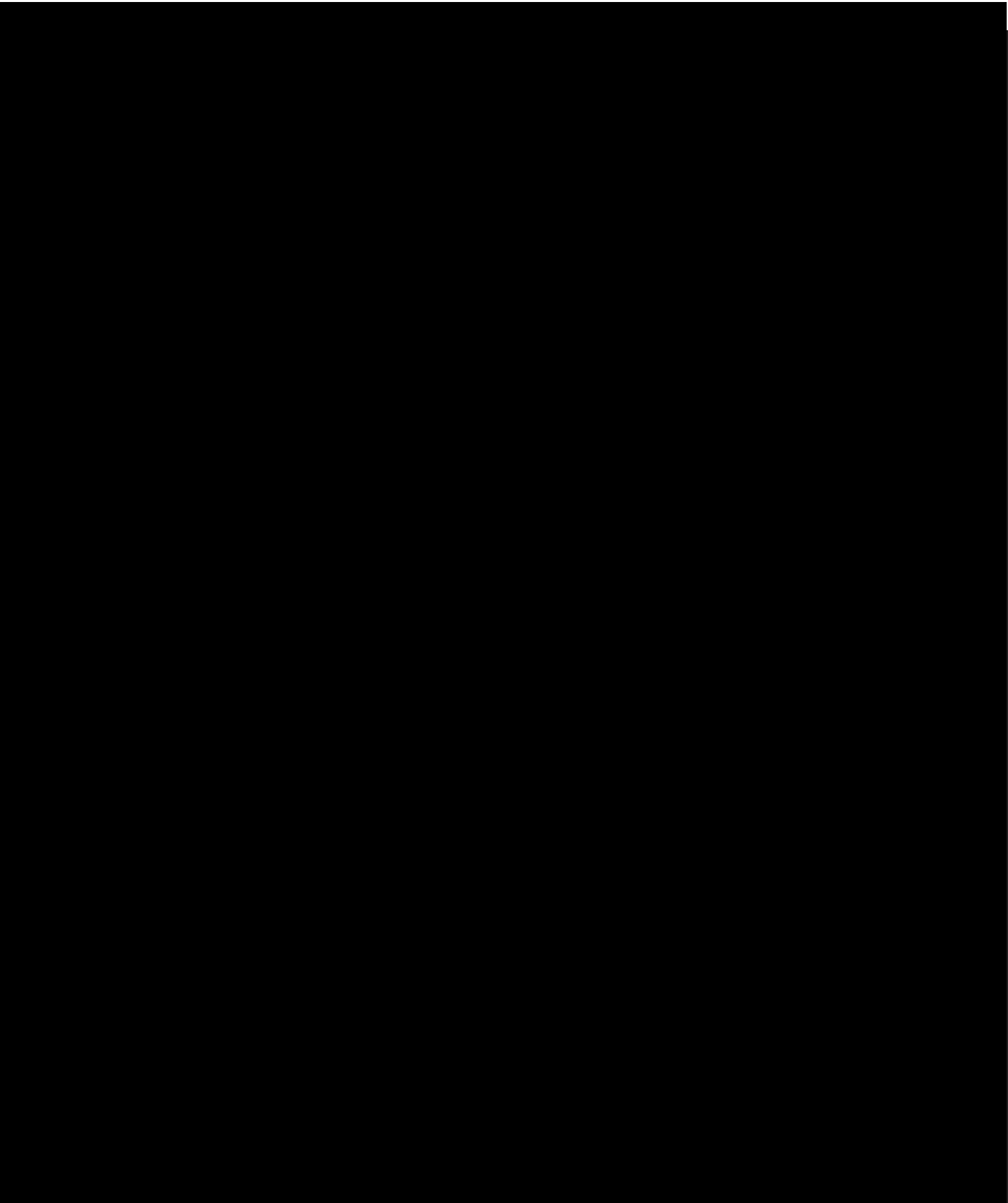


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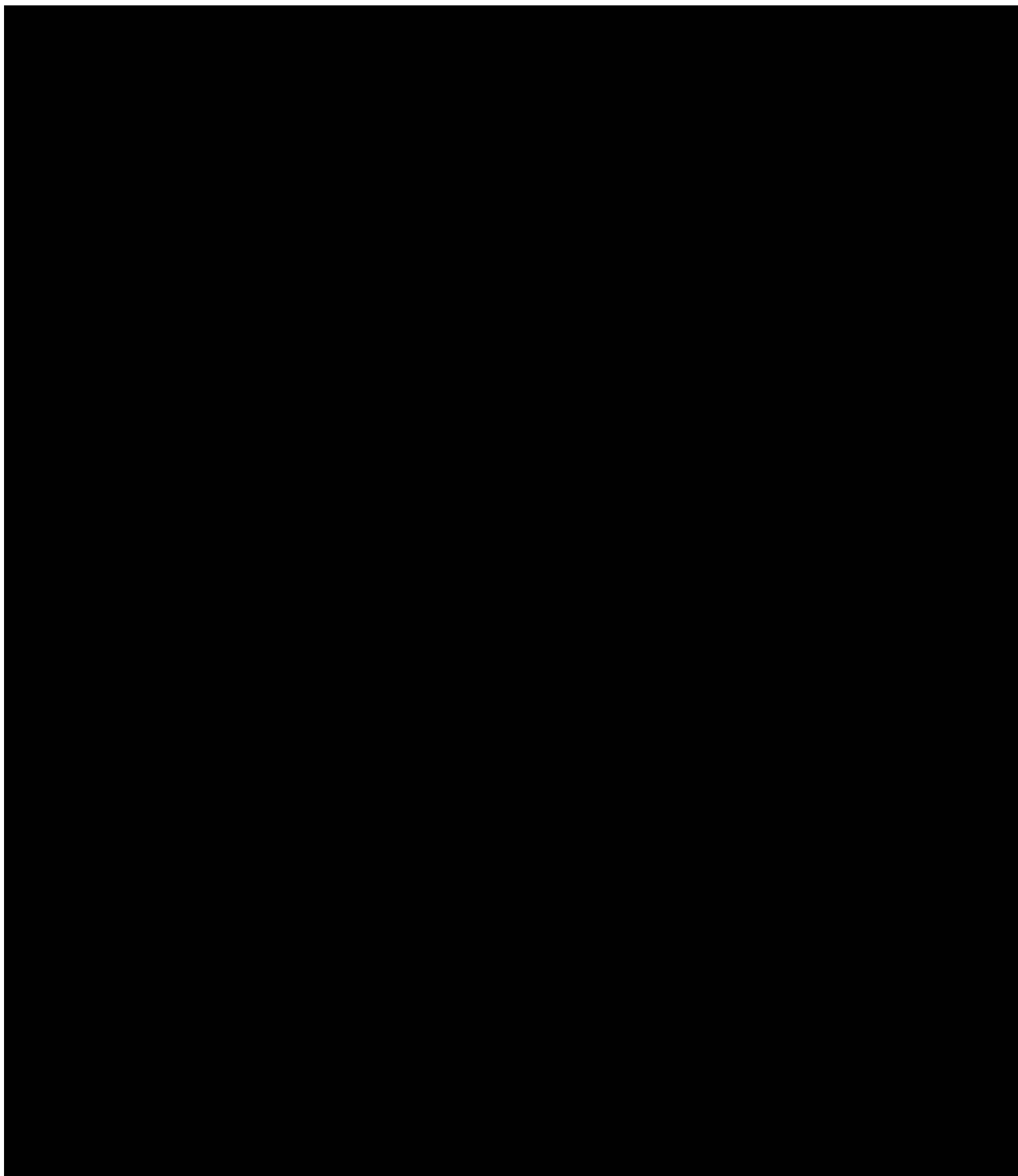
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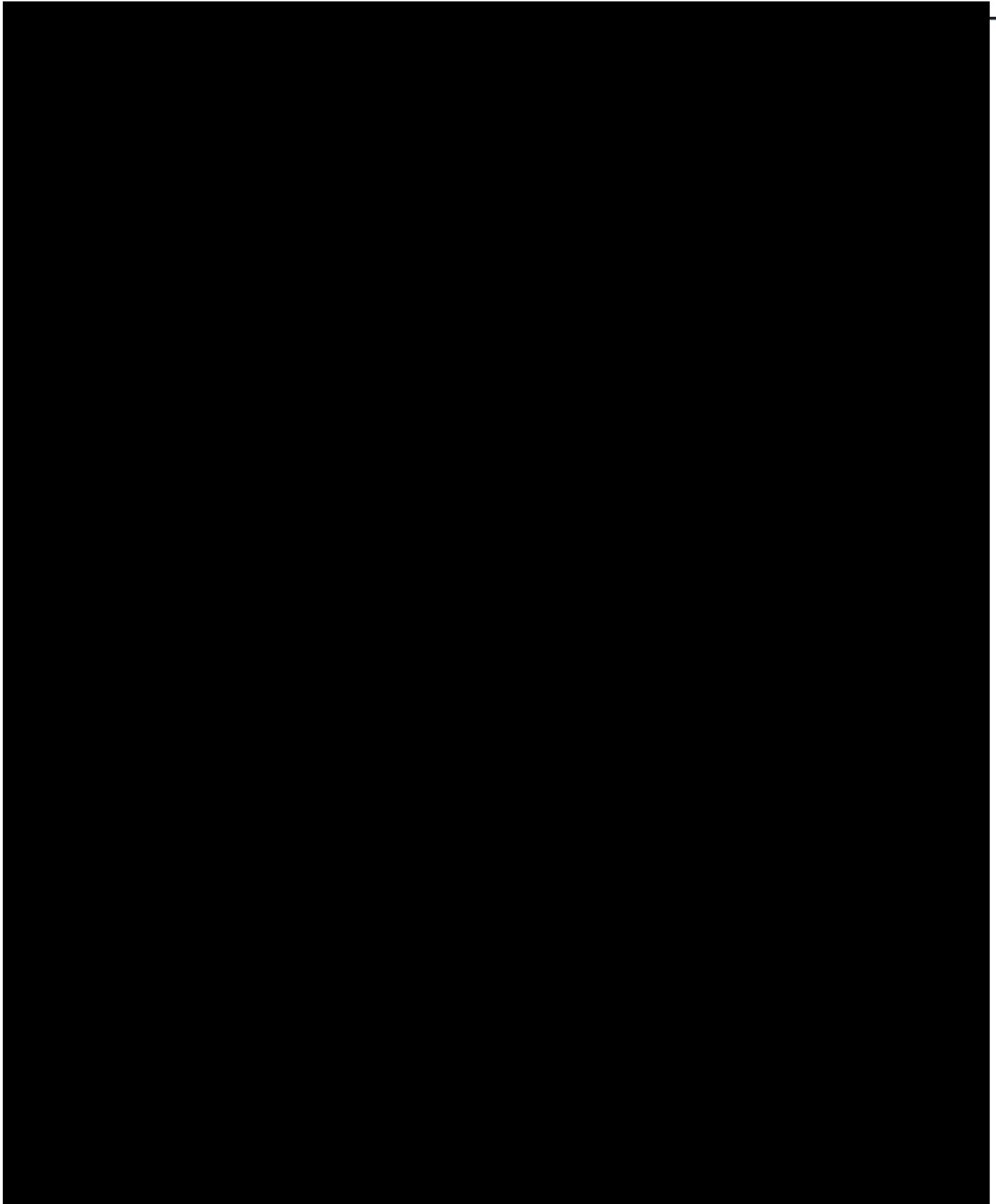
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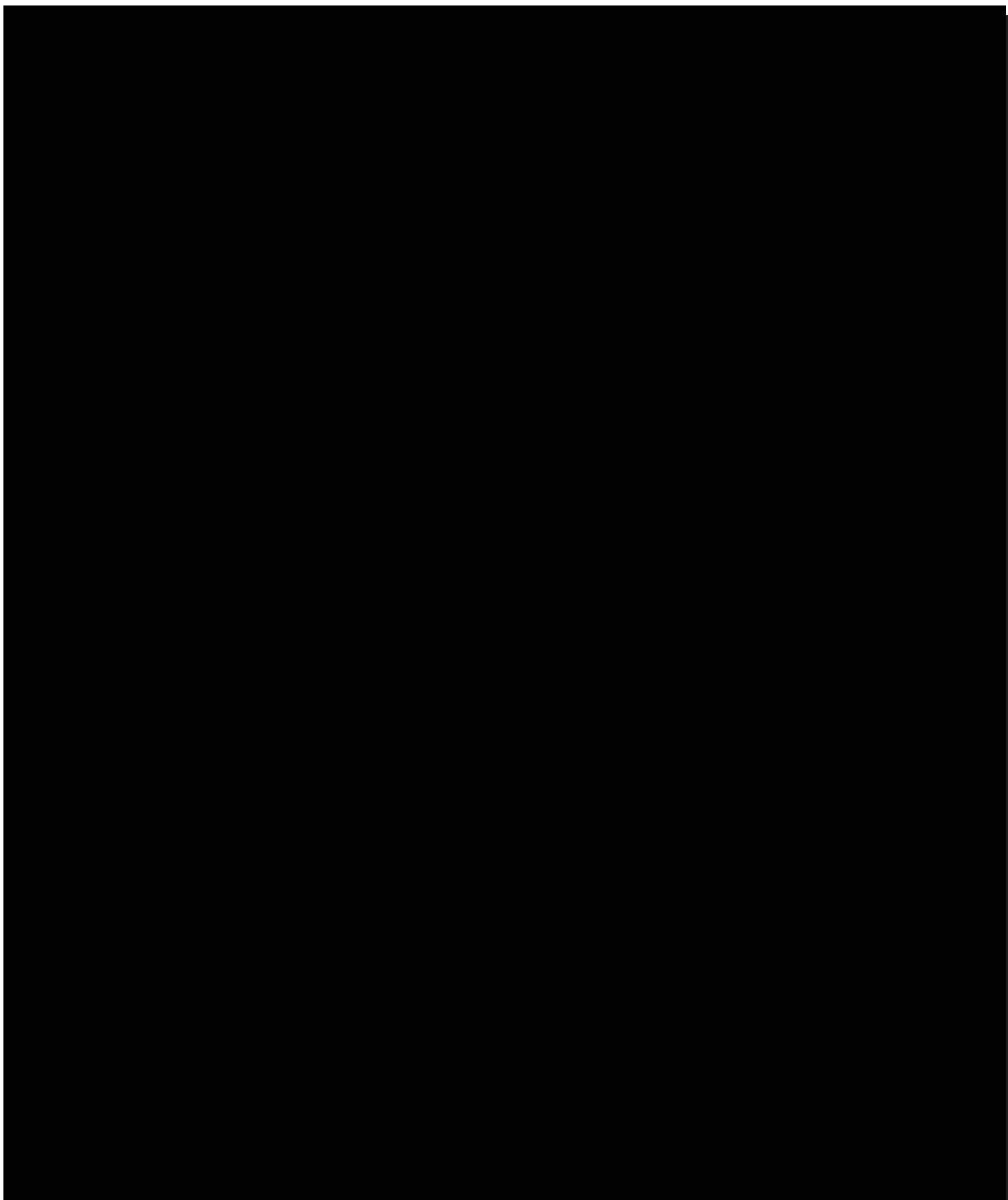
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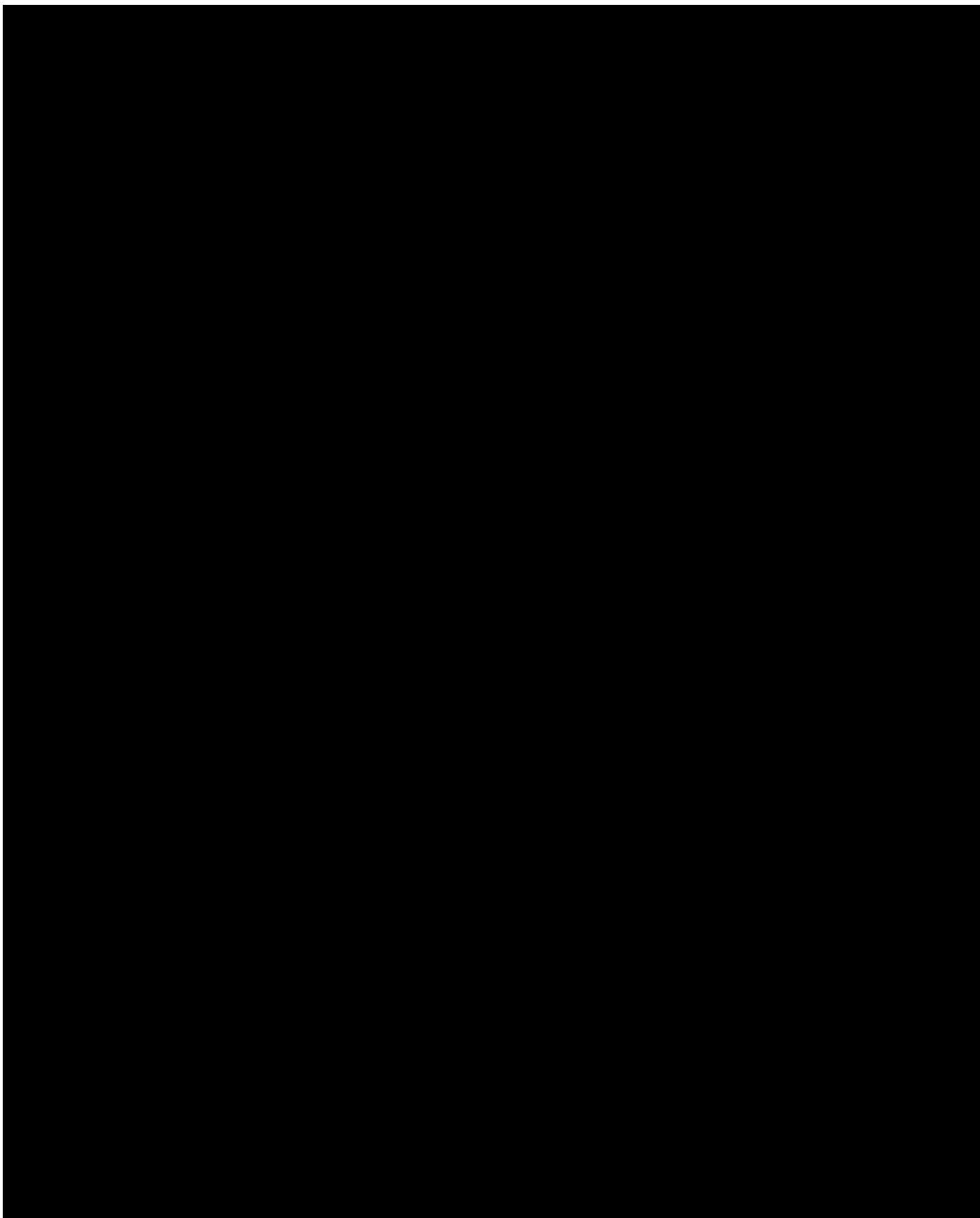
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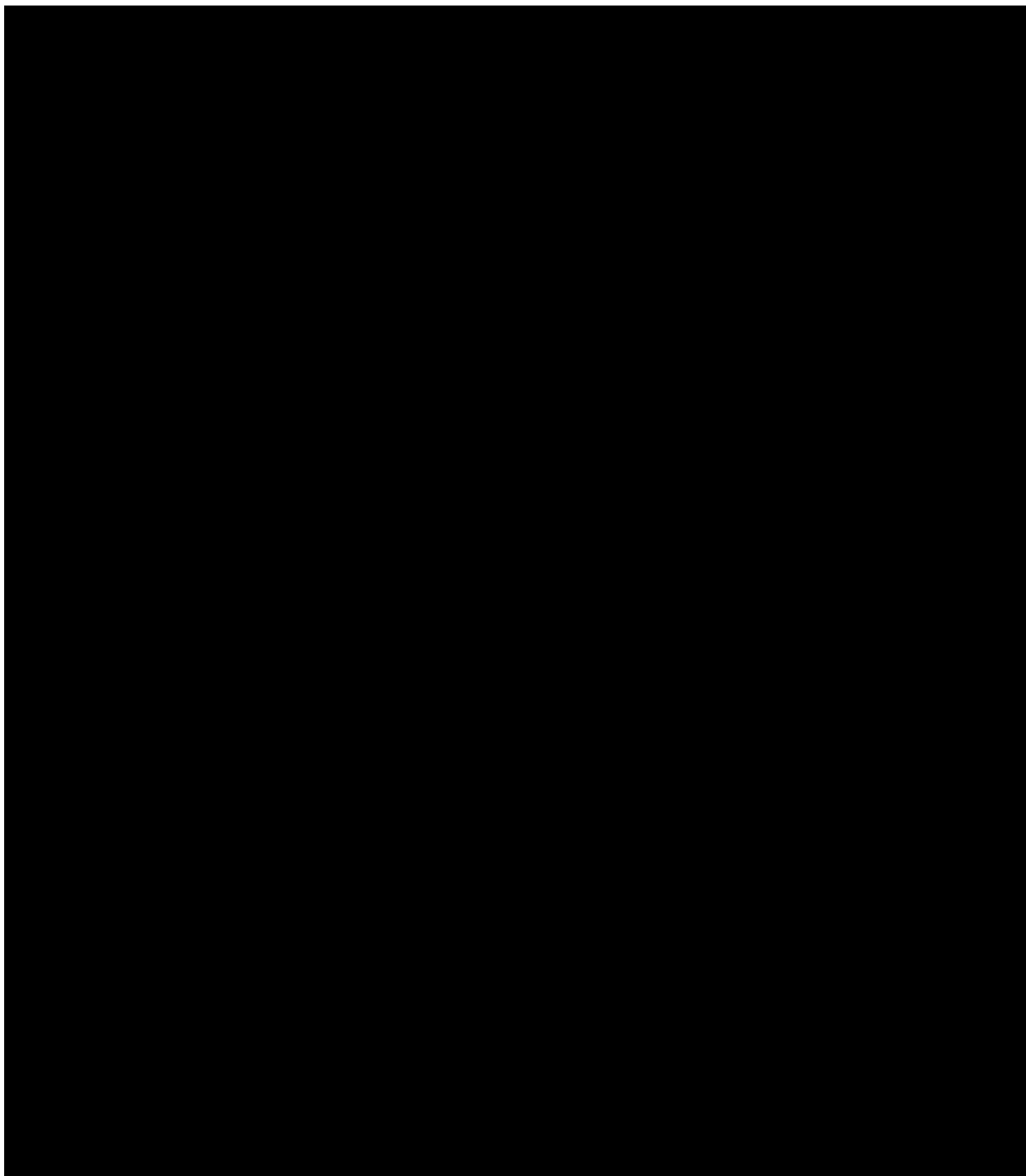
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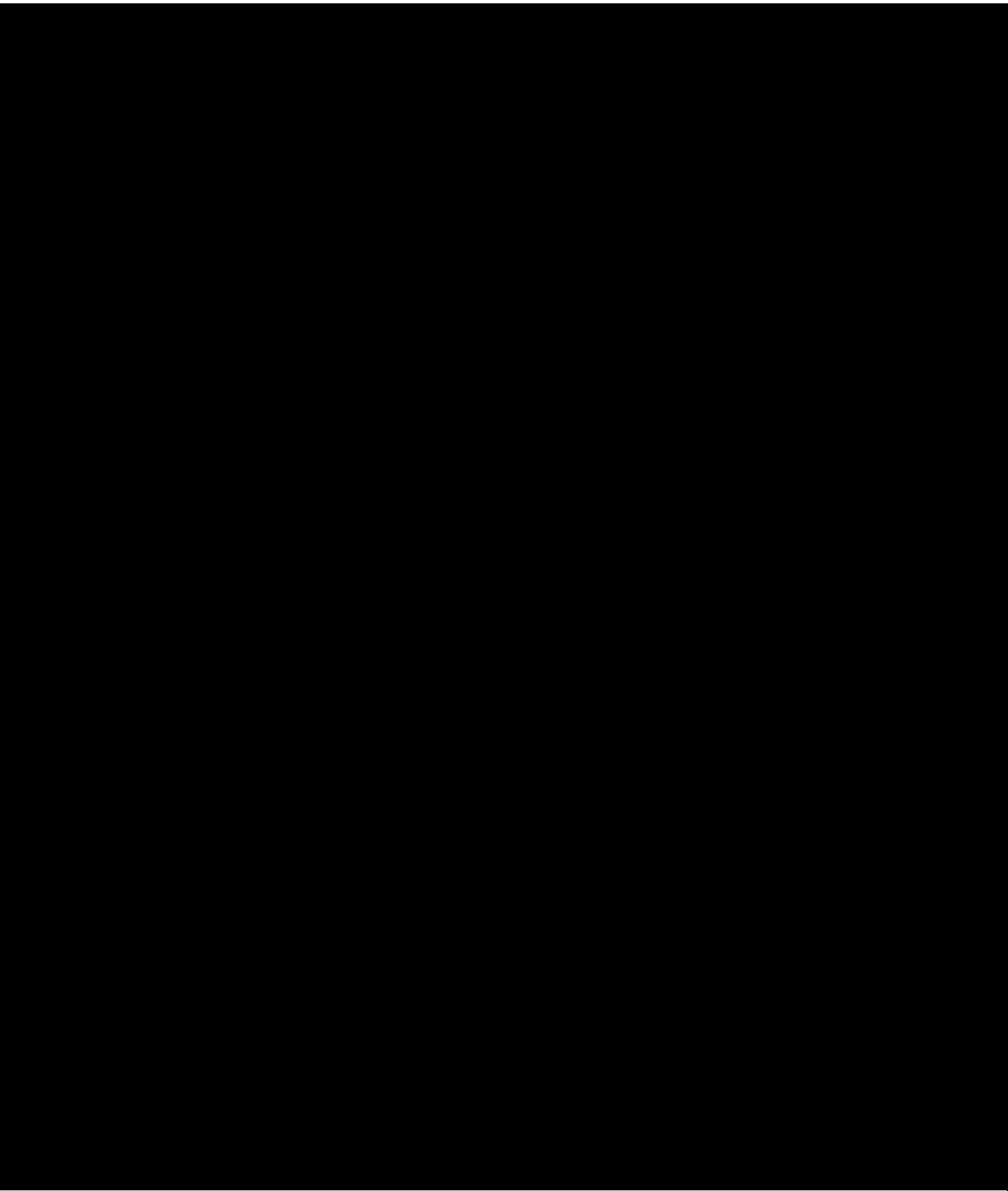
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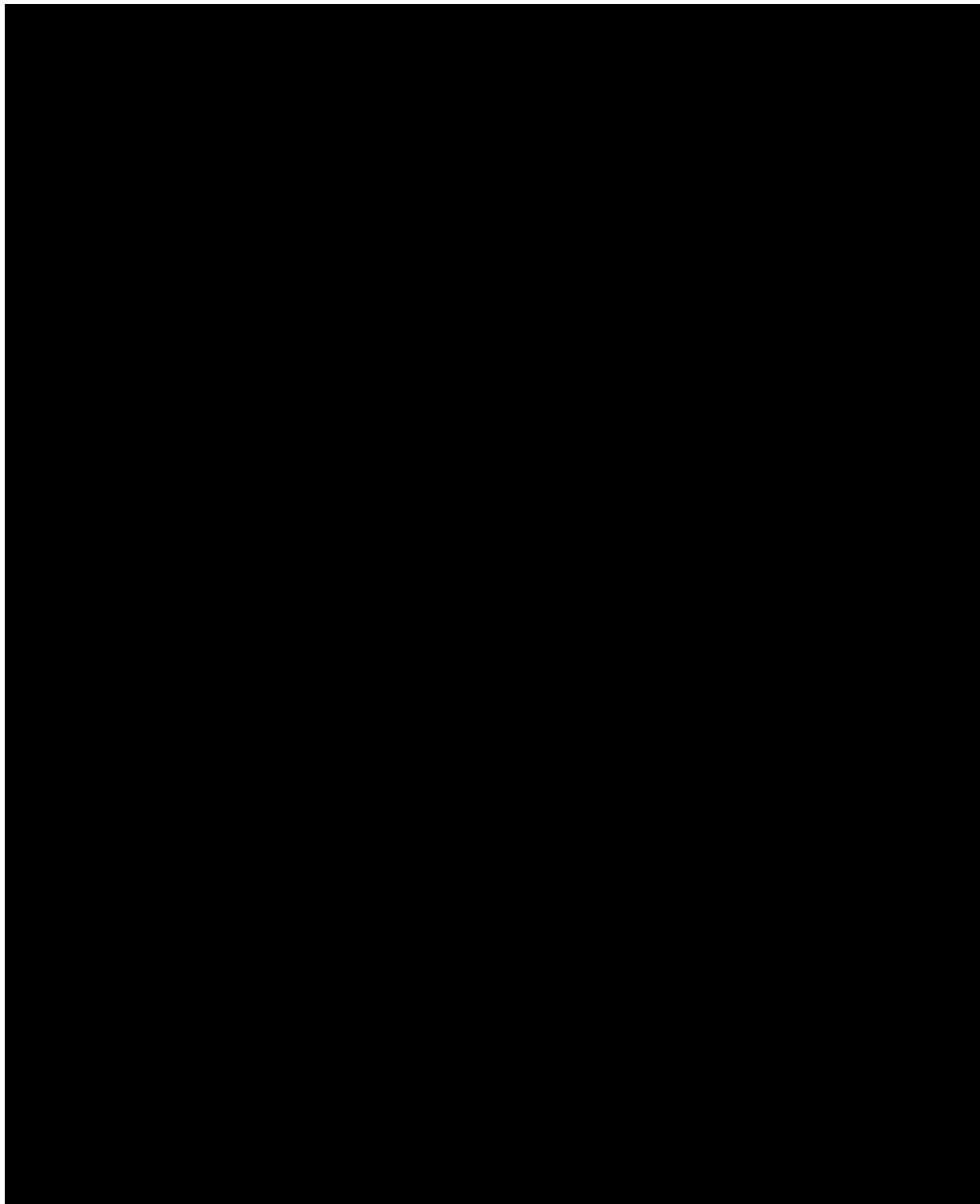
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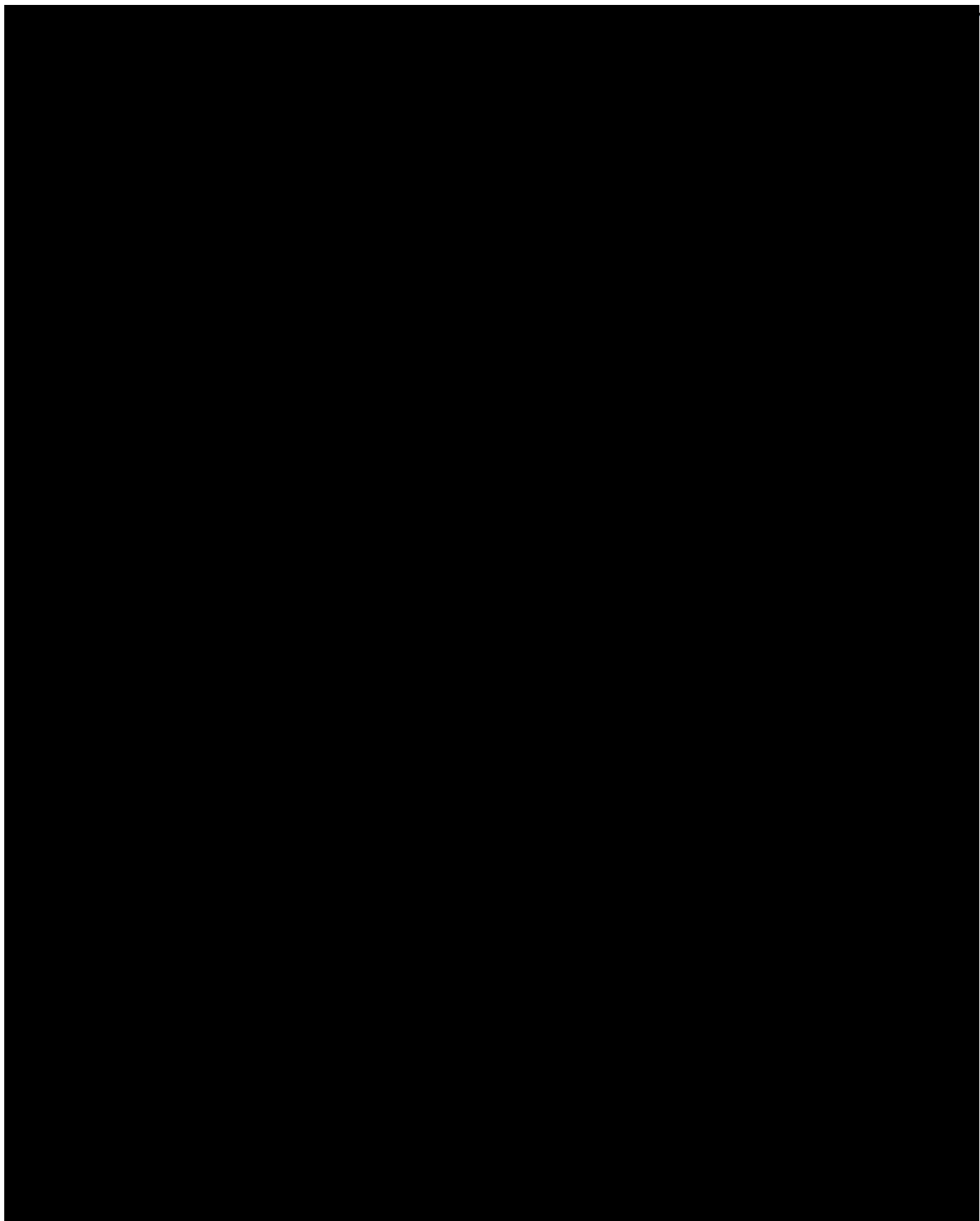
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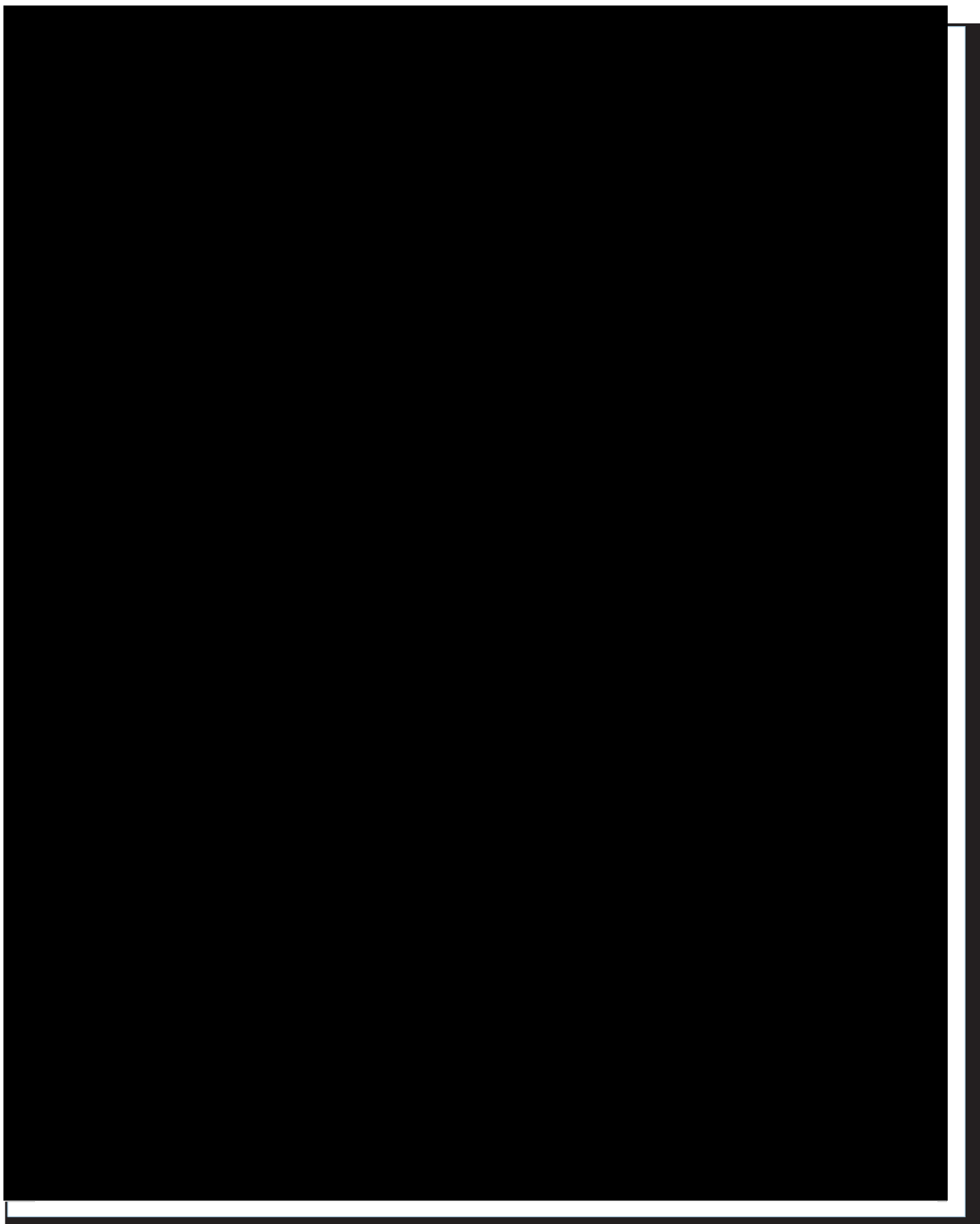
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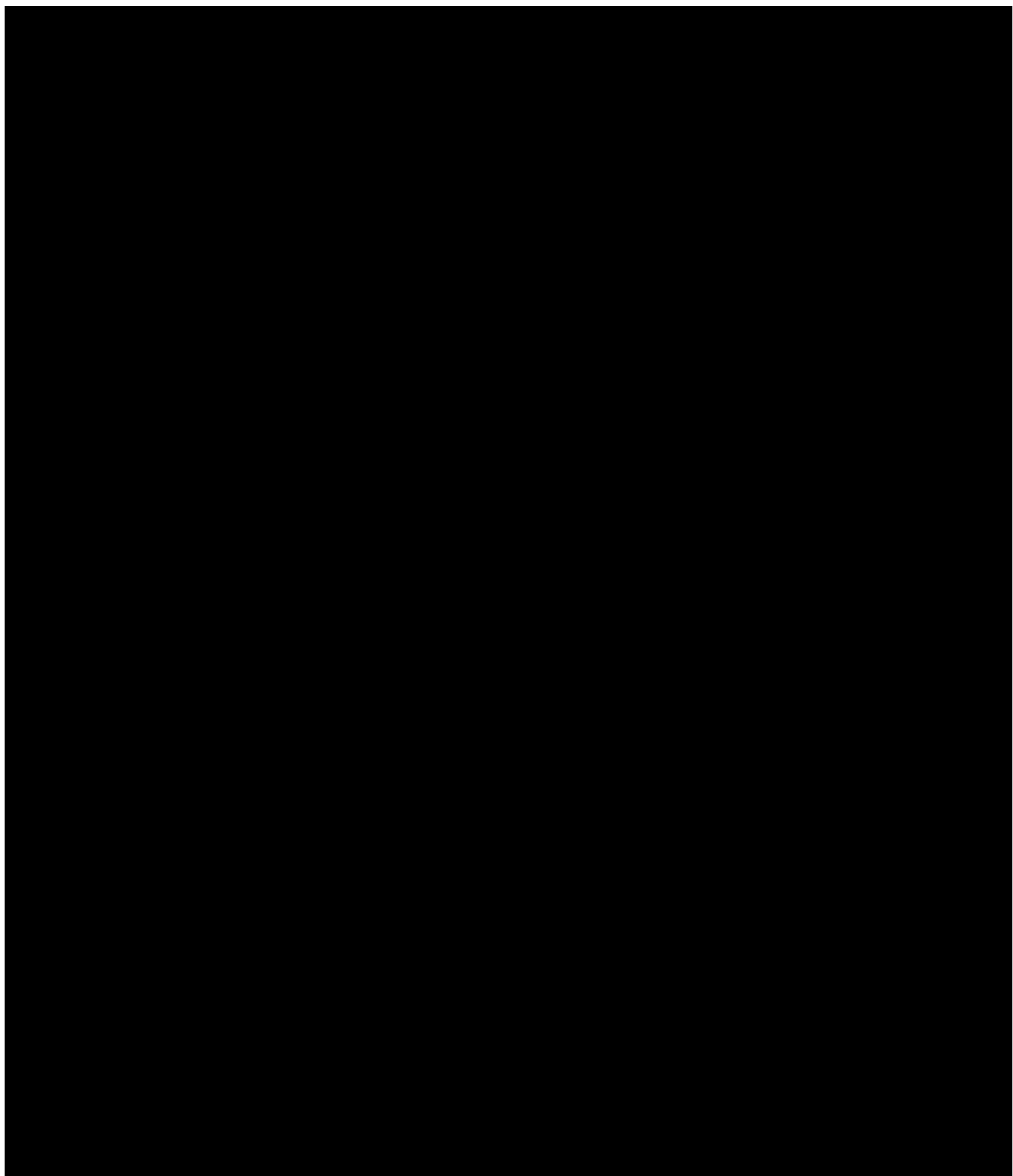
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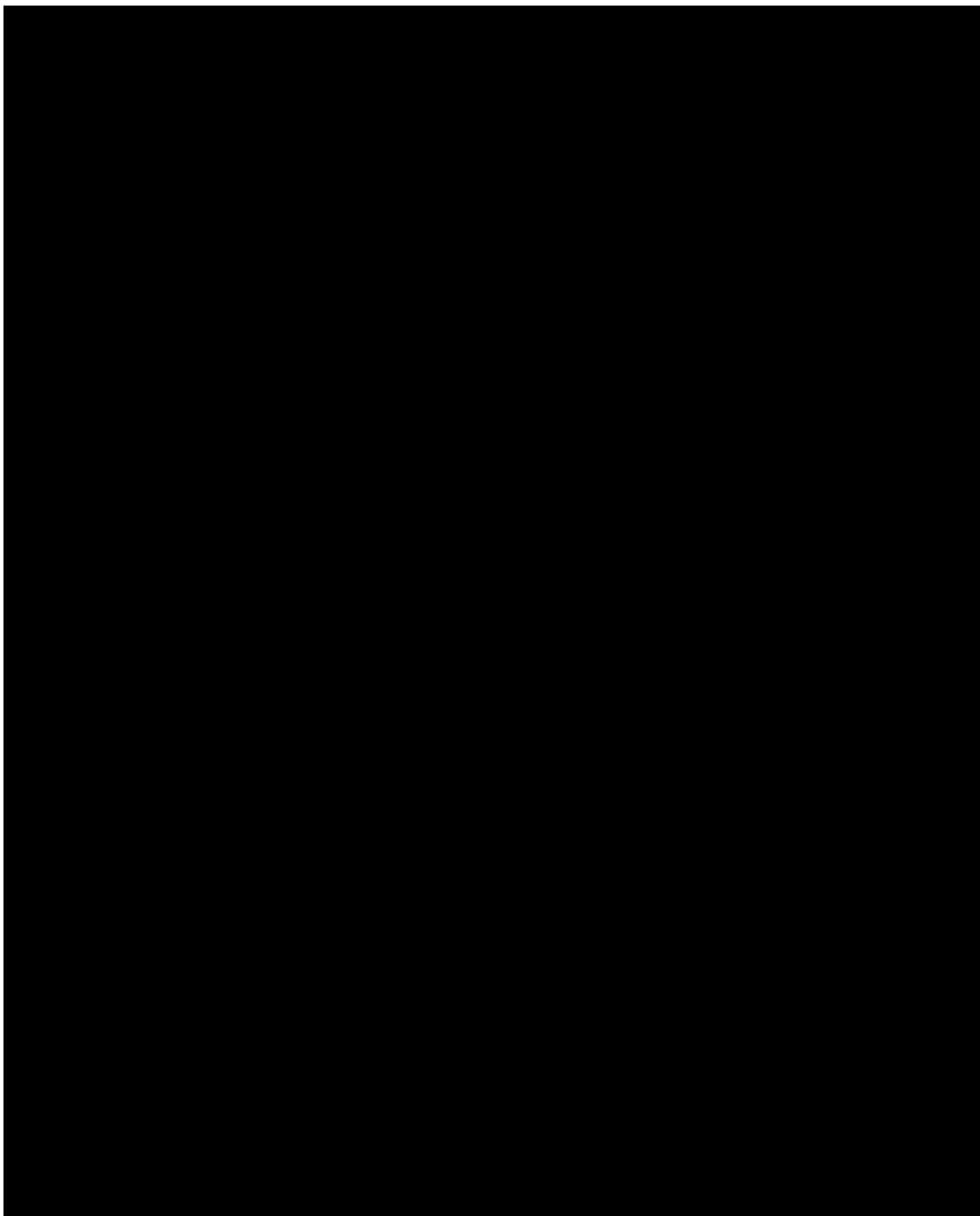
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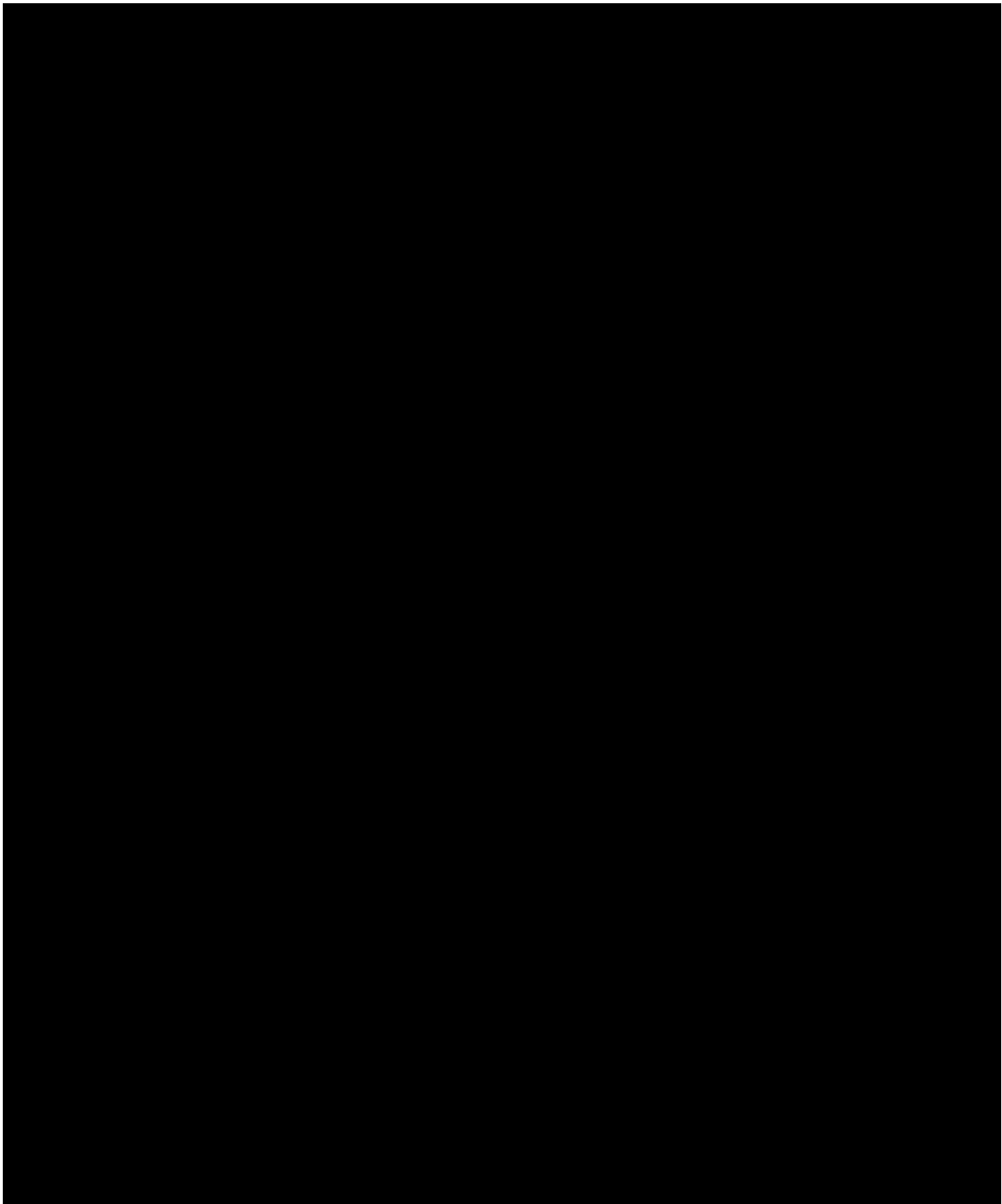
