



CONSTITUTION

C A R E

CONSTITUTION CARE LLC
DISPENSARY FACILITY APPLICATION

Response to RFA #2013-109377

CONSTITUTION CARE LLC - DISPENSARY FACILITY APPLICATION

Response to RFA #2013-109377

Section A: Business Information of Applicant

1. Complete the Dispensary Facility Information Form.

*For applicant's response, please see **Appendix A** attached hereto.*

2. Provide a brief summary of the applicant's qualifications, experience and industry knowledge relevant to the development and operation of a dispensary facility.

*For applicant's response, please see **Appendix F** attached hereto.*

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

*For applicant's response, please see **Appendix G** attached hereto.*

Section B: Location and Site Plan

Please provide the following information:

1. The location of the proposed dispensary facility;

2. Documents sufficient to establish that the applicant is authorized to conduct business in Connecticut and that state and local building, fire and zoning requirements and local ordinances are met for the proposed location of the production facility;
3. If the property is not owned by the applicant, provide a written statement from the property owner and landlord certifying that they have consented to the applicant operating a dispensary facility on the premises;
4. Any text and graphic materials that will be shown on the exterior of the proposed dispensary facility;
5. 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;
6. A site plan drawn to scale of the proposed production facility showing streets, property lines, buildings, parking areas, and outdoor areas, if applicable, that are within the same block as the dispensary facility;
7. A map that identifies all places used primarily for religious worship, public or private school, convent, charitable institution, whether supported by private or public funds, hospital or veterans' home or any camp or military establishment that are within 1000 feet of the proposed dispensary facility location; and
8. A blueprint, or floor plan drawn to scale, of the proposed production facility, which shall at a minimum, show and identify the following:

- a. The location and square footage of the area 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 the 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 locations of all areas that may contain marijuana and marijuana products showing the location of walls, partitions, counters and all areas of ingress and egress.

*For applicant's response, please see **Appendix H1-H8** attached hereto.*

Section C: Proposed Business Plan

Provide the following information, using bullet points wherever possible:

1. A detailed description of all products intended to be offered by the dispensary facility during the first year of operation;
2. A detailed description of all services to be offered by the dispensary facility during the first year of operation;
3. 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;
4. A detailed description of the features, if any, that will provide accessibility to qualifying patients and primary caregiver beyond what is required by the Americans with Disabilities Act;
5. A detailed description of any air treatment or other system that will be installed and used to reduce off-site odors;
6. A detailed description of the process by which marijuana and marijuana products will be delivered to a dispensary facility from the producer, including the protocols that will be used to avoid any diversion, theft or loss of marijuana;
7. A detailed description of the training and continuing education opportunities that will be provided to dispensary facility employees; and
8. A detailed description of any processes or controls that will be implemented to prevent the diversion, theft or loss of marijuana.

*For applicant's response, please see **Appendices I 1- I 9** attached hereto.*

Section D: Proposed Marketing Plan

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

*For applicant's response, please see **Appendix J** attached hereto.*

Section E: Financial Statements and Organizational Structure

Please provide the following information or copies of the following documents:

1. Documents such as the articles of incorporation, articles of association, charter, by-laws, partnership agreement, agreements between any two or more members of the applicant that relate in any manner to the assets, property or profit of the applicant or any other comparable documents that set forth the legal structure of the applicant or relate to the organization, management or control of the applicant;
2. A current organizational chart that includes the 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;
3. The name, title and copy of the resume of the person who will be responsible for all information security requirements, including the requirement that patient information remain confidential;

4. A copy of all compensation agreements with dispensary facility backers, directors, owners, officers, other high-level employees or any other persons required to complete **Appendices B, C, or E**;
5. 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;
6. Provide audited financial statements for the previous fiscal year, which shall include, but not be limited to, an income statement, balance sheet, statement of retained earnings or owners' equity, statement of cash flows, and all notes to such statements and related financial schedules, prepared in accordance with generally accepted accounting principles, along with the accompanying independent auditor's report. If the applicant was formed within the year preceding this application, provide certified financial statements for the period of time the applicant has been in existence and any pro forma financials used for business planning purposes;
7. Provide complete copies of all federal, state and foreign 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; and
8. Provide complete copies of the most recently filed federal, state and foreign tax returns filed by each (i) dispensary facility backer; and (ii) each backer member identified in **Section B of Appendix B**.

*For applicant's response, please see **Appendices K1-K8** attached hereto.*

Section F: Bonus Points

1. Employee Working Environment Plan: Describe any plans you have to provide a safe, healthy and economically beneficial working environment for your employees, including, but not limited to, your plans regarding workplace safety and environmental standards, codes of conduct, healthcare benefits, educational benefits, retirement benefits, and wage standards.

*For applicant's response, please see **Appendix L** attached hereto.*

2. Compassionate Need Plan: Describe any compassionate need program you intend to offer. Include in your response:
 - The protocols for determining which patients will qualify for the program;
 - The discounts available to patients eligible for the compassionate need program;
 - The names of any other organizations, if any, with which you intend to partner or coordinate in connection with the compassionate need program, including any producer applicant; and
 - Any other information you think may be helpful to the Department in evaluating your compassionate need program.

*For applicant's response, please see **Appendix M** attached hereto.*

3. Research Plan: Provide the Department with a detailed proposal to conduct, or facilitate, a scientific study or studies related to the medicinal use of marijuana. To the extent it has been determined, include in your proposal, a detailed description of:
- The methodology of the study;
 - The issue(s) you intend to study;
 - The method you will use to identify and select study participants;
 - The identity 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.

*For applicant's response, please see **Appendix N** attached hereto.*

4. Community Benefits Plan: Provide the Department with a detailed description of any plans you have to give back to the community either at a state or local level if awarded a dispensary facility license.

