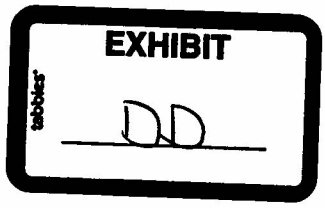

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April 23, 2013

Commissioner William M. Rubenstein
Department of Consumer Protection
Room 103
State Office Building
165 Capitol Avenue
Hartford, CT 06106

Re: Public Comments – Palliative Use of Medical Marijuana

Dear Commissioner Rubenstein:

Thank you for having the public in for comments on April 22, 2013, regarding Connecticut's approval of the use of medical marijuana. I enjoyed appearing before the commission and found the hearing informative and thought provoking.

It was interesting to me, that the majority of potential producers were all from out of state, namely Colorado. If memory serves, only one other potential applicant for a producer's license, besides me, was from Connecticut. Although I know you probably cannot, I hope that the commission will show some deference to Connecticut applicants rather than those from out of state.

It is obvious, that only those already in the medical marijuana business can say that they have successfully produced medical marijuana. This in of itself should not be the deciding factor in the issuance of producer licenses. Remember, that they too, when entering the medical marijuana field, started with nothing. The fact that they are able to produce in other states, is no reason to exclude those who are not presently in the business of producing medical marijuana from being licensed in the State of Connecticut.

My group, Hanlee Pharmaceuticals, LLC, will be an applicant for a producer's as well as a dispensary license, and therefore we felt it necessary to comment upon the recently promulgated rules and regulations. I have enclosed ten (10) copies of my written comments to the Rules and Regulations for your review. Although the DCP has drafted an excellent set of rules, there are some issues which I feel must be brought to DCP's attention.

As you may remember from the hearing, I was quite disappointed that DCP has not set aside any monies for the study of this medicine. Because we feel that the study of this medicine is germane to the medicine's usage by patients, Hanlee will be making its production facility available to a biomedical research company for the study of medical marijuana. We have already received their request and specifications for building laboratories within the facility. It is my hope that the DCP

will allow this activity, within a producer facility, as it will require the DCP to change its regulations to allow for "diversion" of medical marijuana to the research facility.

Additionally, Hanlee Productions, a subsidiary of Hanlee Pharmaceuticals, will be staging Connecticut's First Medical Marijuana Conference and Trade Show in October or November to educate the medical profession and potential patients about the benefits and potential side effects of the use of medical marijuana. These medical conferences will of no cost to the attendees, as the cost will be underwritten by the concurrent trade show. As there are no current educational offerings to teach medical personnel and potential patients about medical marijuana, we hope to be the providers of such information. There seems to be a tremendous need for it within the State of Connecticut.

Thank you again for your time spent at the public hearing and in advance for spending more time reviewing this set of written comments. In the event that you have any questions or feel the need for any further information, please do not hesitate to contact me at any time.

Sincerely yours,

Douglas Breakstone
Hanlee Pharmaceuticals, LLC
Enclosures

Submission of Response to State of Connecticut Department of consumer Protection's Regulations concerning The Palliative Use of Marijuana.

1. Receipt of applications, for producer and dispensary licenses, by the DCP, should be allowed no fewer than 60 days following the promulgation of the final regulations after public hearing by the DCP and the approval of the rules and regulations by the attorney general, the legislature and the governor.
2. The following should be added as allowable activities under the regulations:
    a. Sharing seeds, clones and plants among licensed producers.
    b. Growing and sharing medical marijuana plants, seeds, clones, and medicine with laboratories and research facilities for research and development into the medicine.
    c. Producers should be allowed to delivery samples of medicine to testing laboratories, rather than having to wait for the samples to be picked up.
3. The DCP should set up a program to research and study medical marijuana. DCP should seek out a biomedical research firm to study medical marijuana from the inception of the state's legalization program.
4. DCP should work with Connecticut's medical schools to include this medicine as part of its teaching curriculum.
5. DCP should work with the University of Connecticut agricultural school, medical school and pharmacy school to allow research and education to students about this medicine.
6. DCP should issue all 10 licenses because of the rising demand for this medicine. If there are 500 licensed patients, there will need to be 1,000 ounces available. This requires approximately 500 – 600+ plants all being harvested at one time. Most facilities

prescription filled at one pharmacy and then another, at a whim, why shouldn't medical marijuana patients be able to do the same thing.