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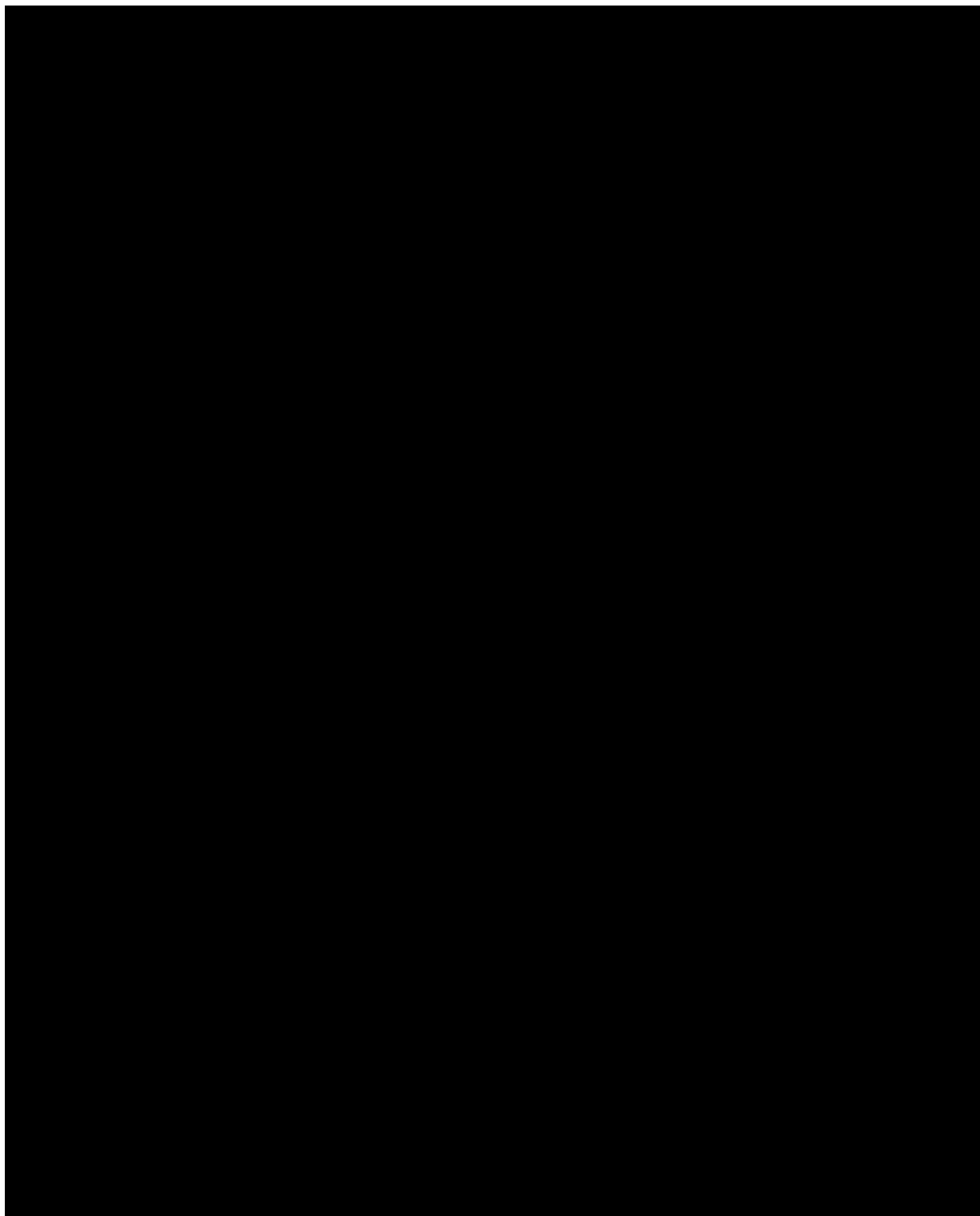
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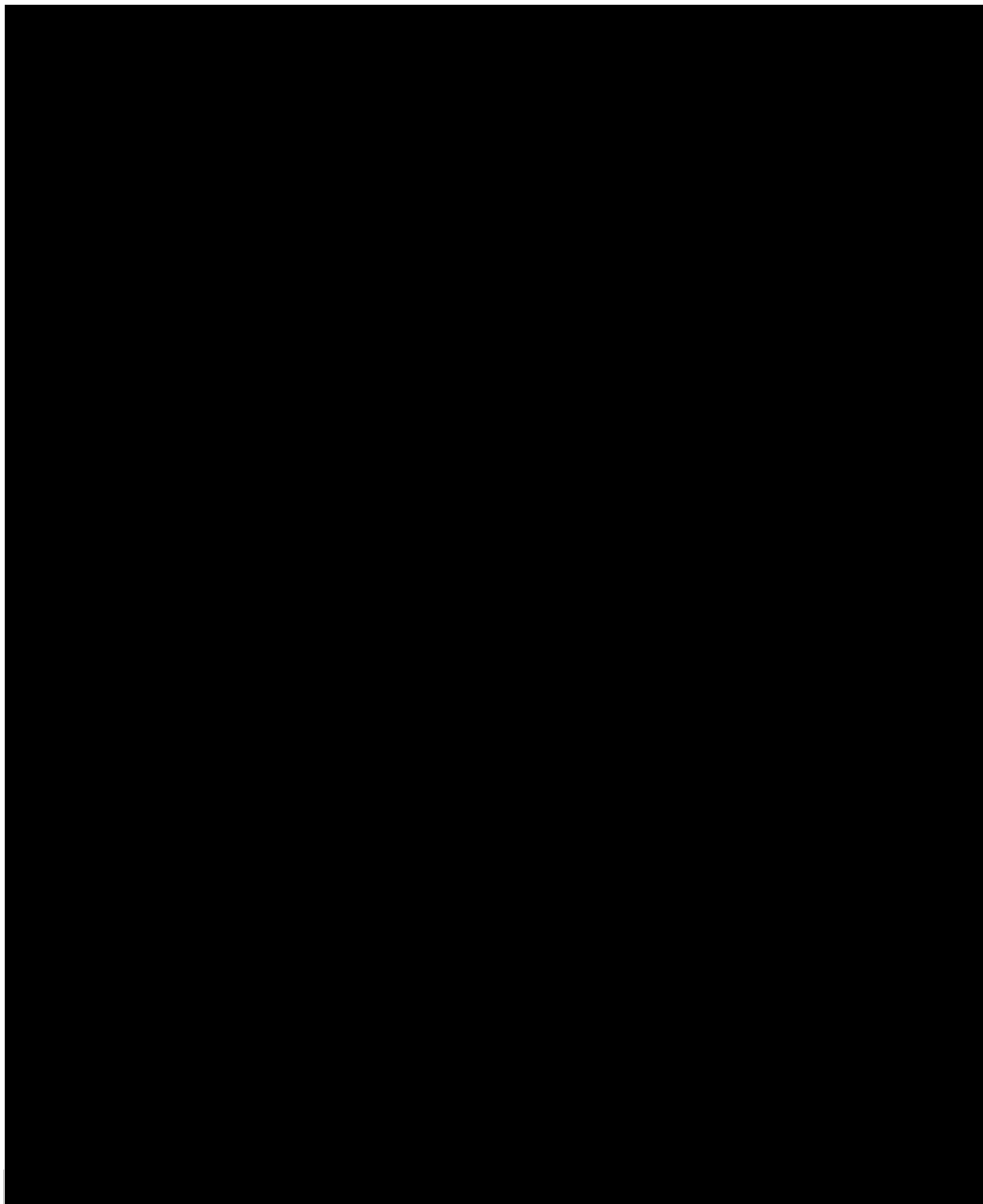
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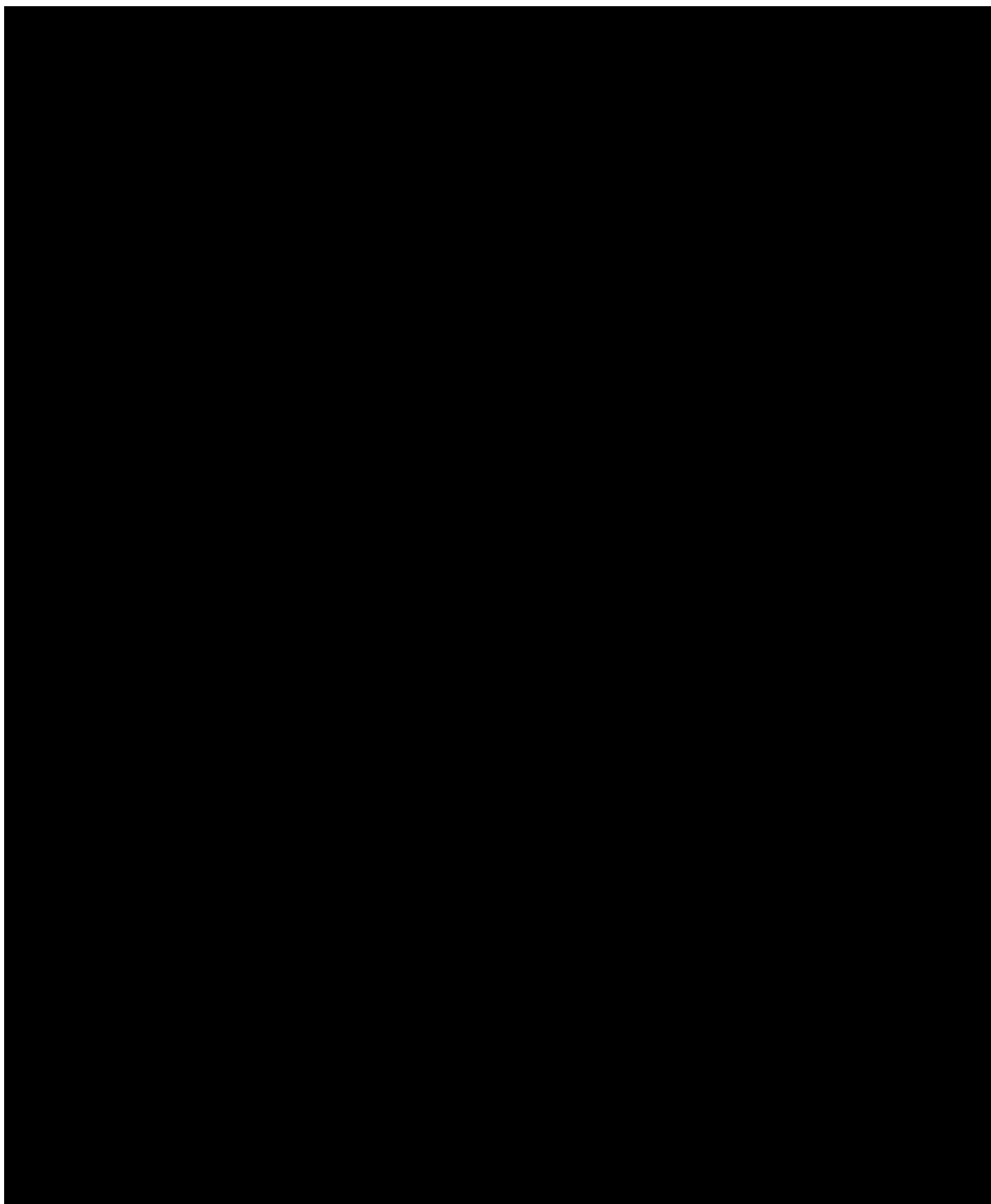
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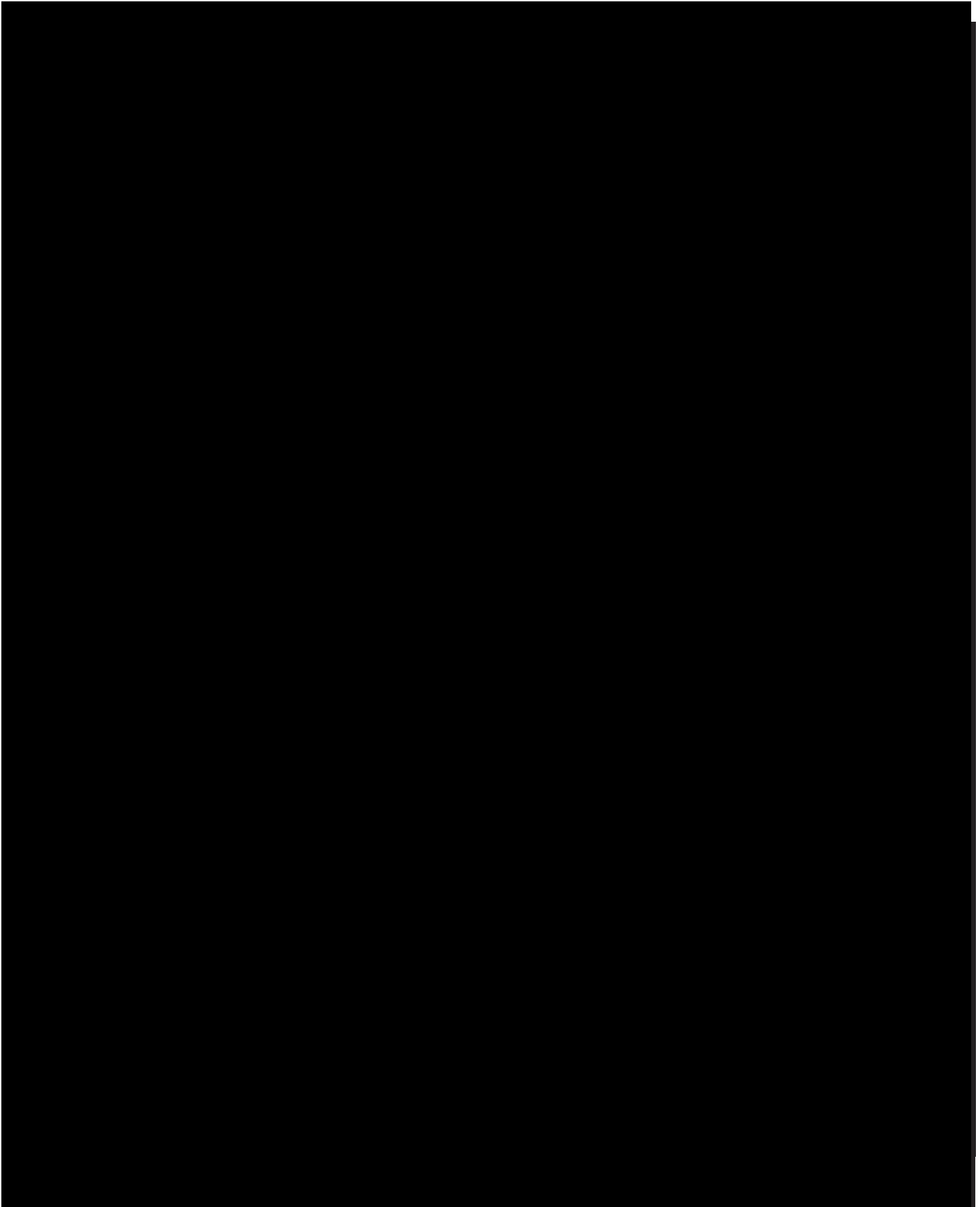
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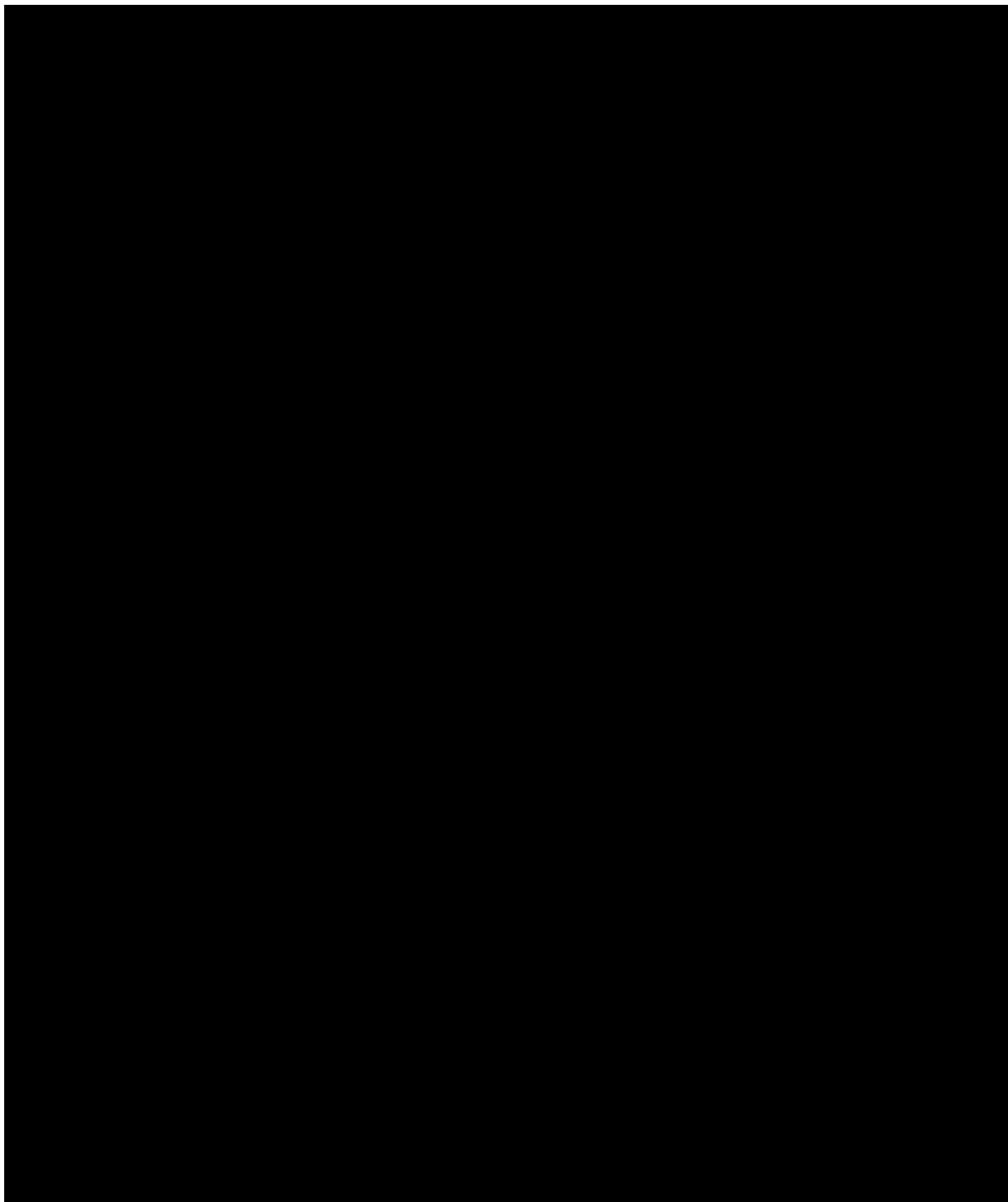
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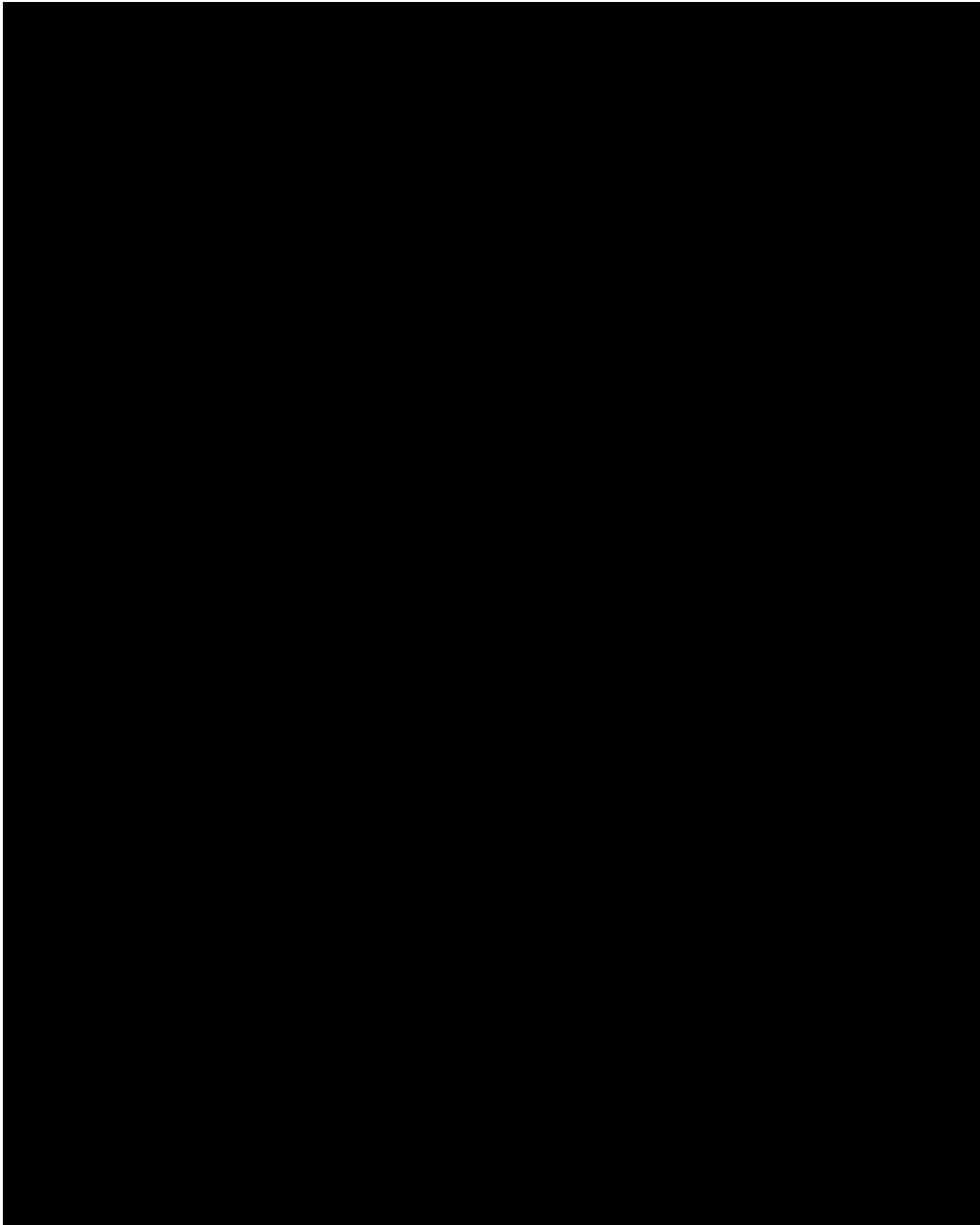
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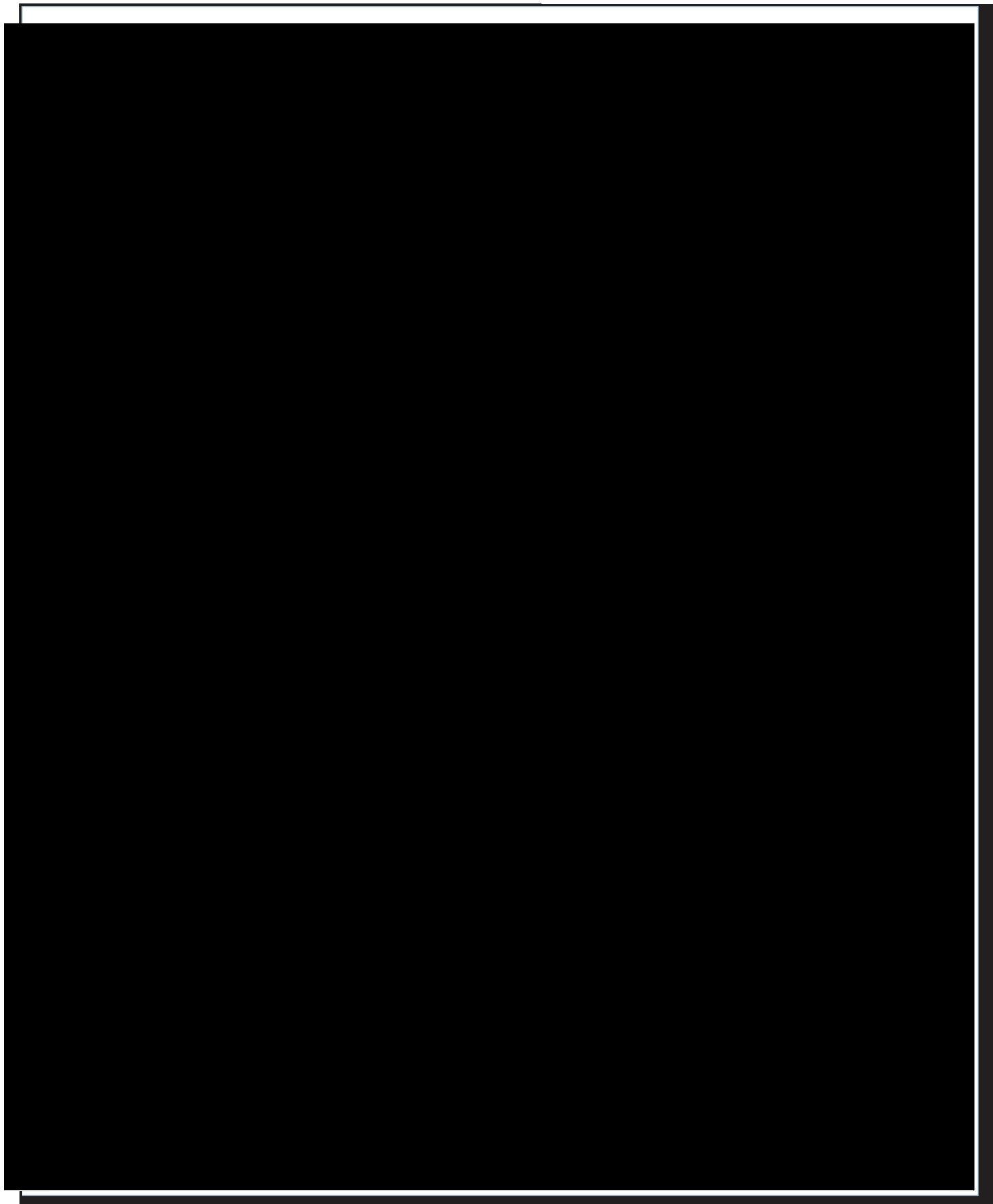
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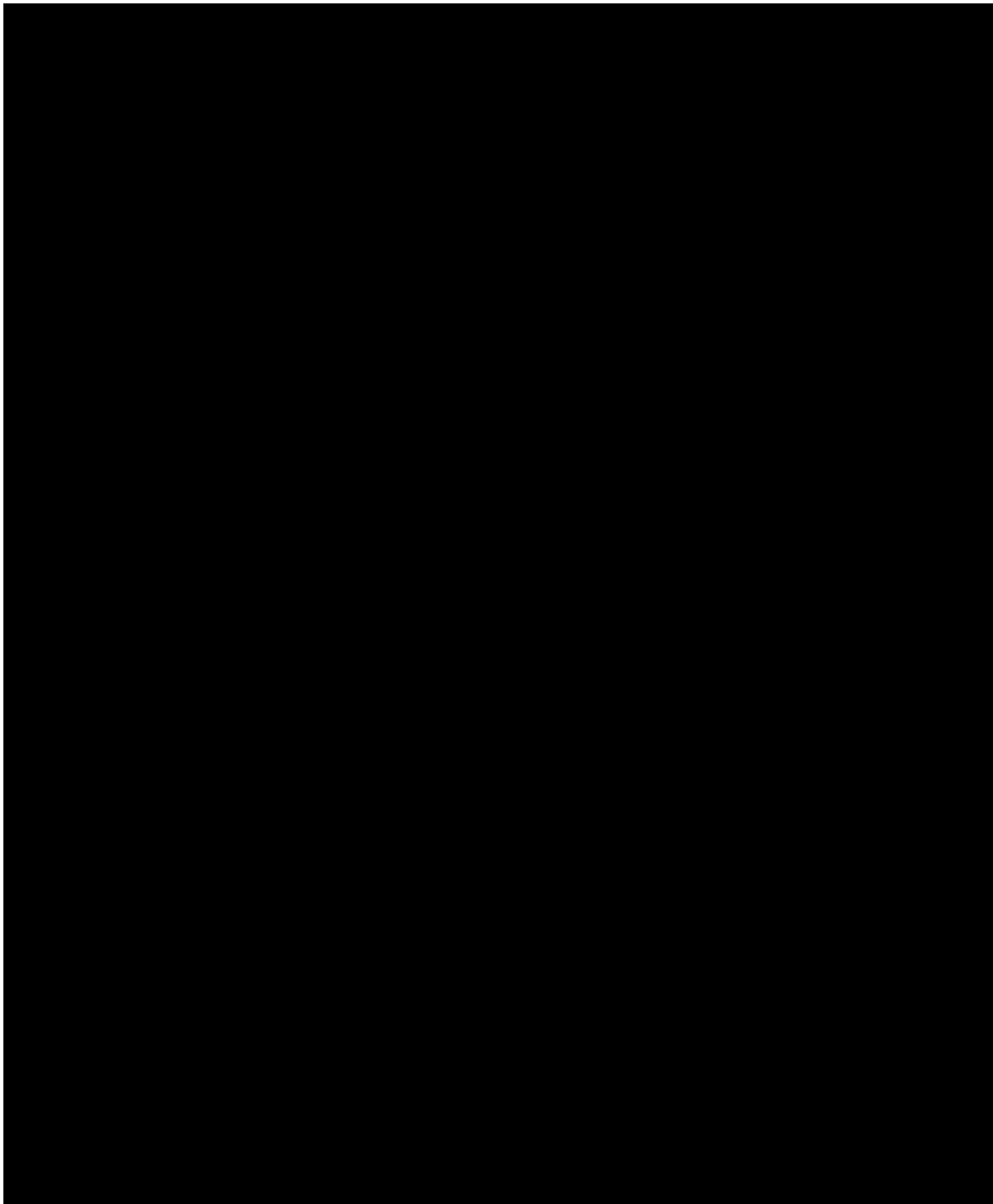
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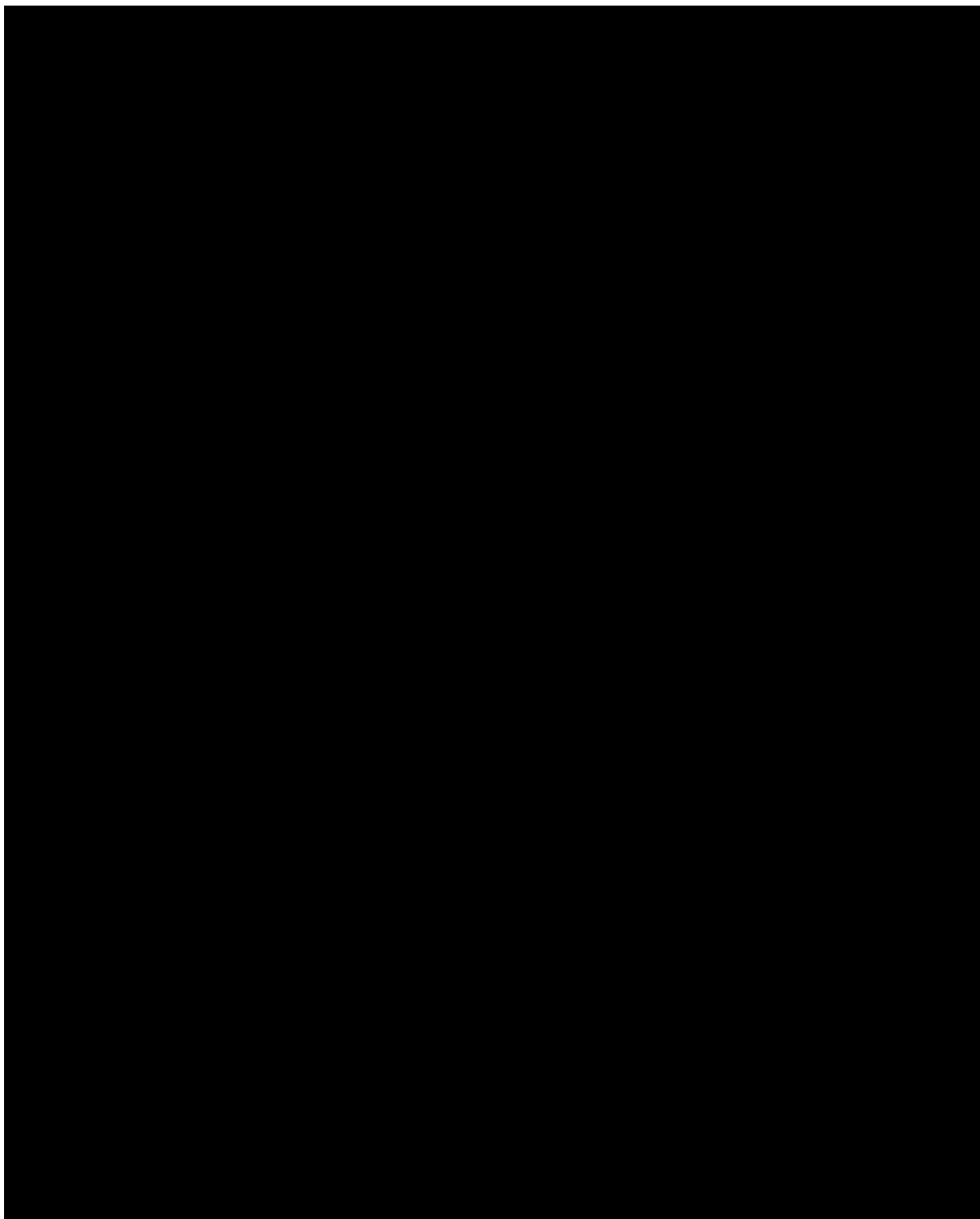
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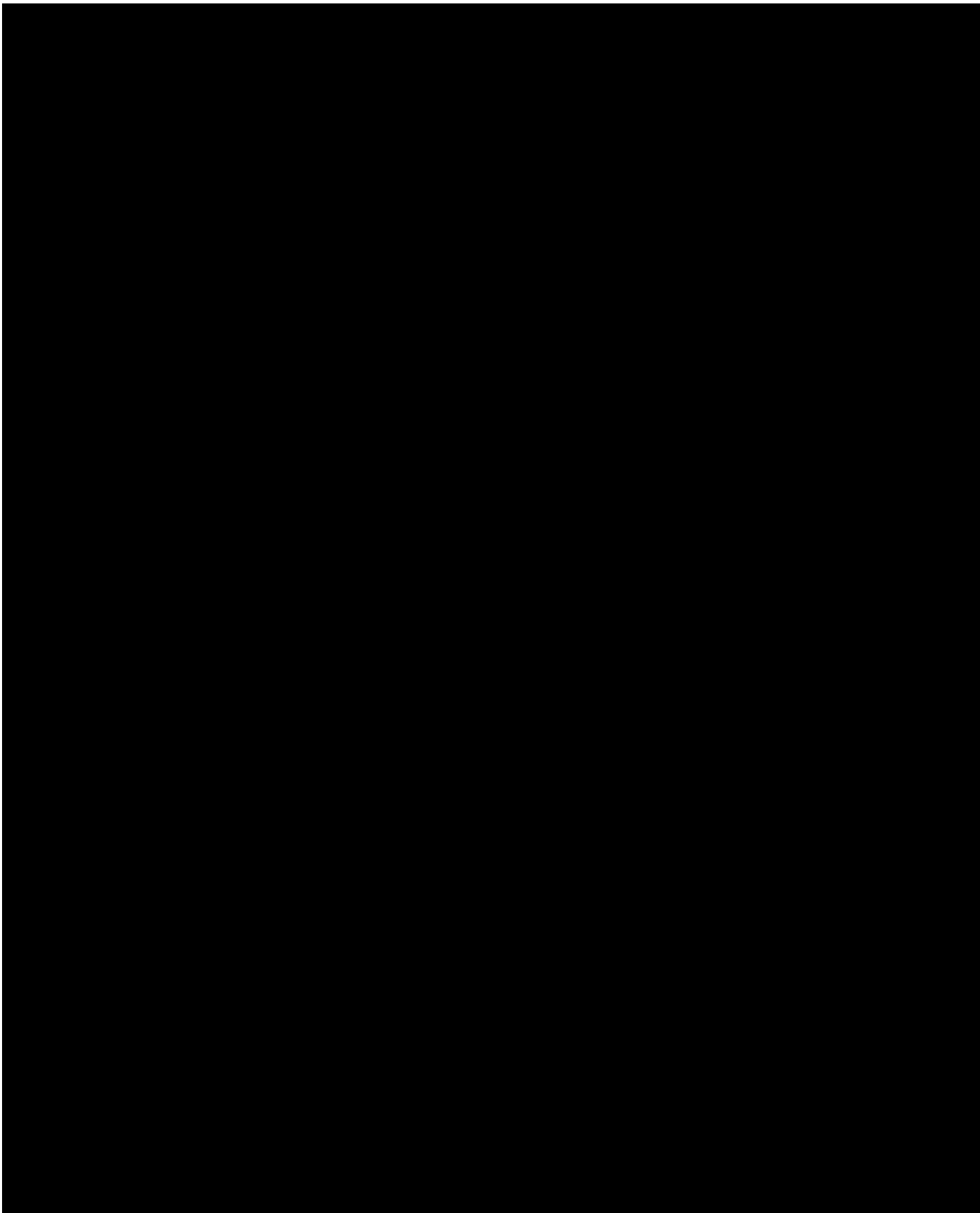
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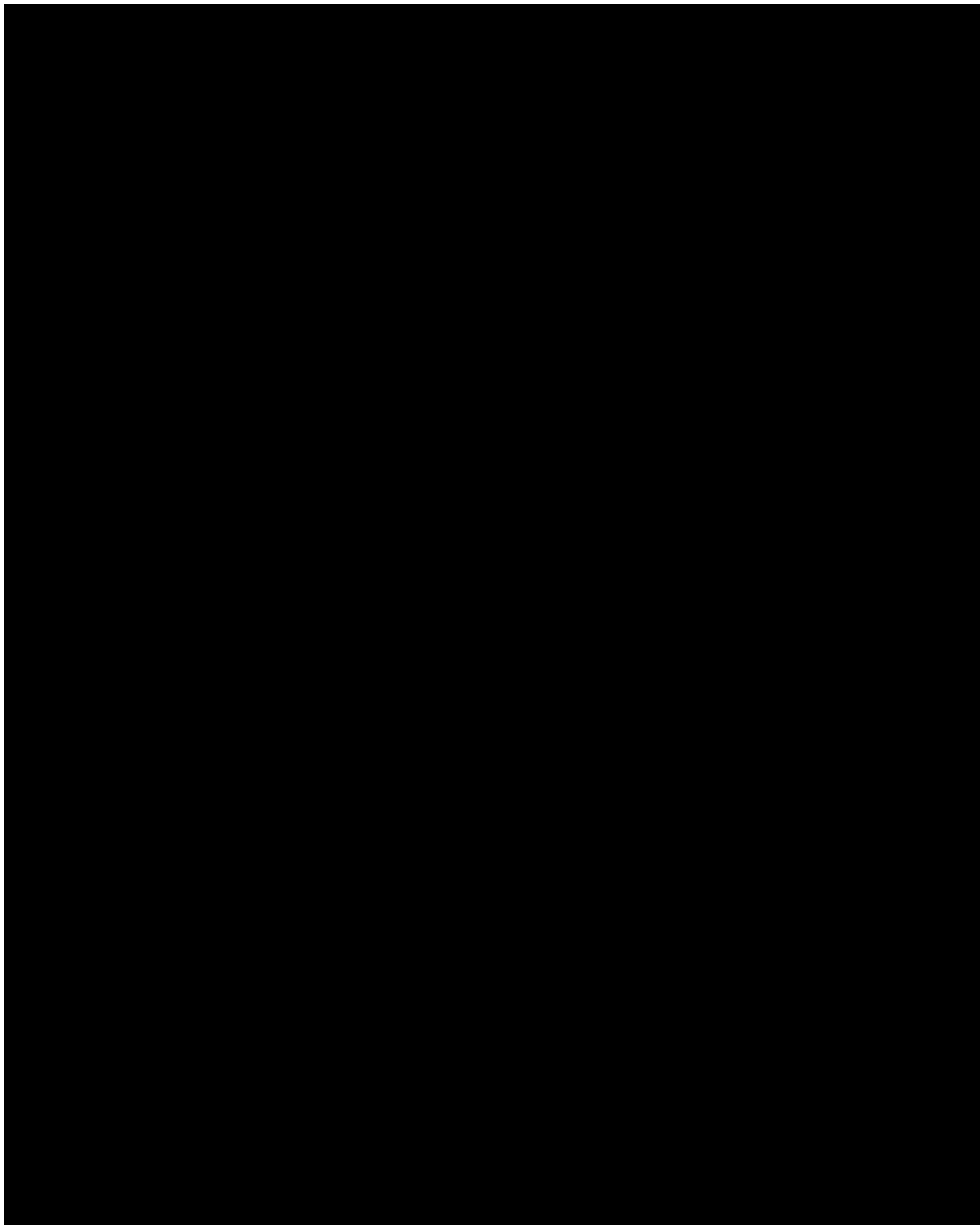
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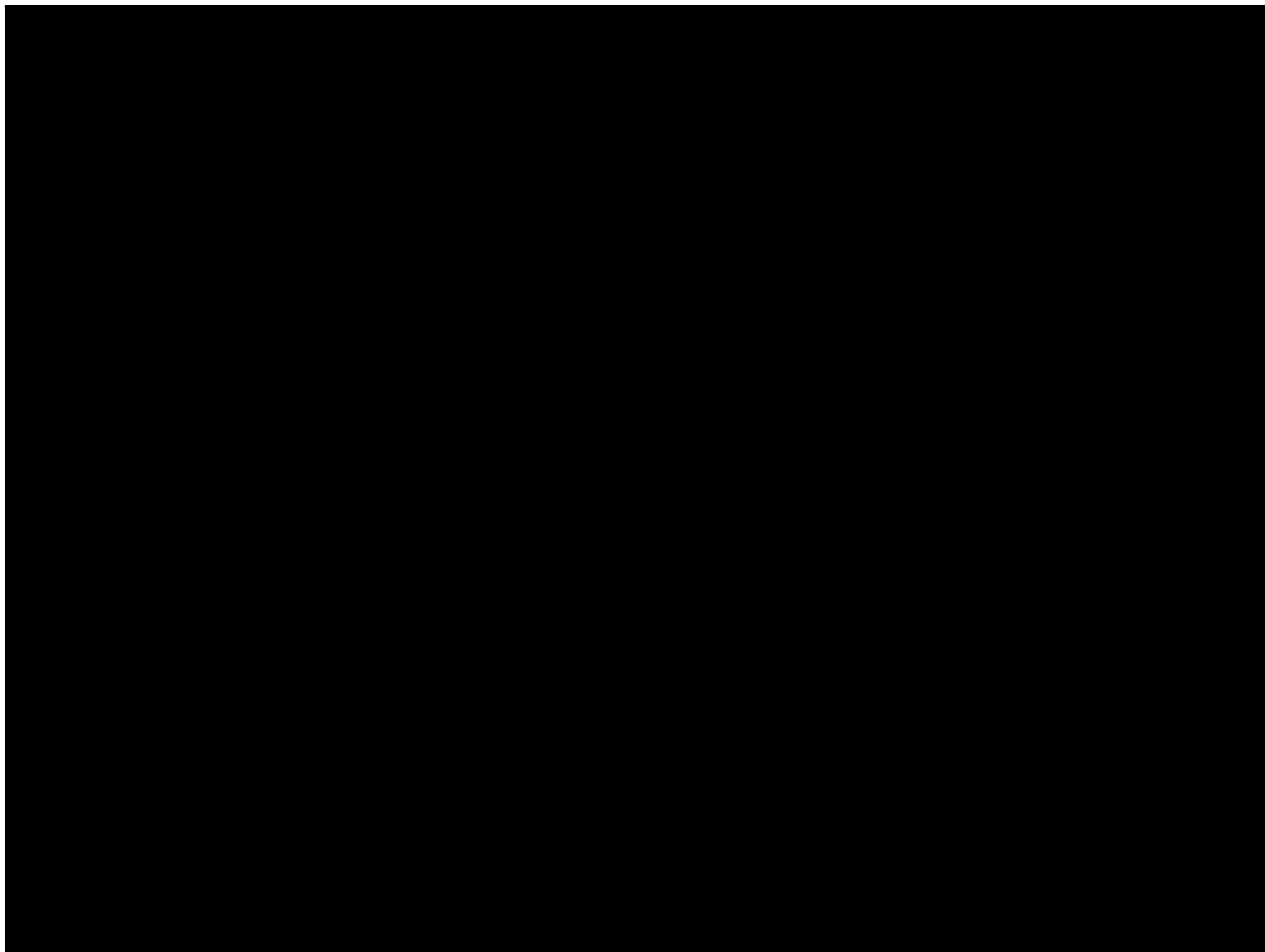