*For applicant's response, please see **Appendix O** attached hereto.*

5. Substance Abuse Prevention 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.

*For applicant's response, please see **Appendix P** attached hereto.*

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Appendix A

Dispensary Facility License Information Form

In re: RFA Section A Question 1

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.



Medical Marijuana Program

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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: _____
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2. Legal Name of Applicant: Constitution Care LLC

3. Trade Name of Applicant: n/a

4. Applicant's Business Address: 1131-O Tolland Turnpike, Suite 297

5. City: Manchester
6. State: 7. CT
Zip Code: 06042

8. Daytime Telephone Number: (203) 442-9000
9. E-mail Address: bmayeron@gmail.com

10. Applicant's Mailing Address (if different than business address): 1131-O Tolland Turnpike, Suite 297
11. City: Manchester

12. State: CT
13. Zip Code: 06042
14. Daytime Telephone Number: (203) 442-9000
15. Fax Number: n/a

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: Robert Mayerson
17. Primary Contact Title: Member/CFO

18. Primary Contact E-mail Address: bmayeron@gmail.com
19. Primary Contact Telephone Number: (978) 771-1434

20. OPTIONAL - Name of Alternate Contact: Nicholas Vita
21. Alternate Contact Title: Member/CEO

22. Alternate Contact E-mail Address: nkivita@aol.com
23. Alternate Contact Telephone Number: (917) 703-9208

Section C: Formation/Incorporation Information

24. Date of Formation/Incorporation: 10/03/2013
25. Place of Formation/Incorporation: Connecticut

26. Registered with the Connecticut Secretary of State: Yes No
27. Sale and Use Tax Permit Number: 60311594
Provide a copy of your Sale and Use Tax permit with your application.



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Section D: Proposed Dispensary Facility Information

28. Proposed Dispensary Facility Address: 46-50 Magee Avenue		29. City: Stamford	
30. State: CT	31. Zip Code: 06902	32. Telephone Number: (203) 442-9000	33. Fax Number: n/a
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: Magee Avenue, LLC	

Section E: Business Association Information

36. Are you associated with any other dispensary facility license applicant or producer license applicant: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, provide the name of all applicants with whom you are associated. Attach additional pages if necessary.	
37. Applicant Name: Great River Growers LLC	38. Applicant Type: <input type="checkbox"/> Dispensary Facility <input checked="" type="checkbox"/> Producer
39. Applicant Name:	40. 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	9:00 am	to	6:00 pm	Friday	9:00 am	to	6:00 pm
Tuesday	9:00 am	to	6:00 pm	Saturday	9:00 am	to	6:00 pm
Wednesday	9:00 am	to	6:00 pm	Sunday	9:00 am	to	6:00 pm
Thursday	9:00 am	to	6:00 pm				

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	9:00 am	to	6:00 pm	Friday	9:00 am	to	6:00 pm
Tuesday	9:00 am	to	6:00 pm	Saturday	9:00 am	to	6:00 pm
Wednesday	9:00 am	to	6:00 pm	Sunday	9:00 am	to	6:00 pm
Thursday	9:00 am	to	6:00 pm				



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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: N/A	44. Time Period: N/A

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:	46. Time Period:

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: Columbia Care CT LLC	48. Percentage of ownership 100%



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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):	50. Title:	51. Role:
Michael Abbott	Member	Chairman
Robert Mayerson	Member	Chief Financial Officer
Nicholas Vita	Member	Chief Executive Officer

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:	53. Cost:	54. Source of Funds:
Contractor fees/wages	\$ 25,000	Columbia Care CT LLC
Legal Fees	\$ 23,015	Columbia Care CT LLC
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	

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:	Sonitrol New England	
56. Primary Security Company Address (including Apartment or Suite #):	65 Inwood Road	57. City: Rocky Hill



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58. State: CT	59. Zip Code: 06067	60. Telephone Number: (860) 247-4500	61. Fax Number: n/a
62. E-mail Address: n/a			
63. Backup Security Company Name (if applicable): Safe & Sound Connecticut			
64. Backup Security Company Address (including Apartment or Suite #): 363 Woodford Avenue			65. City: Plainville
66. State: CT	67. Zip Code: 06062	68. Telephone Number: (860) 793-9955	69. Fax Number: n/a
70. E-mail Address: n/a			
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.



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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:

11/13/2013

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

I fully understand that if I knowingly make a statement that is un true 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:

11/13/2013



STATE OF CONNECTICUT DEPARTMENT OF REVENUE SERVICES

TWENTY-FIVE SIGOURNEY STREET, SUITE 2 HARTFORD, CONNECTICUT 06106-5032

Corr ID: 1300018541224

Date: 10/31/2013

Dear Taxpayer:

Attached is your sales and use tax or room occupancy tax permit. Please display it conspicuously for your customers to see. Any permit previously issued by the Connecticut Department of Revenue Services (DRS) for the specific location noted on the permit is now void and should be destroyed.

Any change in ownership or form of organization requires a new permit. If your business is sold, transferred, or discontinued, return this permit at once to:

Department of Revenue Services
Registration Section
25 Sigourney St Ste 2
Hartford CT 06106-5032

Enter the last day of business and the name of the successor, if applicable, on the back of the permit. Sign the permit as indicated.

Business and individual taxpayers can use the **Taxpayer Service Center (TSC)** at www.ct.gov/tsc to file a variety of tax returns, update account information, and make payments online.

You may not assign or transfer this permit. Display this permit conspicuously for your customers to see.