6. 21a-408-14(c)(2)(C) – Define "detrimental effect".
7. 21a-408-14(c)(2)(D) – Define "detrimental to public interest".
8. 21a-408-15(d)(12) – Define the period of time in which the department may request "other documents and information". Is this before or after submission of a completed application?
9. 21a-408-20(c)(1)(B) – Define "detrimental to the public interest". Define "effect ...on such town or neighborhood". MM is grown indoors and except for employees and the occasional contractor, not much will change in the neighborhood, even if there were 6 producers on the same street.
10. 21a-408-20(c)(C)(7) – Why such a stiff penalty? $2,000,000.00 is too much of a penalty if a producer is unable to satisfy the requirements. "Failed to timely and successfully complete the construction of a production facility" must be tempered to include acts of God, situations beyond the control of the producer. This should include but not be limited to being closed by the federal government.
11. 21a-408-20(h) – "Commencement of Operation...within 180 days", must be tempered to include acts of God, situations beyond the control of the producer as well as being closed by the federal government. If a producer is unable to produce or commence production, through no fault of his own, he should not be penalized at all, let alone $2,000,000.00.
12. 21a-408-21(d)(2) – An onsite visit by the department prior to the issuing a producer's license should be mandatory not discretionary. After all, $25,000.00 should at least buy an onsite visit.

13. 21a-408-23(b) – Why should there be any charge for the change of a name of the production facility. I understand the reporting requirement but not the fee to change a name.
14. 21a-408-23(c) – Why is this so expensive? $3,500.00 to apply and then $1,500.00 additional.
15. 21a-408-24(b) – The initial producer license must be issued for a period of five (5) years. A renewal then would cost $75,000.00 in application fees and $25,000.00 for the actual license. $100,000.00 a year for a license. Potential investors want to know that as producer will be in business long enough to be able to repay any monies invested in the business. A one year license will not suffice. There should be yearly payments for licenses, but those licenses should be issued for at least a five (5) year period.
16. 21a-408-29 – Section (c) should be added to define how the last $500,000.00 will be returned to the producer. The Department should define under what theory it would continue to hold $500,000.00.
17. 21a-408-30(b) – Grounds for the refusal to issue or renew a producer or dispensary license should also be given to producers and dispensaries.
18. 21a-408-31(a) – As "sufficient cause" is the standard for the suspension, revocation, probation, placing conditions on and refusal to grant or renew a license or permit, "sufficient cause" should be defined beyond the examples given.
19. 21a-408-31(b)(3) – This should not include allegations of grievances brought against attorneys, which are civil actions. Grievances are only allegations and not proven facts until found after trial. To act upon only allegations goes against the "innocent until proven guilty" portions of our law.
20. 21a-408-31(b)(20) – Invoking one's 5th amendment rights against self incrimination should not be considered a "Failure to cooperate" for purposes of finding "sufficient cause".

21. 21a-408-31(b)(22) – Finding of "violation" of the general statutes or regulations established hereunder, relating to a person's profession, should be by judicial decree and not allegations.

22. 21a-408-31(b)(23)(c) – Reasons for the denial of applications based upon the applicant's "character and fitness" should be given to the applicant.

23. 21a-408-52(b)(4) – Language should be added to allowed a production facility to deliver medical marijuana to testing facilities and to laboratories for purposes of research and development as well as required testing under the statute.

24. 21a-408-52(b)(7) – Producers should be allowed to charge what they want for medical marijuana. Producer prices should not necessarily be the same throughout the state. Prices for any retail and wholesale products vary by location within the state. Gasoline is but one obvious example.

25. 21a-408-53(f)(2) - DCP should promulgate a form which can submitted by any electronic means. There may be reasons why prior written requests may be impossible to file with the Commissioner. (emergencies with water, heat, air conditioning, etc.) If a producer has to wait for approval, his entire business may be destroyed by the time DCP gives its permission. DCP should allow persons to be admitted to facilities with notification and keeping of a log, which can be reviewed by the DCP.

26. 21a-408-55(a) – Section 8 should be added to allow for the manufacture and sale of chocolates and candies and other eatables.

27. 21a-408-60(d) – This section should be amended to allow a producer to deliver samples to both testing facilities as well as research and development facilities.

28. 21a-408-60(f) – This section should be amended to not require two (2) employees during transportation. The employee left alone during deliveries would be put in great danger. He would be very venerable to theft and bodily harm. He is not a guard. There is no reason to have two employees accompany deliveries. It is a waste of resources.