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"Provide complete copies of the most recently filed federal, state and foreign
(with translation) tax returns filed by each: (i) dispensary facility backer; and (ii)
each backer member identified in Section B of Appendix B."
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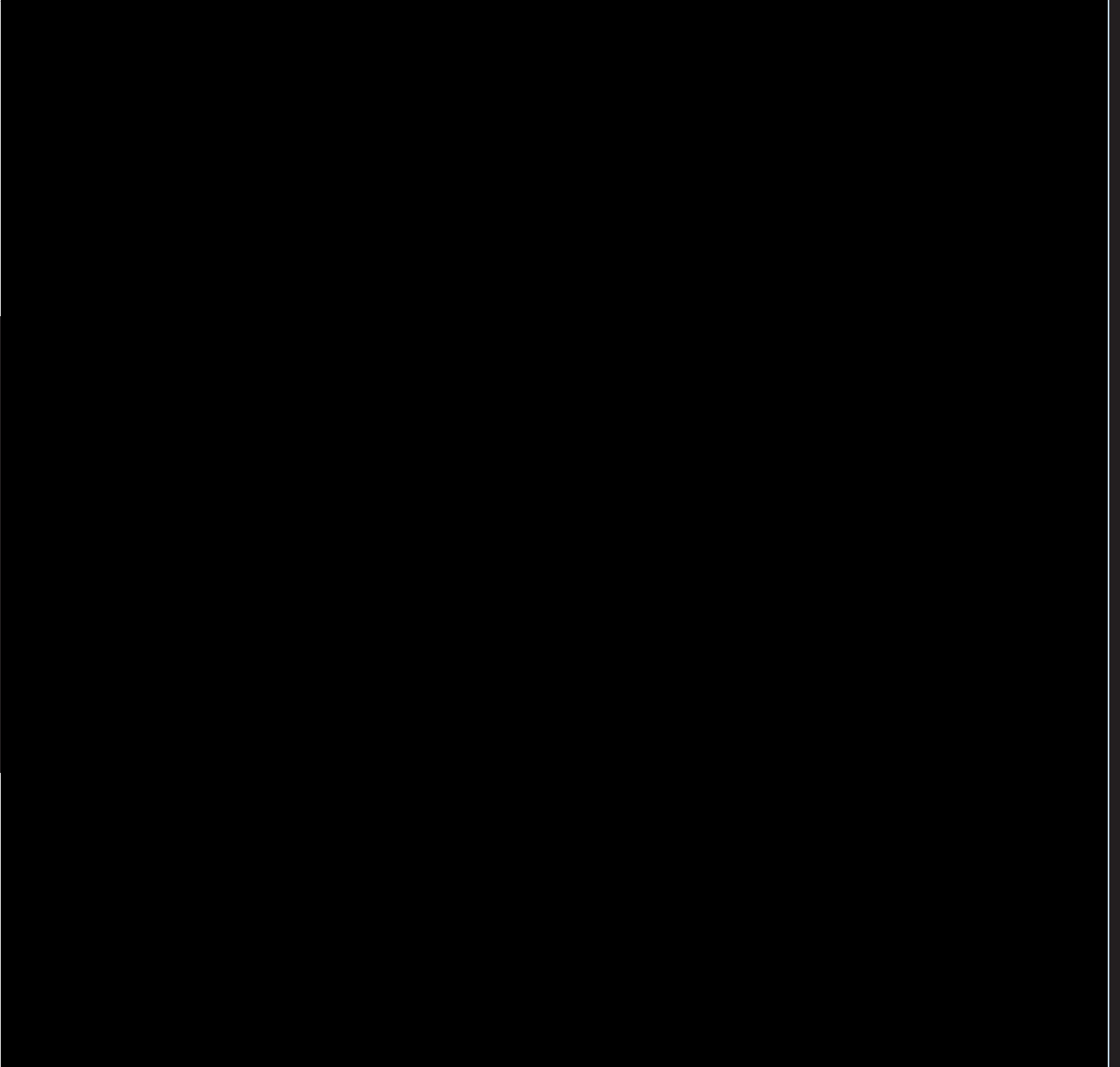
**"CONFIDENTIAL" THIS PORTION OF THE RFA IS EXEMPT FROM DISCLOSURE UNDER
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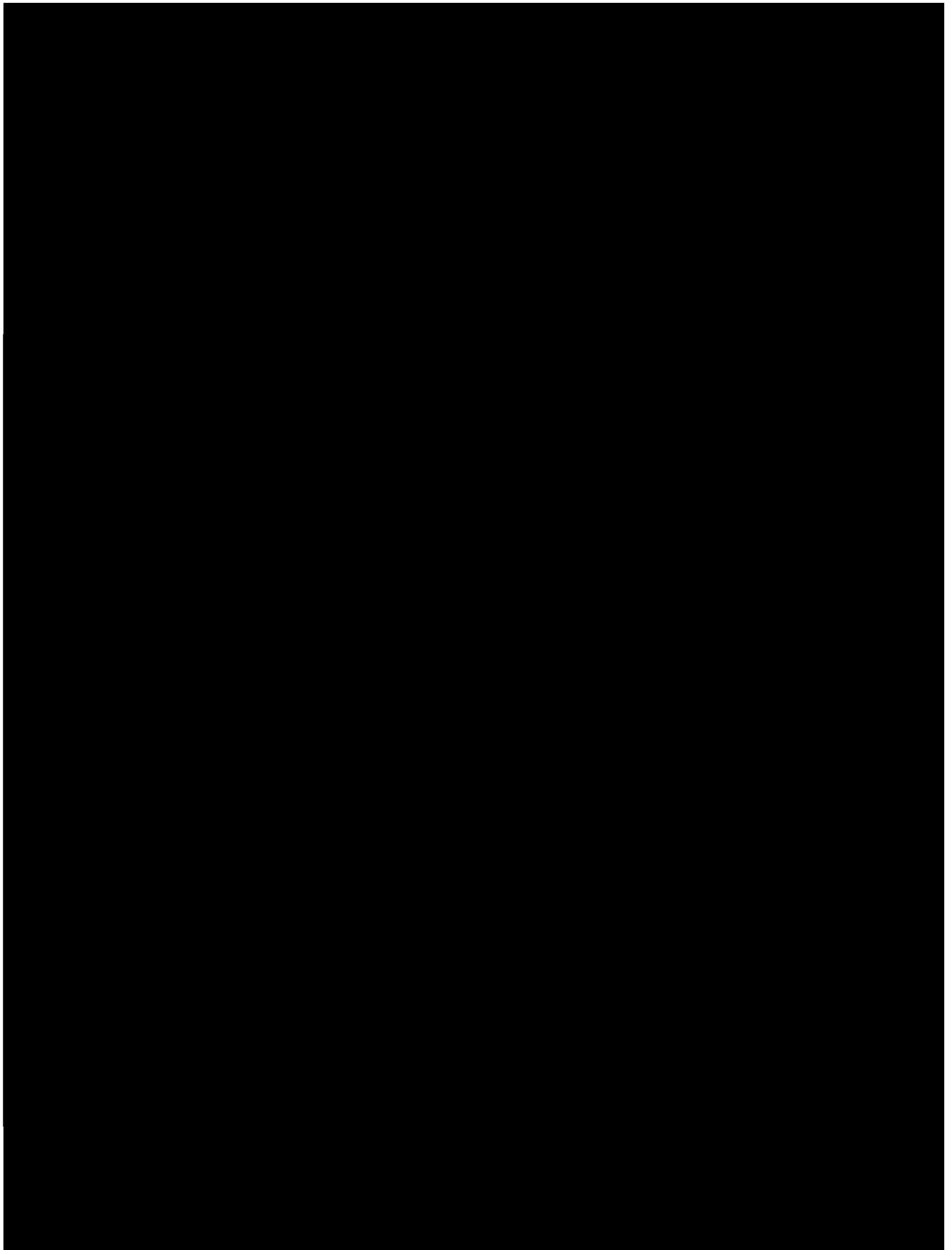


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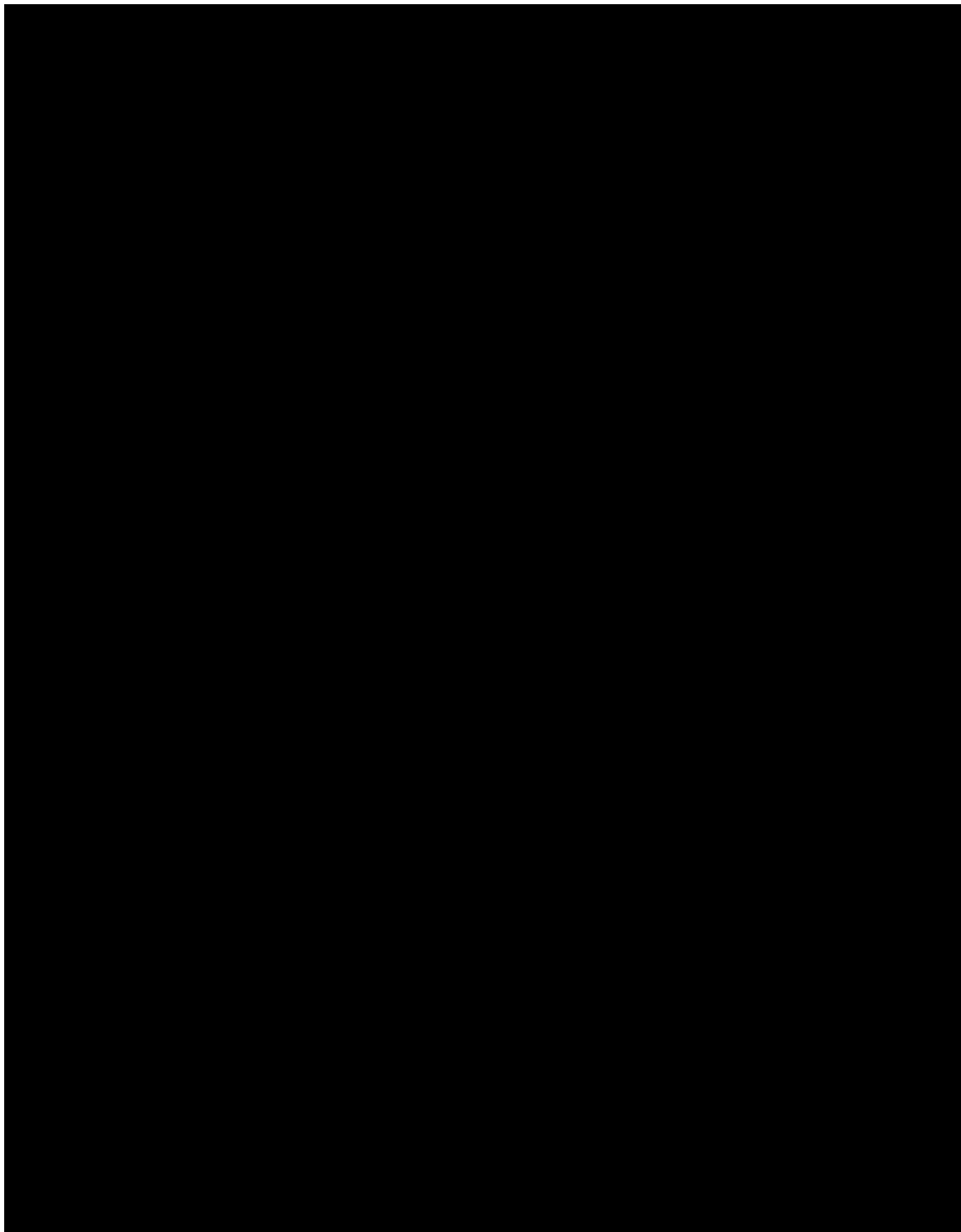


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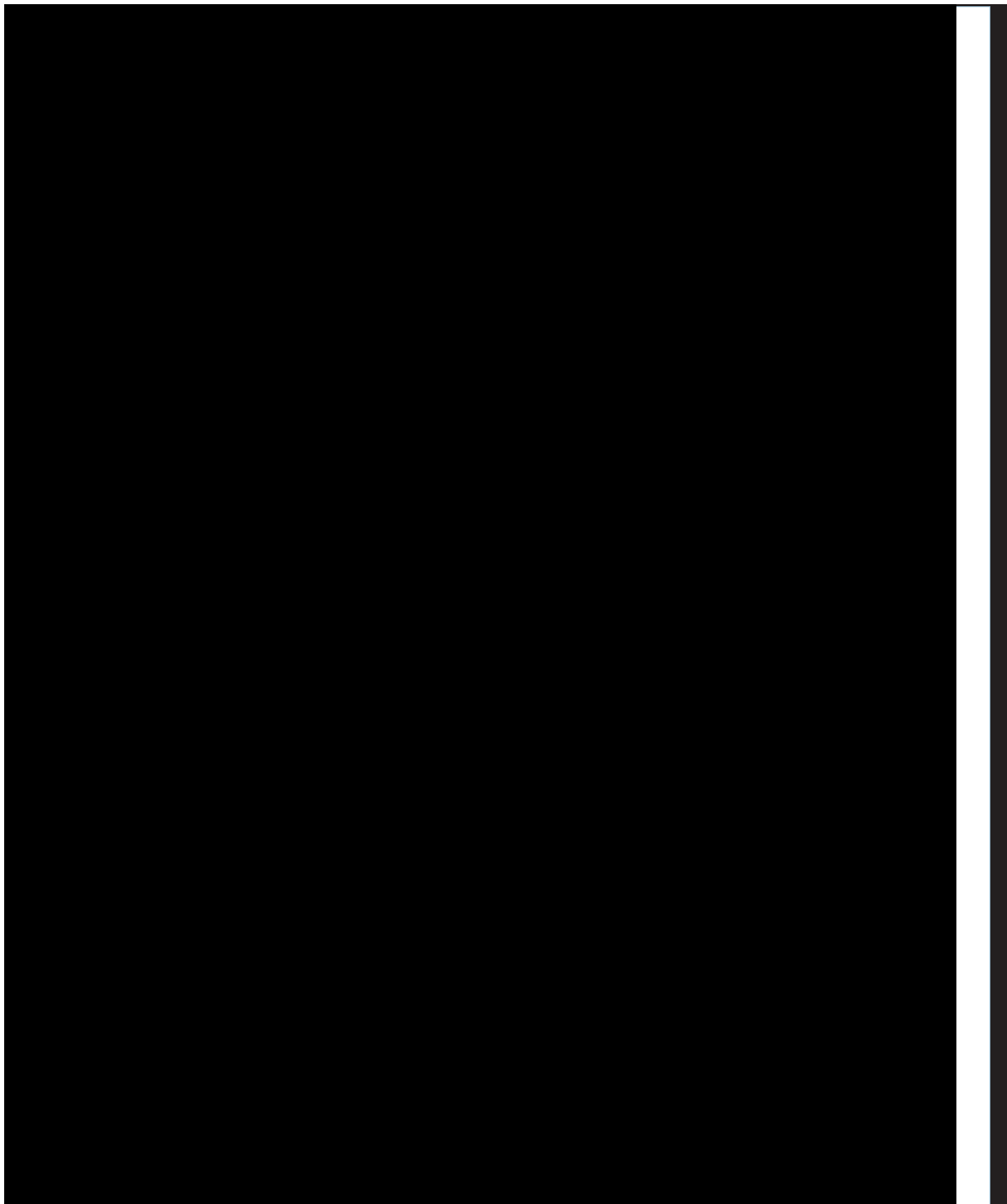
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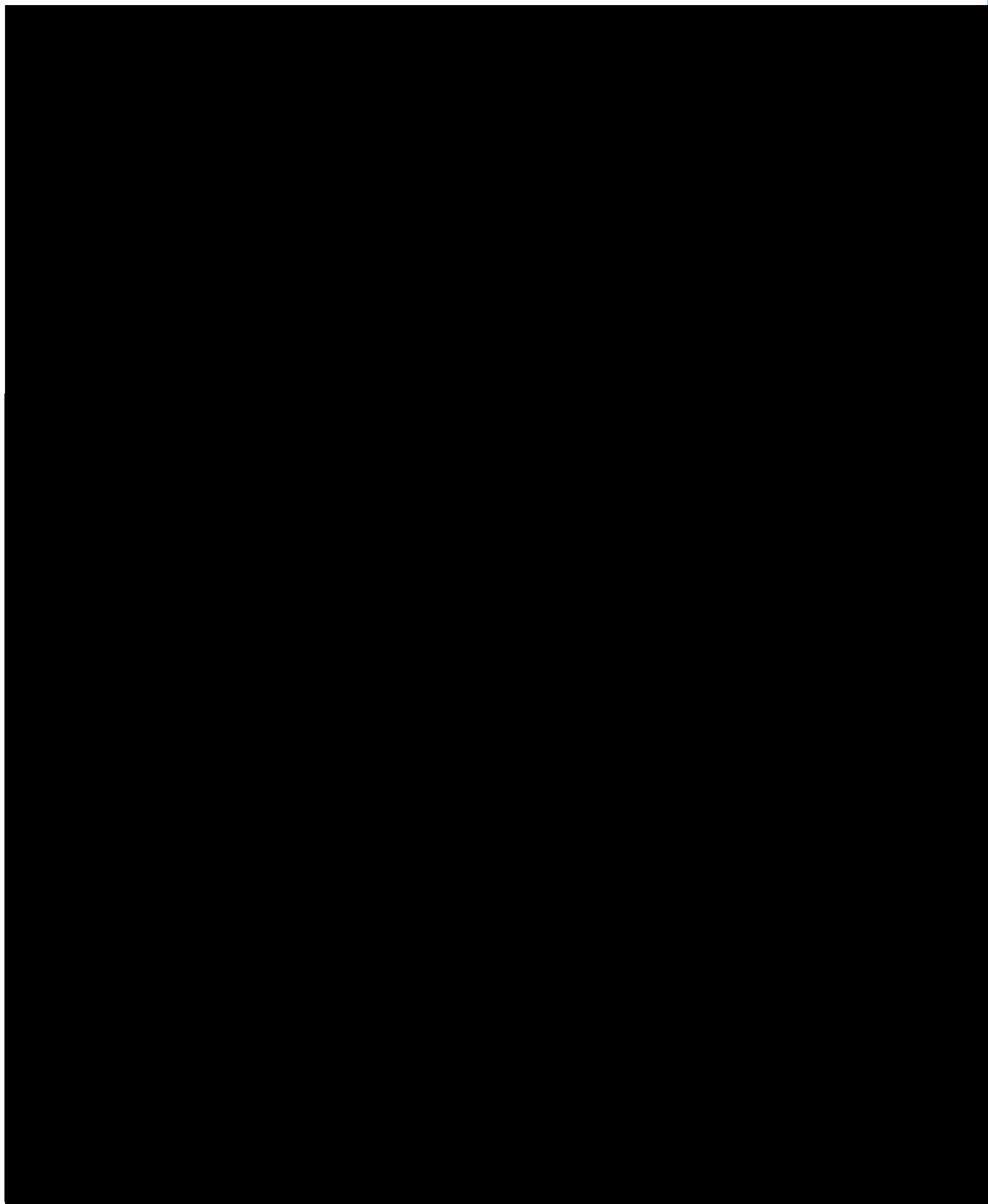
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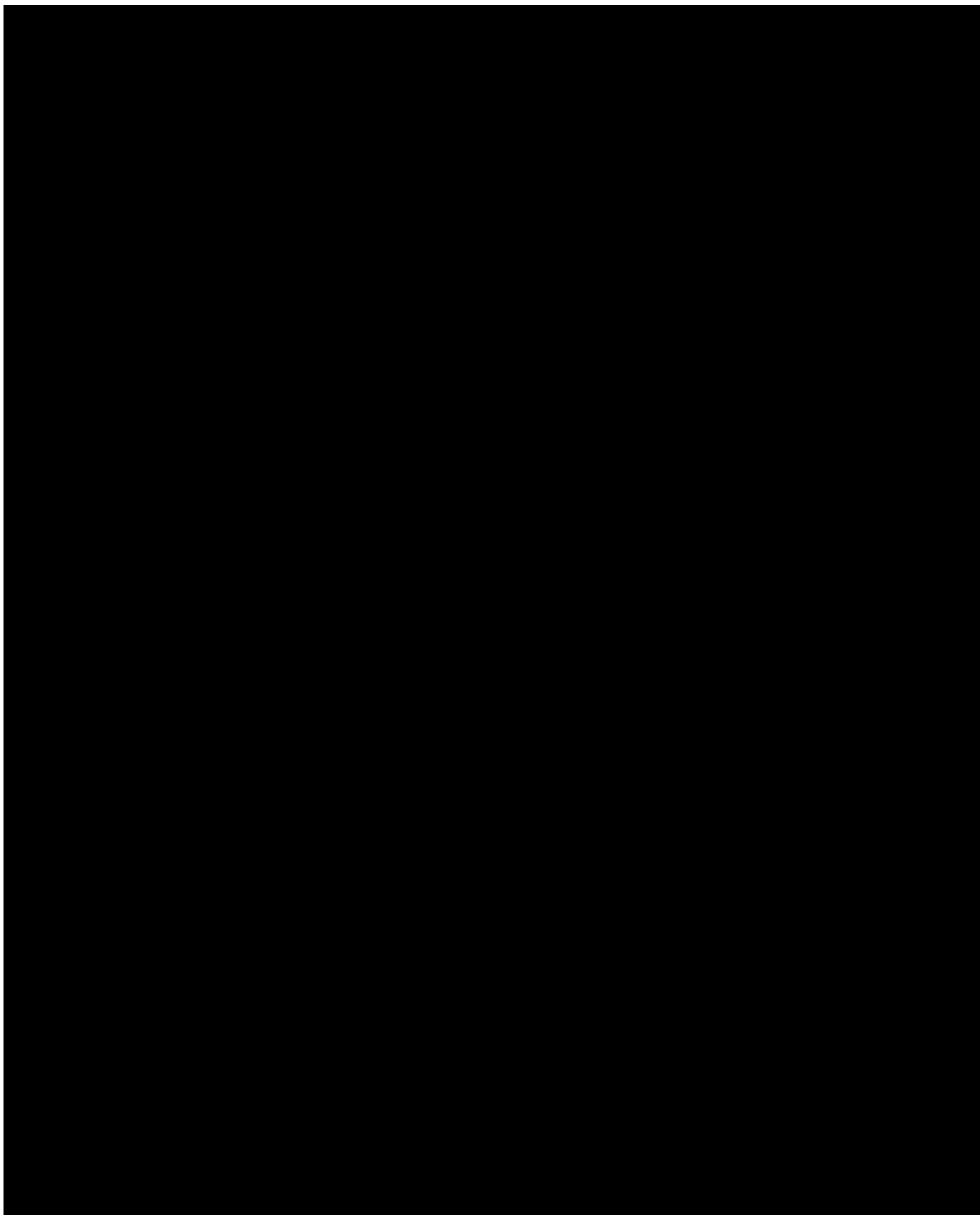
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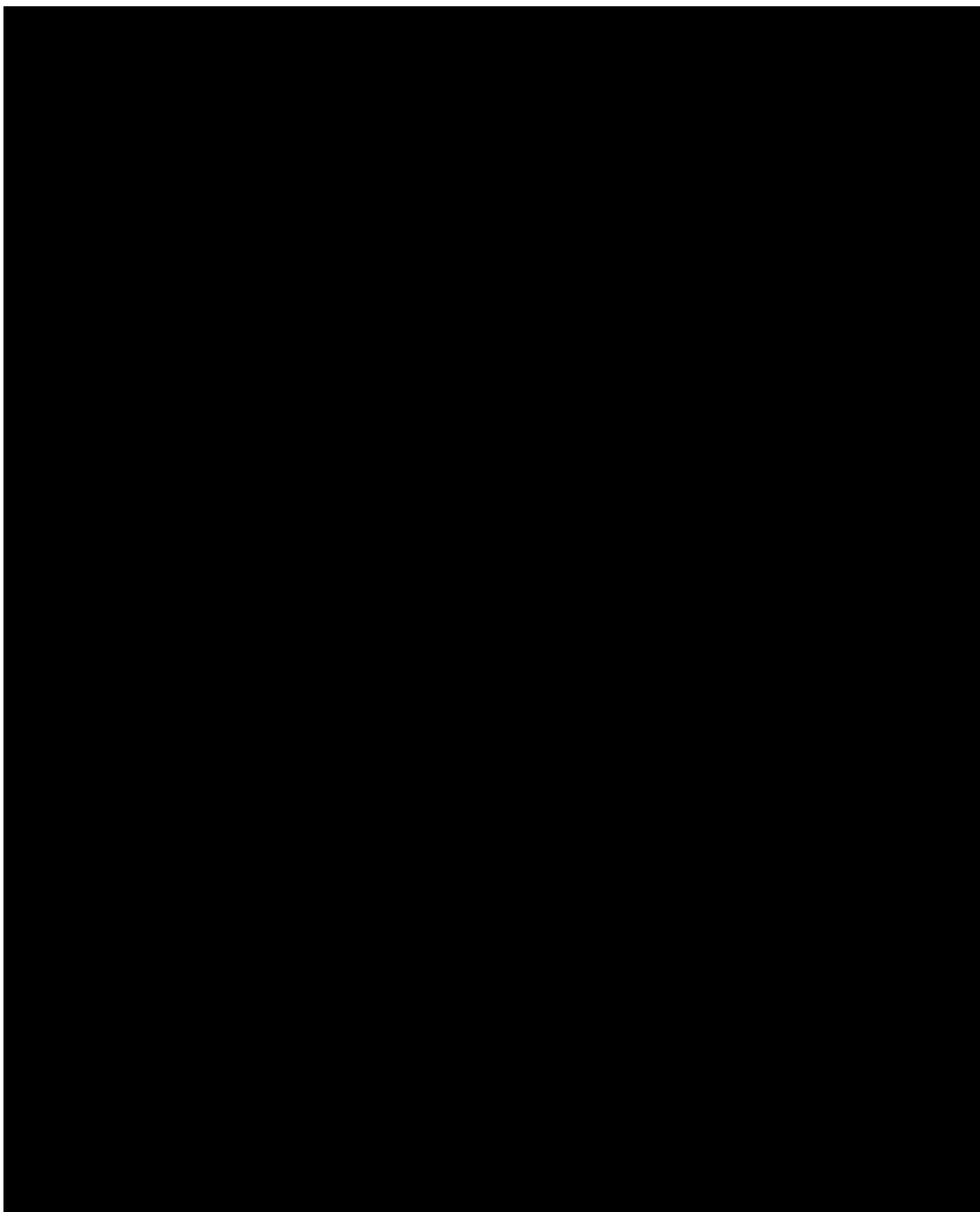
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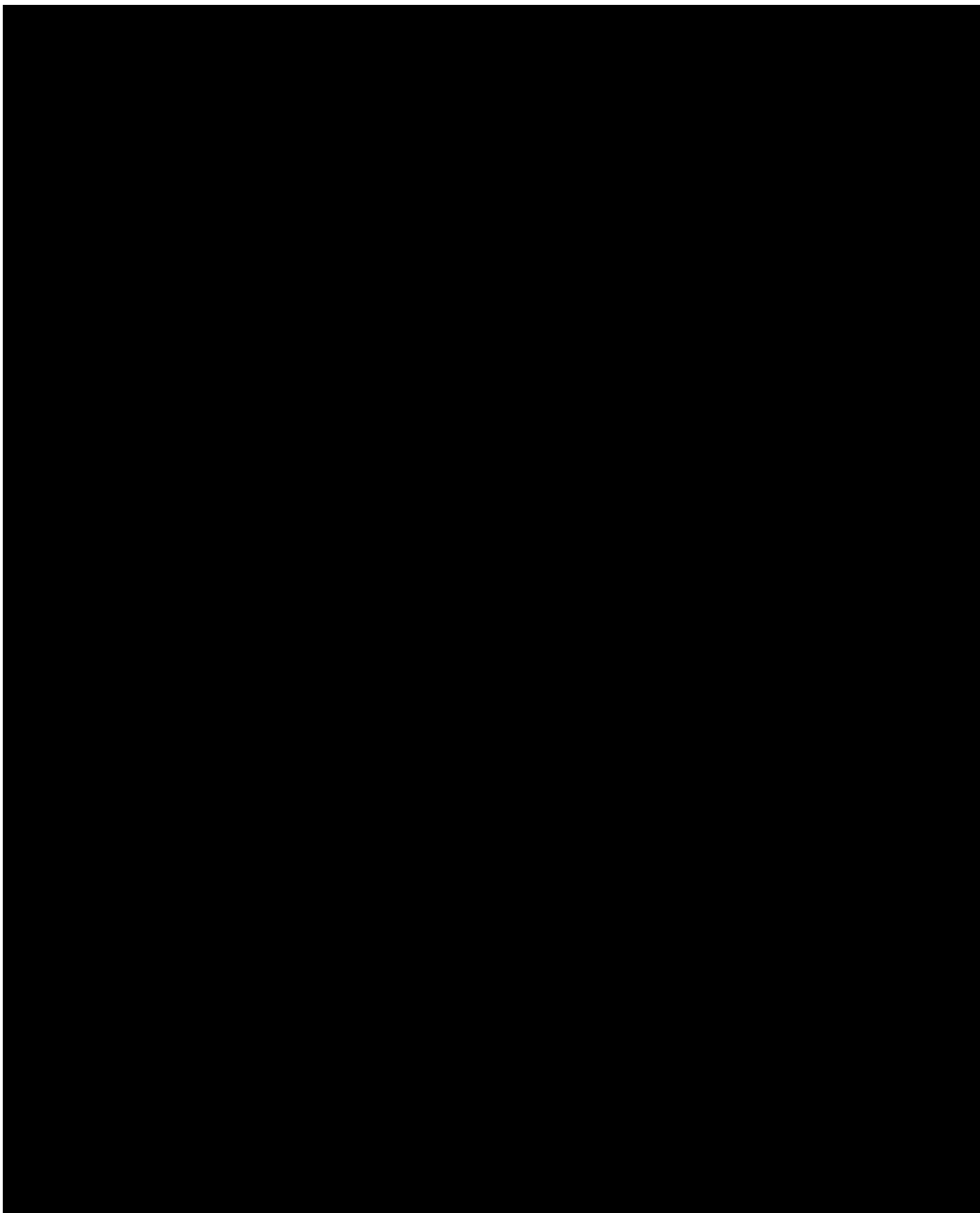
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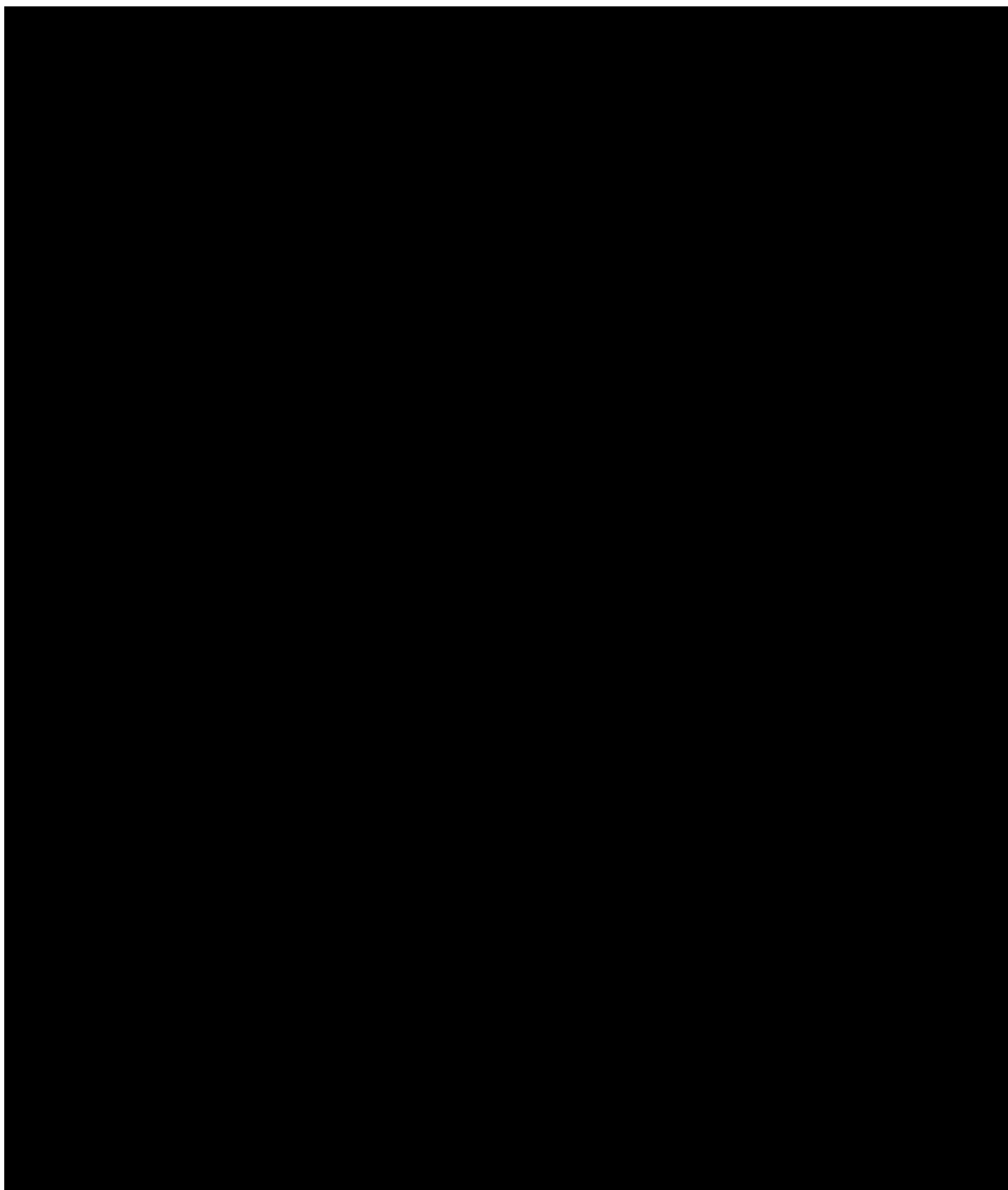
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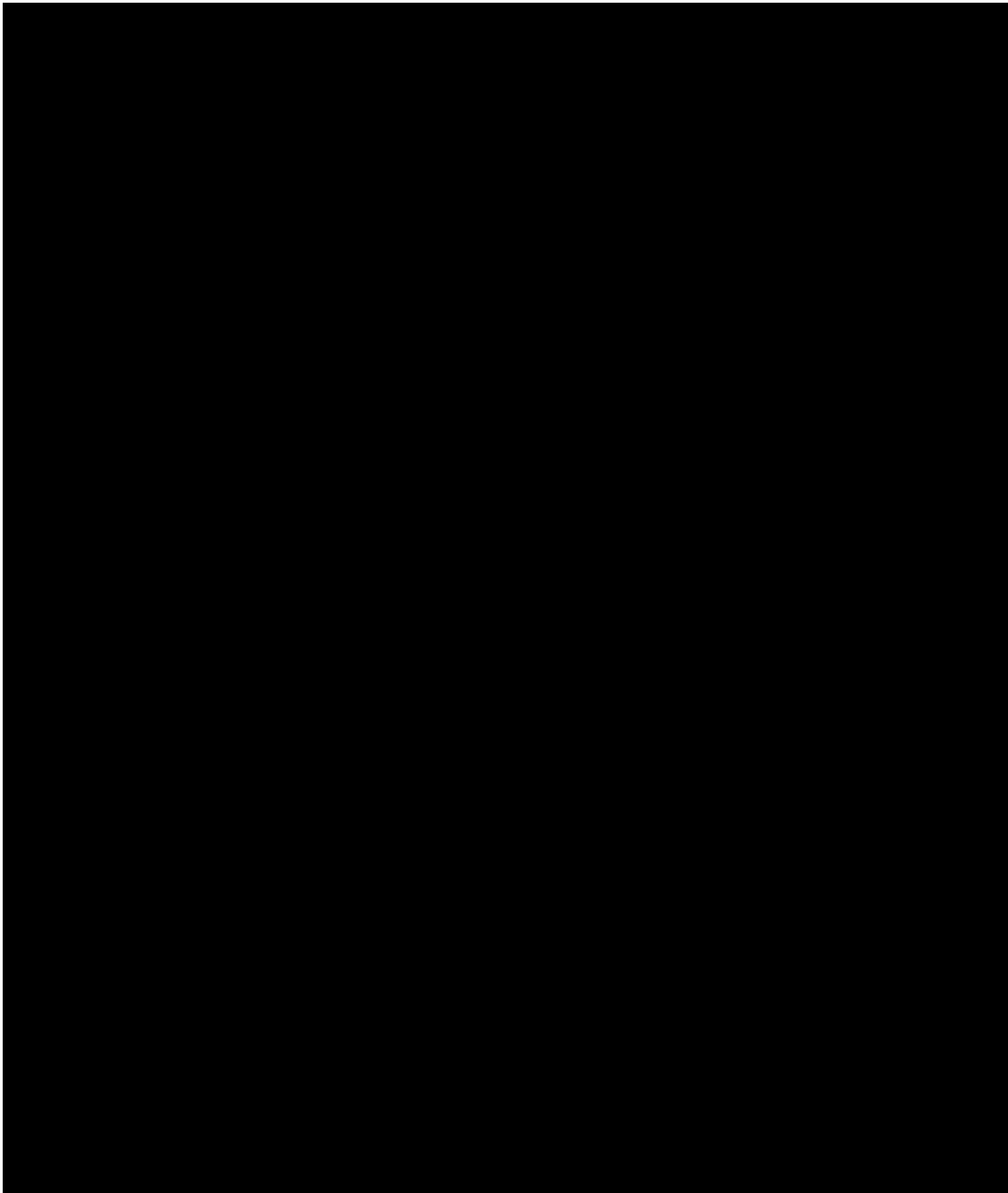
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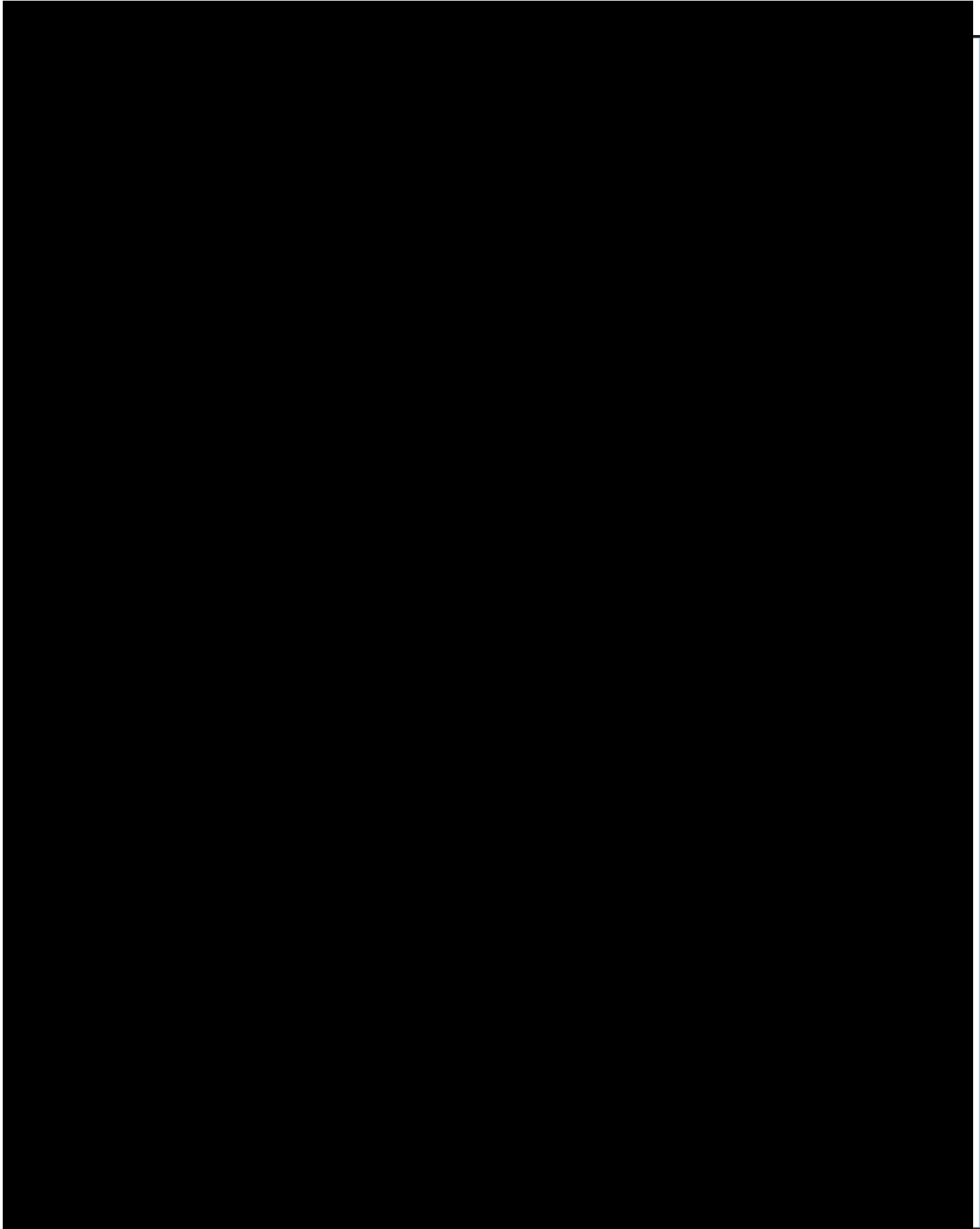
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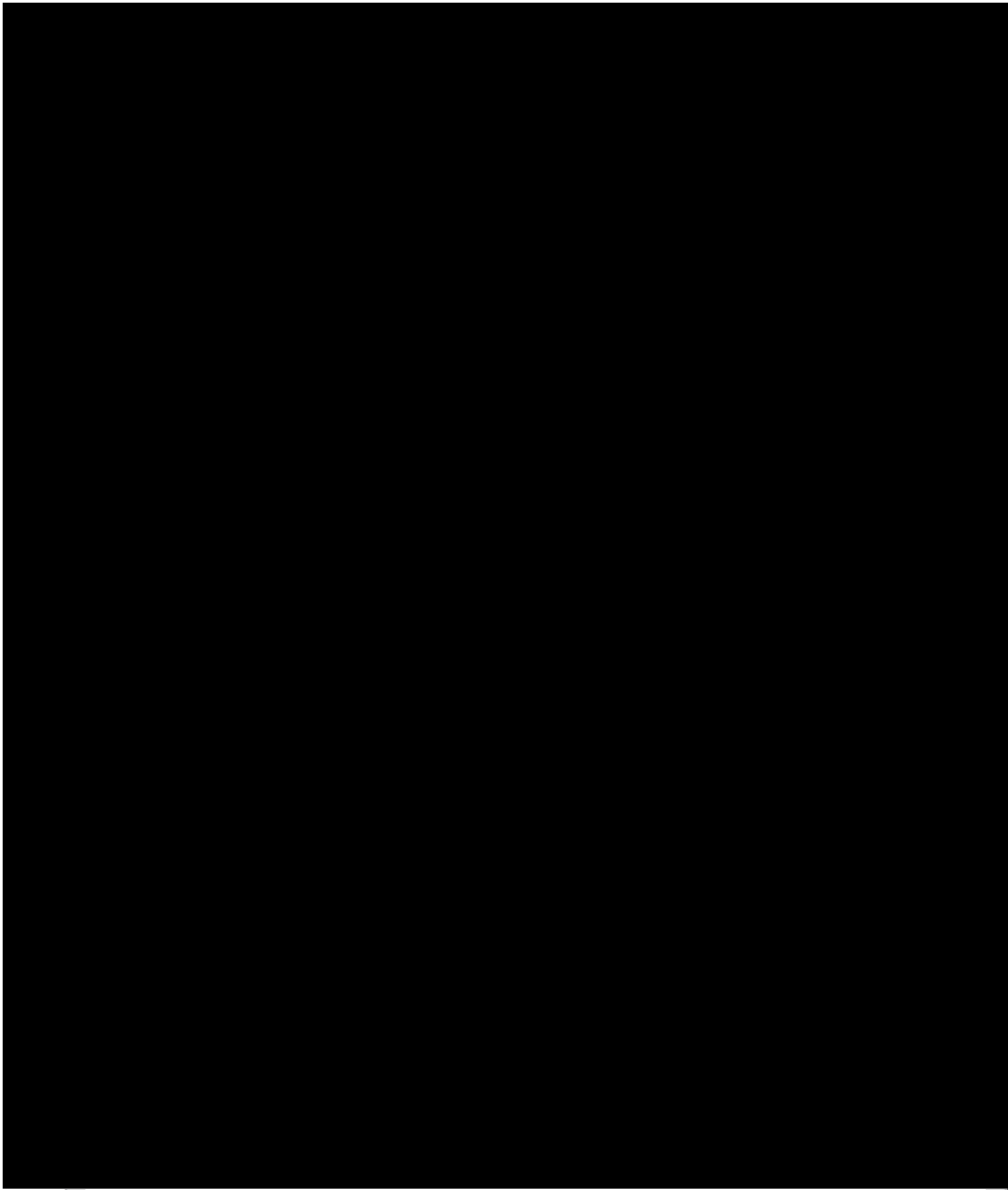
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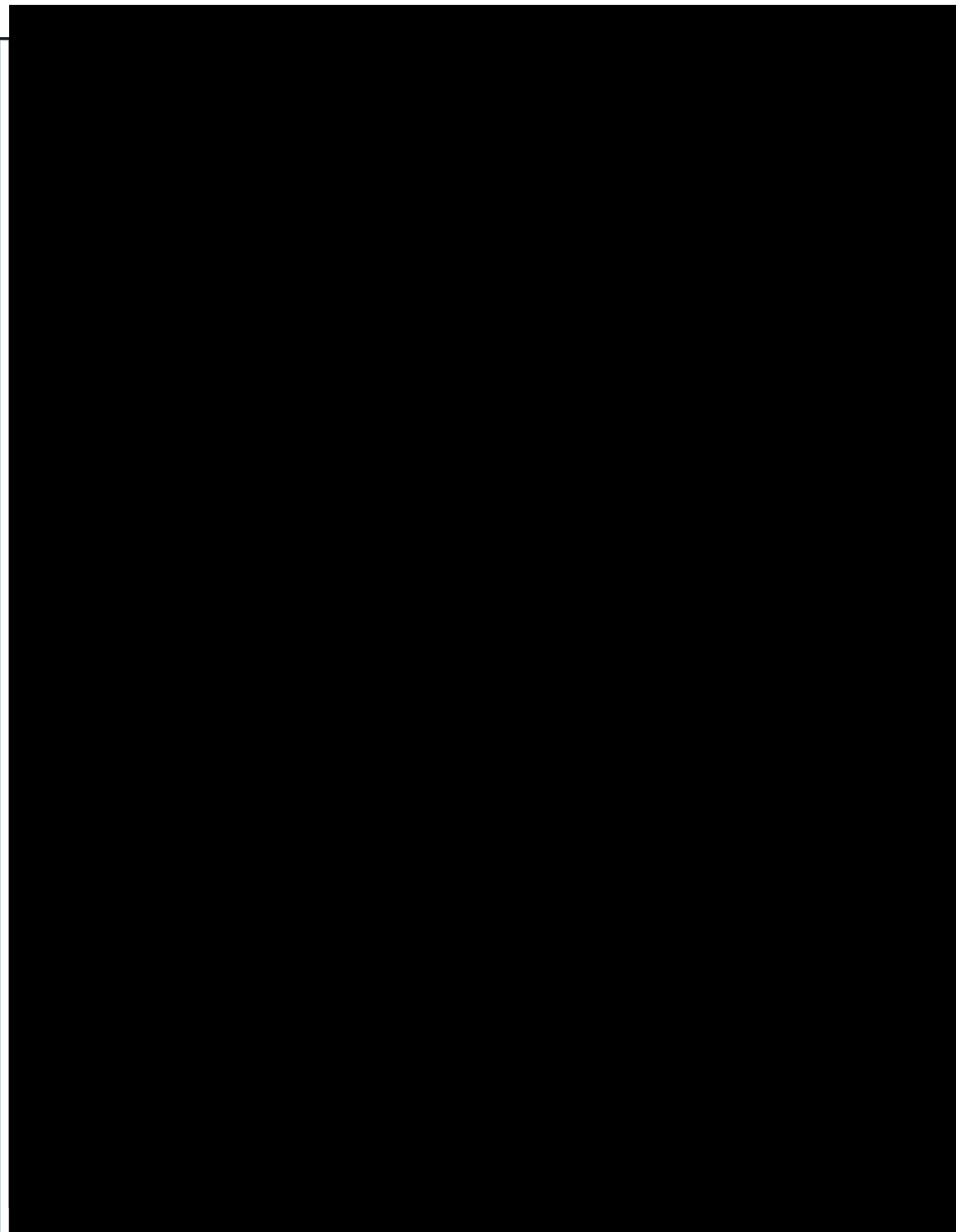
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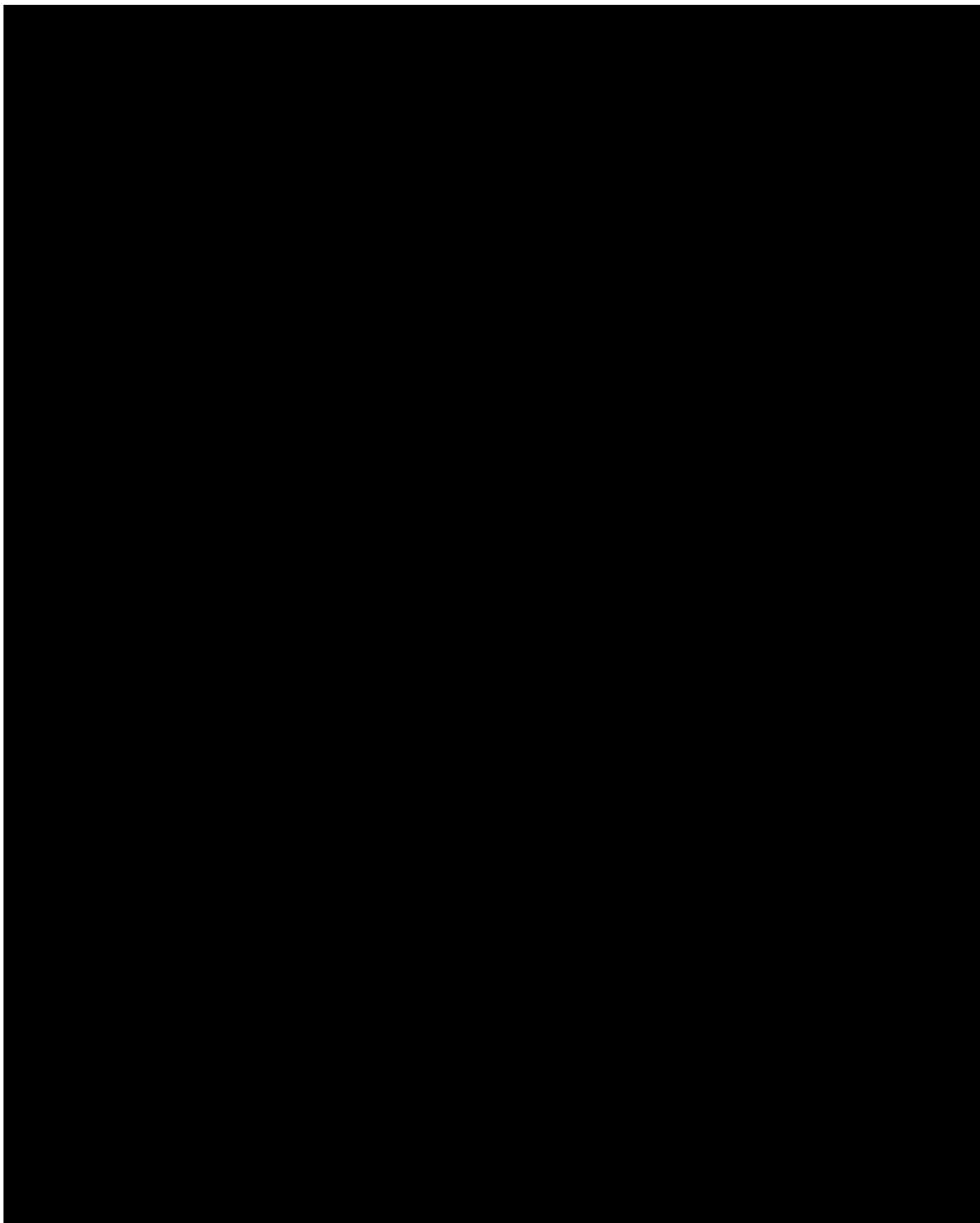
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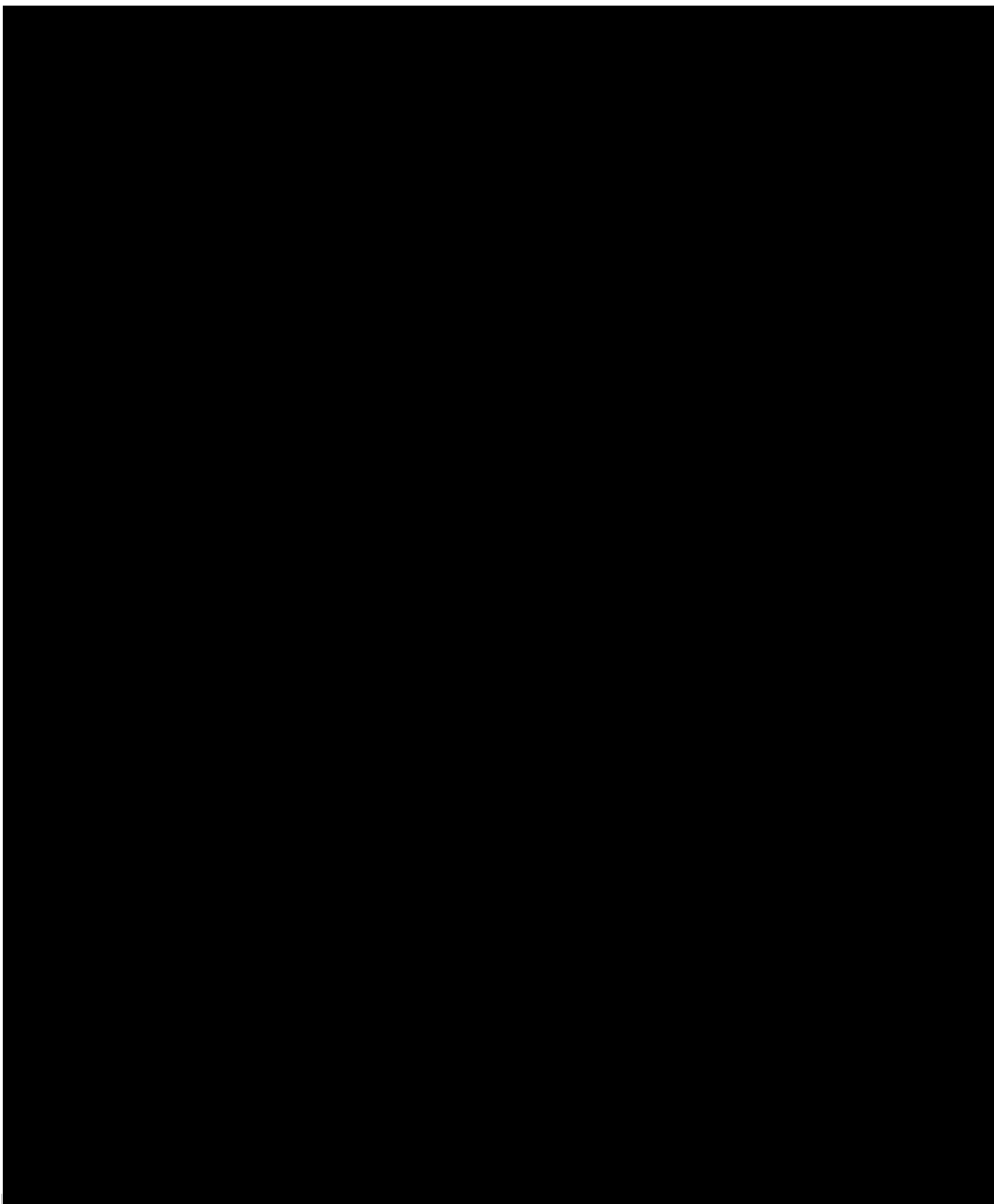
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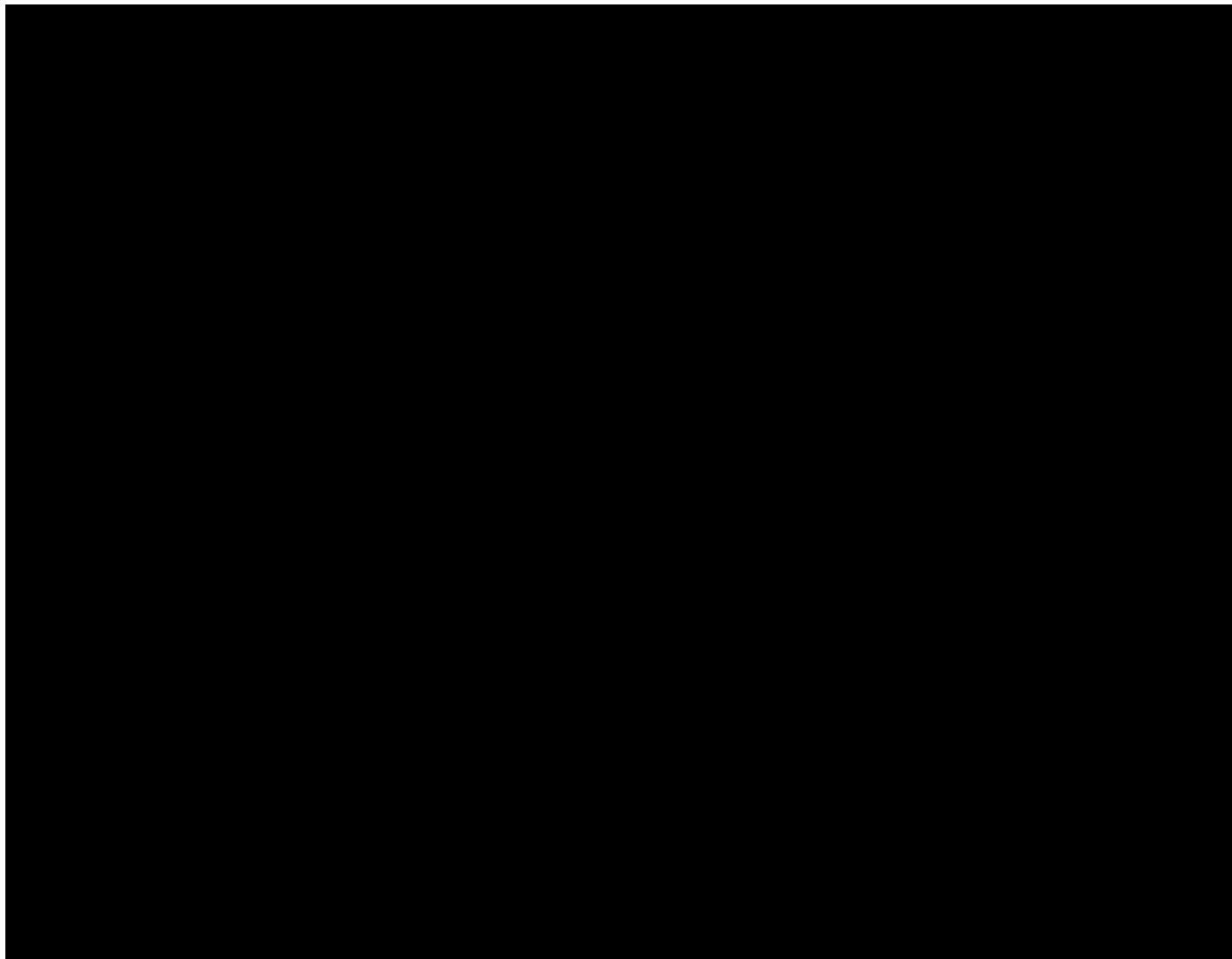
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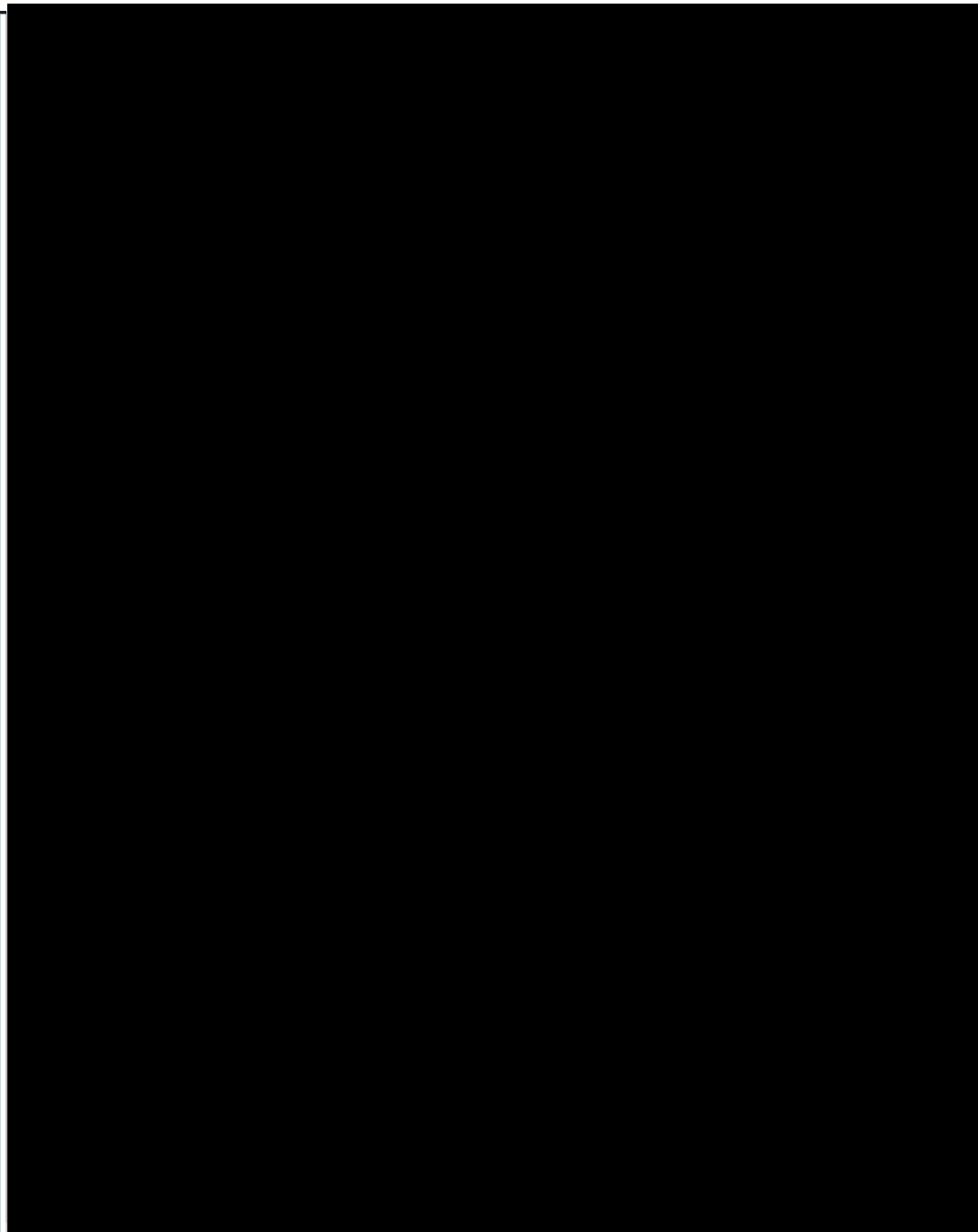
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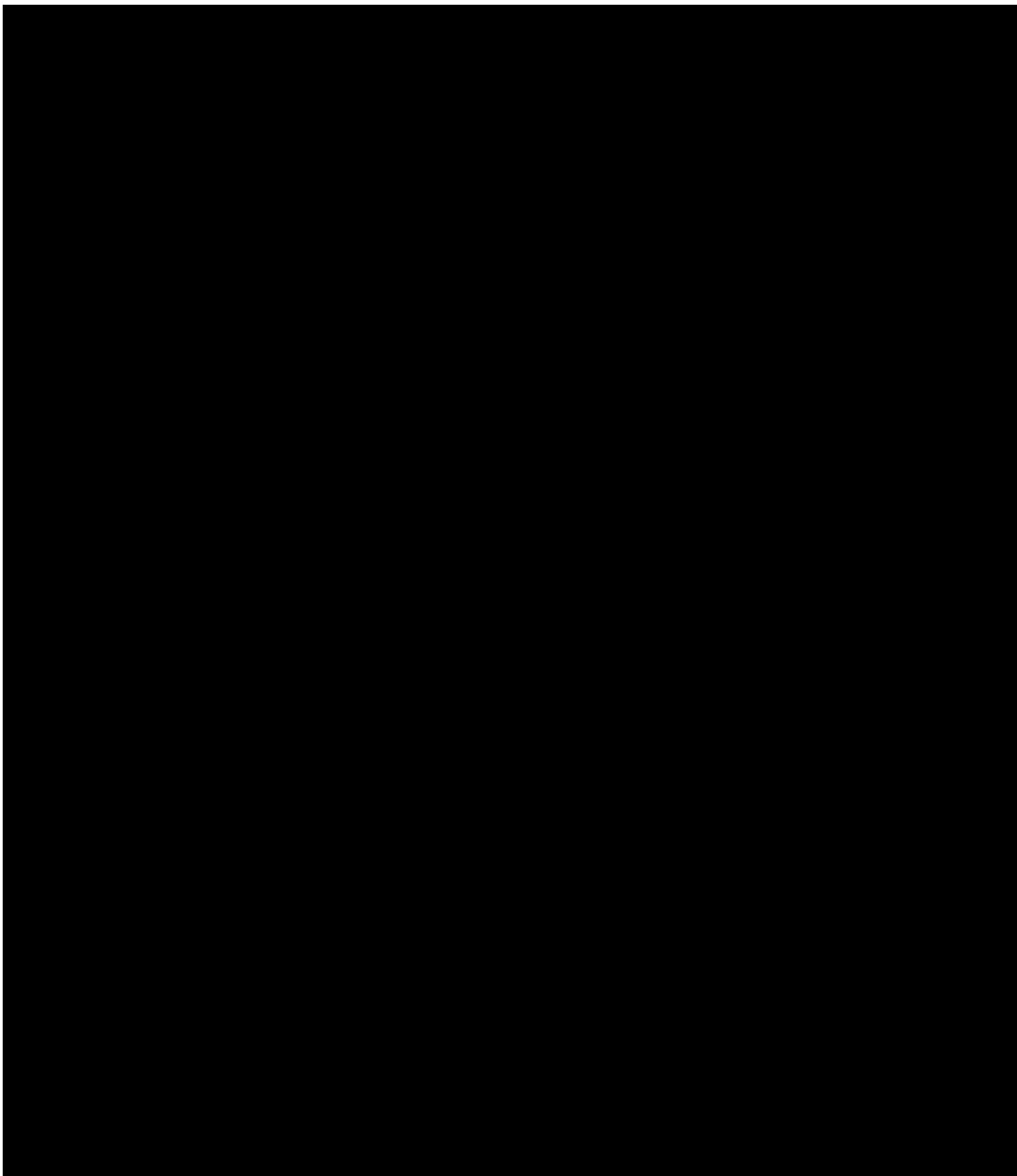
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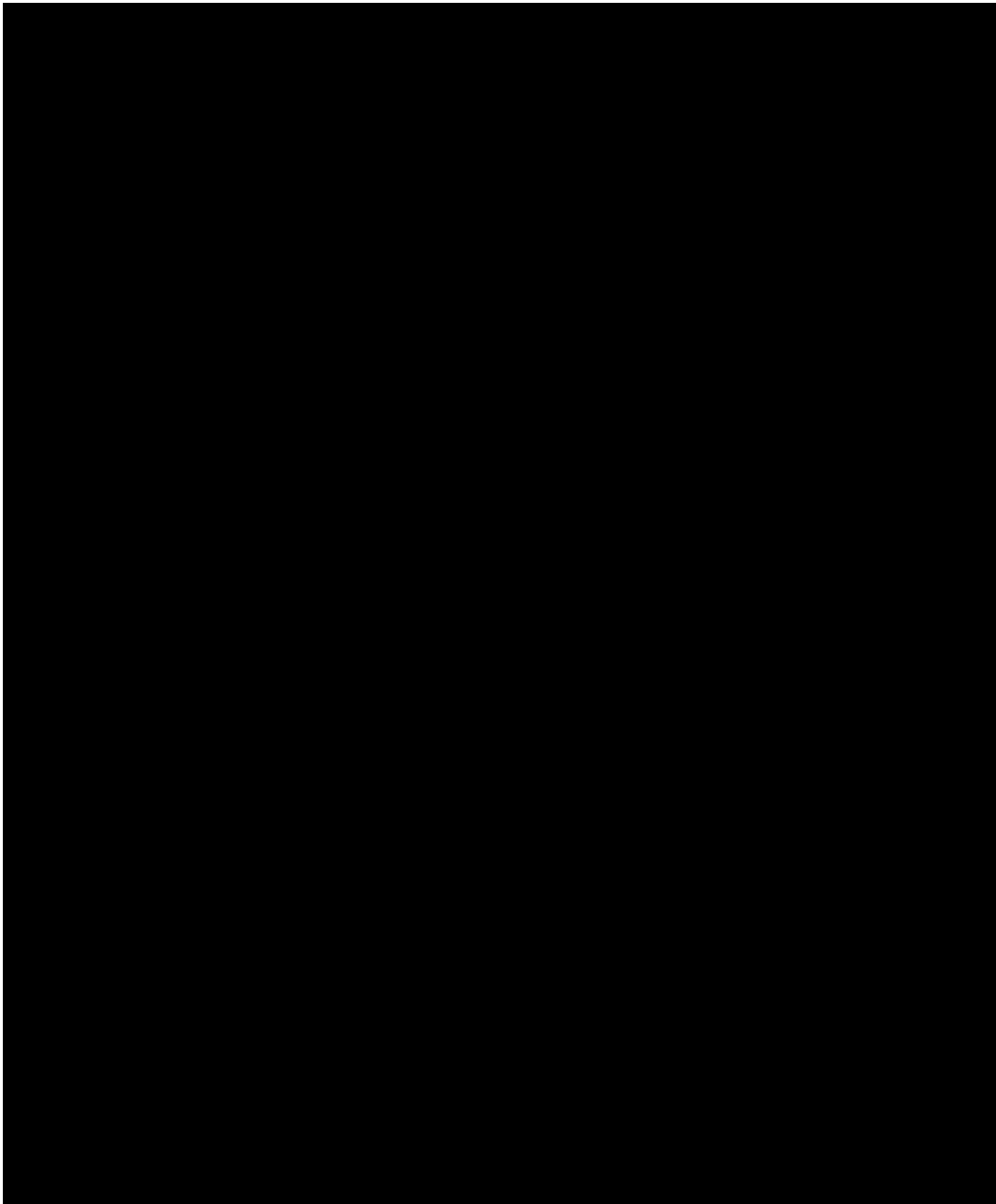
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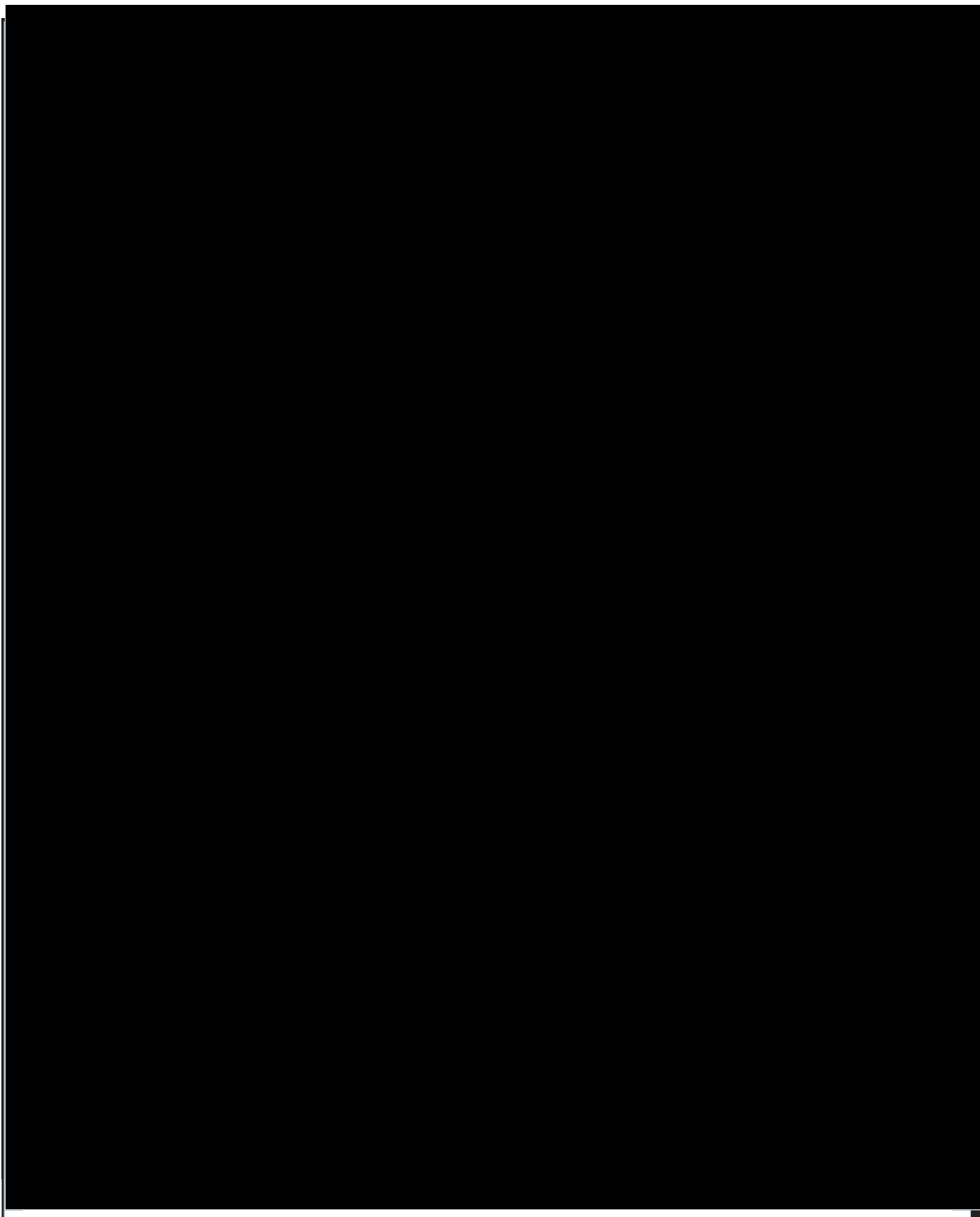
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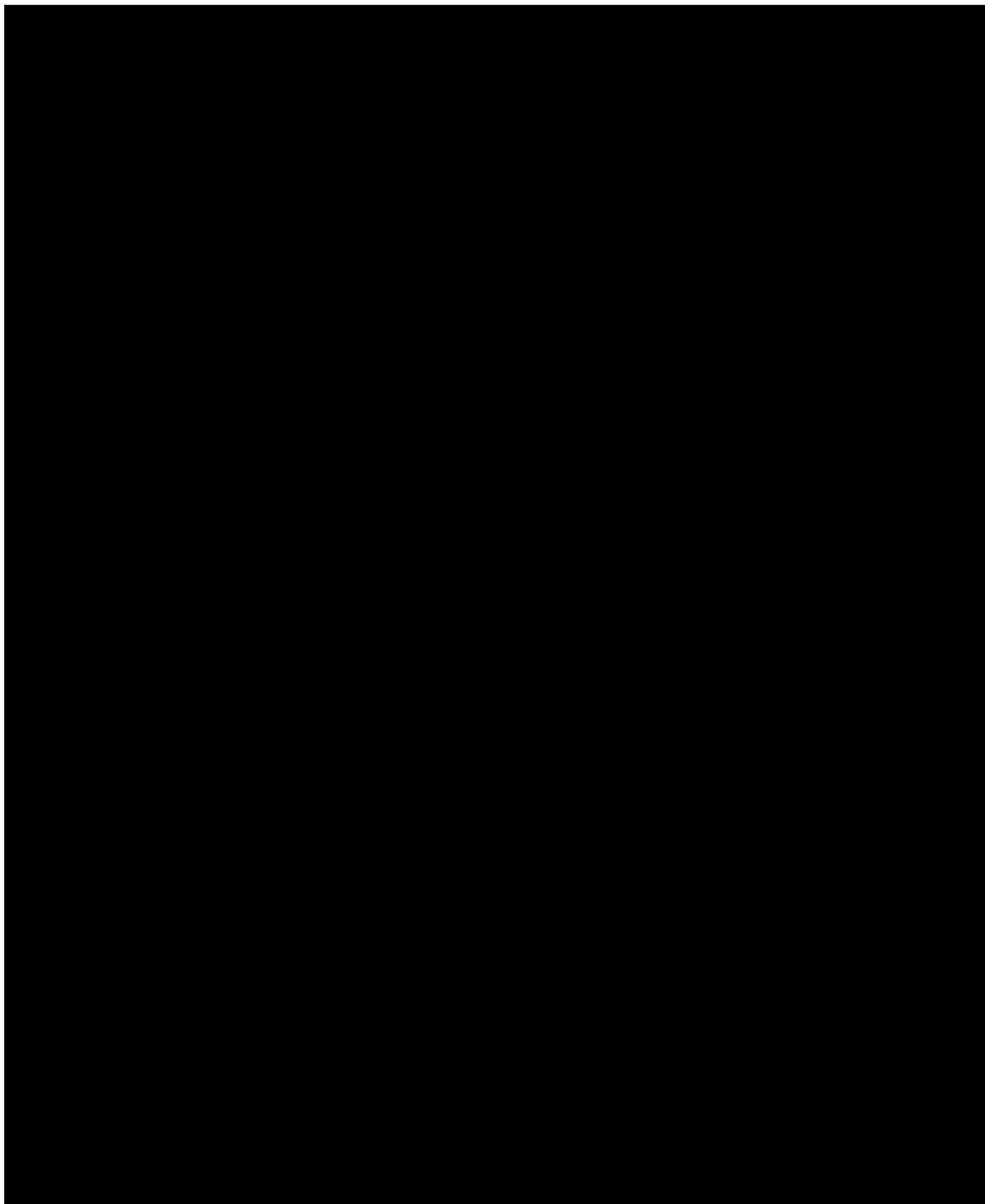
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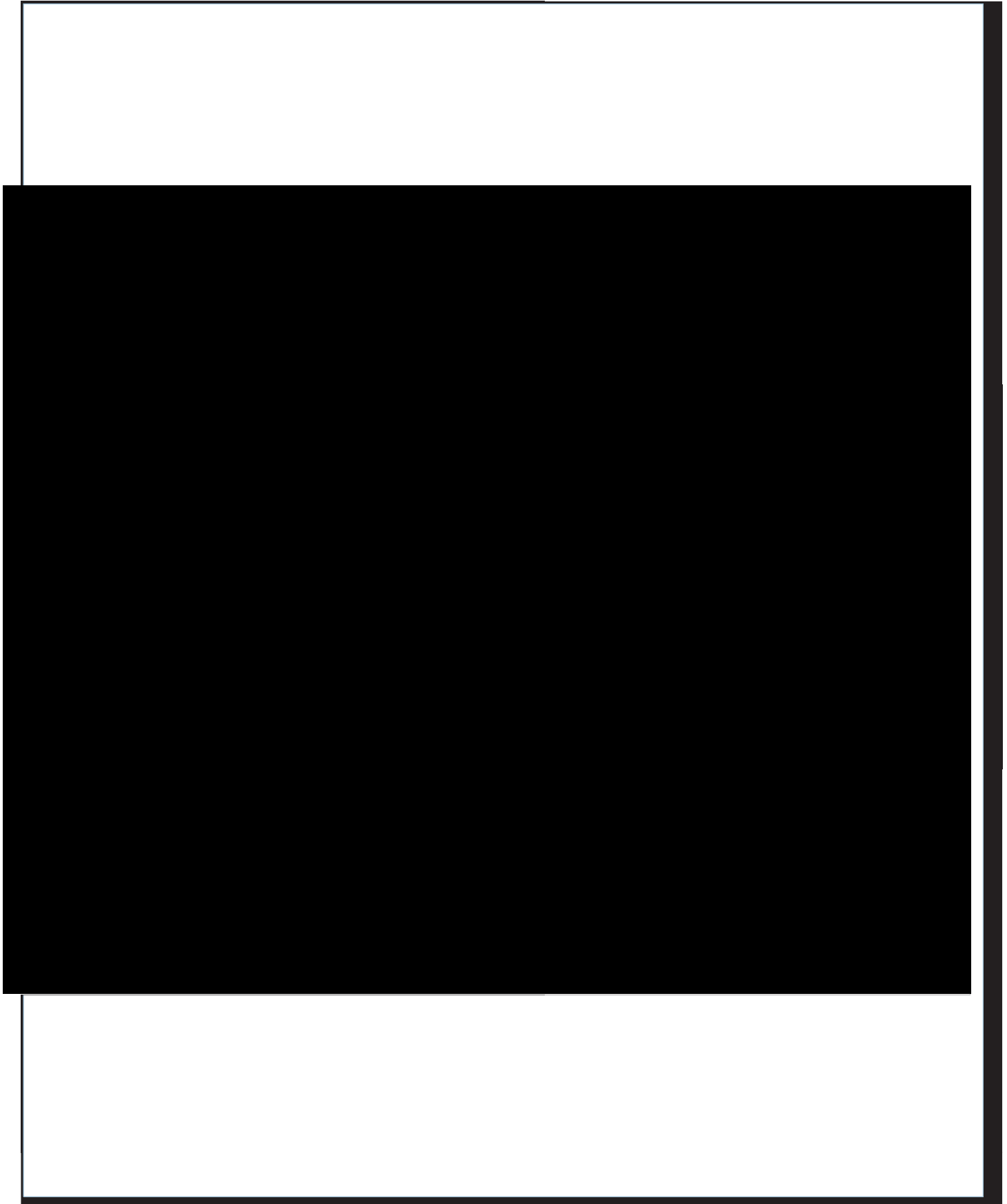
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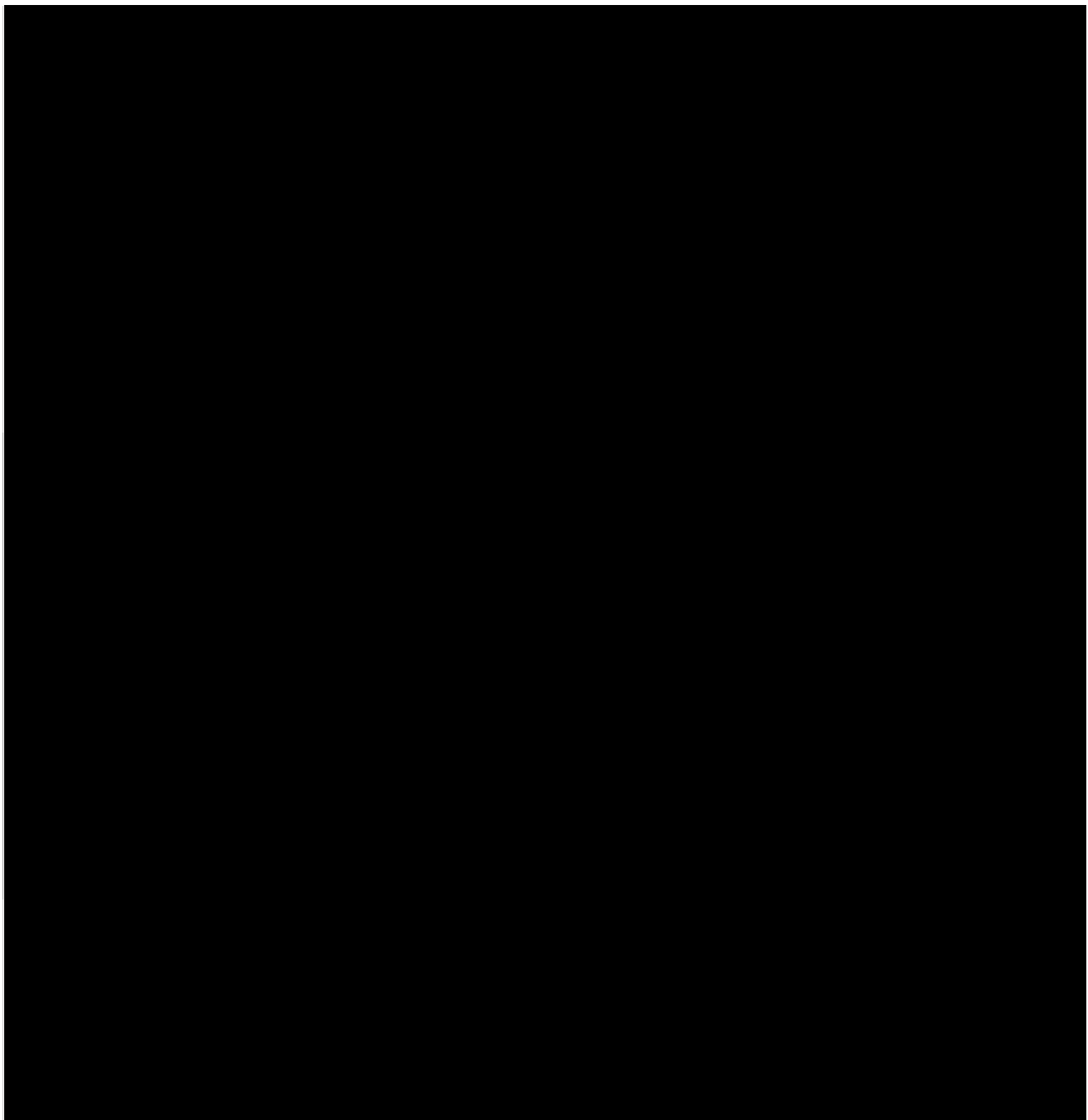