Department of Revenue Services
State of Connecticut
25 Sigourney St Ste 2
Hartford CT 06106-5032
R603 (Rev. 07/09)

Sales and Use Tax Permit



Use only at this location: Lic Nbr: 1055560

The person named below is licensed under the Sales and Use Tax Act. This permit is good **only** for the named permittee and at the location shown. If there is any change in ownership, the permit is null and void.

CONSTITUTION CARE LLC
CONSTITUTION CARE LLC
46 - 50 MAGEE AVE
STAMFORD CT 06902

Date Issued	Expiration Date	Business Start Date	Connecticut Tax Registration Number
10/30/2013	03/31/2019	04/01/2014	60311594-002

|||||
CONSTITUTION CARE LLC
CONSTITUTION CARE LLC
139 STOW RD
HARVARD MA 01451-1832

Kevin B. Sullivan
Commissioner of Revenue Services

This license may not be transferred or assigned.



STATE OF CONNECTICUT
DEPARTMENT OF REVENUE SERVICES

TWENTY-FIVE SIGOURNEY STREET, SUITE 2 HARTFORD, CONNECTICUT 06106-5032

CONSTITUTION CARE LLC
CONSTITUTION CARE LLC
139 STOW RD
HARVARD MA 01451-1832

Corr ID: 1300018541225
Date: 10/31/2013

Dear Taxpayer:

Your registration application has been processed and your business entity has been assigned CT Tax Registration Number 60311594. The CT Tax Registration Number along with the correct Location Number should be used on any communications with the Department of Revenue Services (DRS). You should advise us promptly of any change in your business activities. Visit the DRS Welcome New Business page at www.ct.gov/welcomenewbusiness for information specific to filing and payment options, and to obtain valuable tax information.

Table with 5 columns: Tax Registration Number/Location, Tax Type, Filing Frequency, Start Date, Registration Date. Rows include Business Entity, Wage Withholding, and Sales and Use for various registration numbers.

Connecticut law requires that you file timely tax returns and pay the taxes due for all taxable periods and make the proper remittance, including any penalty or interest due.

We encourage taxpayers to use the Taxpayer Service Center (TSC) at www.ct.gov/TSC to file a variety of tax returns, update account information, and make payments online. You can choose to get first-time filer information and filing assistance, or can log directly into the TSC to file returns and pay taxes.

As a qualifying business registered for the Business Entity tax, whose liability begins on or after January 1, 2013, DRS requires you to file form OP-424, Business Entity Tax Return, biennially (every other year) following the close of every other taxable year.

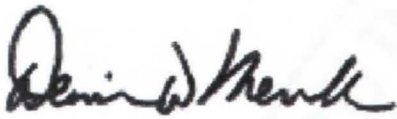
Office of the Secretary of the State of Connecticut

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

CONSTITUTION CARE LLC

a domestic limited liability company, were filed in this office on October 03, 2013.

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



Secretary of the State

Date Issued: October 07, 2013

LEASE AGREEMENT

THIS LEASE AGREEMENT ("Lease") is made this 5th day of November 2013, by and between Magee Avenue LLC ("Lessor"), and Constitution Care LLC, a Connecticut Limited Liability Company ("Lessee").

Lessor/Landlord: Magee Avenue LLC
Address of Lessor: PO Box 2284 Amagansett, NY 11930
Email address of Lessor: leeouteast@hotmail.com

Lessee/Tenant: Constitution Care, LLC
Address of Lessee: 130 West 57th Street 9B, New York, NY 10019
Email address of Lessee: bmayerson74@gmail.com

1. **Property Leased.** Lessor leases to Lessee property consisting of approximately seven thousand nine hundred eighty-eight (7,988) +/- square feet of space (the "Premises"), located at 46 – 50 Magee Avenue, Stamford, Connecticut. The Premises includes one thousand five hundred (1,500) square feet of office space and two (2) loading docks. The estimated square footage described above is an approximation only and Lessee acknowledges that the actual square footage of the Premises may be more or less and is acceptable to Lessee. Rent charges shall be based upon seven thousand nine hundred eighty-eight (7,988) square feet. Lessee is entitled to all parking spaces in the parking lot.
2. **Use of Premises.** Premises are to be used as a marijuana dispensary facility and offices in accordance with all Connecticut laws, rules and regulations, particularly C.G.S. Sec. 21a-408-1 *et seq.* Lessee shall be responsible for determining and be responsible for compliance regarding: all state and local laws, regulations and codes, including but not limited to regulations as to zoning and permitting for the intended use; building safety and fire codes, and architectural barriers. Lessee will have twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year access to the Premises.

Maintenance of the Premises shall be Tenant's responsibility and shall be at Tenant's sole cost and expense. The manner in which the Premises are maintained and the expenditures therefor shall be in the discretion of Tenant but must be approved by the Landlord, which approval shall not be unreasonably withheld. Landlord reserves the right from time to time to (a) make changes in the shape, size, location and appearance of the land and improvements, provided that Landlord shall not materially impair the Tenant's ability to operate its business, (except temporary impairments required by said changes), which changes shall be at Landlord's cost and expense unless required due to Tenant's operation and use of the Premises, in which case shall be paid for by Tenant; (b) make such improvements, alterations and repairs to the Premises as may be required

by governmental authorities or by utility companies servicing the Building, which shall be at Landlord's cost and expense unless such change is required due to Tenant's operation and use in which case shall be paid for by Tenant; (c) construct, maintain and operate lighting and other facilities on all said areas and improvements; which shall be at Landlord's cost and expense unless such change is required due to Tenant's operation and use in which case shall be paid by for Tenant; and (d) to add or remove improvements and facilities to or from the Premises, which shall be at Landlord's cost and expense unless such change is required due to Tenant's operation and use, in which case shall be paid for by Tenant. The use of the Premises shall be subject to such reasonable regulations and changes therein as Landlord shall make from time to time, including (but not by way of limitation) the right to close from time to time, if necessary, all or any portion of the Common Areas to such extent as may be legally sufficient, in the opinion of Landlord's counsel, to prevent a dedication thereof or the accrual of rights of any person or of the public therein; provided, however, Landlord shall do so at such times and in such manner as shall minimize any disruption to Tenant to the extent reasonably possible, and shall not materially interfere with the Tenant's intended use of the Premises as a dispensary facility.

