



**Testimony of HydroPharm
Department of Consumer Protection
Regulations Concerning Palliative Use of Marijuana
April 22, 2013**

Commissioner Rubenstein & Consumer Protection Staff,

We thank you for the opportunity to testify before you today. HydroPharm is a special purpose company in formation for the specific purpose of growing medical marijuana per the proposed regulations. The efforts to develop these regulations have been substantial and staff should be commended for the work completed. While the regulations provide a workable basis to initiate and administer the enterprise, there are four areas of concern that we would like to discuss;

Escrow Requirements: Since Federal law is in conflict with state there is a risk of seizure of assets. An account with \$2,000,000 or a letter of credit would be at substantial risk should the federal government seek to levee against it. We encourage the Commission to consider utilizing other surety instruments as well to accomplish the same outcomes without exposing licensees to a high level of risk.

License Term and Commencement: The 180 day requirement for commencement of operations should be automatically extended due to force majeure or delays imposed by governmental bodies with jurisdiction in the process.

Number of Licensed Patients: The current level of licensed patients does not come close to supporting the establishment of three growing operations. Economic viability should be considered when licenses are issued as qualified entities will not pursue and establish growing operations when revenue will not allow for a return on investment. The Department should give thought to tying issuance of growing licenses to registered patients. To support 3 growers there should be a minimum of 3000 registered patients or 1000 per license.

Pricing: While there may be reluctance to “set” pricing and allow the market to work, the unique nature of the product suggests that some oversight be considered. We recommend that floor or minimum pricing be

implemented as it will minimize the likelihood of efforts to access high grade medical marijuana for resale illegally.

MAPLE LANE FARMS_{LLC}

Maple Lane Farms is owned by Allyn Brown III. Mr Brown is recognized as a leader in the state's agricultural industry. Maple Lane is the largest hydroponic grower in the State. Considered a leading innovator in agriculture, he was the first wholesale producer of oyster mushrooms in the United States. He reintroduced black currants to Connecticut and is the largest grower of black currants in the country. In addition to growing black currants he operates a juice bottling plant that distributes throughout the Eastern U.S. His farm also produces a variety of fruits, berries and Christmas trees.

Mr. Brown is a lifelong Connecticut resident. He has served his state and community in many capacities including; Governors Council for Agricultural Development, New England Produce Council, Preston Economic Development Council and formerly served as Chairman of the Preston Zoning Board of Appeals and Treasurer of the Three Rivers Community College Foundation.



NuPower LLC is a Connecticut company primarily engaged in renewable energy development and energy management. The principals, Dan Donovan and Scott Guilmartin have actively participated in the development of gasification, combined heat & power and fuel cell projects in the region. Their largest project, Plainfield Renewable Energy, is a 37.5 MW biomass gasification plant currently under construction. At a developed cost of \$200M this project will come online in the fall of 2013. It is the largest renewable project in the State.

NuPower will bring its energy, management and government relations expertise to the project.

Mr. Donovan is a long time resident of the State and founder of Prospero, LLC a merchant bank and Prospero Capital. He holds NASD Series 7, 24 & 53 certifications. He serves as the Governors Appointee on the Long Island Advisory Council and as Board Chairman of the Bridgeport Discovery Museum.

Mr. Guilmartin is a lifelong resident of Connecticut. He is currently a member of the Connecticut Housing Authority Board

of Directors and the Connecticut Airport Authority Board of Directors. He was formerly a Board Member of CT Innovations and past Chairman of the Suffield Planning & Zoning Commission.