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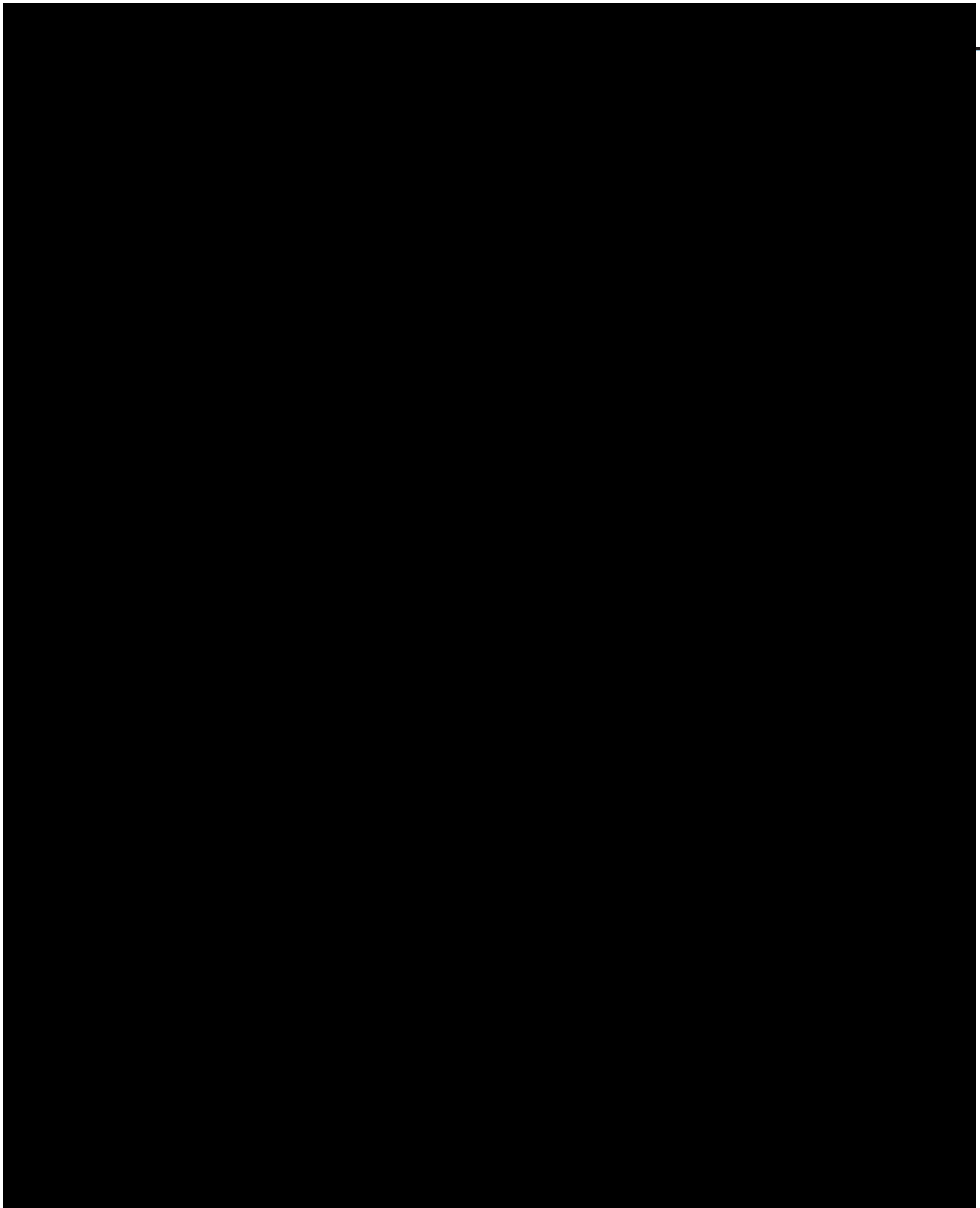