Tenant acknowledges that neither Landlord nor any agent of Landlord has made any representation or warranty with respect to the Premises or the Building with respect to the suitability of either for the conduct of Tenant's business. Tenant shall not use or occupy, or permit the use or occupancy of, the Premises or any part thereof for any use other than the sole use specifically set forth above, or in any manner that, in Landlord's reasonable judgment, would adversely affect or interfere with the use and enjoyment of any part of the Building by any other tenant or occupant. Except as provided in Sections 14 and 16 below, the Tenant has examined the Premises, and accepts it in its present condition "as is" and without any representations on the part of the Landlord or its agent as to the present or future condition or permitted use of the said premises. The Tenant shall keep the Premises in good condition, and shall maintain the interior of said premises as may be necessary to keep them in repair and good appearance. The Tenant shall quit and surrender the premises at the end of the demised term in as good condition as the reasonable use thereof will permit, reasonable wear and tear excepted. The Tenant further agrees to keep said Premises and all parts thereof in a clean and sanitary condition and free from trash, flammable material and other objectionable matter. The Tenant further agrees to keep the area located near the front entrance of the Premises clean and free of obstructions. Tenant shall be responsible for the removal of snow and ice in front of the building. The Tenant agrees to indemnify and hold Landlord harmless from any claim, loss or damages incurred by Landlord arising from or relating to Tenant's failure to keep the premises, and area located near the entrance of the Premises clear and free of obstruction during the term of this lease and extension periods.

3. **Term of Lease.** The Initial Term of this Lease shall commence 90 days after Lessee receives its license approval to operate a dispensary facility in the City of Stamford from

the State of Connecticut upon Lessee's application on November 15, 2013 (hereinafter "Commencement Date"), and shall continue for a term of five (5) years. In any event, Lessee shall have the right to immediately terminate this Lease should they not receive their license to operate a dispensary facility in the City of Stamford from the State of Connecticut or the necessary permits from the City of Stamford to operate such dispensary facility. Prior to the commencement of the Initial Term of this Lease, Lessor agrees to hold the Premises for Lessee until Lessee receives its licensing approval from the State of Connecticut (hereinafter, the "Holding Period"). The Holding Period shall not exceed four (4) months and commences November 1, 2013. In exchange for Lessor's agreement to hold, Lessee shall pay Lessor \$2,000 on November 1, 2013 and \$2,000 on the first day of each month thereafter until the Lessee receives approval of its dispensary license from the State of Connecticut or the termination of the Holding Period. Should the Lessee be unsuccessful in obtaining such dispensary license from the State of Connecticut or the necessary approvals from the City of Stamford, the agreement to hold may be cancelled by Lessee upon thirty (30) days written notice to Lessor. Lessee shall be considered to take possession and/or maintain occupancy of the Premises 90 days after Lessee receives its license approval to operate a dispensary facility in the City of Stamford from the State of Connecticut upon Lessee's application on November 15, 2013. Lessee shall be entitled to access Premises prior to such possession for purposes of construction planning provided that suitable notice is given to Lessor. Lessee shall in a timely manner make every attempt to obtain the necessary permitting to operate its business. If Lessee obtains such dispensary license and for any reason thereafter the State of Connecticut revokes or suspends such license for a period longer than one month, Lessee shall, in its sole discretion, choose to either appeal such revocation or suspension or terminate this Lease upon thirty (30) days written notice to Lessor and Lessor's sole remedy shall be retainer of the security deposit hereinbefore described and Lessee shall pay an additional four (4) months of rent to Lessor in an amount to be determined by reference to the monthly rent paid during the year Lessee exercises its right to terminate.

Lessee understands that there is an existing tenant who occupies the Premises who is entitled to a ninety (90) day period subsequent to Lessor's giving notice to vacate such Premises. Lessee agrees that upon successfully receiving a license to operate a dispensary facility from the State of Connecticut upon its application on November 15, 2013, Lessee will give notice of such to Lessor and Lessor shall serve a notice to vacate the Premises on said existing tenant within two (2) days of receiving Lessee's notice. Landlord agrees that Tenant may begin construction and/or renovation on the space within the Premises not presently occupied by the current tenant on the second floor immediately upon receiving its license to operate a dispensary facility from the State of Connecticut and providing notice of same to Landlord. However, the current tenant shall not be disturbed in its possession of the area it now occupies on the first floor of Premises and shall have access to this area until he/she vacates the Premises.