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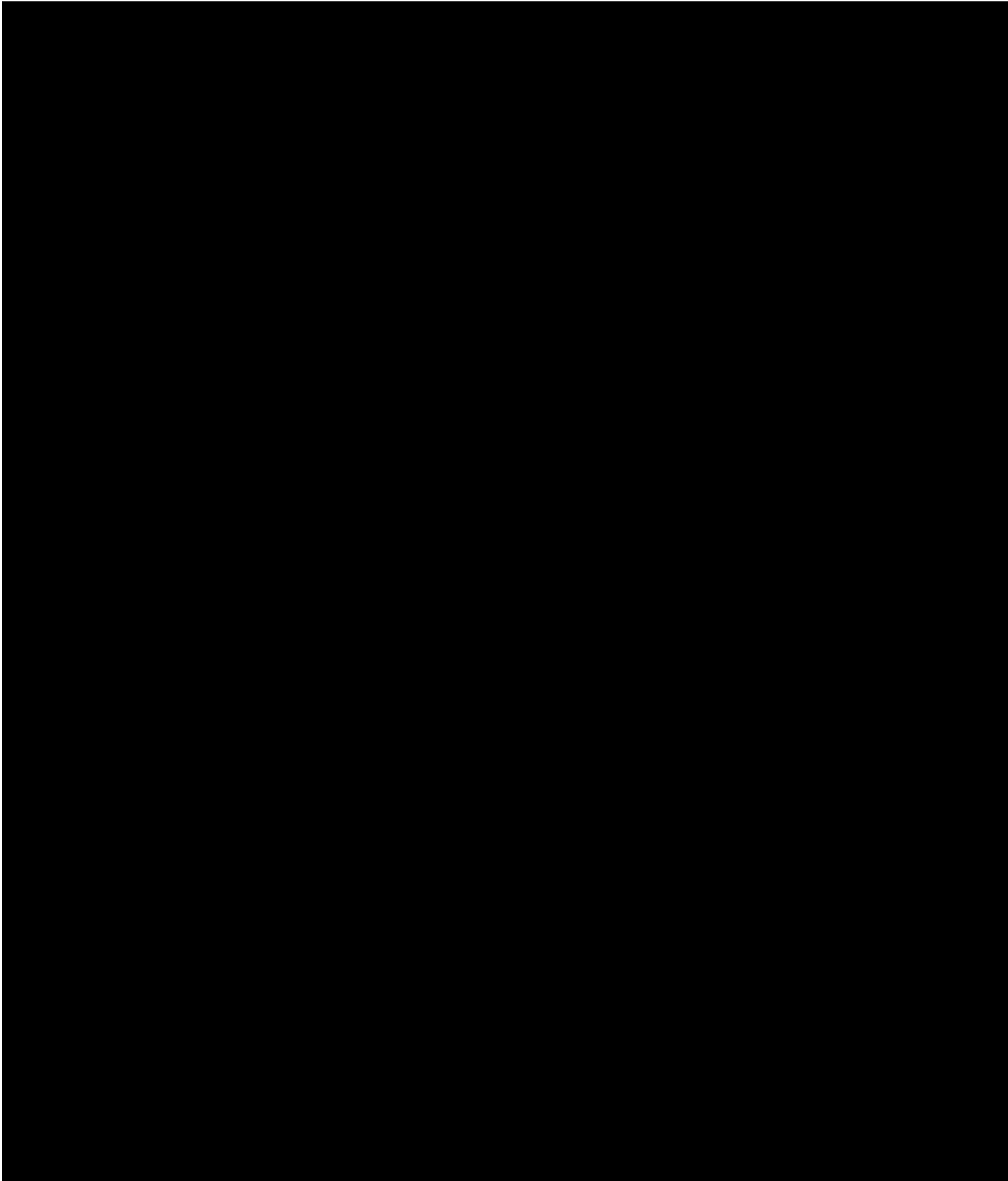
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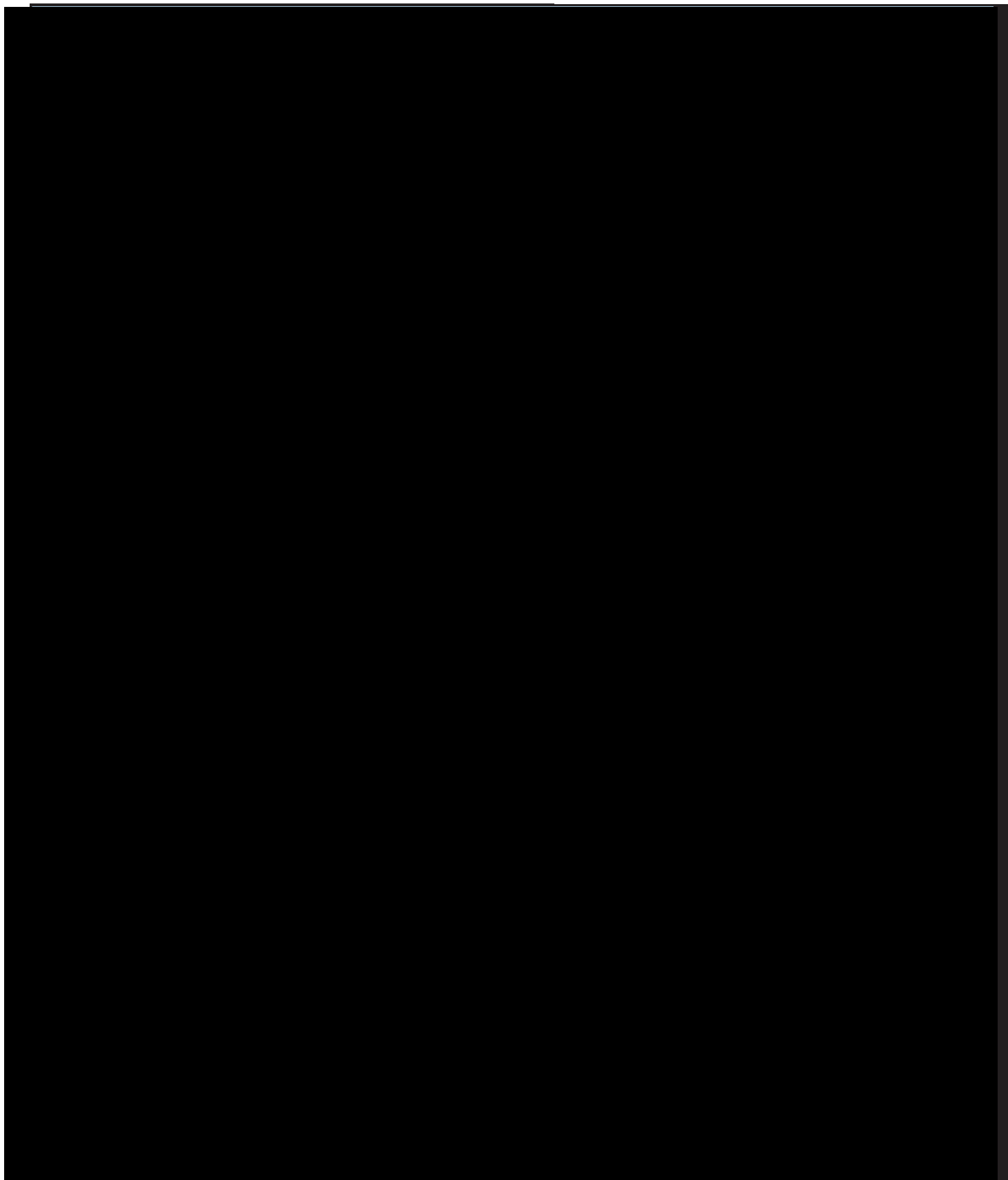
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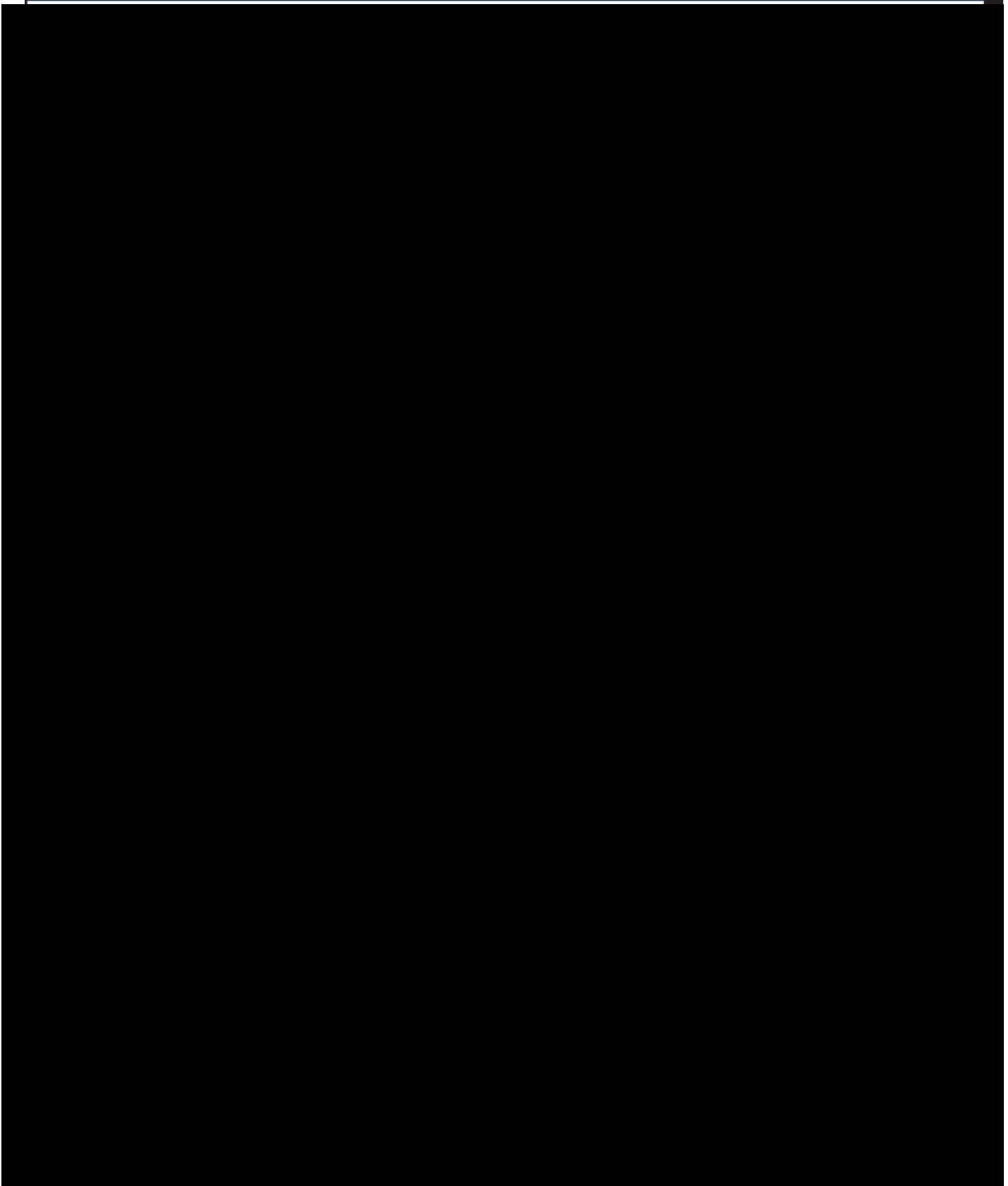
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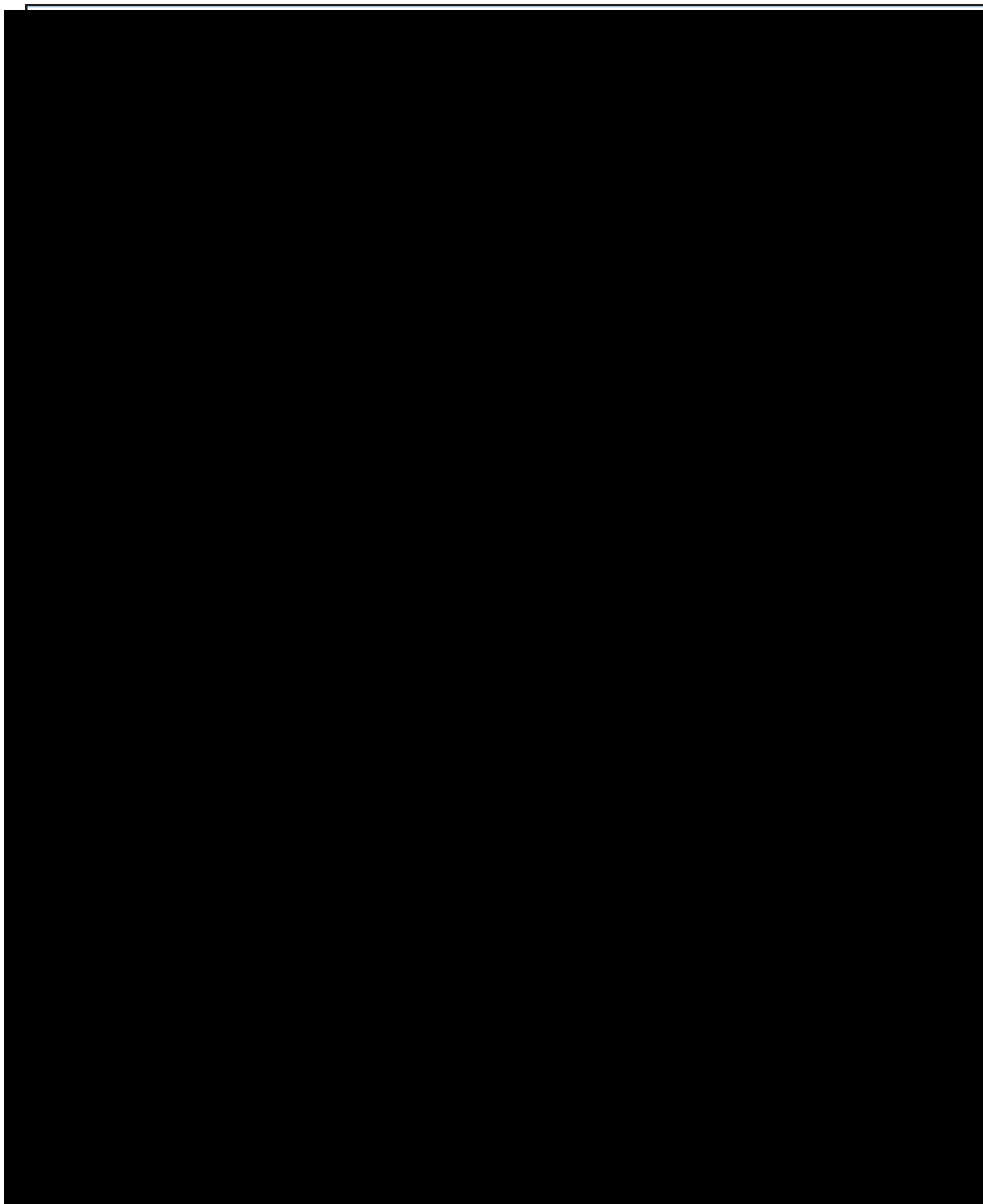
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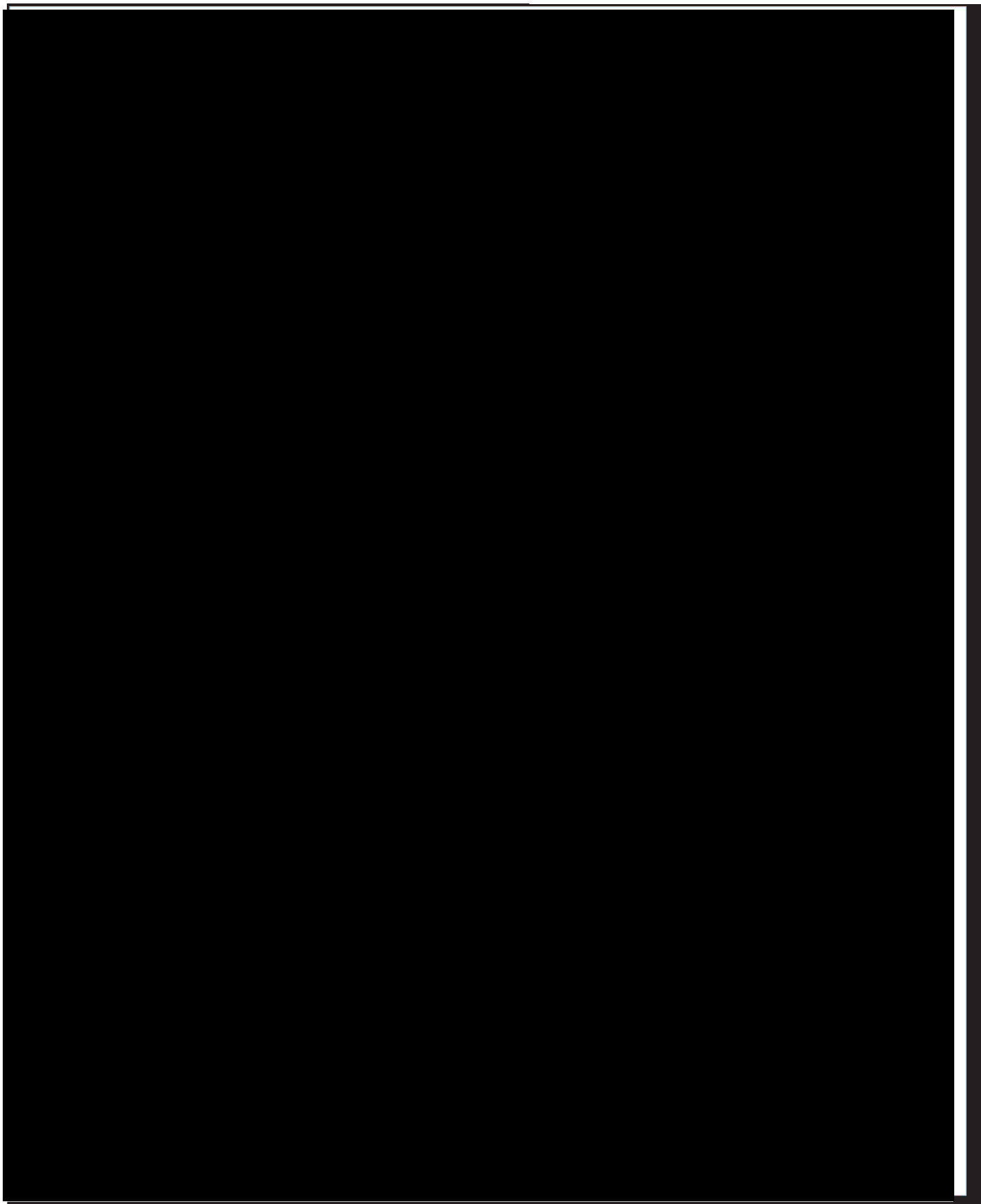
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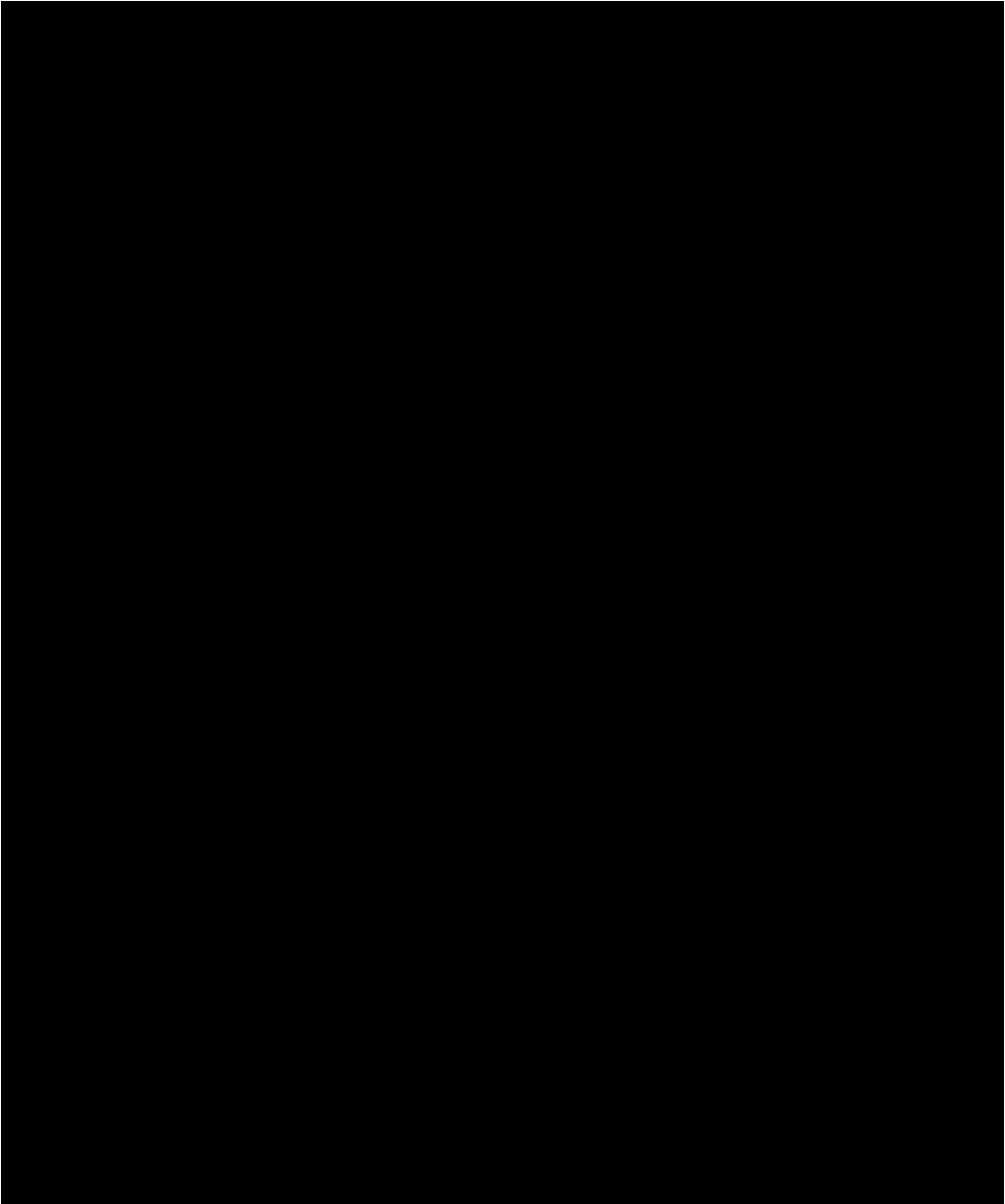
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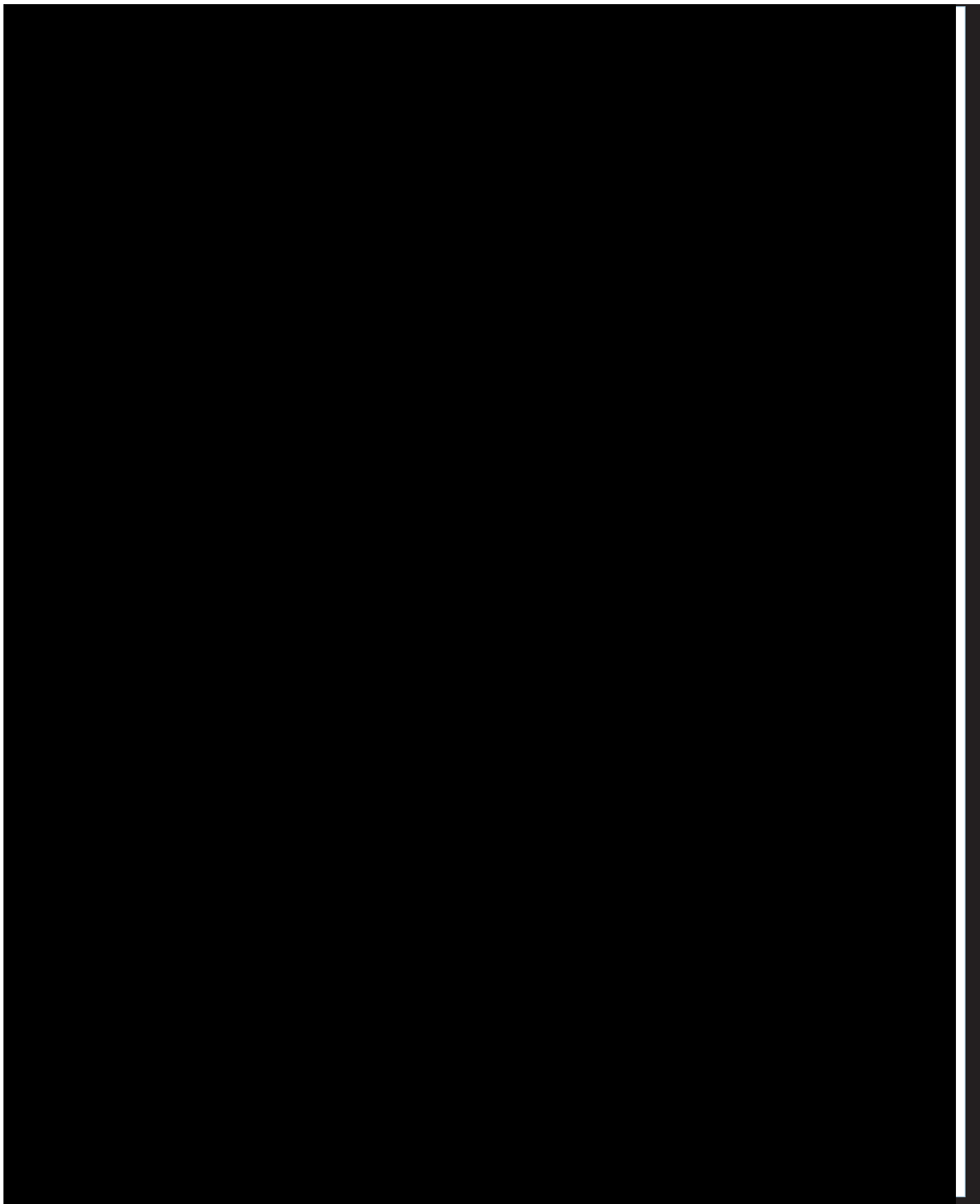
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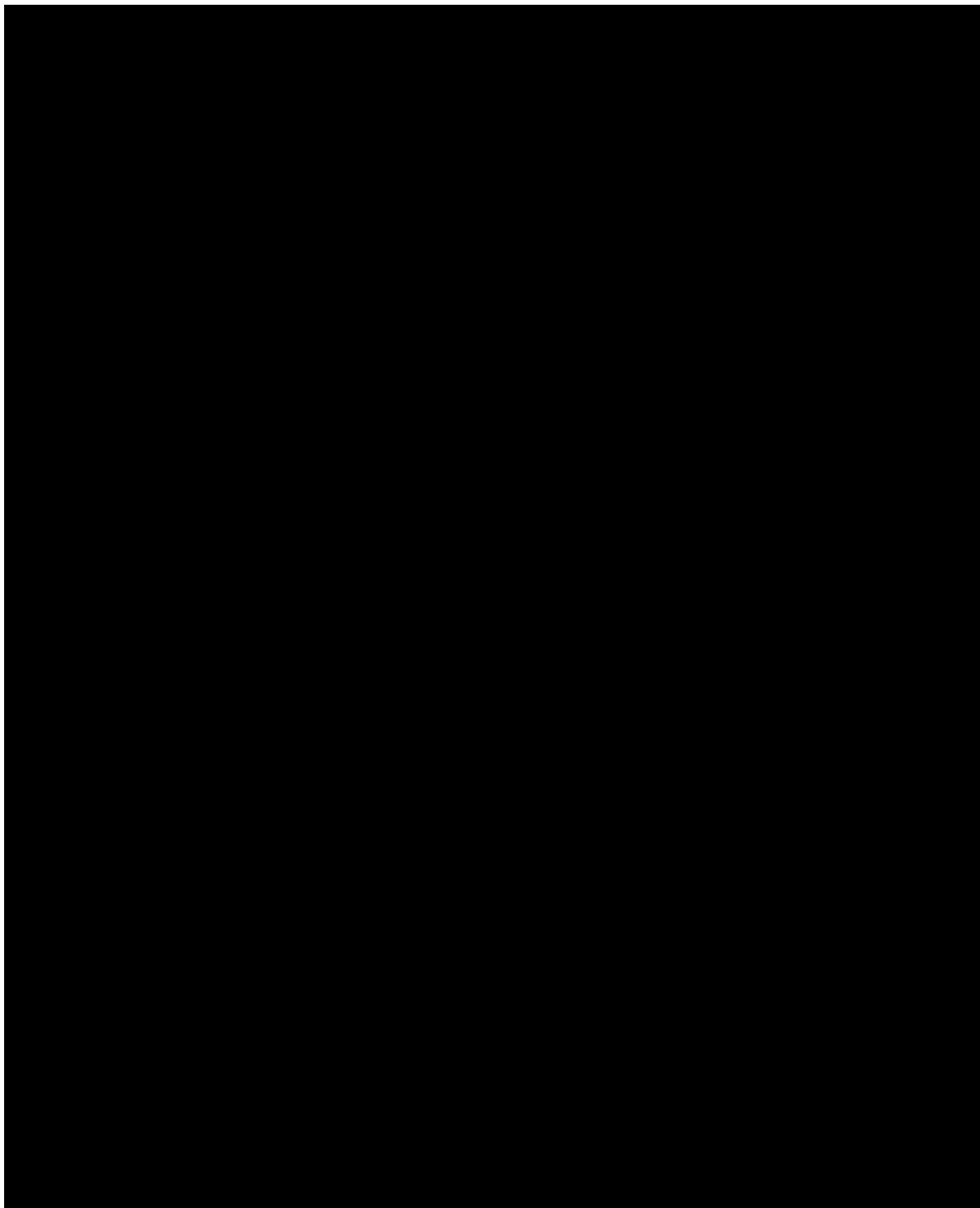
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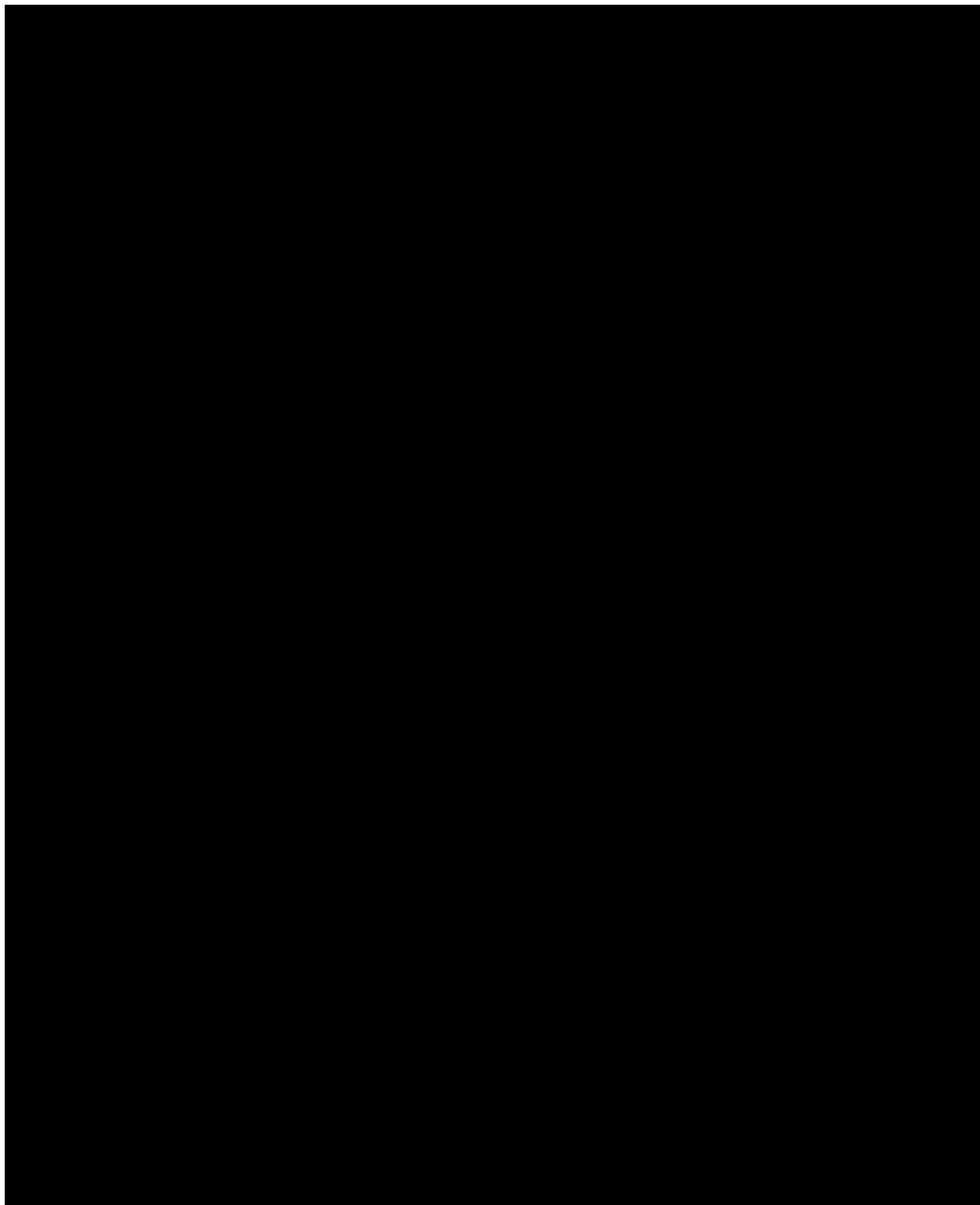
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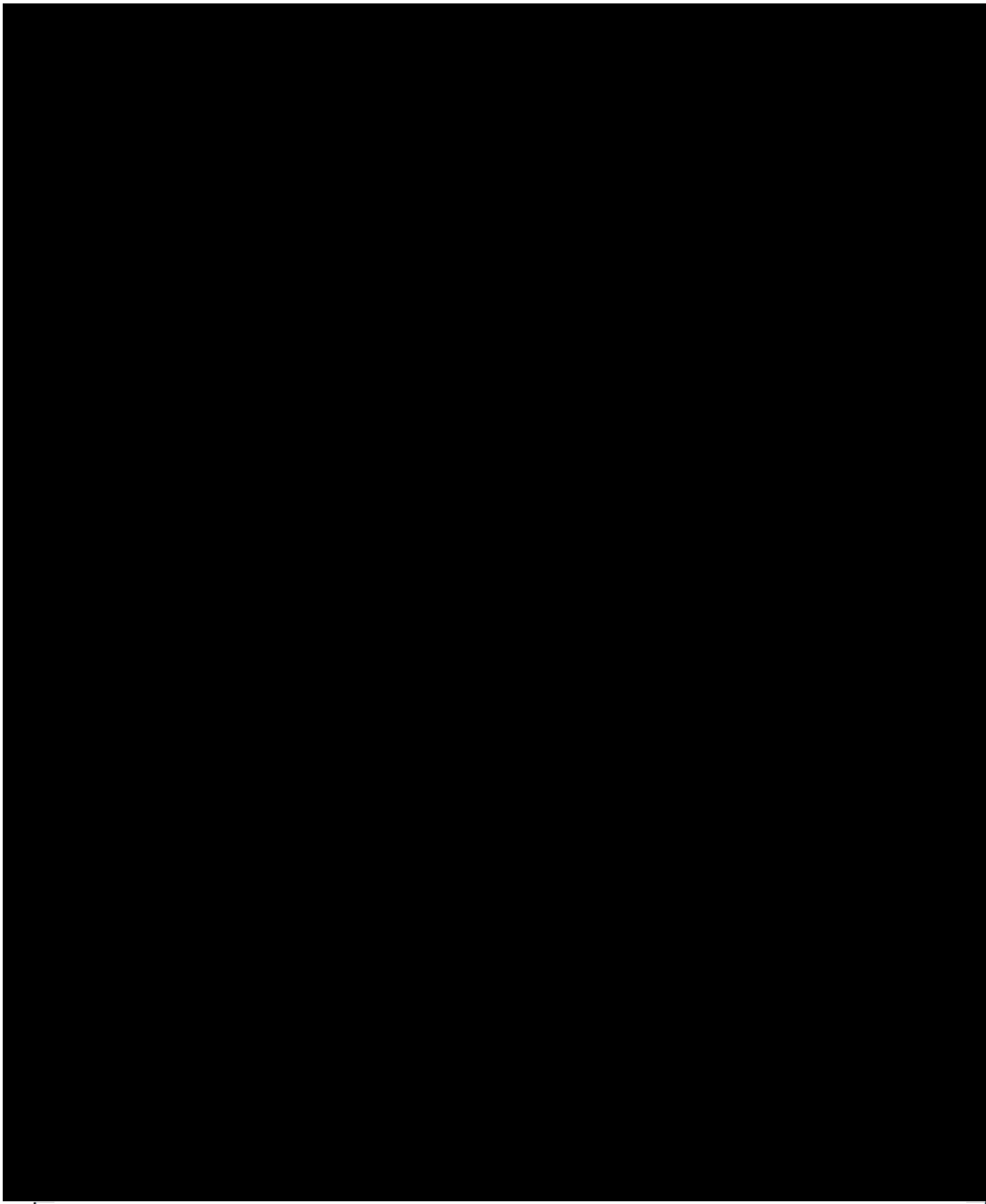
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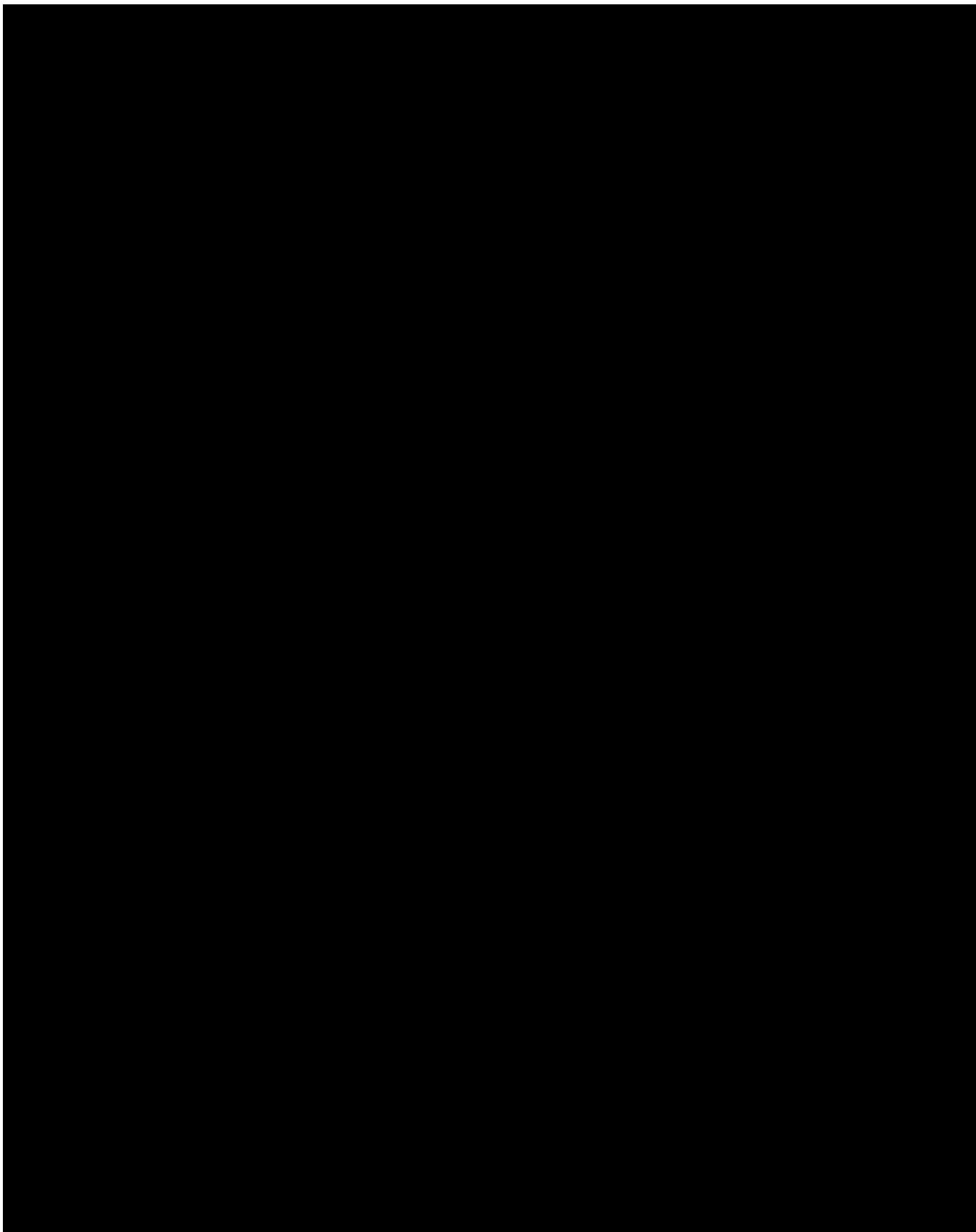


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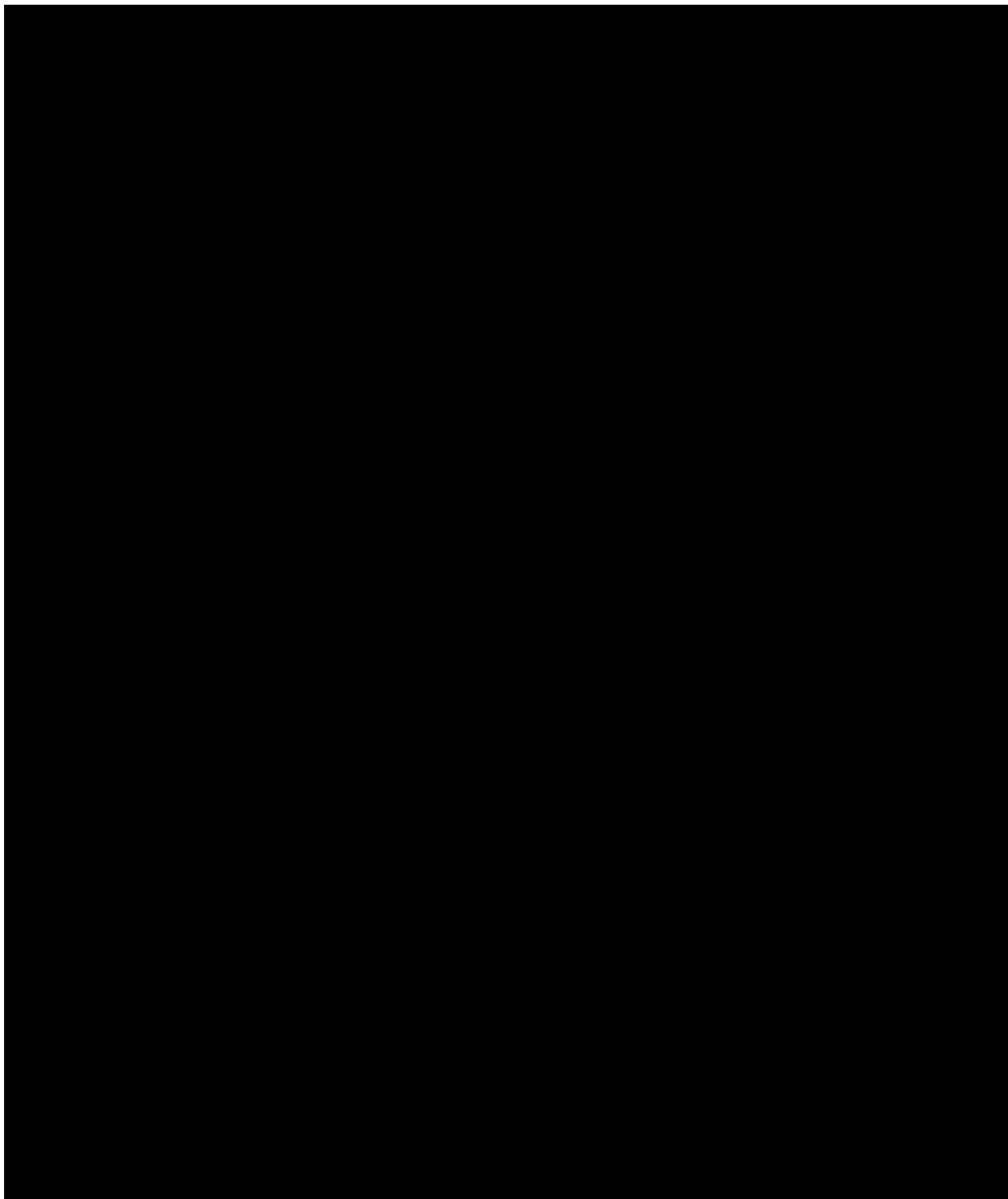


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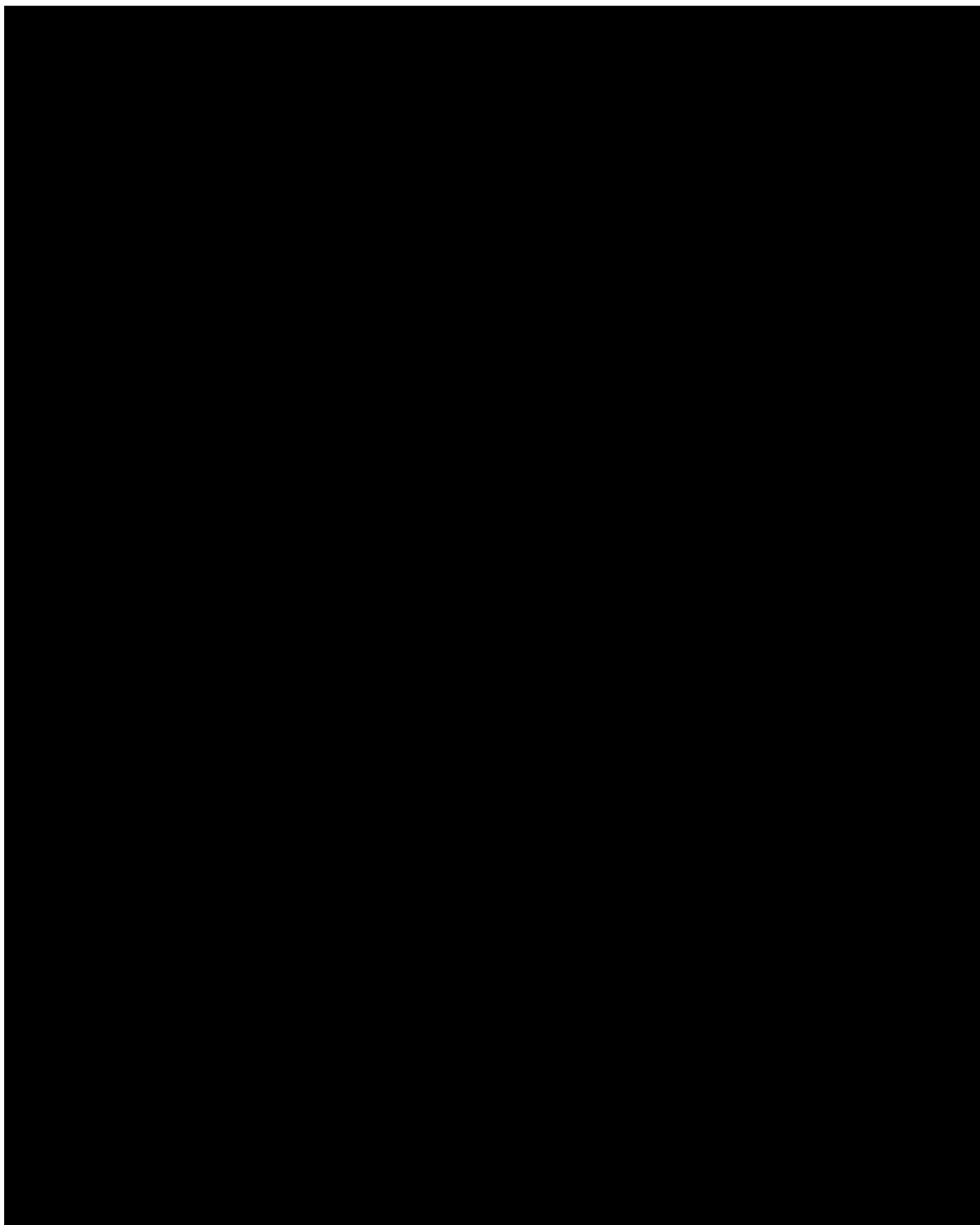
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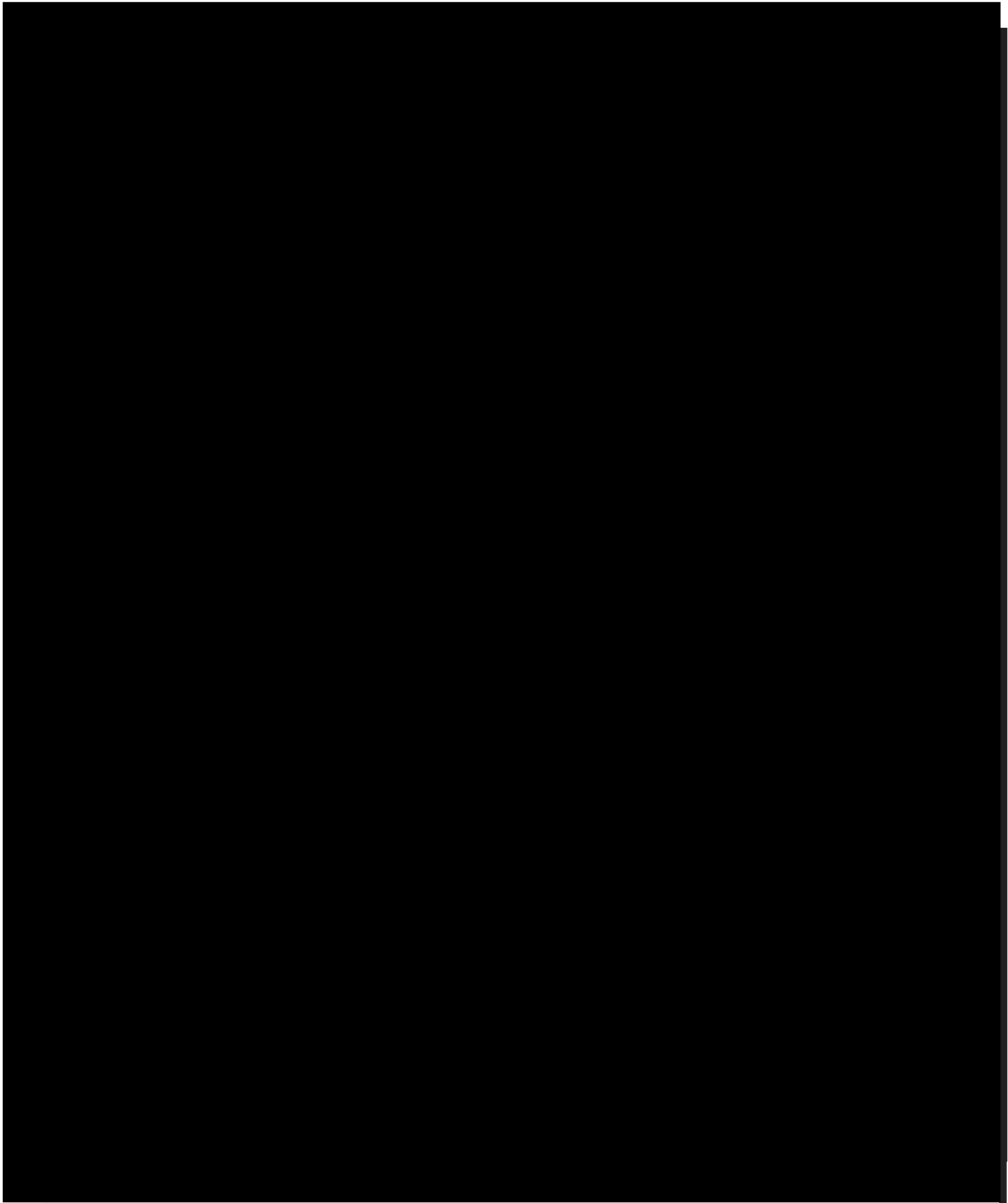
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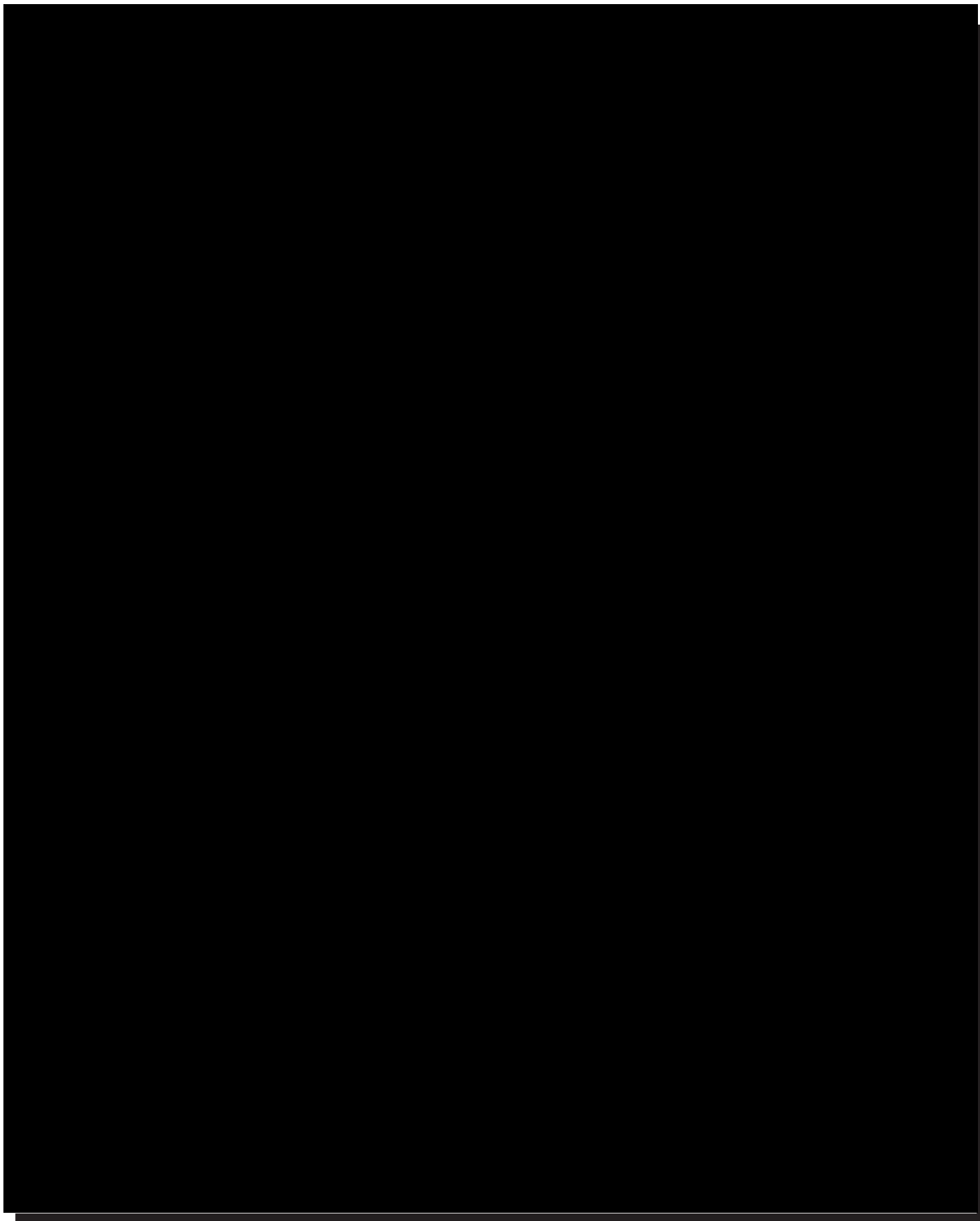