4. **Extension Option.** Lessee is granted an option to extend this Lease for one successive five (5) year period upon the expiration of the Initial Term of this Lease. Lessee shall exercise its option to extend the Lease by giving written notice of Lessee's intent to exercise its option no later than one hundred eighty (180) days prior to the expiration of a Lease term. Lessor shall have the right to place ordinary "for lease" signs on the Premises any time within one hundred eighty (180) days prior to the expiration of this Lease should Lessee not exercise its option to renew in a timely manner and to show the premises to prospective purchasers or Lessees upon twenty-four (24) hours advanced notice during such period. In order to avoid conflict with state regulations, Lessee must accompany Lessor during all such visits and Lessor shall endeavor to schedule such visits prior to Lessee opening for business on a given day. Rent during the extended term(s) shall be \$13.00 per square foot with 4% increases beginning in the second year of such extension term.
5. **First Offer.** Lessor, for the consideration of Lessee entering into the lease agreement, grants to Lessee the first right of offer to purchase the leased building. Specifically, if during any lease term, the Lessor decides to sell the leased building and Lessee is not then in default, Lessee shall be offered first offer to purchase. The Lessee's right of first offer must be exercised, if at all, within thirty (30) days of receipt from Lessor of written notice.
6. **Deposit and Payments.** Upon execution of this Lease, Lessee shall pay to Lessor a security deposit of \$13,313.66 plus one month's rent of \$6656.83 dollars. On the Commencement Date, the obligations contained herein shall begin but payments for Base and Additional Rent shall commence to be paid pursuant to Paragraph 7 below. Lessor shall return any refundable security deposit to Lessee promptly after termination of the Lease, provided that Lessee is not in material breach of this Agreement and has returned the Premises in good condition, less reasonable wear and tear. The security deposit shall not accrue interest or be deemed or construed to be an advance payment of rent for any month of the term of this Lease. If Lessee is in default, Lessor may use the security deposit to cure the default or to compensate Lessor for damages sustained by Lessor resulting from Lessee's default without prejudicing Lessor's rights hereunder. Thereafter, Lessee shall immediately pay to Lessor an amount sufficient to restore the security deposit to its original amount. If Lessee is unsuccessful in obtaining the appropriate licenses, approvals or permits to operate a medical marijuana dispensary for the Premises, Lessor shall refund the entire amount of the deposit to Lessee.

In the event of a sale or leasing of the Building, Landlord shall have the right to transfer the balance of the Security Deposit to the new owner or to Tenant. Landlord shall thereupon be released by Tenant from all liability for the return of the Security Deposit;

and Tenant agrees to look to the new landlord. If any mortgagee, including Landlord's Mortgagee should succeed to Landlord's interests hereunder, such mortgagee should only be liable to Tenant for any security deposited by Tenant hereunder to the extent such security was actually transferred to such mortgagee.

If Tenant performs all of Tenant's obligations hereunder during the Term, Landlord will, within 30 days after the expiration or earlier termination of the Lease, return the Security Deposit, or so much as has not been applied by Landlord, to Tenant or the last permitted assignee of Tenant's interest hereunder at the expiration of the Term.

7. **Rent, Additional Rent, (Taxes and Utilities).**

The Parties acknowledge that tenant hereby agrees to pay all real estate taxes, building insurance, and maintenance on the property in addition to any normal fees that are expected under the agreement (rent, utilities, etc.). Furthermore and except as otherwise provided herein, Tenant is responsible for all costs associated with the repair and maintenance of any common area.

- A. All Base and Additional Rent shall be paid monthly in advance to be received by Lessor on the first day of every calendar month ("Rent Payment Date"), at Lessor's address first noted above, or such other place as Lessor may designate in writing from time to time, provided that Base Rent shall not be due for two (2) consecutive months subsequent to the Lease Commencement Date. Additional Rent shall commence to be payable on the Commencement Date. All rent shall be paid without prior demand or notice in lawful currency of the United States of America. Time is of the essence regarding all payments due herein. In the Initial Term of this Lease, the Lessee shall pay Base Rent of \$10.00 per square foot annually, which equates to an approximate monthly payment of \$6,656.66. Base Rent will increase by 4% annually beginning in Year 2.
- B. In addition to the Base Rent and any increases thereof as provided above, Lessee shall be responsible for the following expenses and costs which are defined together with other provisions in this Lease as "Additional Rent":
 - i. Common Area Maintenance, Property Taxes, Master Insurance - Lessee shall be responsible for the costs of maintaining the property including property taxes and assessments, and master insurance on the Premises and common areas which insurance shall inure to the benefit of both Lessor and Lessee. These costs are currently estimated at \$ TBD. Property taxes are \$15,754.38 annually but master insurance is to be determined. Lessee shall be responsible for Additional Rent charges from the date of Lease

Commencement. In the event that the Lessor's estimate of the taxes and assessments are insufficient to pay the obligations therefore, then Lessee hereby agrees to pay the difference resulting therefrom to Lessor within thirty (30) days of written notice of Lessor's calculation of the shortfall of the Additional Rent payments. If Lessee deems excessive or illegal any such tax or assessment, Lessee upon prior written notice to Lessor, may apply and prosecute an abatement of such taxes or assessment, provided that the full unabated bill has been paid prior to such application.

8. **Utilities** - Lessee shall directly pay suppliers for all utilities, including, but not limited to electric, water, sewer, telephone, cable, and internet access provided for Lessee's use at the Premises. All utilities shall be in the Lessee's name for billing purposes. Lessee shall be responsible for providing trash collection services.
9. **Late Fees**. A late fee in the amount of Twenty Five Dollars and 00/100 (\$25.00) per day shall be due if any Base or Additional Rent is not paid and received by Lessor within ten (10) business days of the due date, retroactive to the due date. The late fee does not extend the due date of any payment and the payments due hereunder must be paid and received by Lessor on or before the due date or Lessee shall be in breach of this Lease.
10. **Signage**. Lessee shall have the right to install, at Lessee's cost, building signage which complies with City of Stamford requirements.
11. **Lessee Alterations & Improvements**. Lessee shall have the right to make interior, non-structural alterations and/or improvements to the Premises with the approval of the Lessor, not to be unreasonably withheld. If consent is granted, all such alterations or improvements shall be completed in a good and workmanlike manner, with first-class materials and workmanship by a licensed contractor and compliant with all applicable codes. At the time Lessor's approval of any alteration or improvement is sought, Lessee shall submit to Lessor plans and specifications for such work. Any alterations or improvements shall be at Lessee's sole expense, unless otherwise agreed by the parties, and Lessee shall reimburse Lessor for its costs in retaining an architect and/or engineer to review such plans. Lessee shall be responsible, in its sole cost and expense, for any data, internet, telephone or other modifications, repairs or improvements made to the Premises. Lessee shall discharge any liens imposed by suppliers, workers or other liens relating to alterations or improvements and shall discharge the same within thirty (30) days of imposition.
12. **Fixtures**. Lessee shall provide, at Lessee's sole expense, its own furniture, fixtures, tools, equipment and inventory, including security equipment and cameras located inside and outside the Premises and any other security devices required by C.G.S. Sec. 21a-408-