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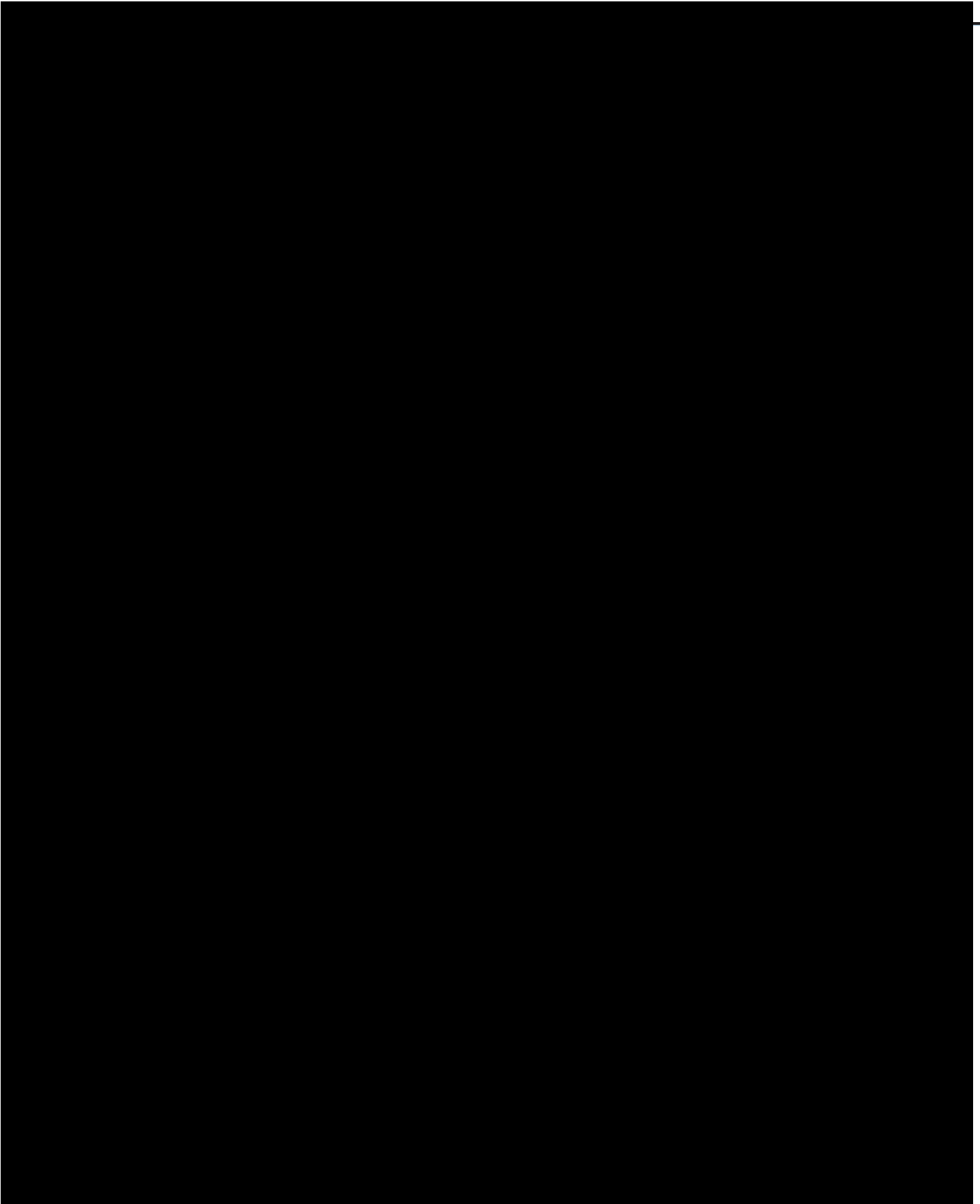
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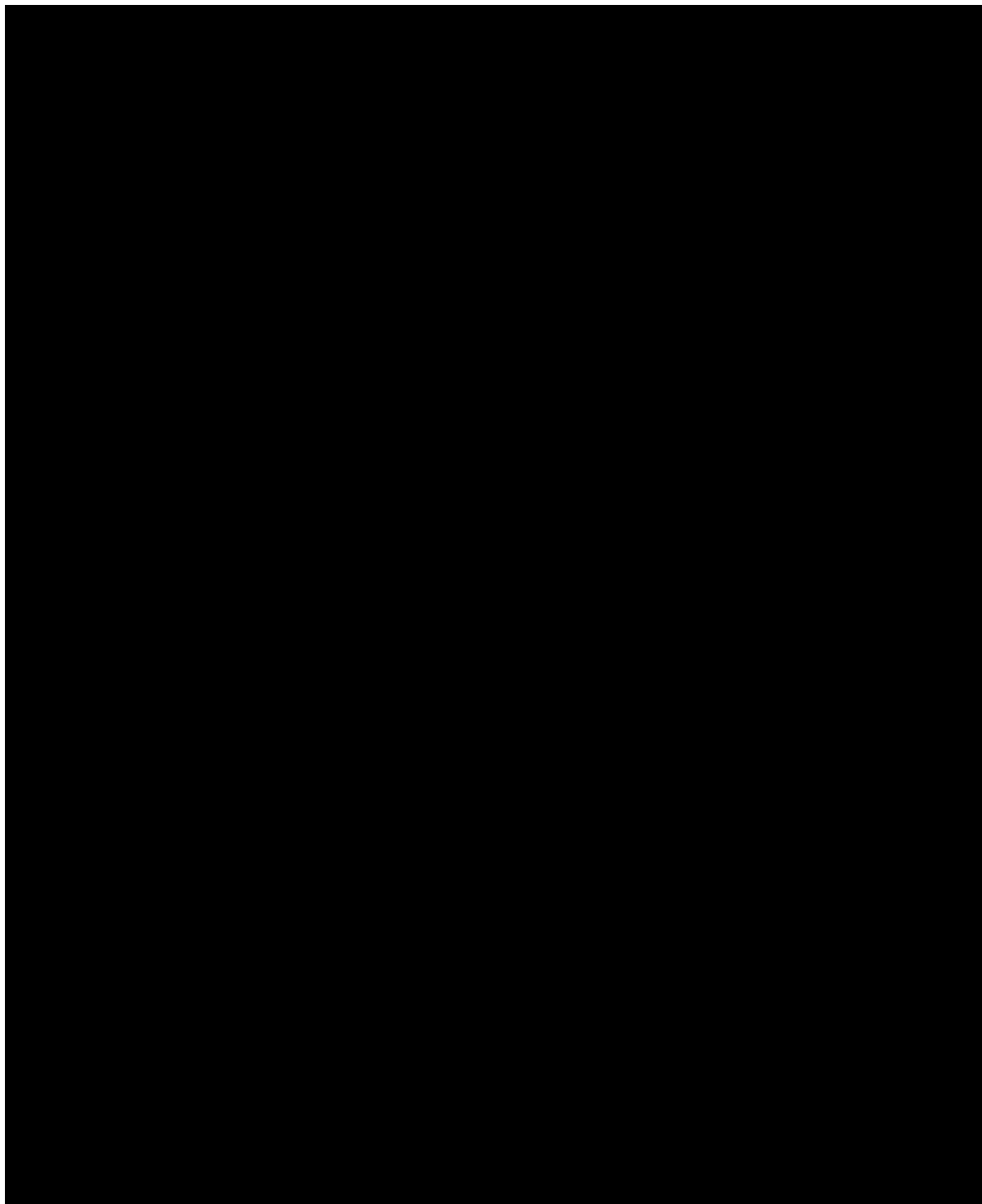
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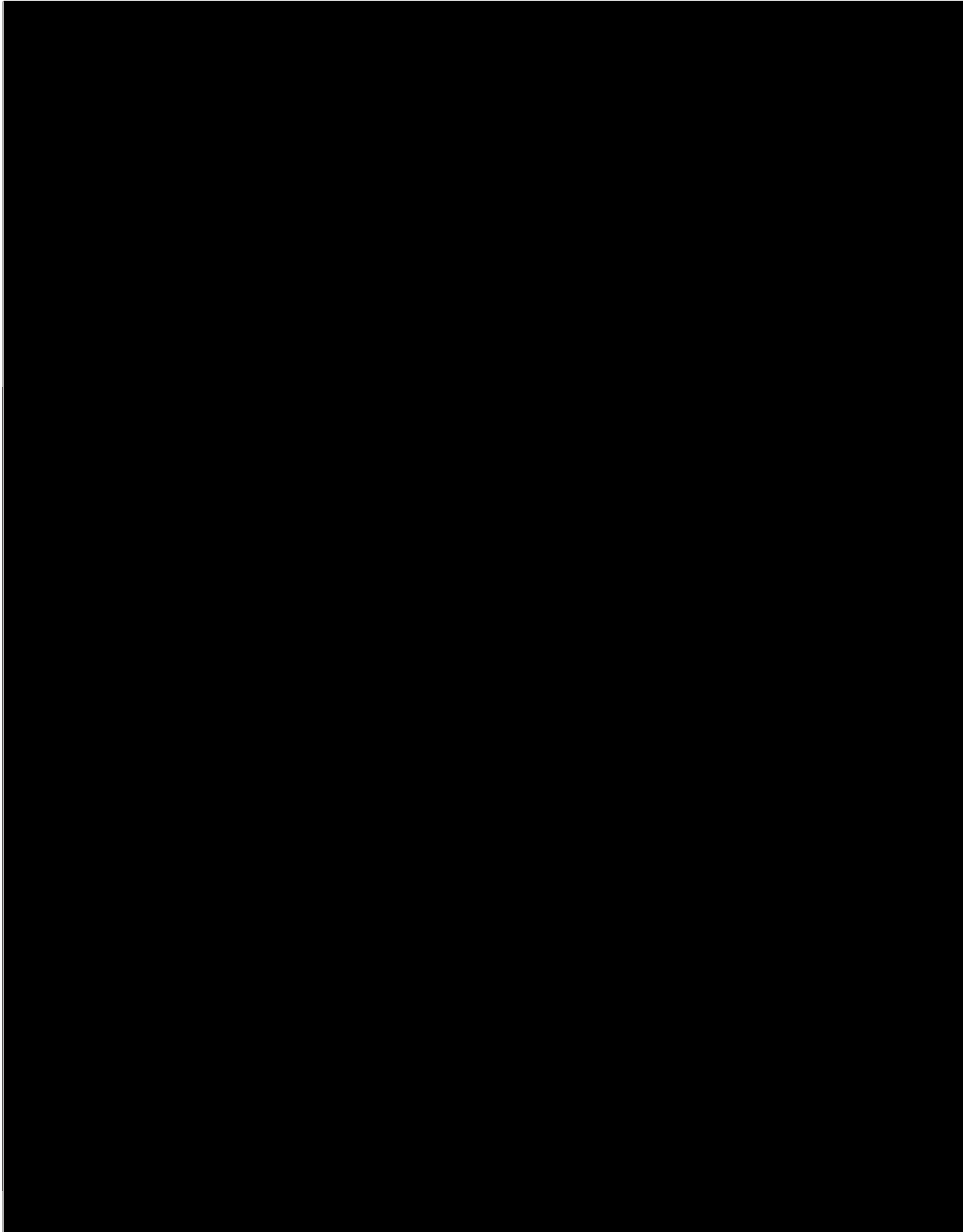
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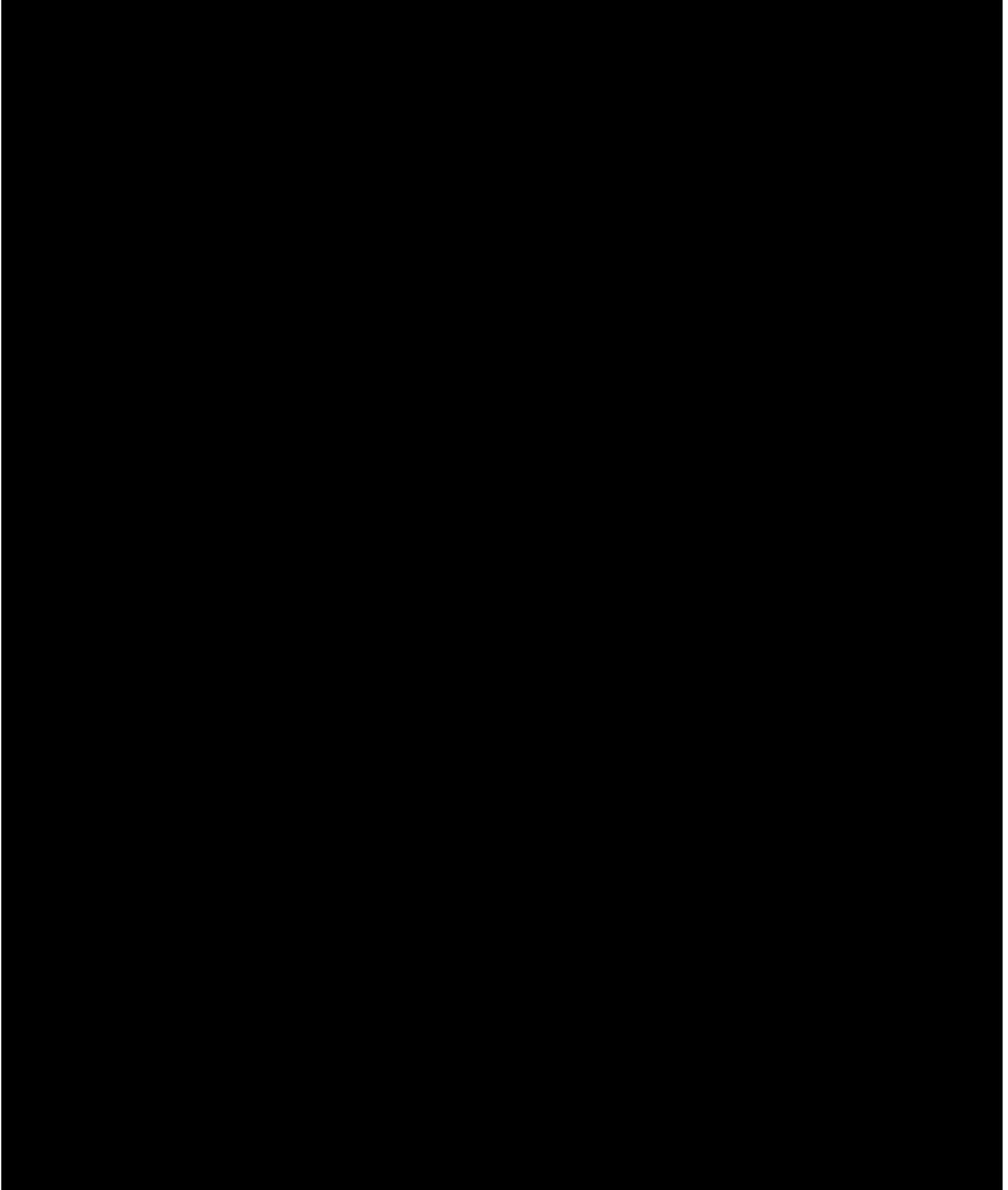
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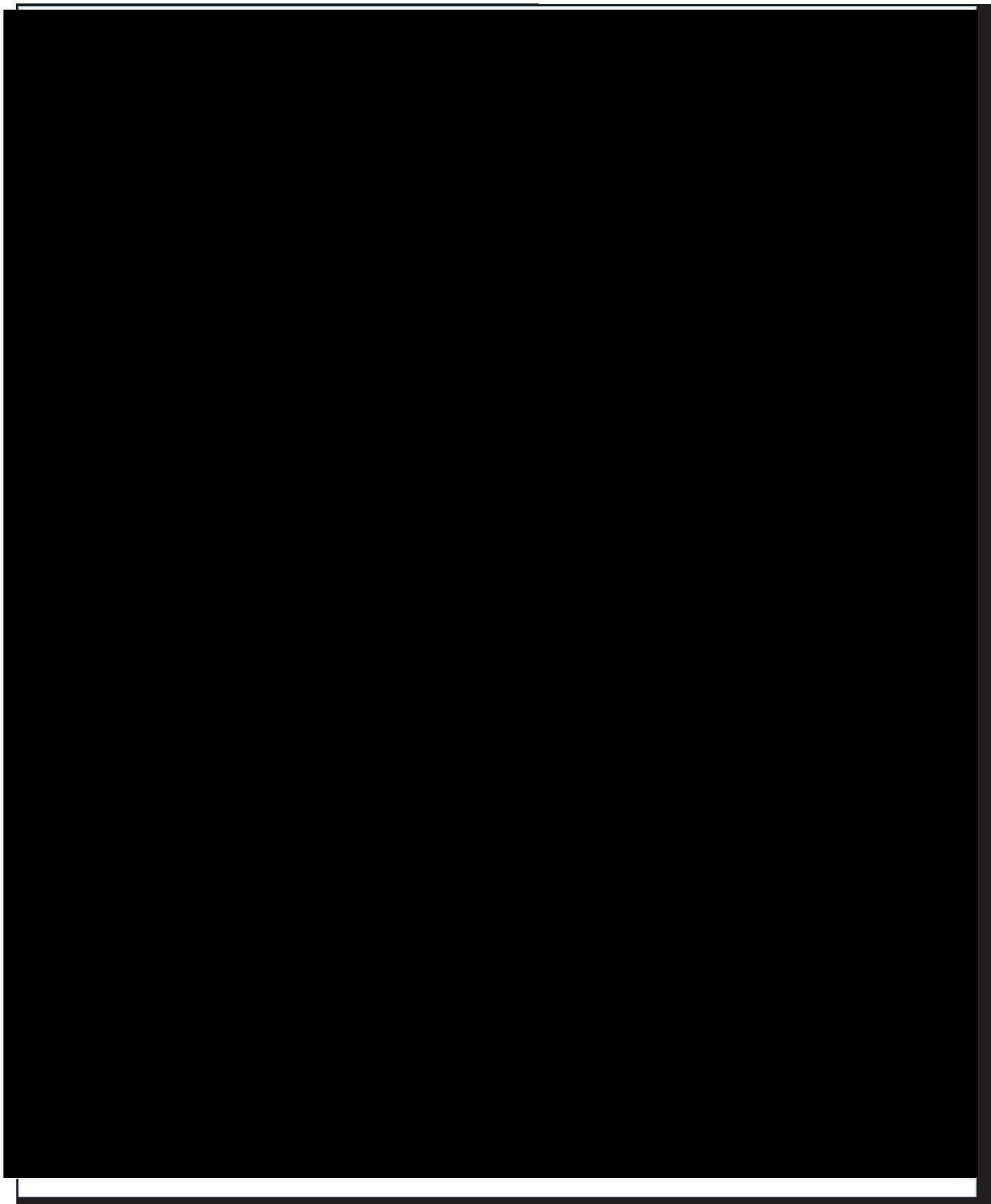
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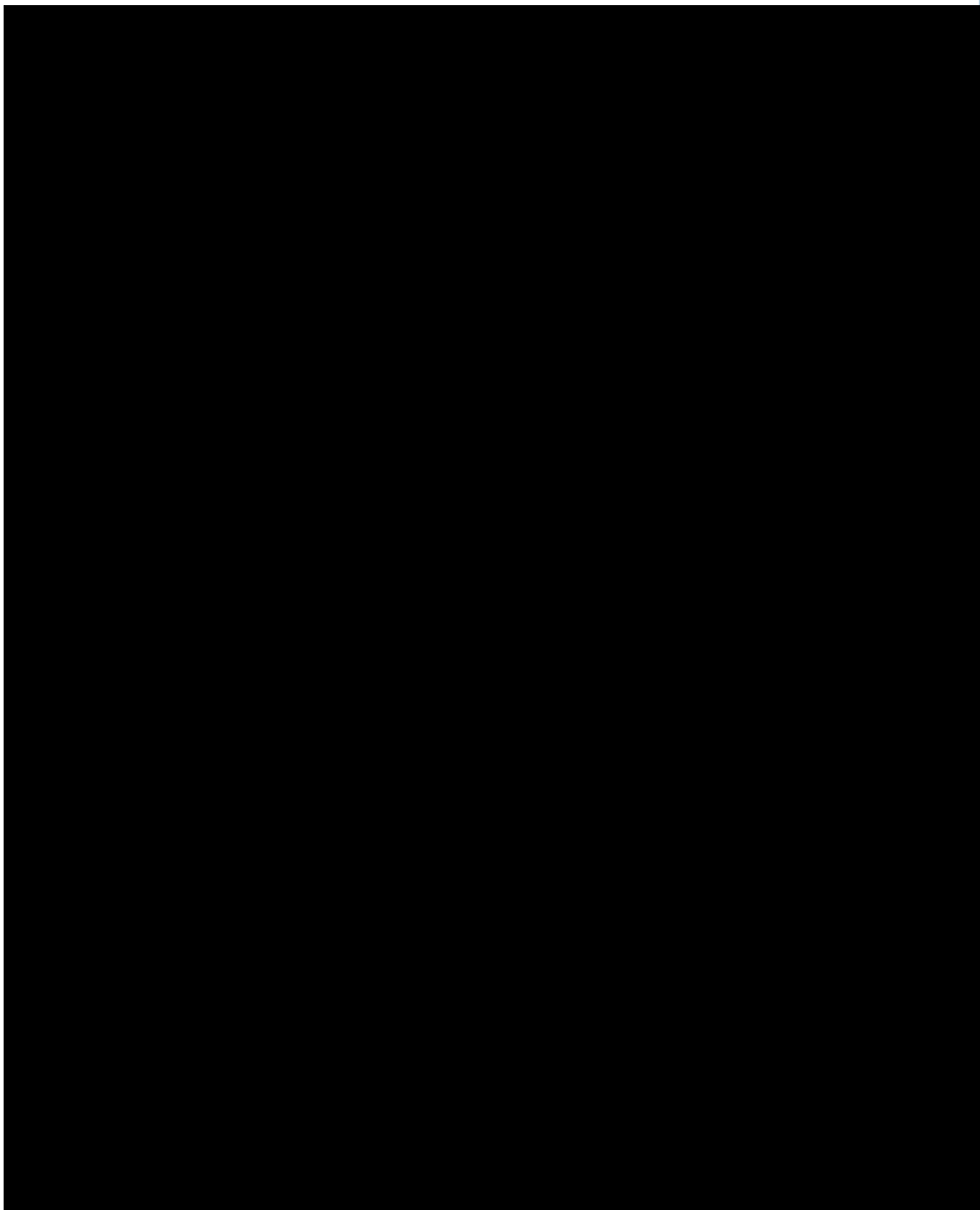
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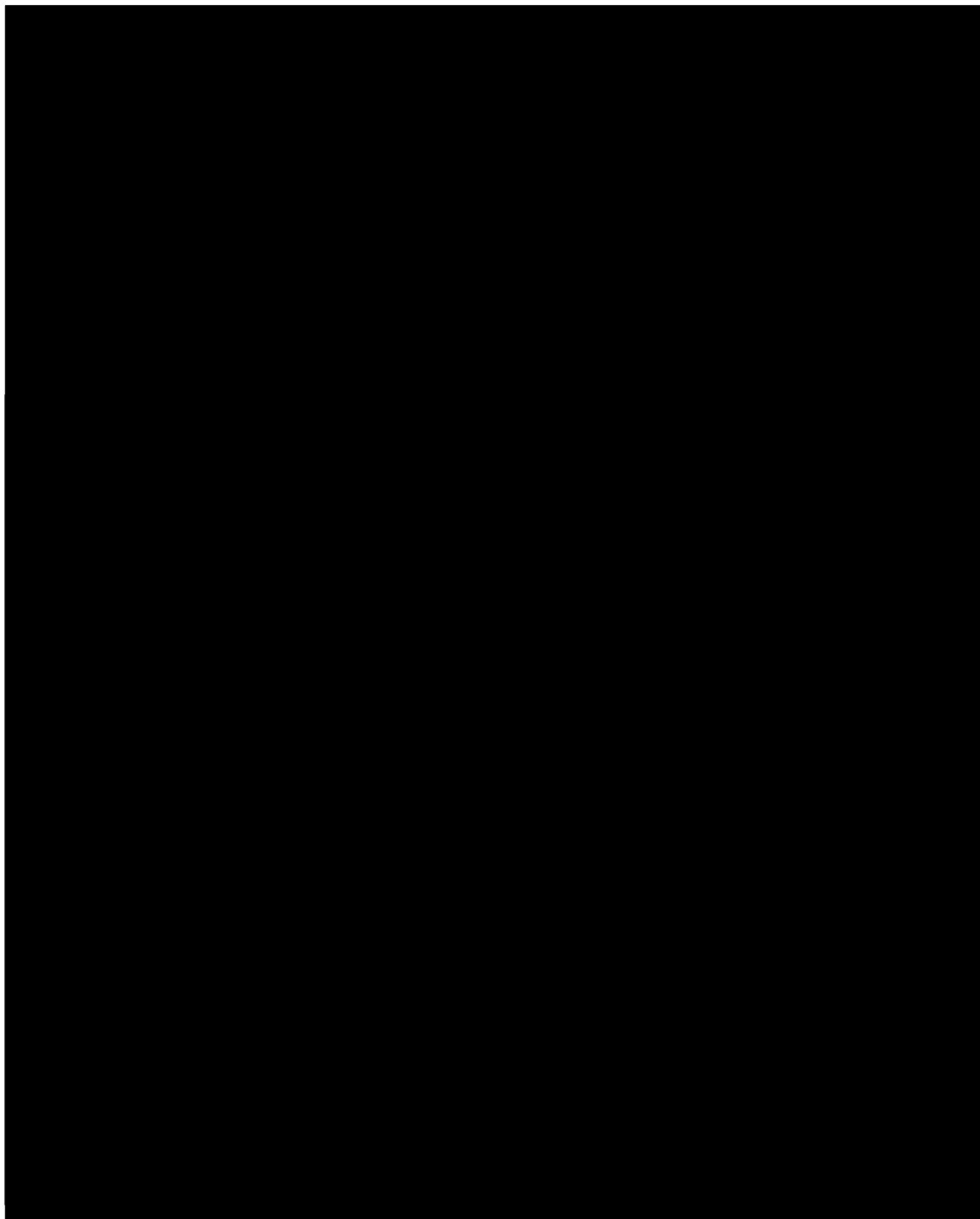
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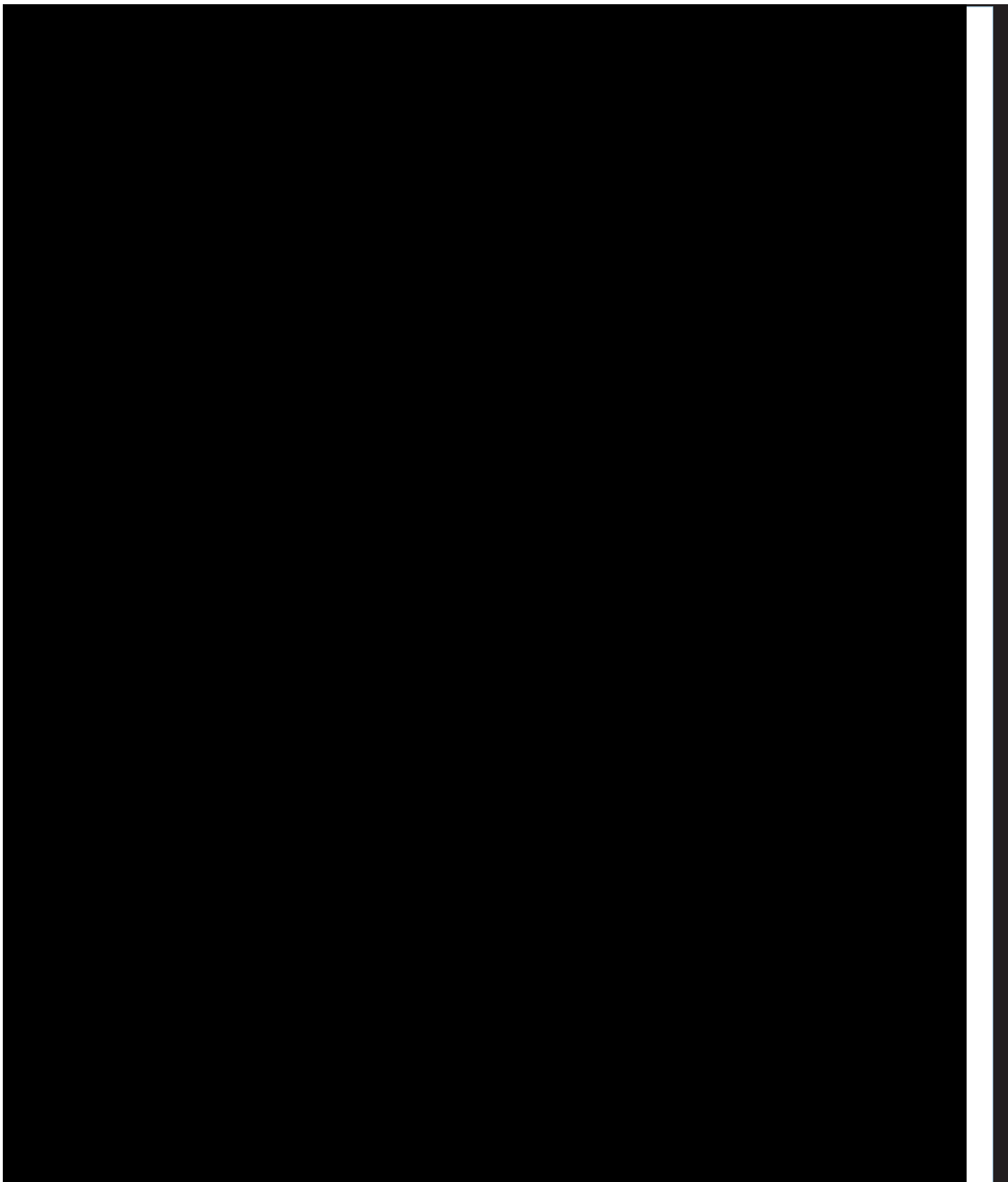
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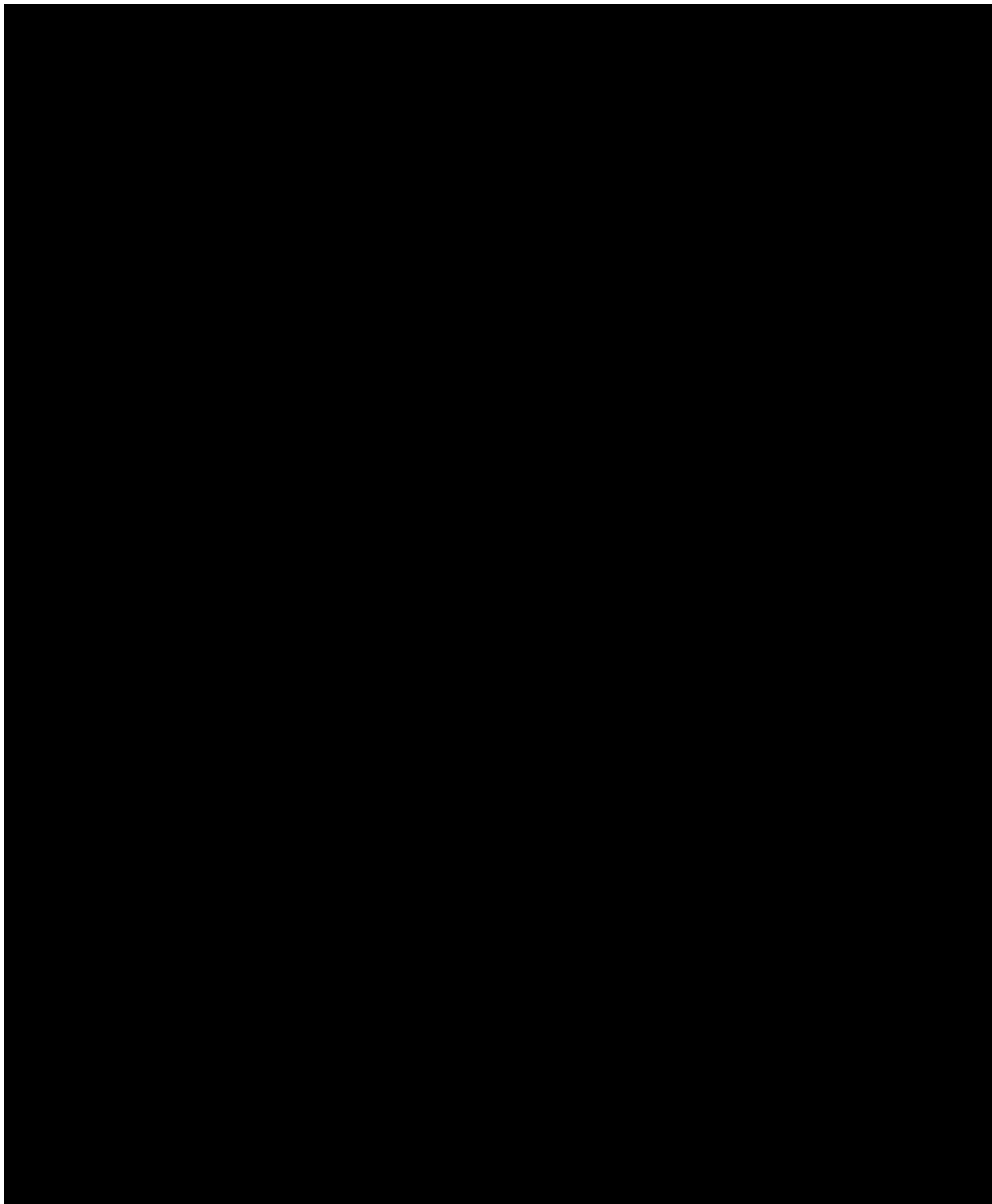
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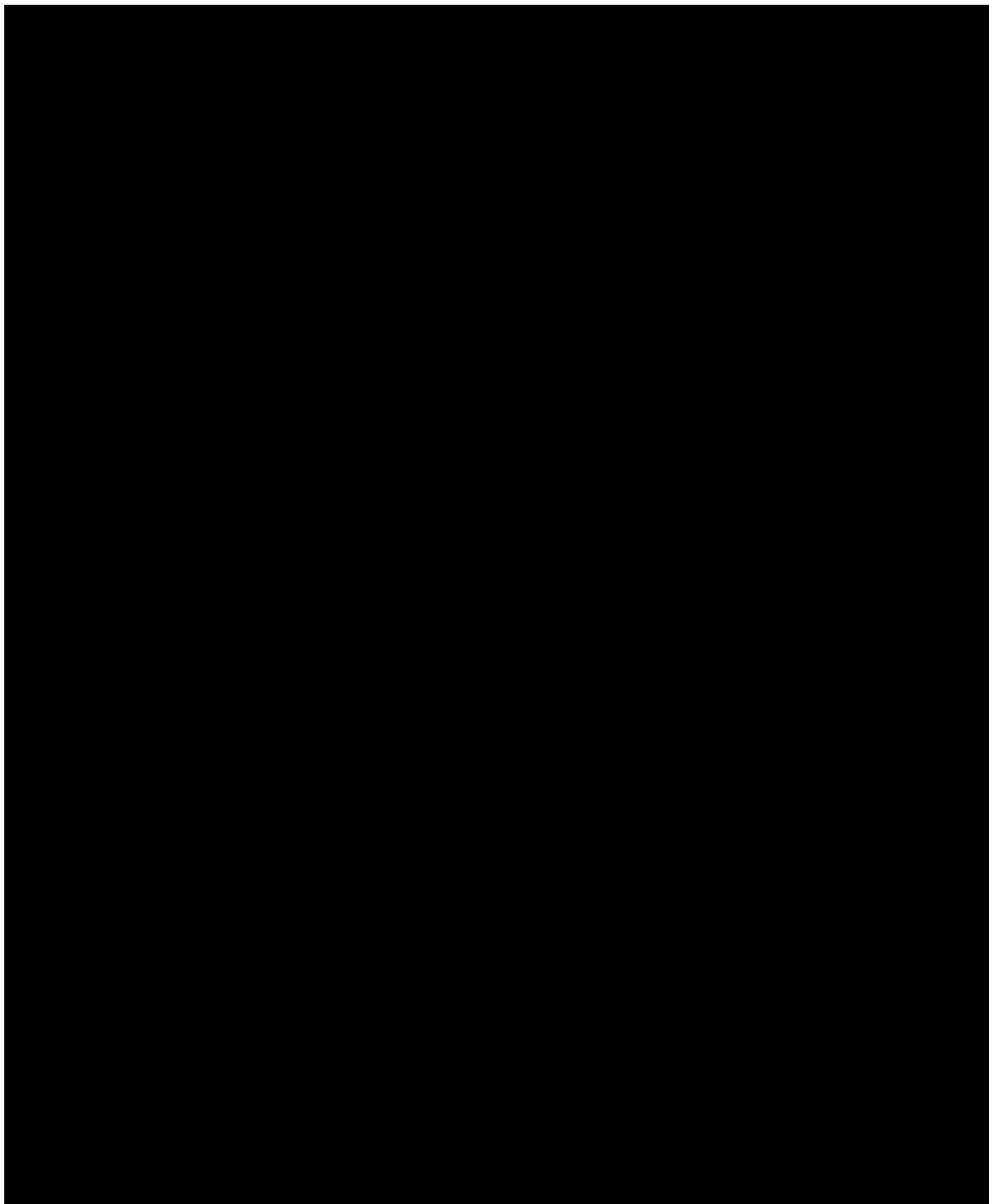
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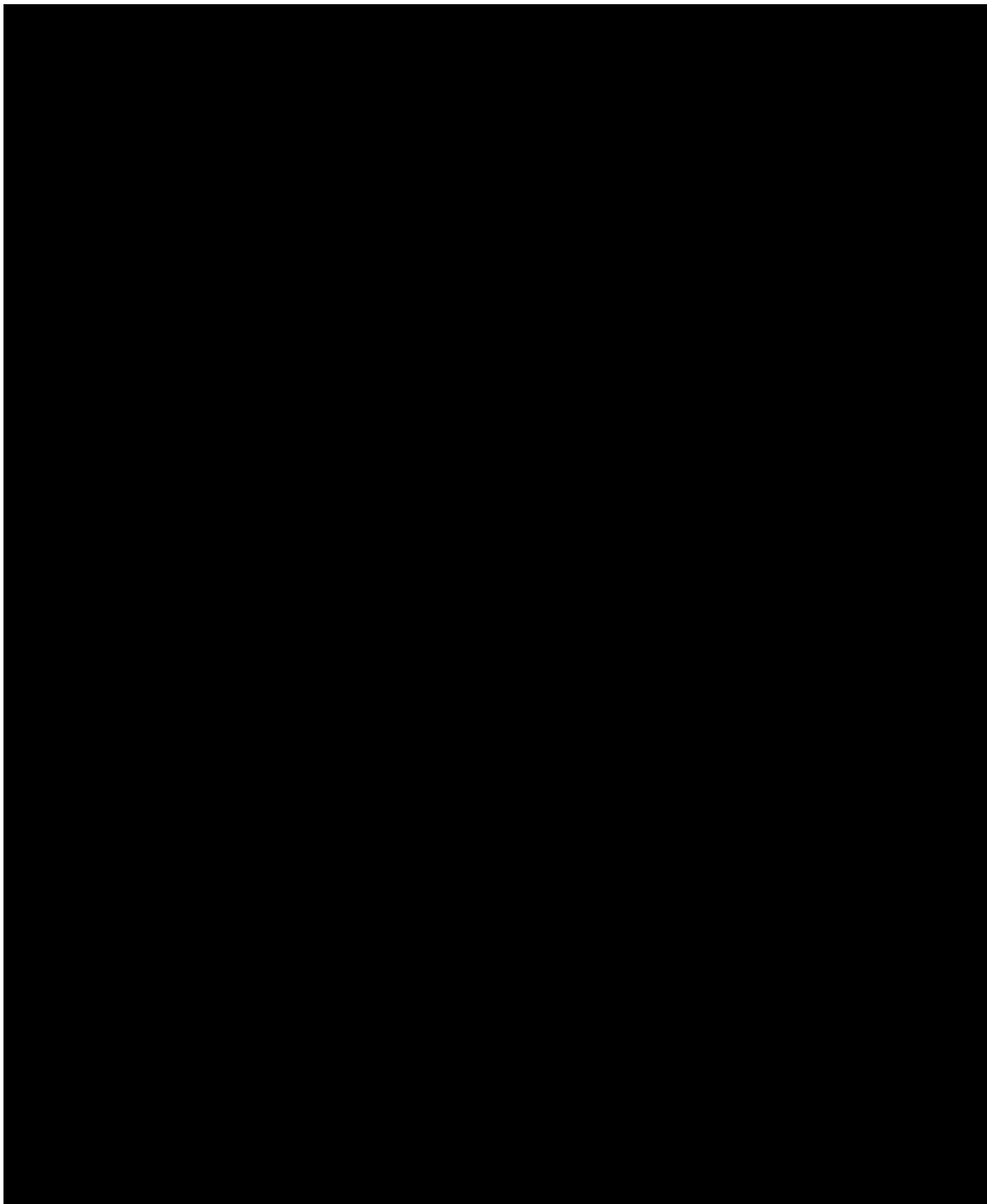
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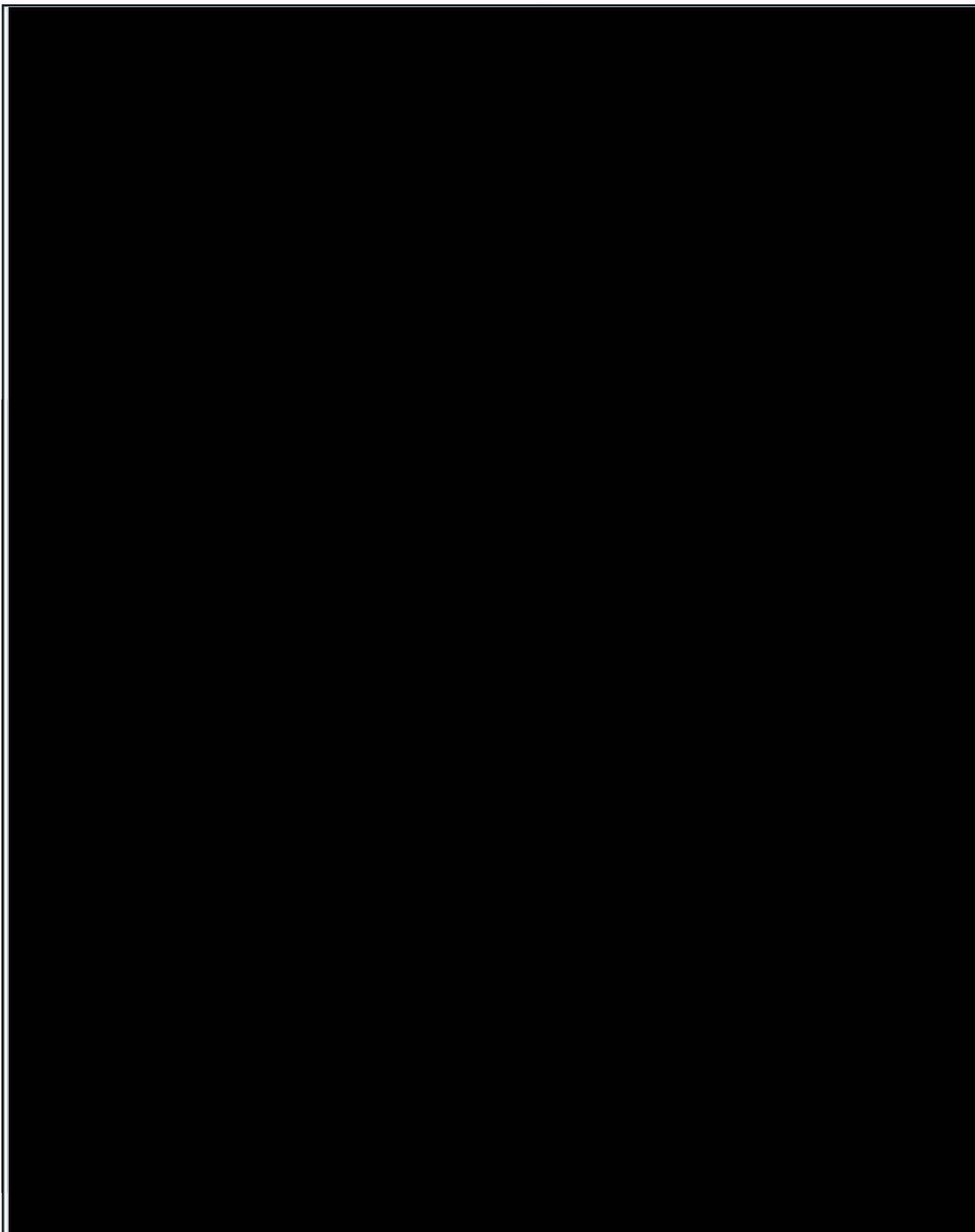
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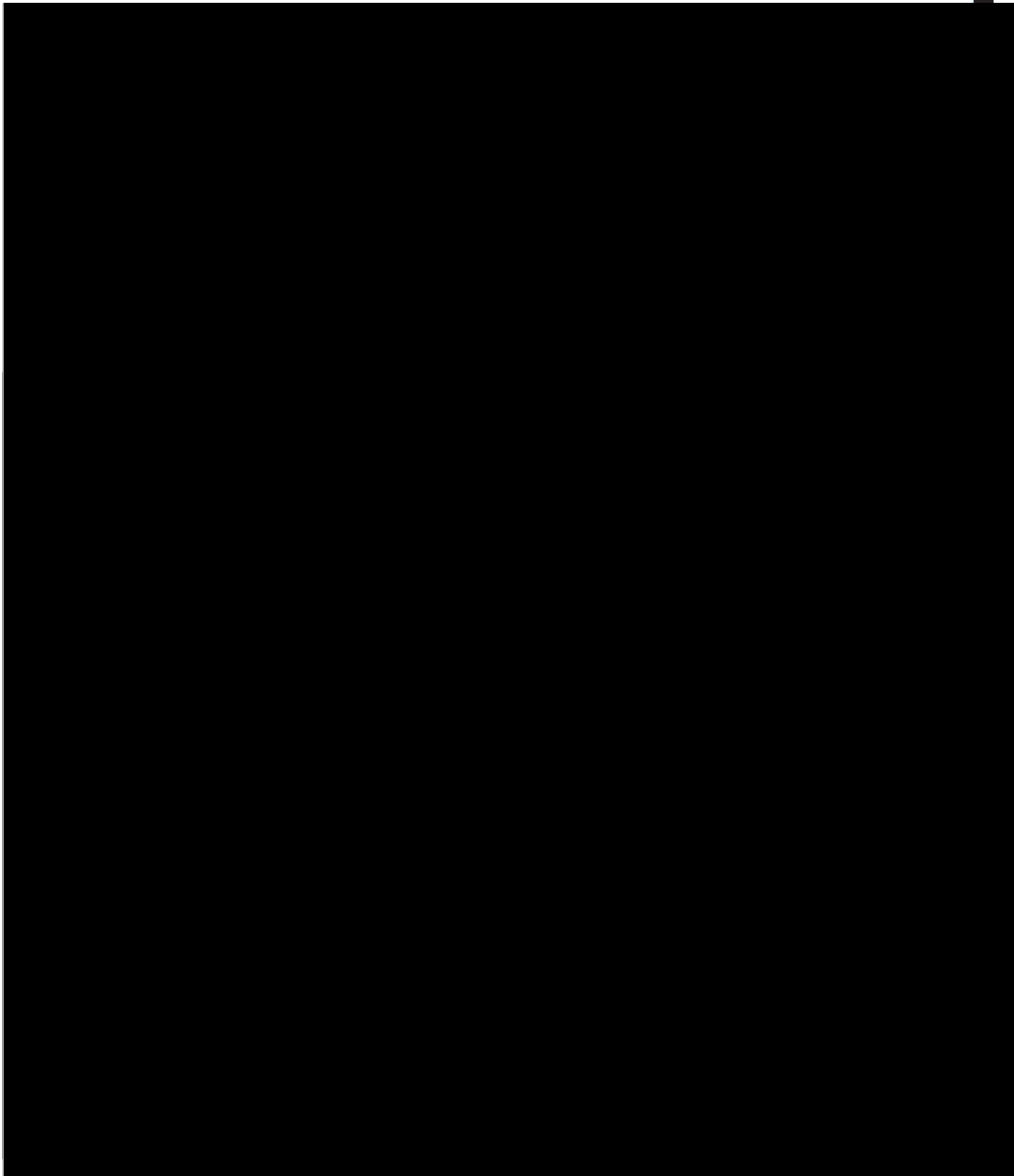
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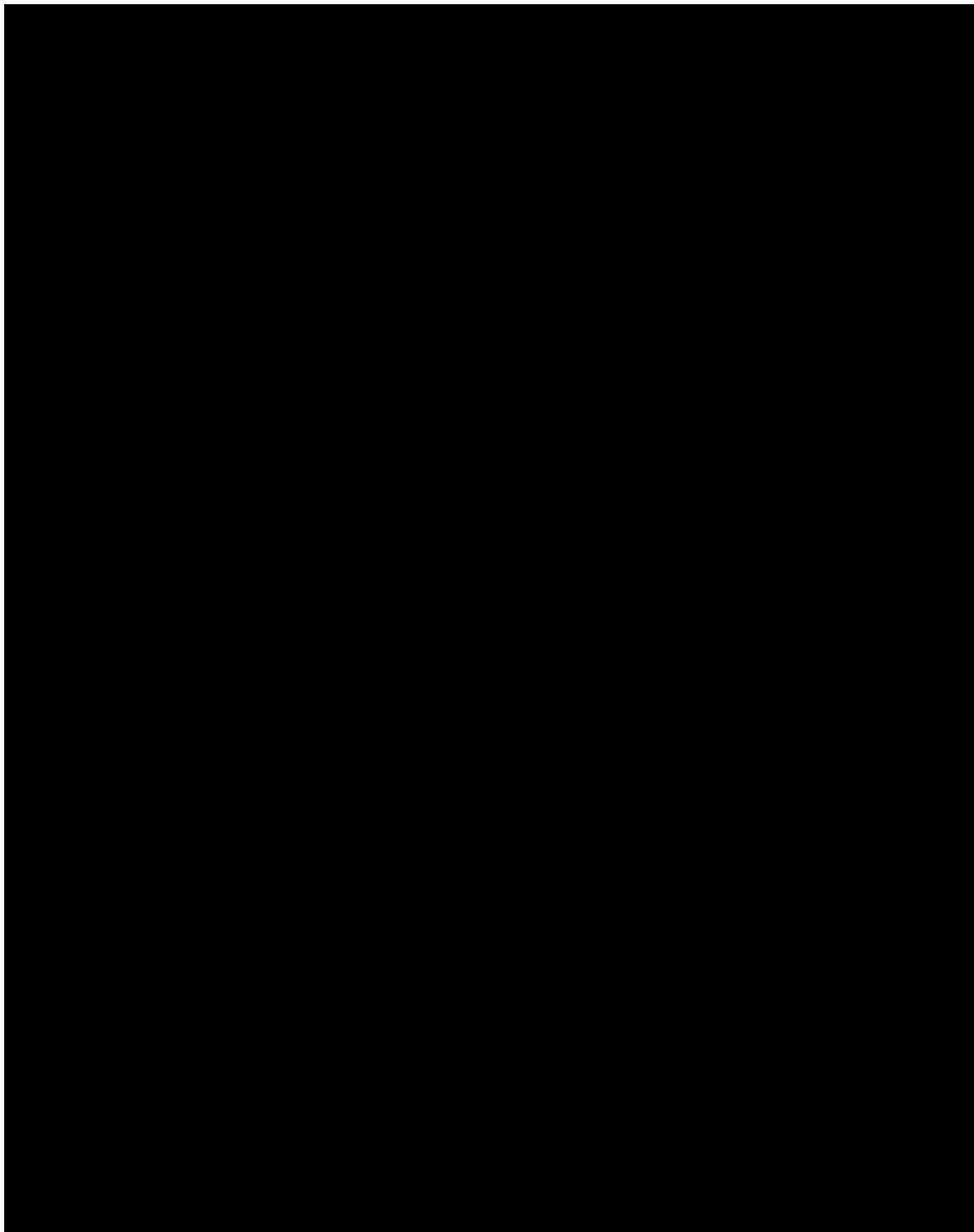
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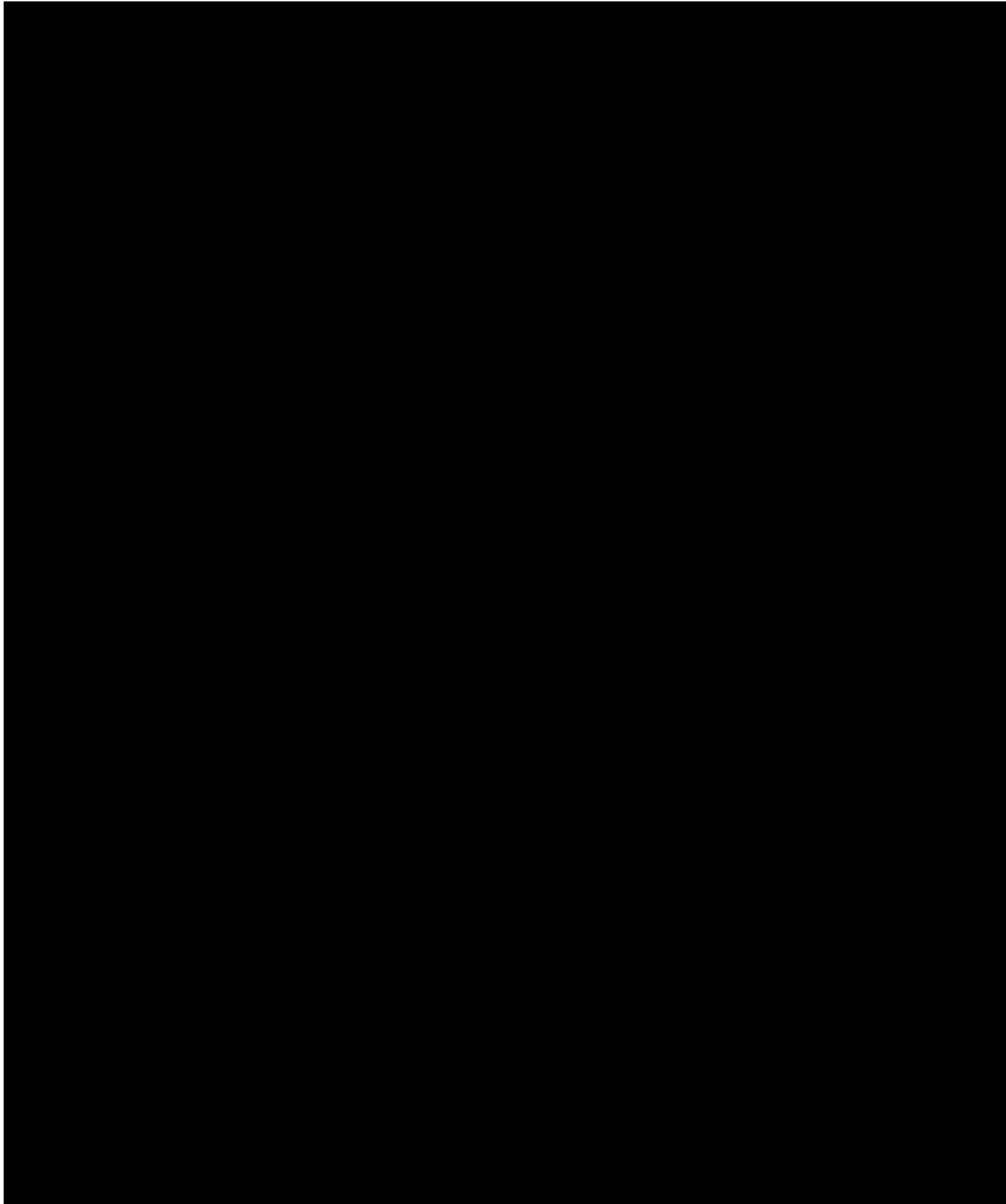
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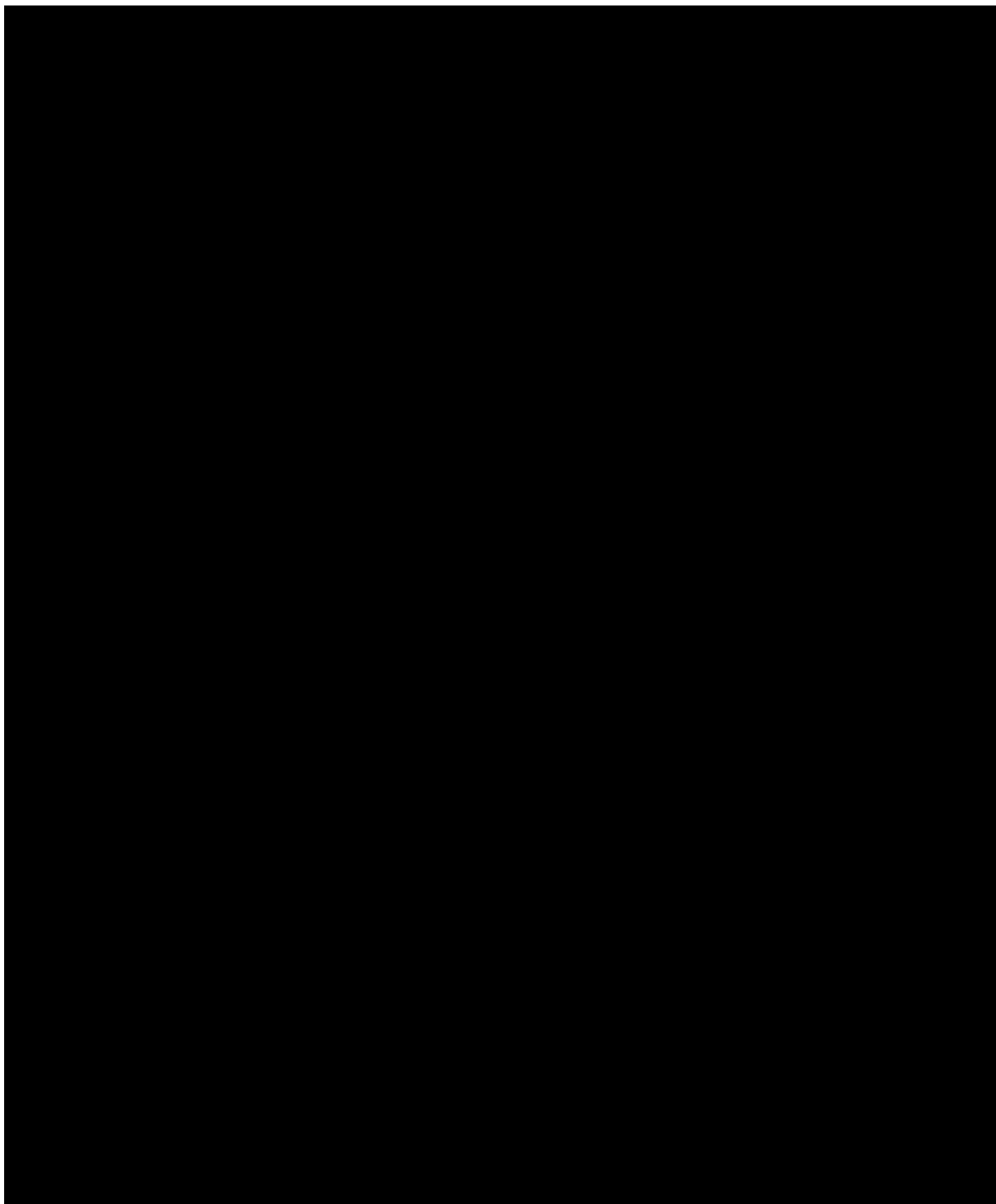
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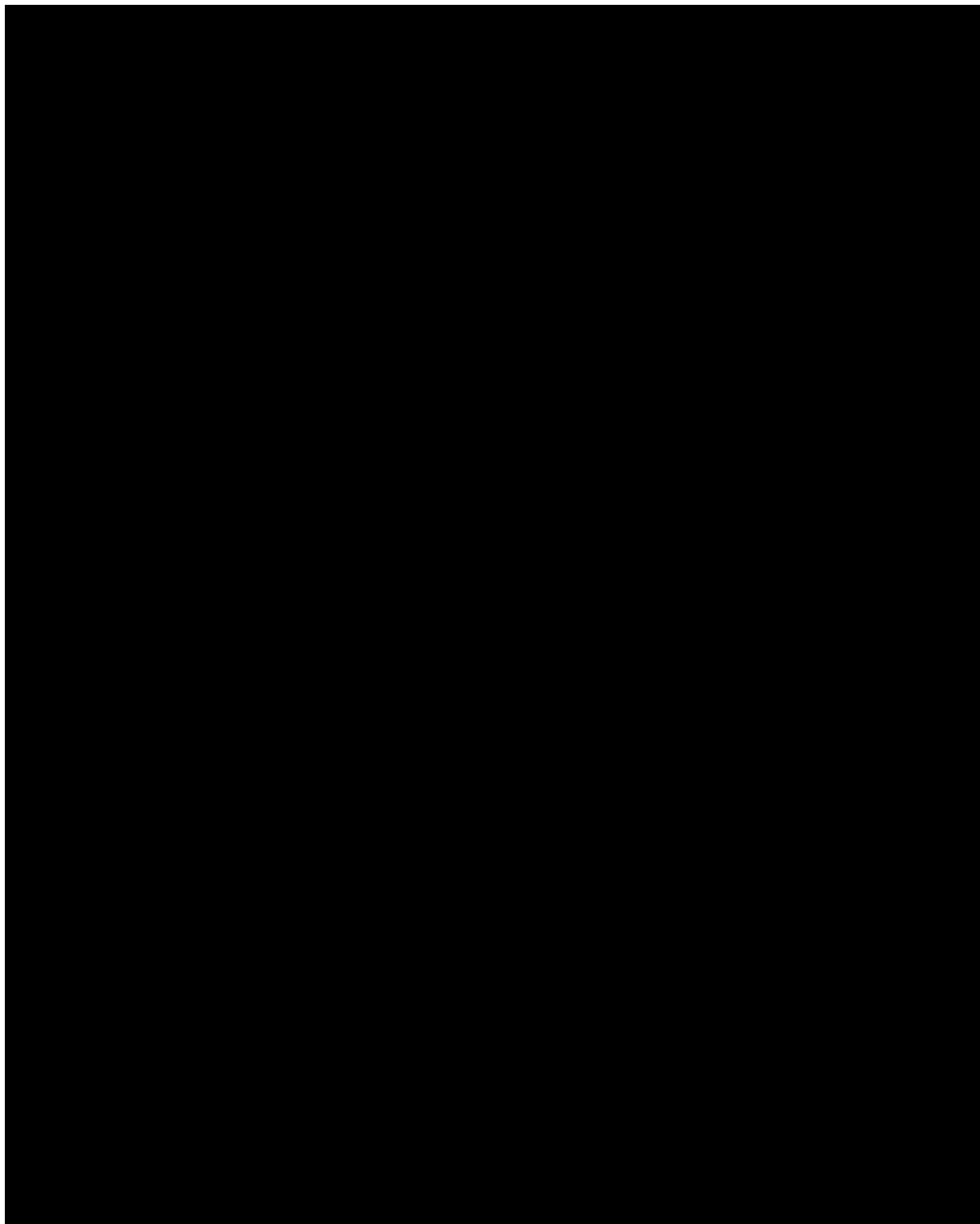