1 *et seq.* or local rule, for Lessee's use in the Premises. Lessee may remove any such trade fixtures that Lessee installs, provided that damage caused by removal is repaired by Lessee at Lessee's sole expense. Lessee shall pay all taxes on fixtures and personal property placed upon the Premises.

13. **Common Areas.** Common areas and facilities include all automobile parking areas, driveways, entrances and exits thereto and other facilities furnished by Lessor in or near the building, including parking areas, pedestrian sidewalks, ramps, stairs, landscaped areas, and other areas and improvements provided by Lessor for general use in common for all occupants and visitors. Lessor shall have the right to construct, maintain and operate necessary utilities on all said areas and improvements; to police the same; from time to time to change the areas, level, location and arrangement of parking; to restrict parking in and to said areas and improvements as, in the use of good business judgment, Lessor shall reasonably require.
14. **Condition of Premises.** Lessor will deliver the Premises broom clean in its existing condition, with all utilities fully operational. Lessor will deliver the Premises with all structural, mechanical, lighting, plumbing, electrical, HVAC and building systems as required in the Lease and in compliance with all applicable codes. Lessee is responsible for compliance with codes for its specific use. In addition, Lessee will be responsible for regular maintenance contracts on HVAC systems but any repairs/replacements over \$1,500 for each occurrence will be Lessor's responsibility. Lessor will be responsible for all structural issues with the building including roof, exterior walls, floors, and foundation. Lessee is also responsible for parking lot.
15. **Waste and Nuisance.** Lessee shall not commit waste or allow any nuisance to exist on the property, nor do any other act which may disturb the quiet enjoyment of other Lessees unless reasonably necessary for the Lessee's use of the Premises as indicated above.
16. **Maintenance:**
 - A. **Lessor's Maintenance.** Lessor is responsible for all roof and structural repairs to the building. Except as provided in section 14 above, Lessee shall be responsible for maintaining heating, ventilating, and air conditioning system (HVAC) in operating condition during the term(s) of this Lease. Costs associated with Lessor's Maintenance as outlined above shall not be included in the CAM charges referenced in paragraph 7 of this Lease.
 - B. **Lessee's Maintenance.** Lessee shall be responsible for all maintenance and repairs within the Premises, including those responsibilities referenced in section 14 above. Upon termination of this Lease, Lessee shall surrender the Premises to Lessor in

the same condition as existed at the commencement of the term, except for reasonable wear and tear and any improvements.

- C. **Right to Enter.** Lessor and its agents shall have the right to enter the Premises upon at least 24 hours advance notice to Lessee for the purpose of examining or inspecting the same, to supply any service to be provided by Lessor or Lessee hereunder, to show the same to prospective purchasers, lenders or future lessees of the Premises. Except for emergency circumstances, at the time of any entry by Lessor, Lessor shall be accompanied by Lessee and such shall be at a mutually convenient time. If Lessee is not personally present to open and permit an entry into the Premises at any time when such entry by Lessor is necessary due to emergency circumstances, Lessor understands the Premises will be alarmed.

17. **Insurance:**

- A. Lessee at its cost shall maintain broad form comprehensive general liability insurance, including personal injury, property damage, products liability, completed operations and fire legal liability coverage with a single liability limit of not less than One Million Five Hundred Thousand Dollars (\$1,500,000) for bodily injury, property damage and personal injury. Such coverage shall insure against all liability of Lessee and its authorized representatives arising out of or in connection with Lessee's use or occupancy of the Premises. The broad form comprehensive liability insurance shall name Lessor as an additional insured. Lessee acknowledges that Lessee will be responsible for maintaining Master insurance coverage for the Premises structure and such insurance shall inure to the benefit of Lessor and Lessee.
- B. Lessee shall maintain required workers' compensation and employers' liability insurance affording statutory workers' compensation benefits for the State of Connecticut in the amount required by statute.
- C. On all its personal property, at its cost, Lessee shall maintain a policy of standard fire and extended coverage insurance with vandalism and malicious mischief endorsements and "all risk" coverage, at its cost, on all Lessee's improvements and alterations in or about the Premises, and on the Premises structure, for their full replacement value. The proceeds from any such policy shall be used by Lessee for the replacement of personal property and the restoration of Lessee's Premises. Lessee acknowledges that Lessor does not maintain any insurance coverage against loss for Lessee's personal property, which responsibility shall be solely that of Lessee.
- D. Lessee shall provide certificates of all insurance coverages required hereunder as and when requested by Lessor but not prior to Lessee taking possession of the Premises.

E. **Waiver of Claims.**

Landlord and Tenant hereby agree and hereby waive any and all rights of recovery against each other for loss or damage occurring to the Premises or any of Landlord's or Tenant's Property contained therein regardless of the cause of such loss or damage to the extent that the loss or damage is covered by insurance or the insurance the injured party is required to carry under this Lease, whichever is greater (without regard to any deductible provision in any policy). This waiver does not apply to claims caused by a party's willful misconduct. This waiver also applies to each party's directors, officers, employees, shareholders, and agents.