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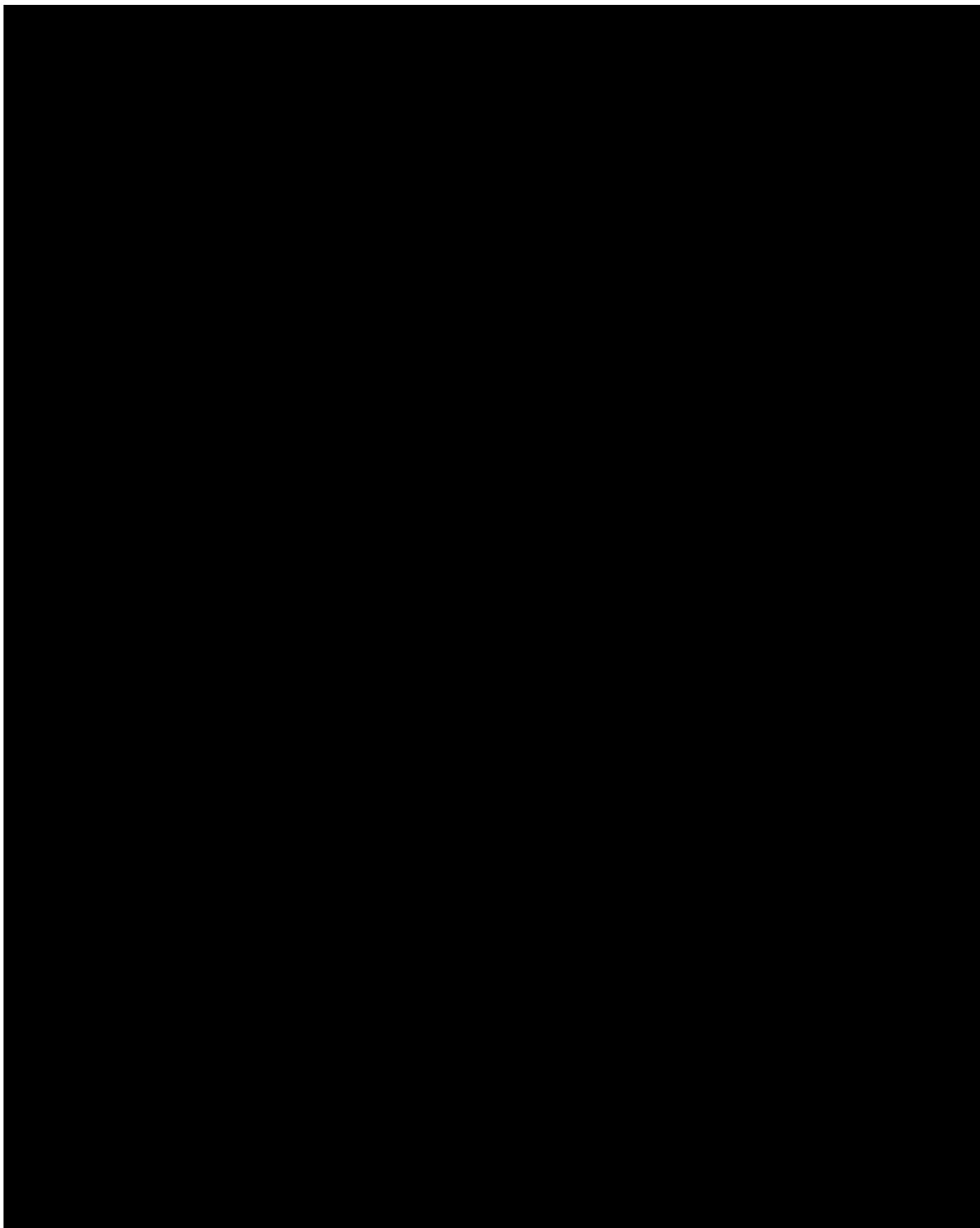
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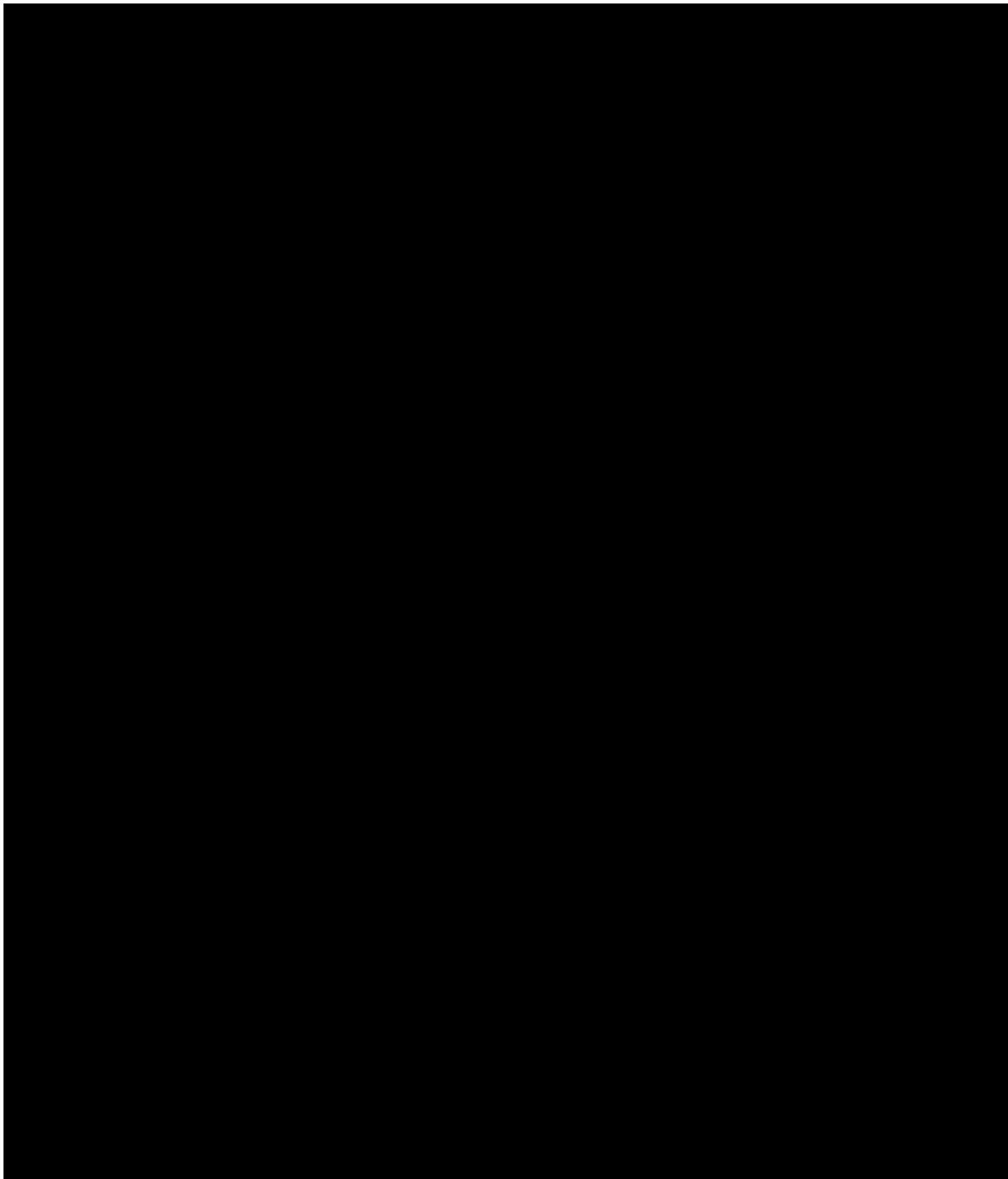
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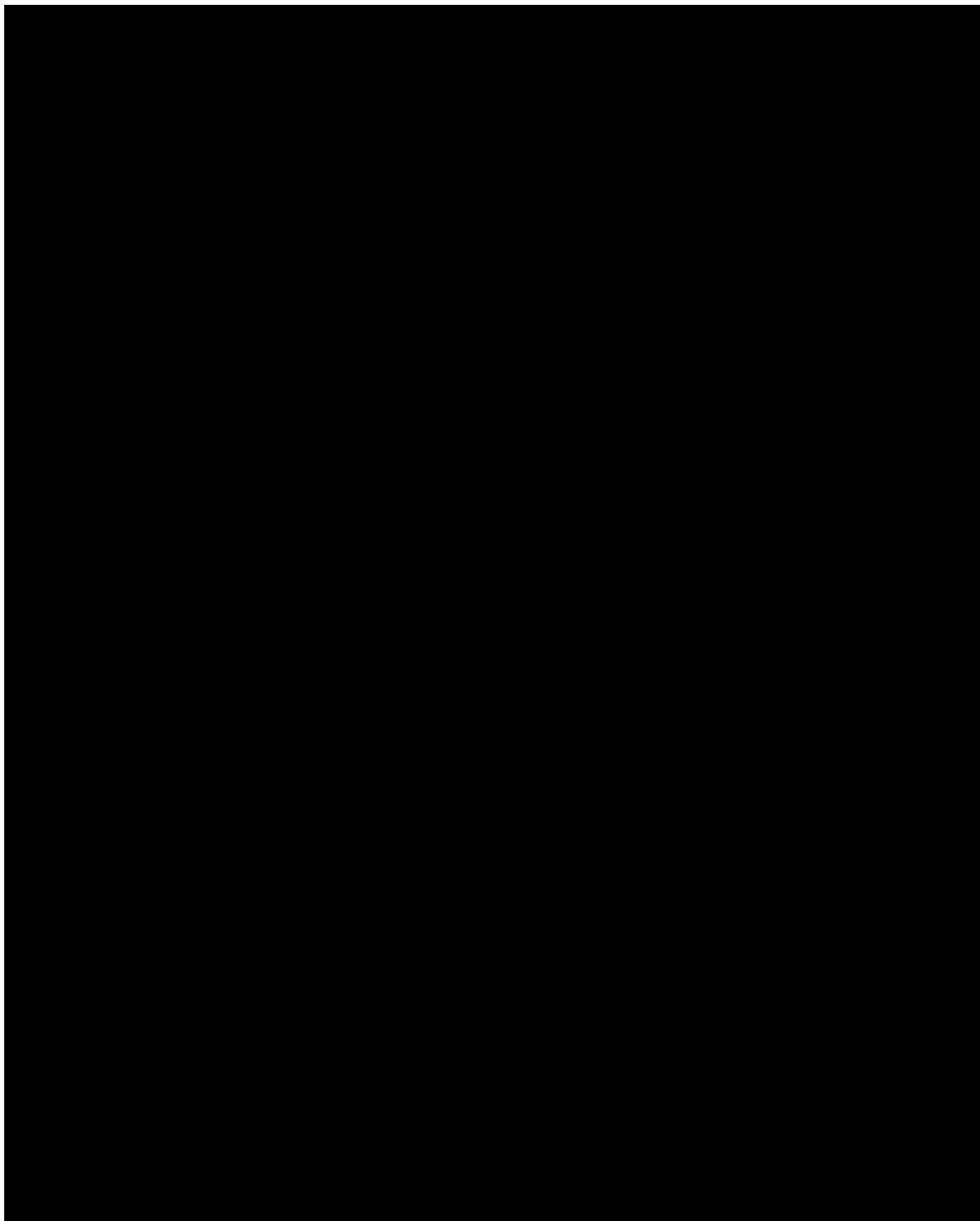
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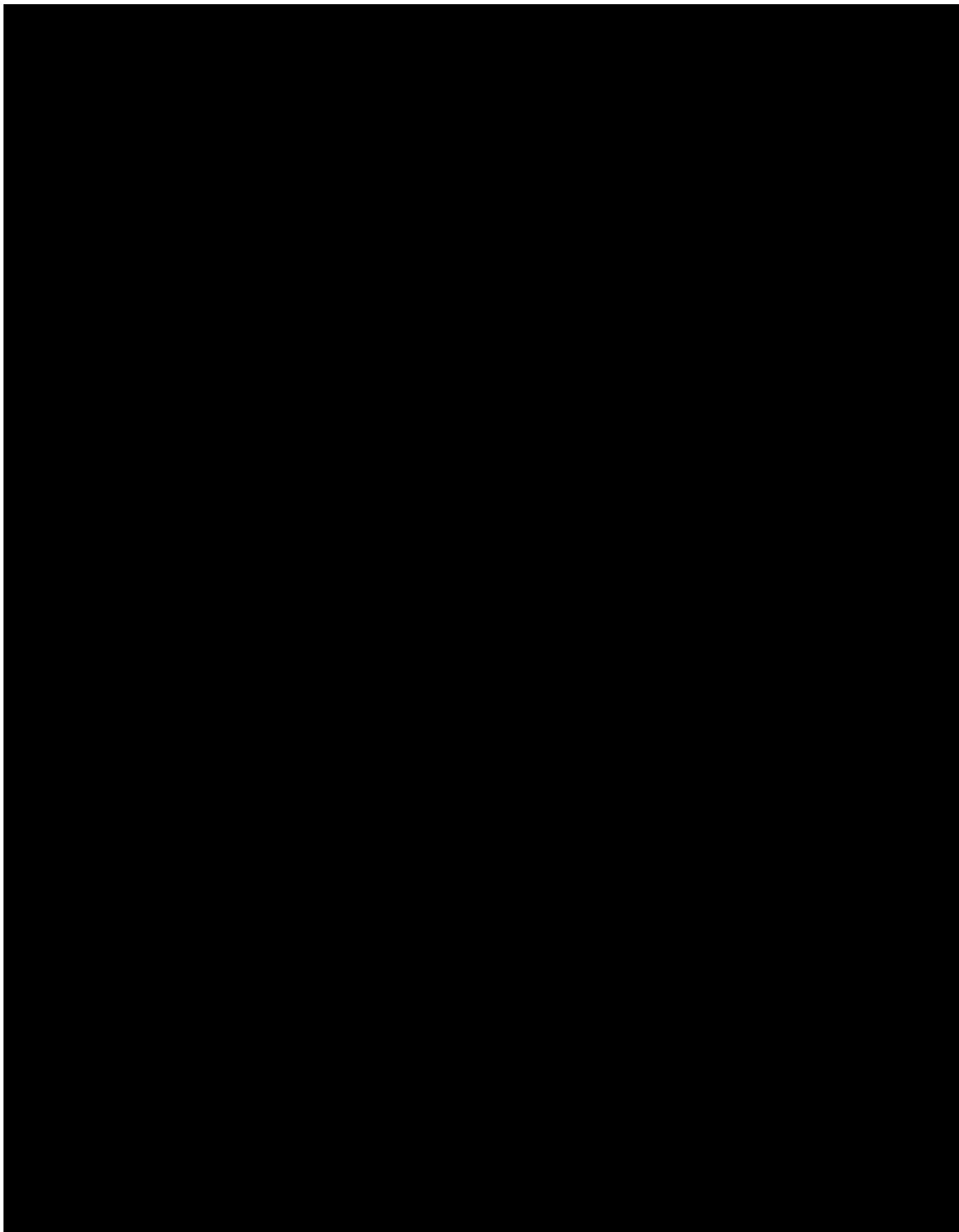
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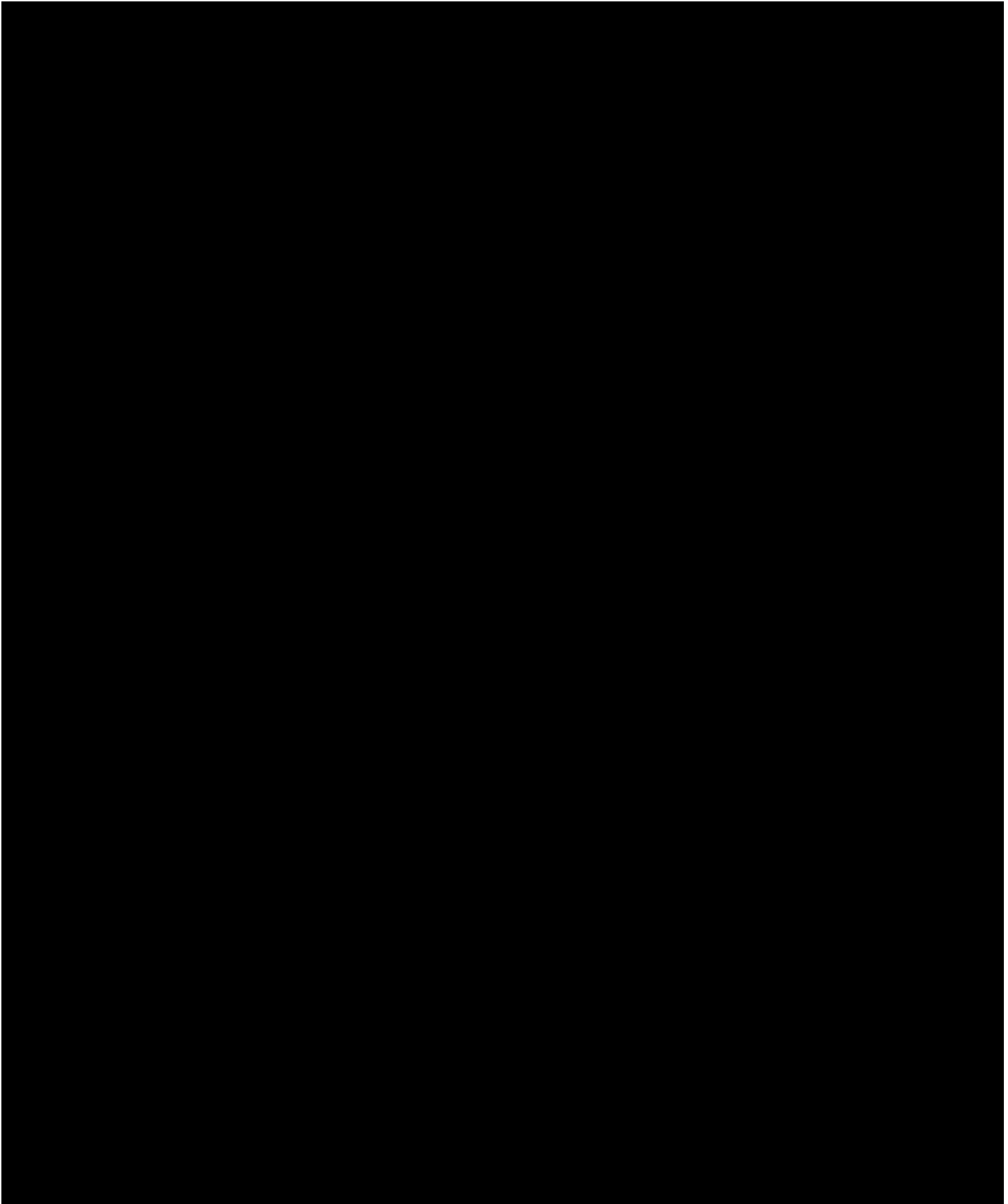


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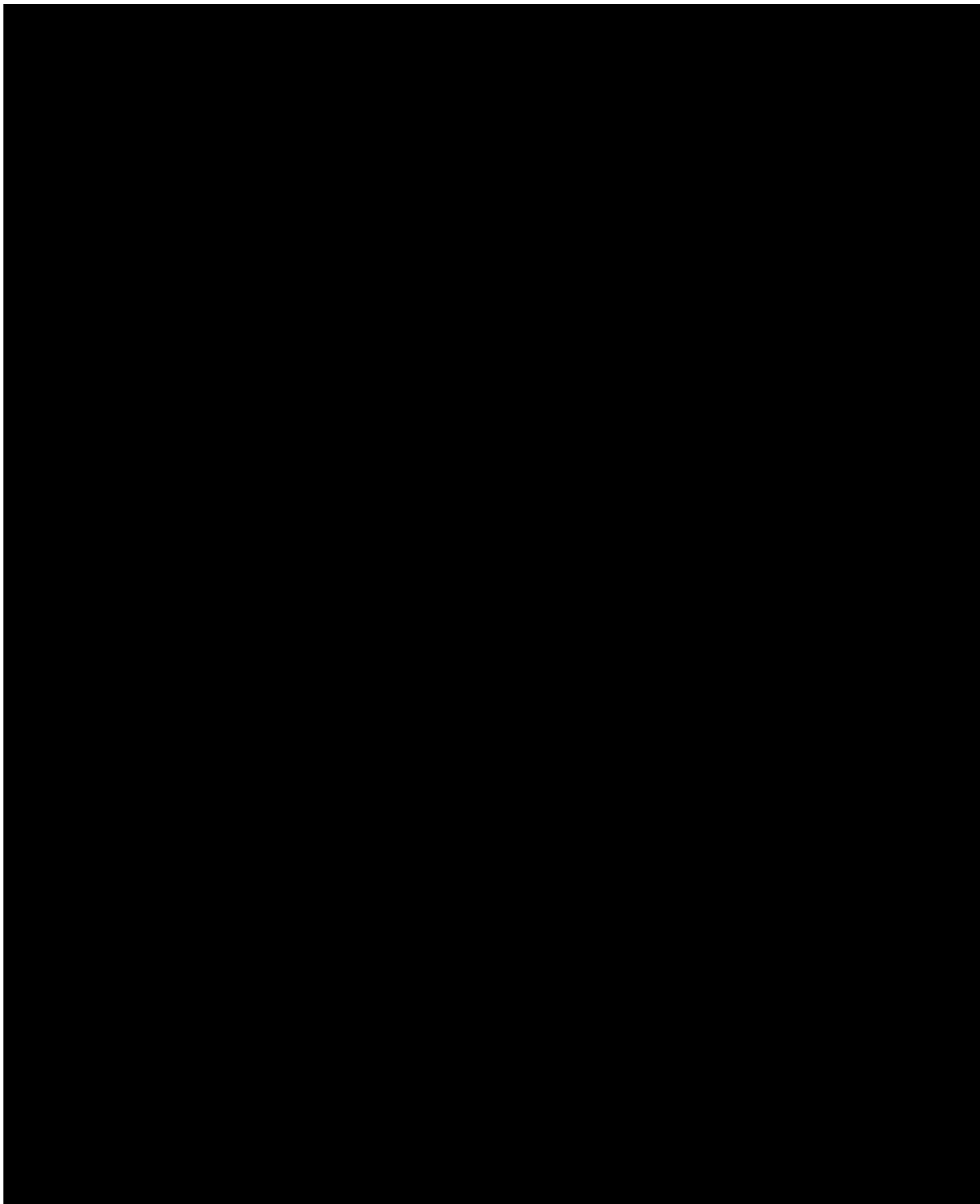


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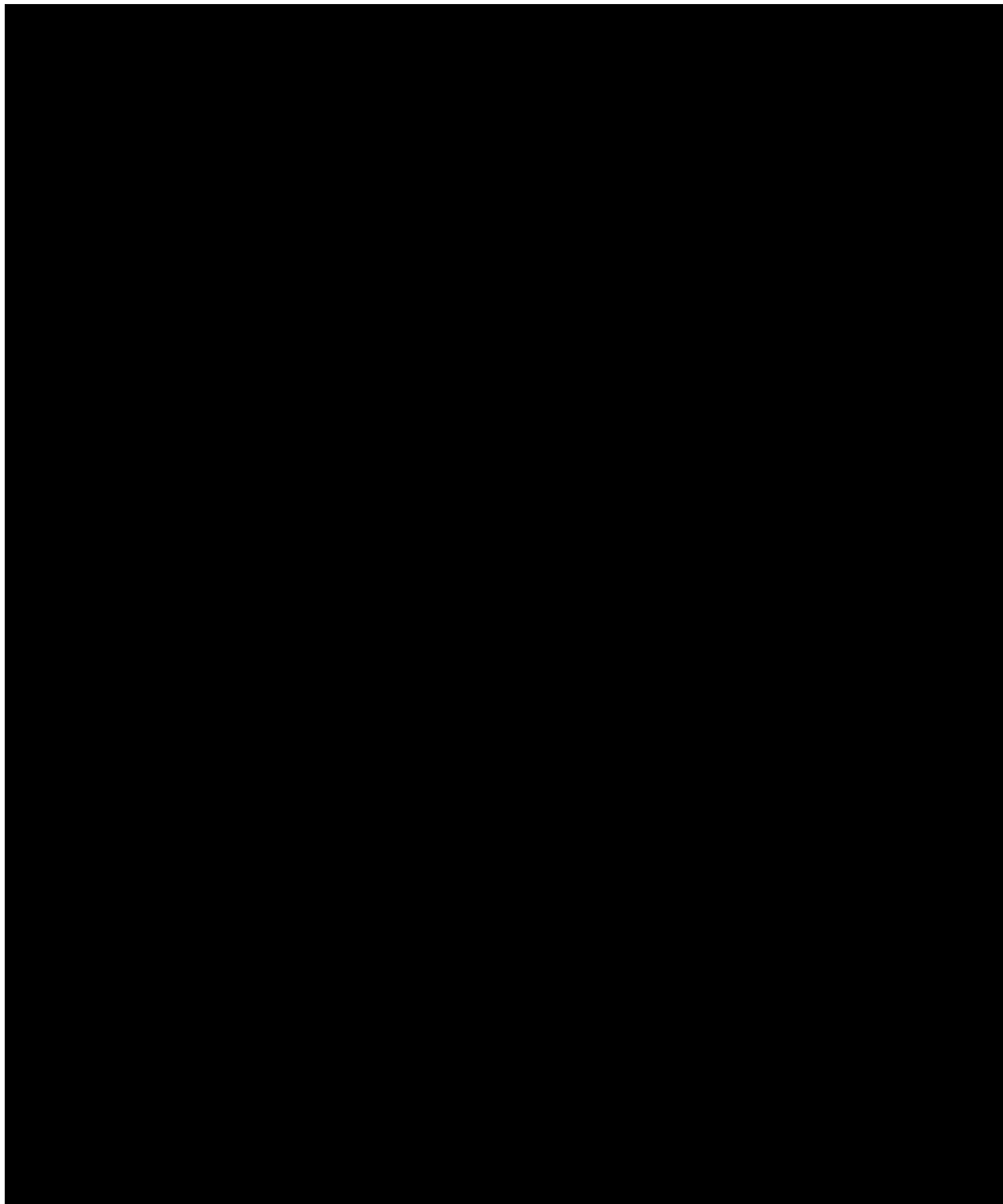
**6. RFA (E)(9) FINANCIAL STATEMENTS AND
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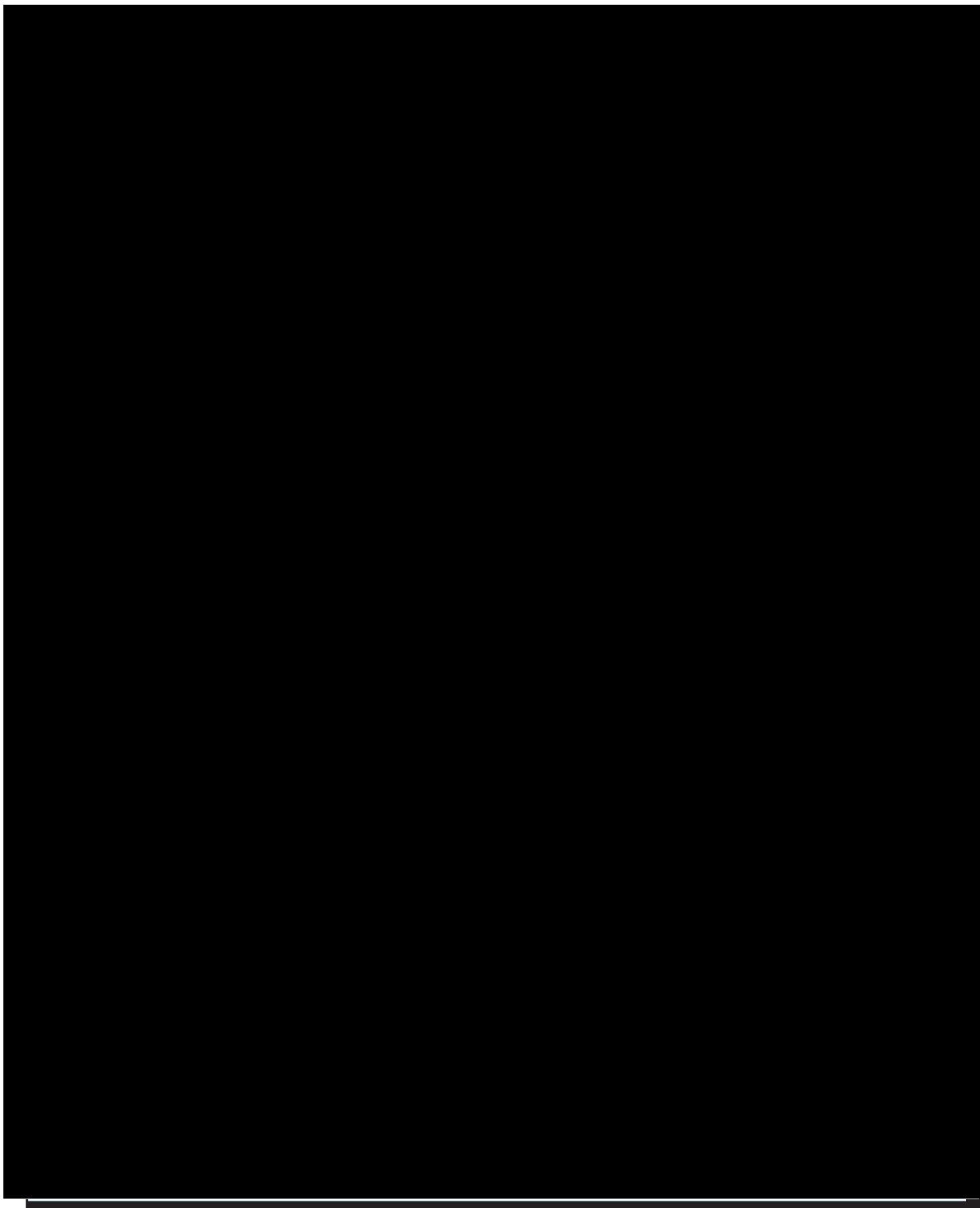
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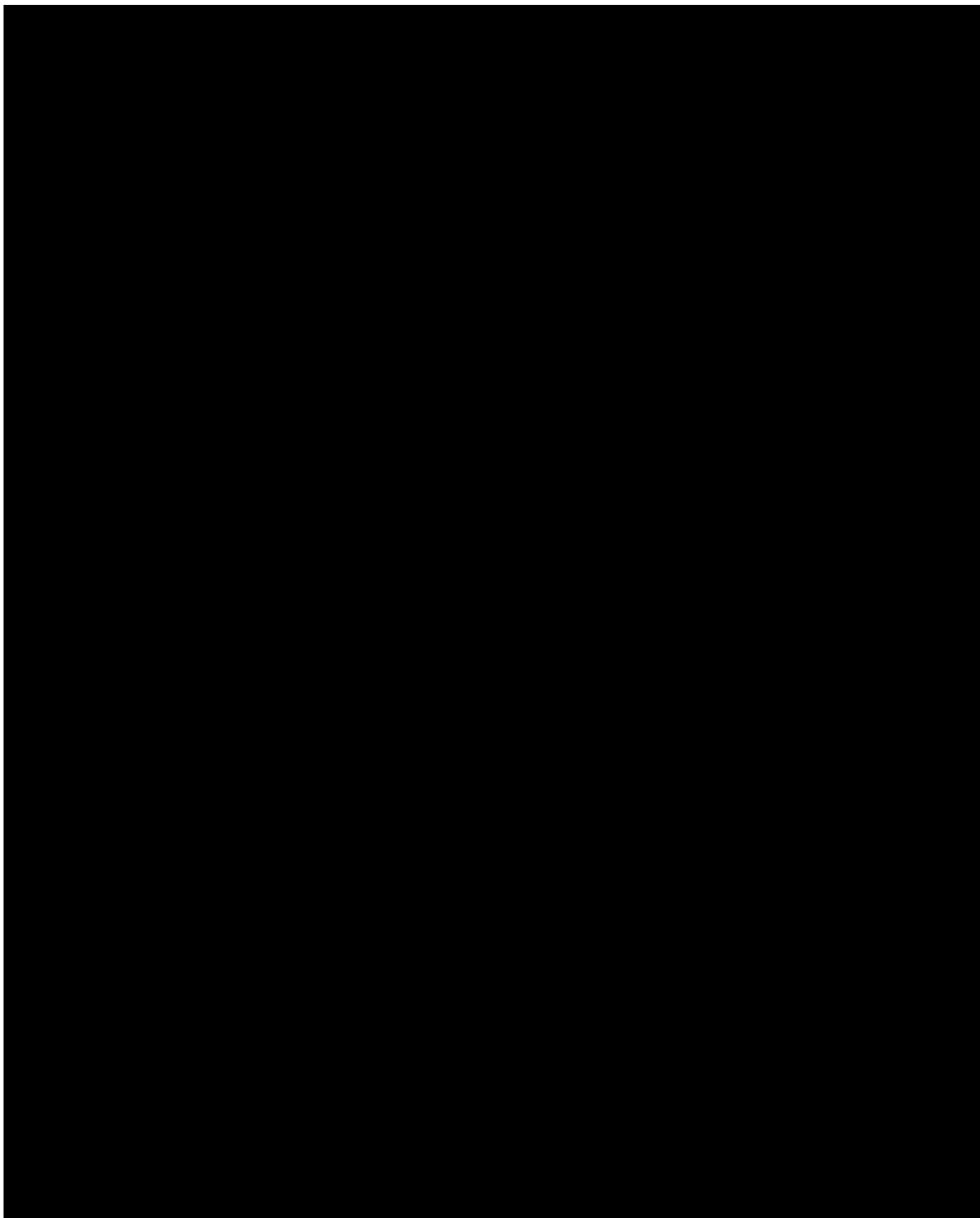
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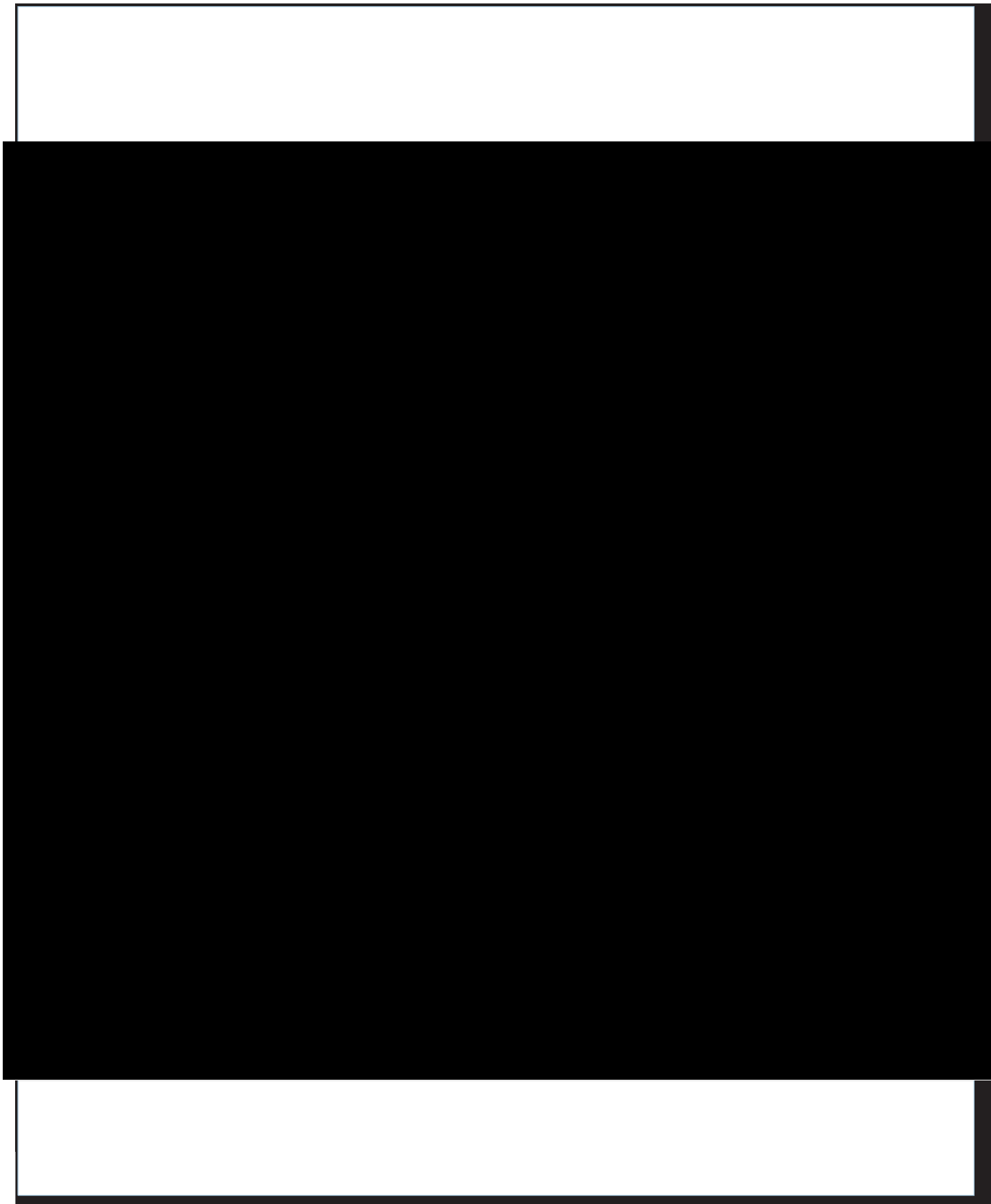