- i. Lessee will assure that its insurance permits waiver of liability and contains a waiver of subrogation. Lessee shall secure an appropriate clause in, or an endorsement to, the insurance policy obtained by or required to be obtained under this Lease, pursuant to which the insurance company: (i) waives any right of subrogation against Landlord or Tenant as the same may be applicable, or (ii) permits Landlord or Tenant, prior to any loss to agree to waive any claim it might have against the other without invalidating the coverage under the insurance policy. If, at any time, the insurance carrier refuses to write (and no other insurance carrier licensed in Connecticut will write) insurance policies which consent to or permit such release of liability, then such party shall notify the other party and upon the giving of such notice, this Section shall be void and of no effect.

18. **Lessee Representations and Warranties.** Lessee represents and warrants that Lessee has made no agreements that are inconsistent with this Lease or that would prevent Lessee or Lessor from entering into this Lease.

19. **Indemnity.** Lessee shall hold harmless Lessor from and against any and all claims arising from any breach or default in the performance of any material obligation on Lessee's part to be performed under the terms of this Lease, or arising from any negligence or omission of Lessee, due to Lessee's or Lessee's invitees or agents actions. Lessor will exonerate and indemnify Lessee against all claims, suits, obligations, liabilities, and damages, including attorney fees, arising out of any failure by Lessor to perform, fulfill, or observe any obligation or liability of Lessor set forth in this Lease, or any negligent act or omission by Lessor or his agents, contractors, subcontractors, servants, employees, licensees or invitees, or any condition of any kind, class, or description, however and whenever caused or occurring, in any portion of the Premises Lessor is obligated to construct, alter, improve, restore, repair, replace, remediate or renovate.

Limitation on Landlord's Liability. Landlord shall not be responsible or liable to Tenant for any loss or damage to Tenant, or its business (including any loss of income therefrom) or its property occasioned by or through the acts or omissions of persons occupying adjoining premises or any part of the premises adjacent to or connected with the Premises, or for any loss or damage resulting to Tenant, or its business (including any loss of income therefrom), or its property from smoke, fire, electricity, steam, gas, vapor, water or rain, or other airborne contaminants, or from the breakage, leakage, obstruction or other defects of pipes, wires, appliances, plumbing, heating, air-conditioning or lighting fixtures, or from any other cause, whether the said damage or injury results from conditions arising from or upon Premises or from other sources or places, including theft. However, this provision shall not limit Landlord's liability for the negligence of itself or its agents, employees, servants, contractors, subcontractors, licensees or invitees.

20. **Defense.** Lessor shall provide and pay all costs, attorney's fees, judgments, awards or other compensation granted for any indemnified claim with an attorney of Lessee's choice after consulting with Lessee. Lessee shall provide and pay all costs, attorney's fees, judgments, awards or other compensation granted for any indemnified claim with an attorney of Lessor's choice after consulting with Lessor.

21. **Damage or Destruction.** If the Premises is damaged by fire, the elements, accident, or other casualty, not of Lessee's making, but are not thereby rendered untenable, Lessor shall at its expense cause such damage to be repaired, and the rent shall not be abated. If by reason of any such occurrence the Premises shall be rendered untenable only in part, Lessor shall cause the damage to be repaired within ninety (90) days, and the rent meanwhile shall be abated proportionately as to the portion of the Premises rendered untenable from the date of occurrence. If the Premises shall be rendered wholly untenable by reason of such occurrence, not of Lessee's making, and such damage cannot be repaired within ninety (90) days of said damage, Lessee or Lessor may, at their election, terminate this Lease and the tenancy hereby created by giving written notice to the other, within thirty (30) days following the date of said occurrence. Any damage which is of Lessee's making shall be immediately remedied and repaired by Lessee at Lessee's sole expense and there shall be no abatement of rent.

22. **Condemnation.** If the whole of the Premises shall be acquired or condemned by eminent domain for any public or quasi-public use or purpose, then the term of this Lease shall cease and terminate as of the date of title vesting in such proceeding and all rentals shall be paid up to that date and Lessee shall have no claim against Lessor nor the condemning authority for the value adjusted to the date of such termination. In the event of a partial taking or condemnation which is not extensive enough to render the Premises unsuitable for the business of Lessee, then Lessor shall at its sole option either promptly restore the Premises to a condition comparable to its pre-condemnation state or cancel the lease. Any condemnation damages awarded as compensation for diminution in value of the

leasehold or to the fee of the Premises shall be the property of Lessor. Lessee shall have the right to claim and recover from the condemning authority, but not from Lessor, such compensation as may be separately awarded or recoverable by reason of loss or damage to Lessee's business or on account of any cost or loss to which Lessee may incur in removing Lessee's merchandise, furniture, fixtures, leasehold improvements and equipment.