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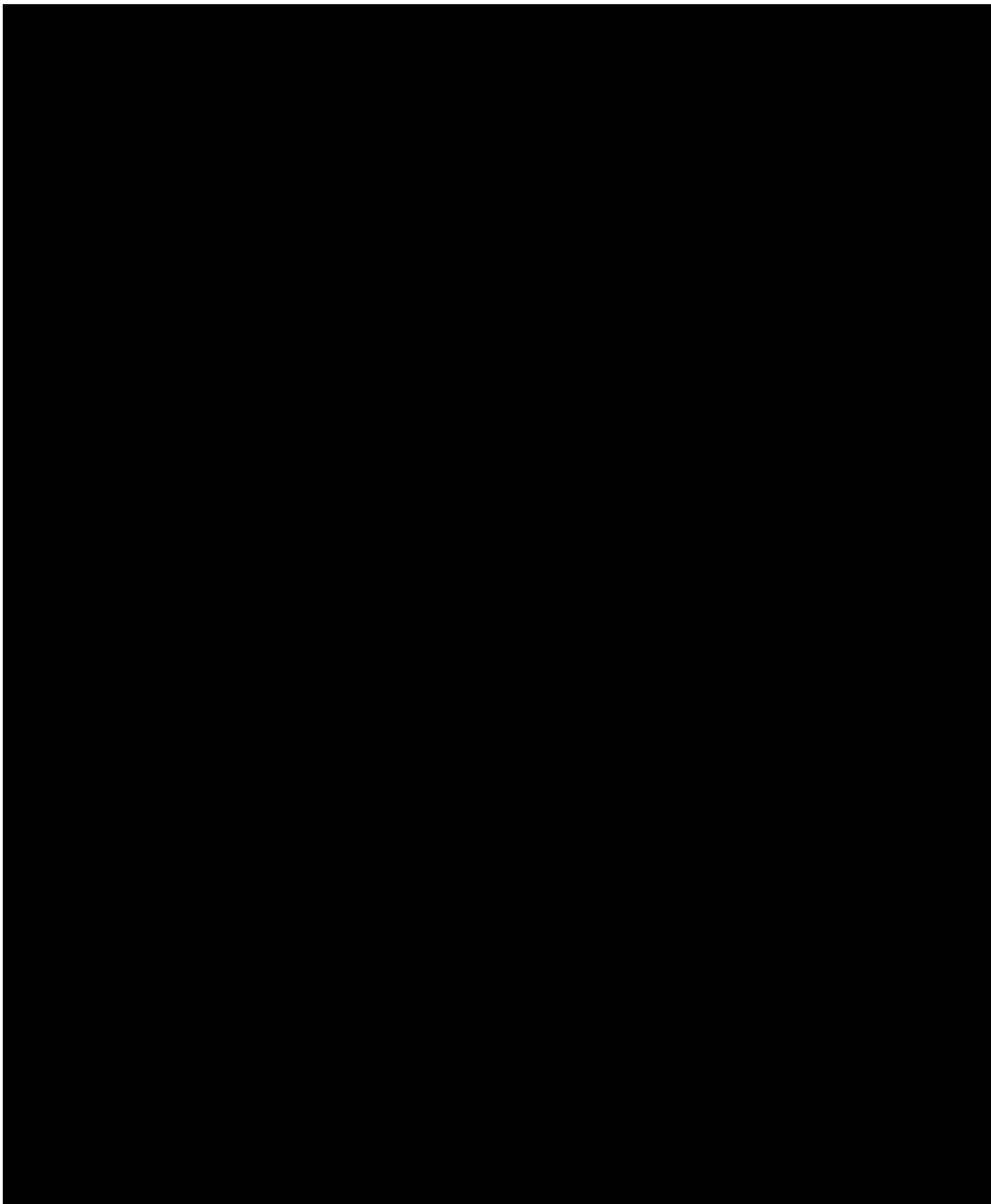


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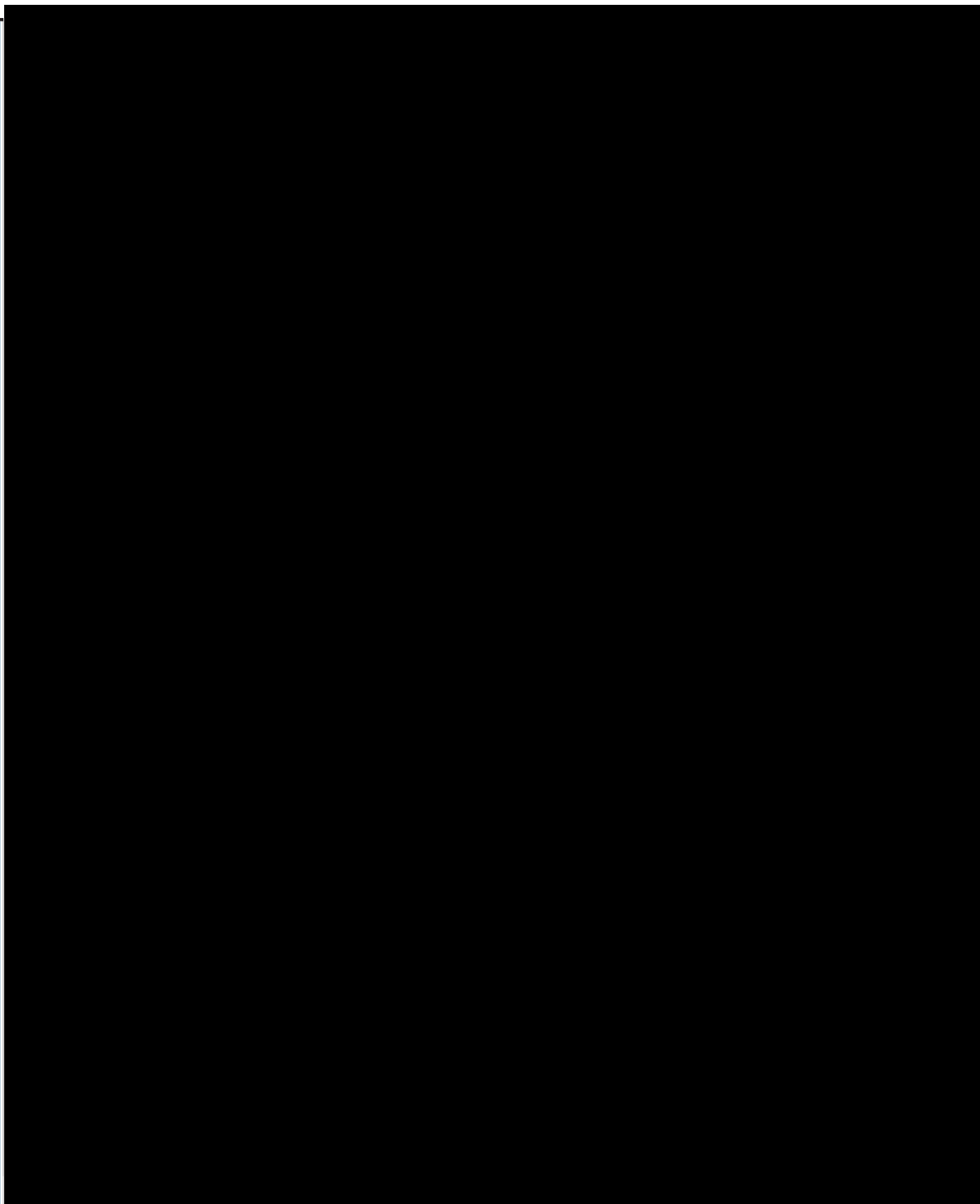
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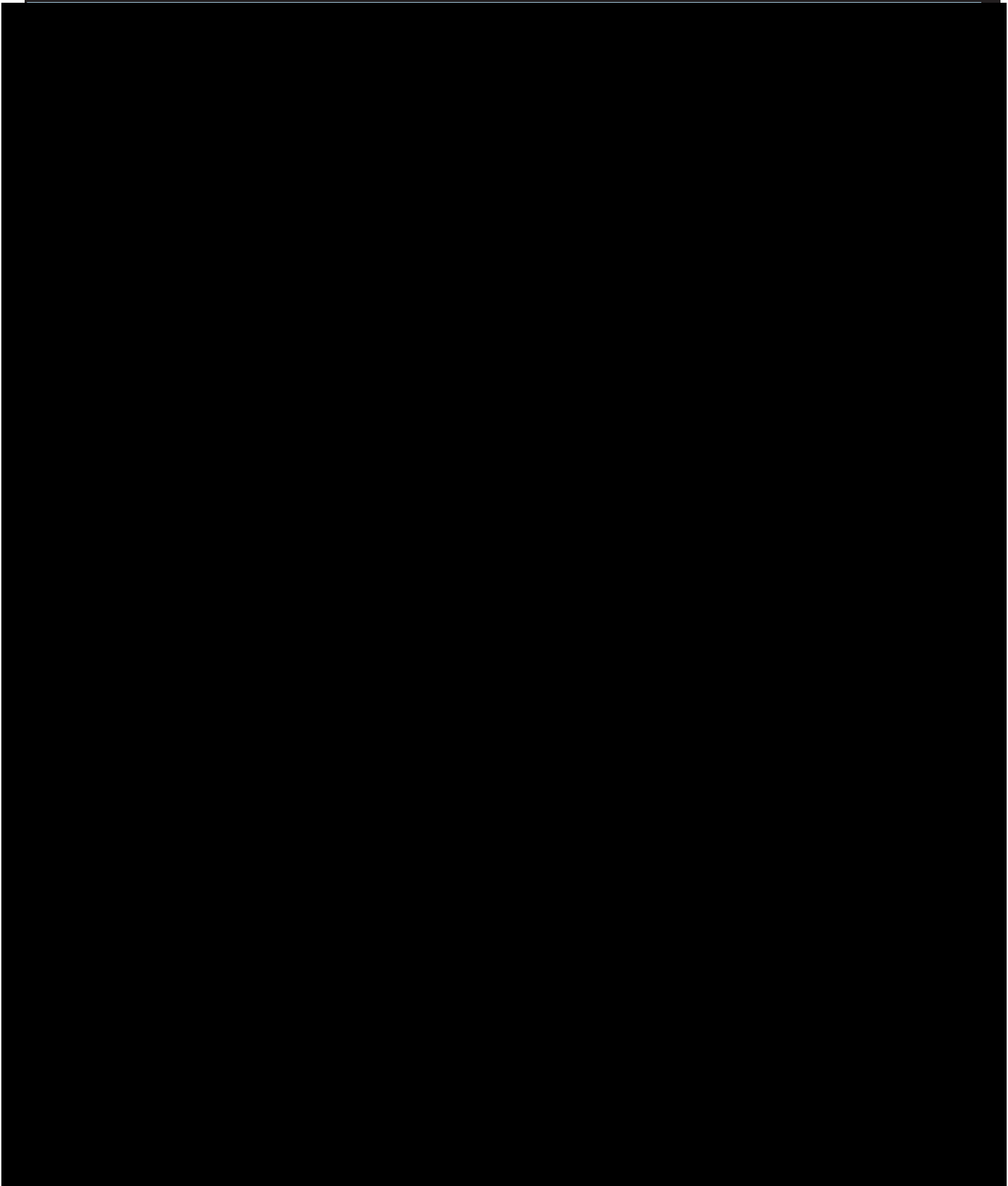


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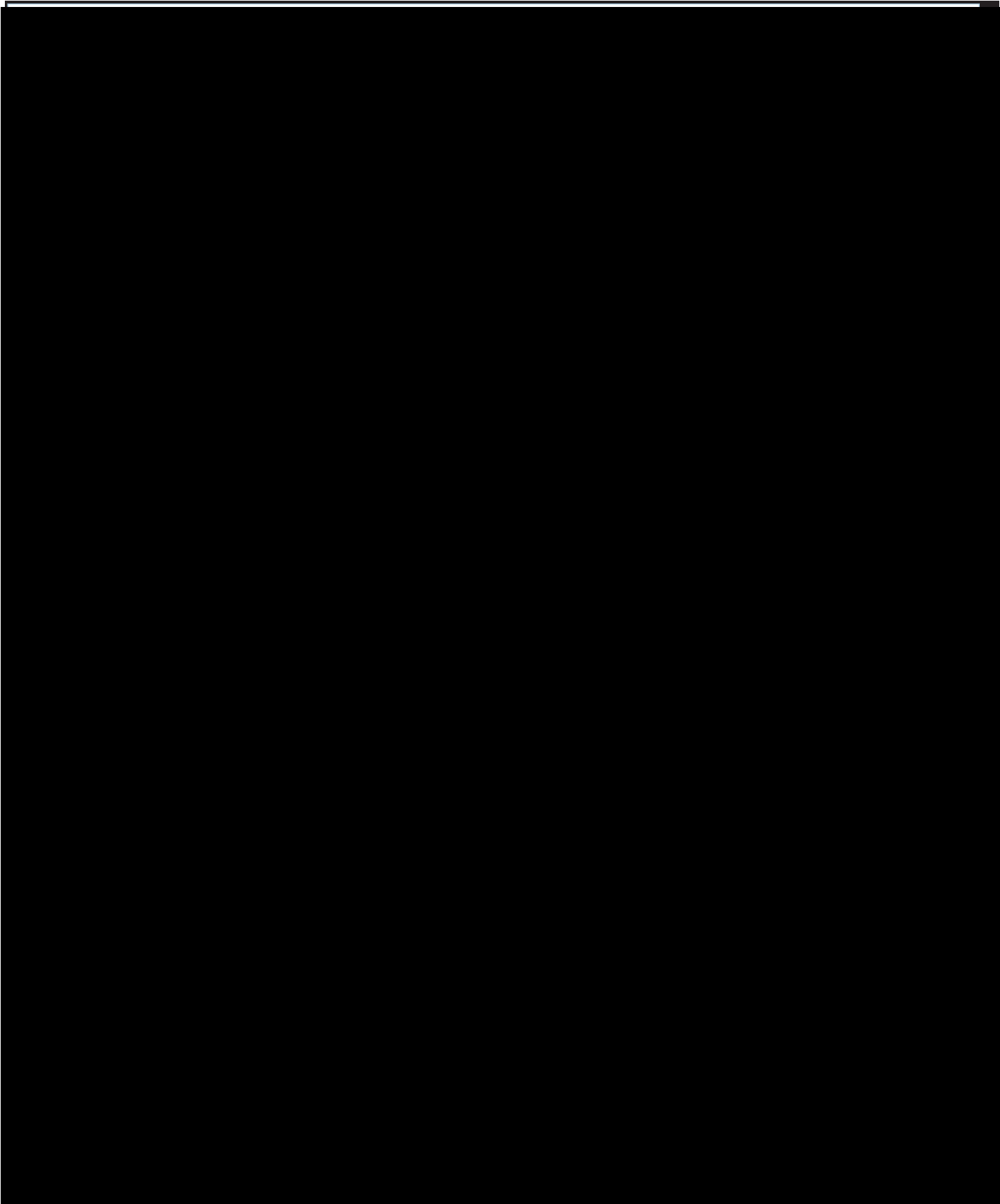


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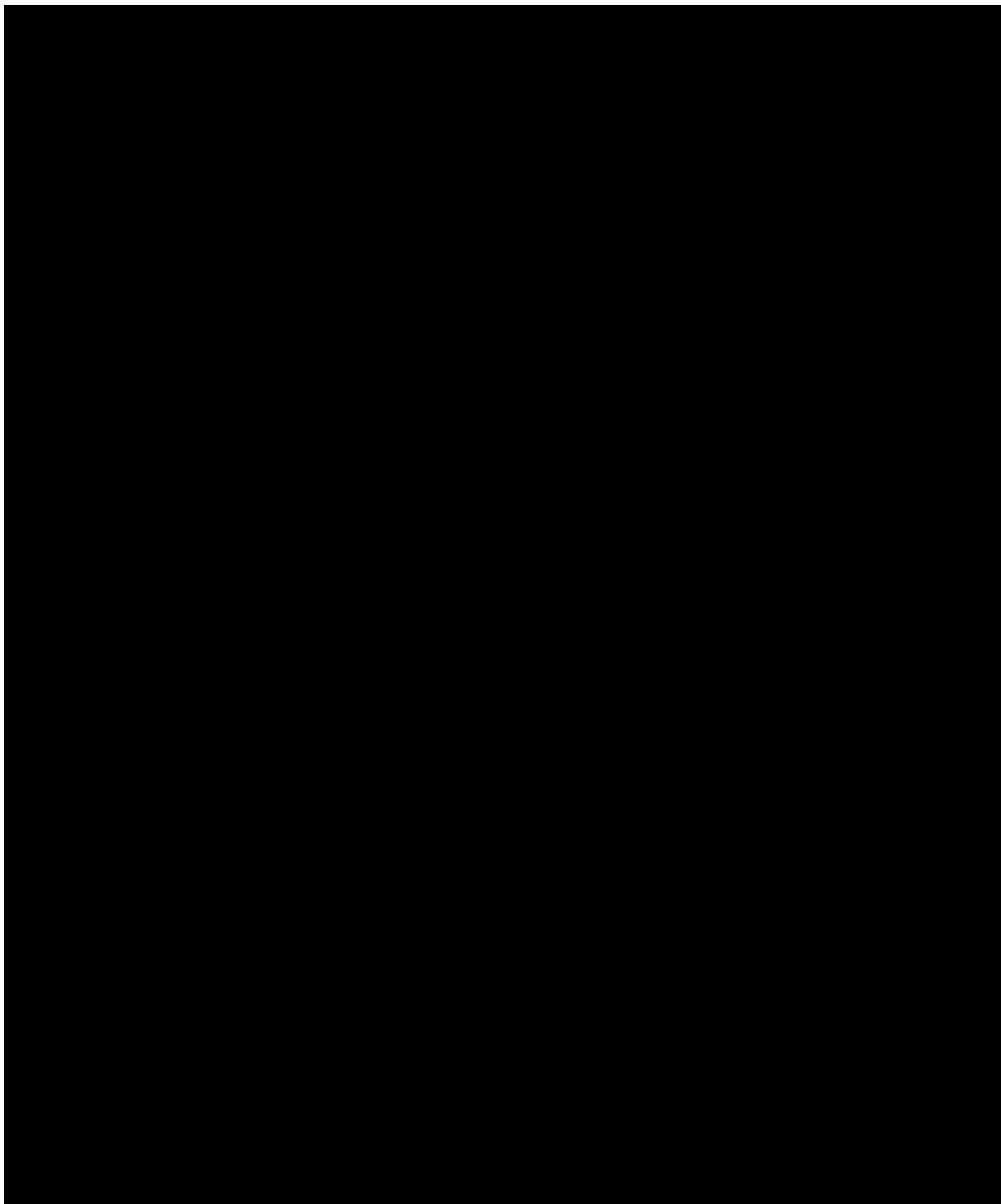
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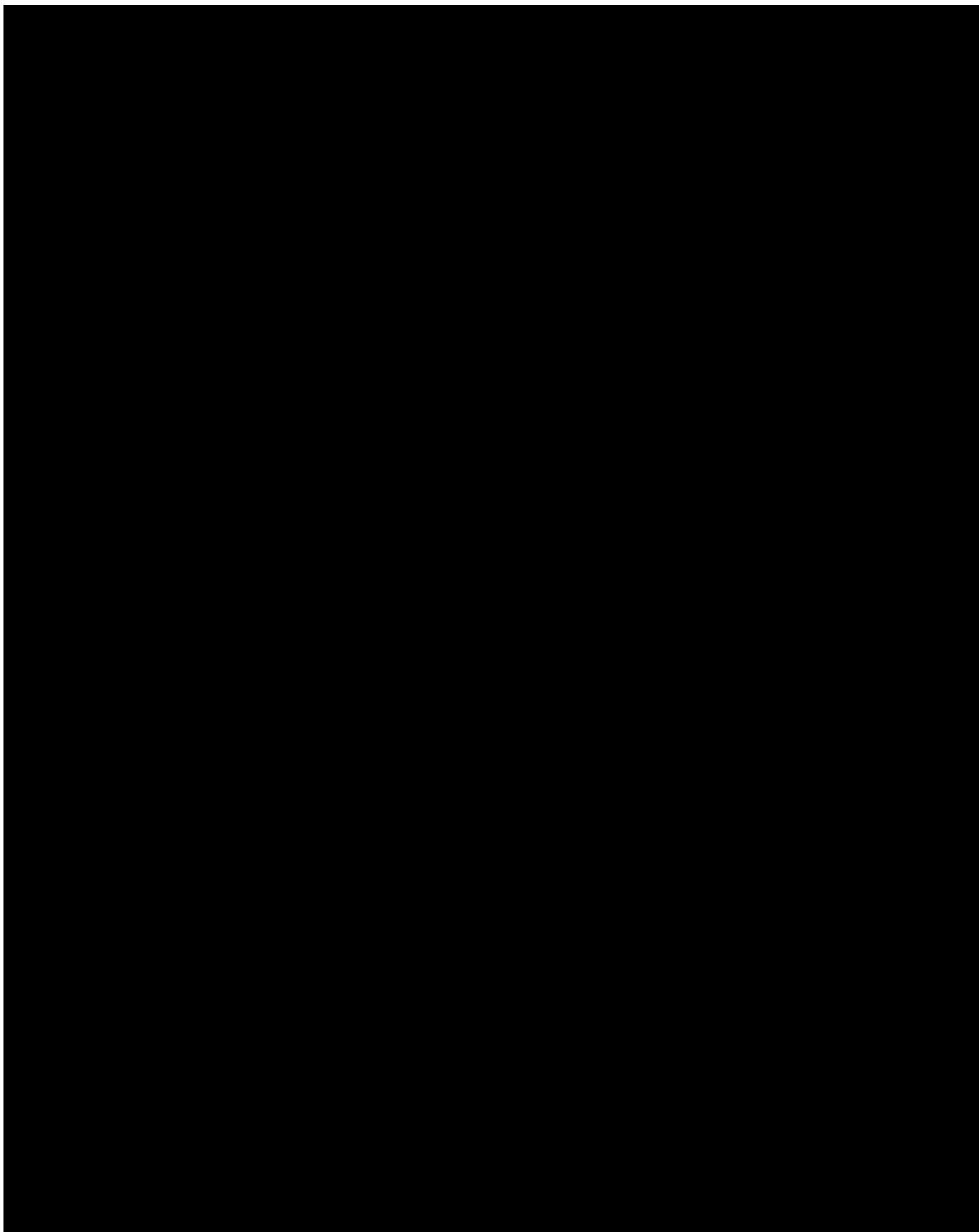
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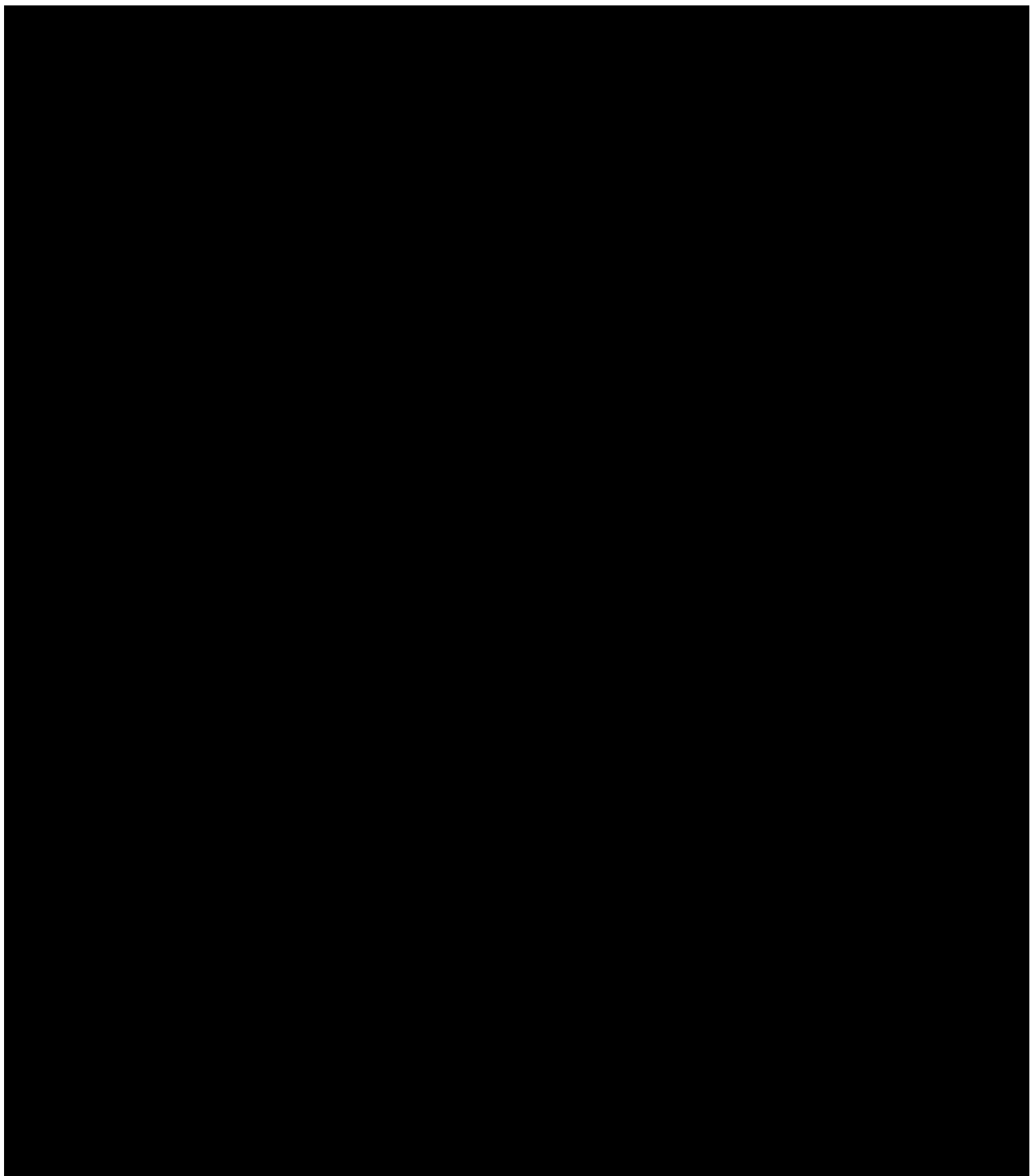
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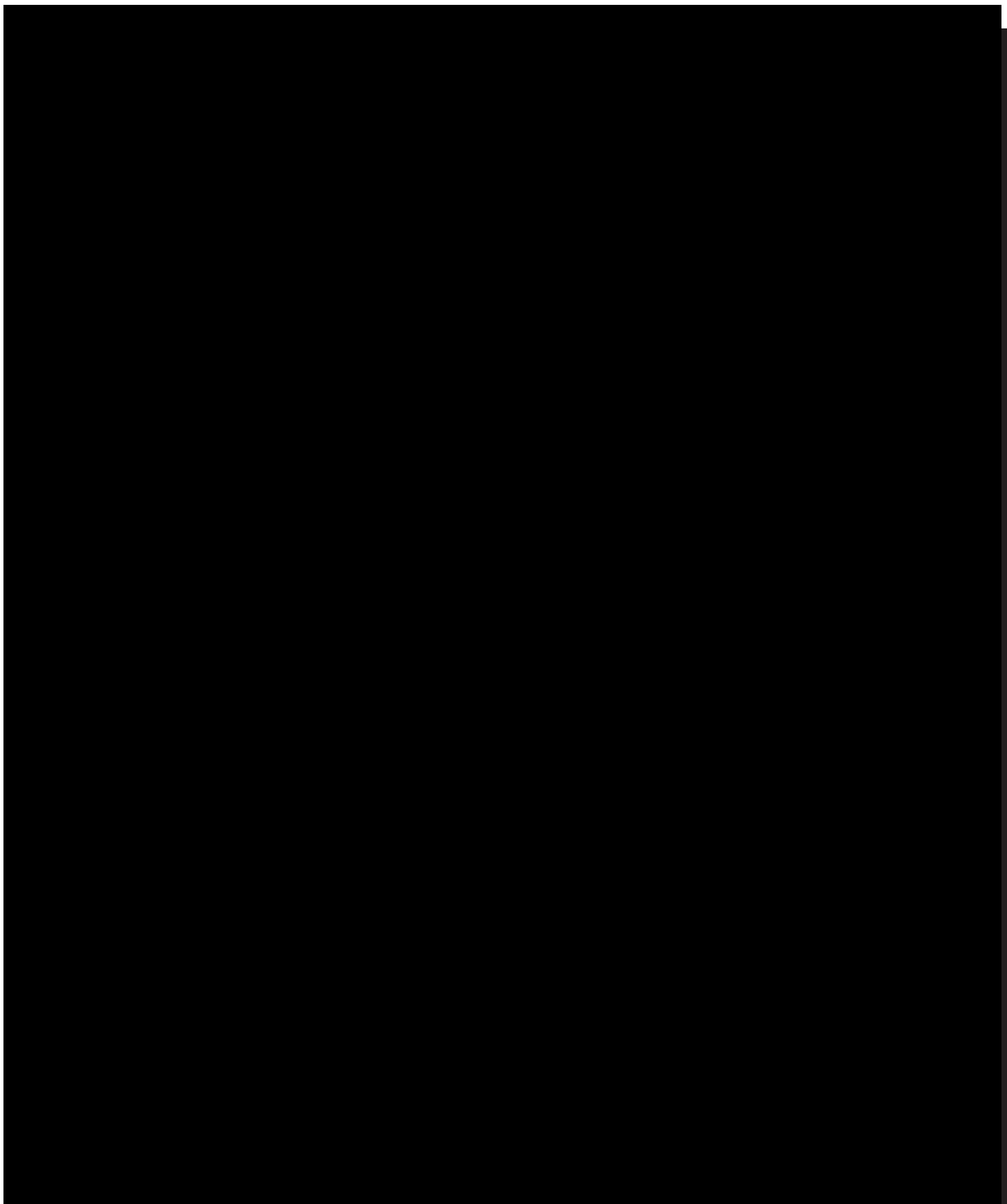
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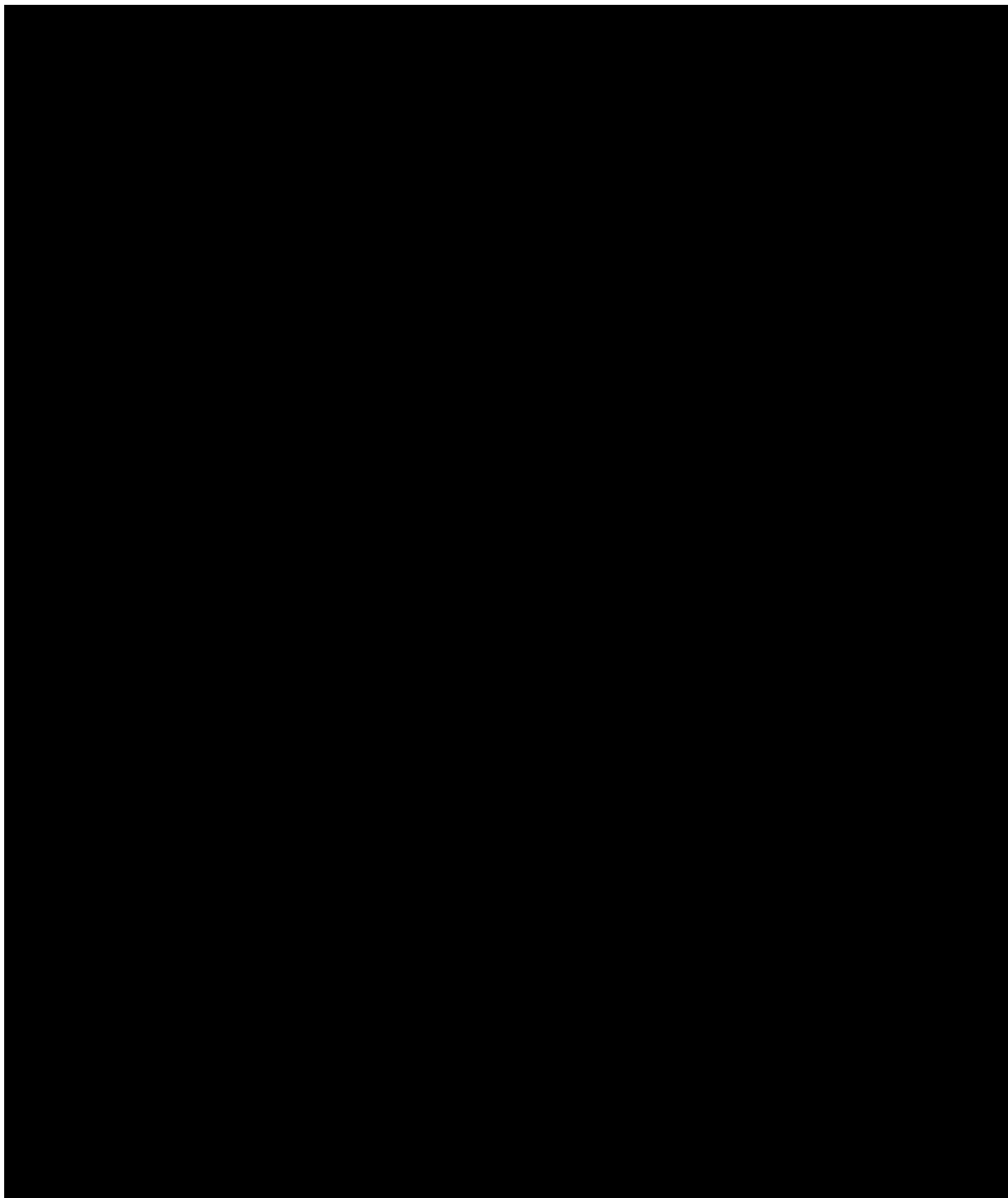
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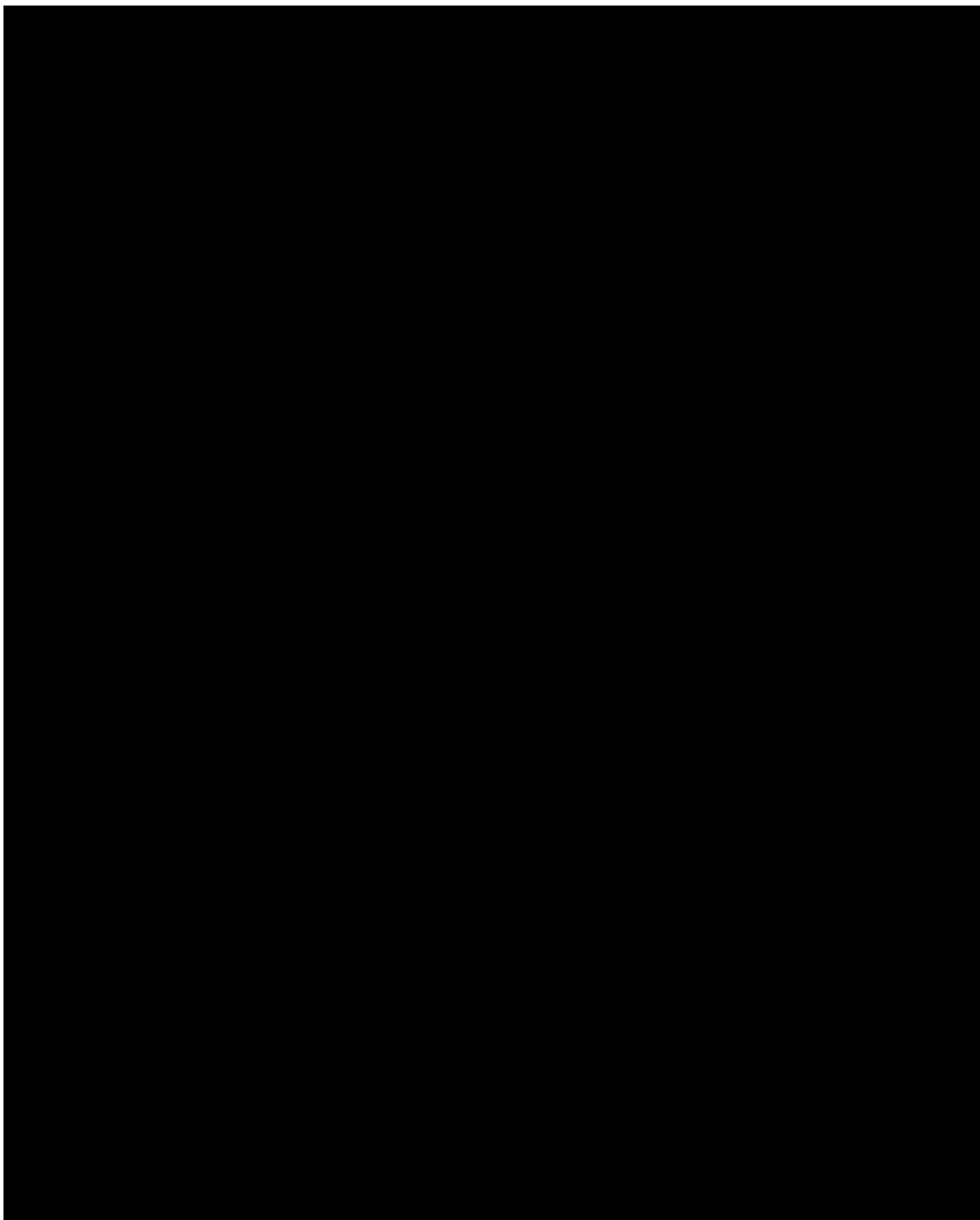
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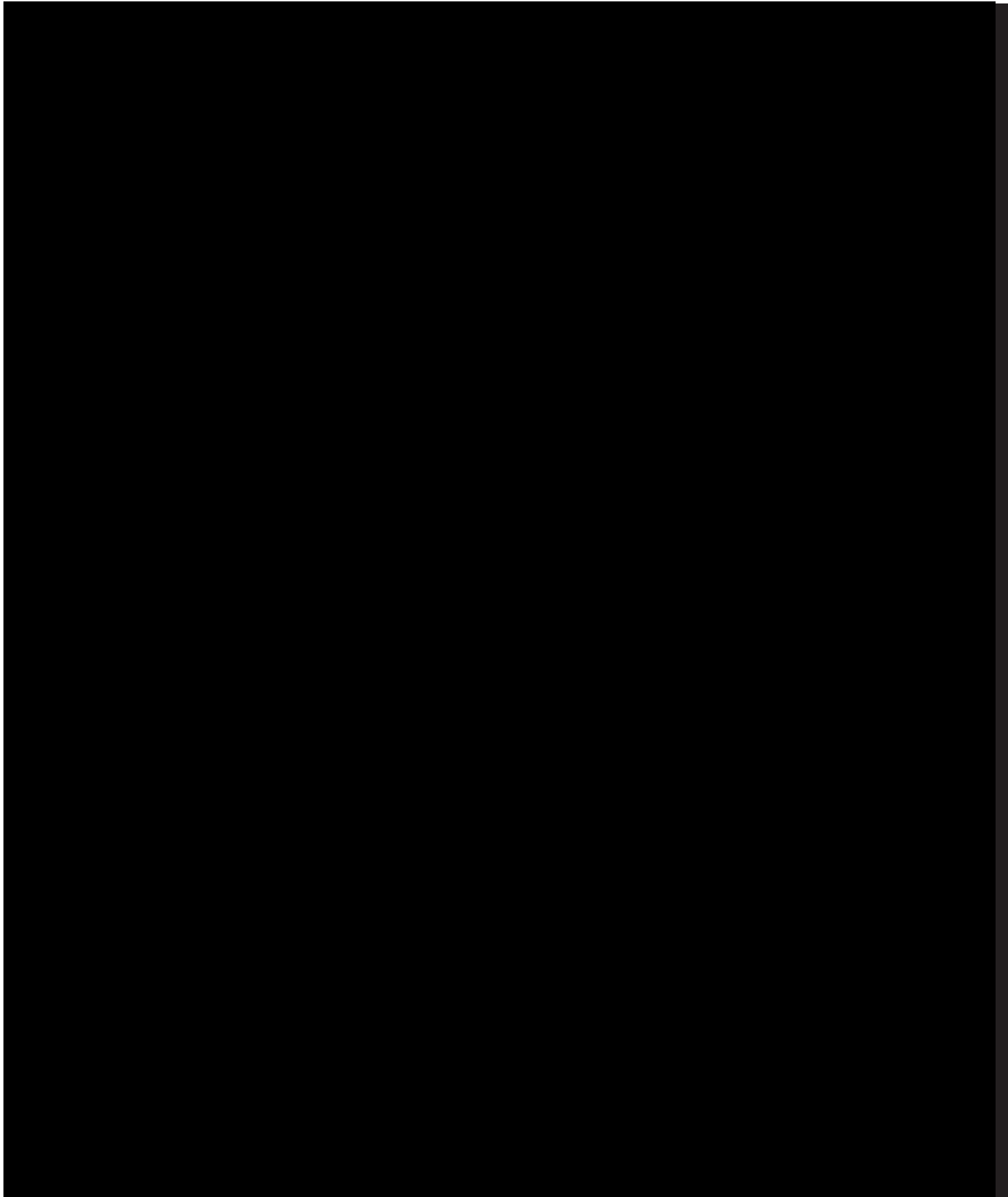
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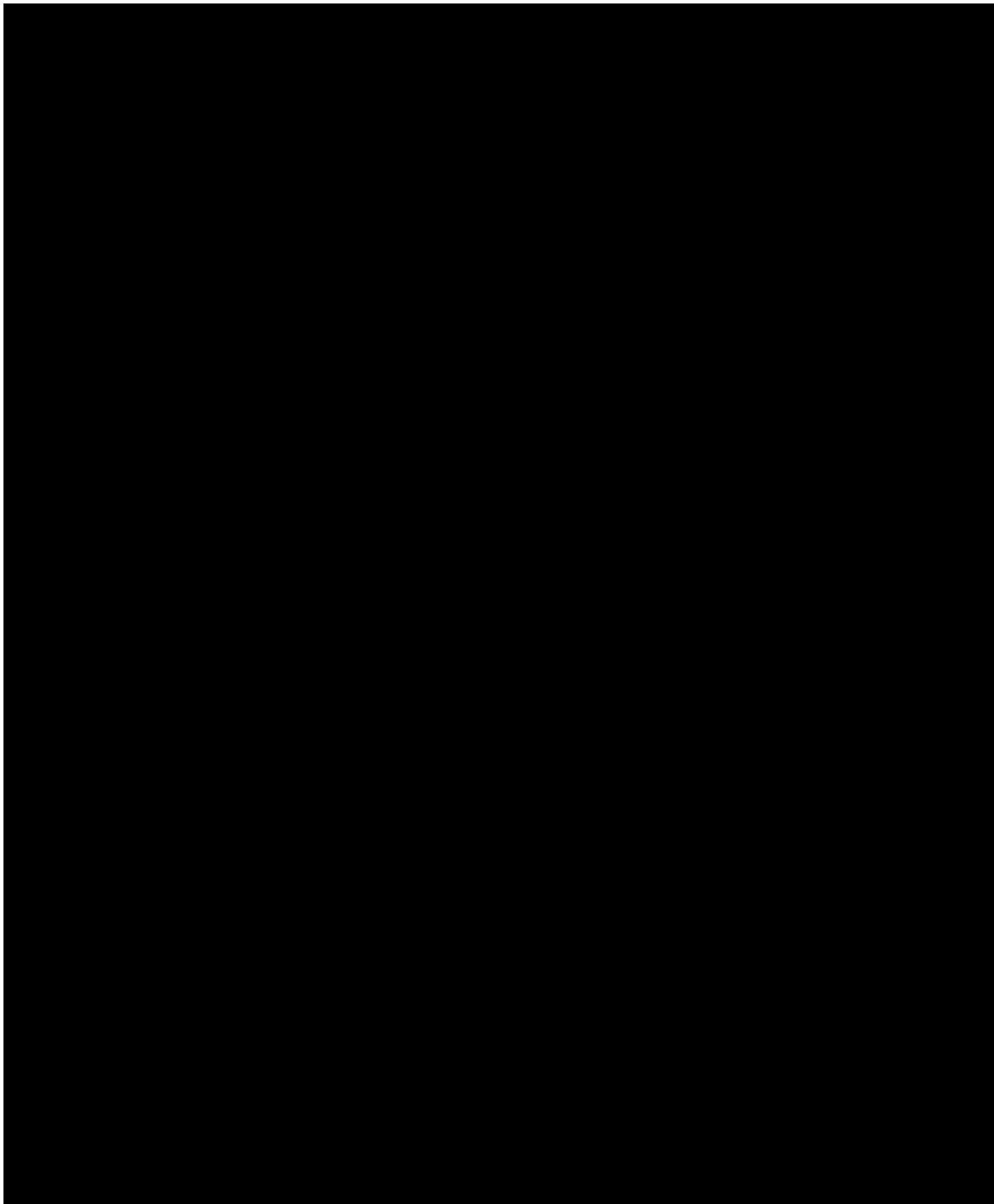
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