23. **Environmental Concerns.** Lessee shall not permit the release of any hazardous substance in, near or on the Premises. Upon discovery of a released hazardous substance, Lessee, in addition to giving immediate notice of the same to Lessor, shall promptly conduct and complete any and all investigations, studies, sampling, testing and all remedial, removal and other actions necessary to clean up and remove all hazardous substances attributable to Lessee's use and occupation of the Premises in accordance with applicable environmental laws; and in accordance with the orders and directives of all governmental authorities. Lessor warrants that no hazardous substances are contained in or upon the Premises and that if any hazardous substance is discovered in or upon the Premises, Lessor shall remediate the condition to the satisfaction of Lessee. A determination of what constitutes a hazardous substance shall be made with reference to all applicable environmental laws, rules, regulations and orders.
24. **Assignments and Subletting.** Provided Lessee is not in default, Lessee shall have the right to assign or sublet all or a portion of the Premises to any subsidiary or affiliate without Lessor's consent. Any other assignment or subletting shall be with the permission of the Lessor, which shall not be unreasonably withheld.
25. **Compliance with Laws.** Lessee agrees to comply, at its own expense, with all applicable Connecticut statutes, laws, ordinances, codes, rules, regulations and other requirements of all governmental units or agencies applicable to the Premises.
26. **Abandonment.** Subsequent to Lessee taking possession of the Premises, if the Premises are left unattended and unoccupied for a period of thirty (30) days or more, such act shall constitute abandonment of the Premises.
27. **Receivership.** If Lessee becomes insolvent; or a receiver is appointed and such receiver has not been discharged within thirty (30) days after the date of appointment thereof; makes an assignment for the benefit of creditors; discontinues its business; files a petition in bankruptcy or a petition of bankruptcy is filed against Lessee, then said action shall be deemed a non-curable breach automatically terminating this Lease.
28. **Holdover.** If Lessee should hold over after the end of any lease period without extending such period, the Lease shall continue thereafter until terminated by either party by not

less than thirty (30) days' prior notice to the other, which notice may, however, be given prior to the commencement of such holdover. All of the terms and provisions of this Lease in effect immediately prior to such holdover shall be applicable during such holdover and for any further time following the end of the lease period during which Lessee may continue to use or occupy the Premises, provided that Base Rent during any holdover shall be calculated at 125% of the Base Rent due at the expiration of the lease period, plus Additional Rent due.

29. **Breach and Cure, Remedies.**

- A. If Lessee shall, at any time, be in default of the payment of either Rent, Additional Rent or any payments required of Lessee hereunder or any part thereof, for more than ten (10) days after the same shall be due hereunder, regardless of whether demand has been made therefor, or if Lessee shall be in default of any of the other material covenants and conditions of this Lease to be kept, observed, and performed by Lessee for more than thirty (30) days after the giving of written notice by the Lessor to the Lessee of such default, then and in any such events the Lessor may re-enter the leased premises by summary proceedings or otherwise, and thereupon may expel all persons and remove all property therefrom, without becoming liable to prosecution therefor, and may, among other remedies, elect:
- i. To relet said premises as the agent of the Lessee, and reserve the rent therefrom, applying the same first to the payment of the reasonable expense of such re-entry, and then to the payment of the rent accruing hereunder; but whether or not the Premises are relet, the Lessee shall remain liable for the equivalent of all rent and other charges provided for under this Lease, plus the cost of reletting, if any, which said amount shall be due and payable to the Lessor as damages, or rent, as the case may be, on the successive monthly rent days hereinabove provided; or
 - ii. To terminate this Lease and immediately resume possession of the Premises, wholly discharged from any obligations under the term of this lease, and re-enter and repossess said Premises, free from any and all claims on the part of the Lessee. Termination of the Lease does not discharge or in any way affect Lessee's obligation to pay Lessor all the rents or other charges or payments accruing under the Lease up to the date of termination.
- B. Lessor shall not be in default unless it fails to perform the obligations required of Lessor by this Lease Agreement within thirty (30) days after written notice by Lessee to Lessor specifying which obligation(s) Lessor has failed to perform. Provided, however, that if the nature of the specified obligation(s) is such that more than thirty (30) days are required for performance, then Lessor shall not be in default if it commences performance within such 30-day period and thereafter diligently prosecutes the same to completion. If Lessor has not cured or commenced

to cure the default set forth in said notice within said 30-day period, Lessee may at his option either (i) cure such default and deduct the reasonable costs and expenses incurred from the next and succeeding rent payment(s) or (ii) cancel this Lease and, in such event, this Lease shall thereupon cease, terminate, and come to an end with the same force and effect as though the original demised term had expired at that time.

- C. Lessor's rights with respect to any of Lessee's payment obligations referenced in subsection (a) of this paragraph shall be subject to the right of the Lessee, upon request, to inspect the books and/or records of Lessor and make any copies thereof with respect to any payment obligations alleged to be due or in default.
31. **Notices.** All notices, requests, and other communications required or permitted to be given hereunder shall be in writing and shall be deemed to have been duly given if delivered personally, by United States postal service, overnight delivery, facsimile with transmission verification or electronic delivery (such as email) to the parties at their addresses and email addresses first noted herein. The effective notice date shall be the date of actual receipt by the party receiving the notice.
32. **Arbitration.** Any controversy or claim arising out of or relating to this Lease, or the breach thereof, except an action to evict Lessee, shall be settled by binding arbitration in accordance with the Commercial Arbitration Rules of the American Arbitration Association and judgment upon the award rendered by the Arbitrator (s) may be entered in any Court having jurisdiction thereof.
33. **Construction.** This writing is the result of the mutual effort of the parties and their respective counsel, therefore, the parties agree that neither party shall be considered the draftsman of this Lease. The invalidity or unenforceability of any provision of this Lease shall not affect the validity or enforceability of any other provision contained herein.\
34. **Non-Disturbance/ Subordination.**
- (a) Subject to the provisions of this Section without the necessity of any additional document being executed by Tenant for the purpose of effecting a subordination, Tenant agrees that this Lease and Tenant's tenancy hereunder are and shall be automatically subject and subordinate at all times to (a) the lien (and the terms and conditions) of any mortgage that may now exist in any amount for which the Building, or Landlord's interest or estate in any of said items is specified as security; and (b) renewals, modifications, consolidations, replacements, and extensions of any of the foregoing. At Tenant's request, Landlord agrees to use commercially diligent efforts to obtain from the holders of any mortgage lien on the Building (collectively, "**Landlord's Mortgagee**") a recordable instrument in a form reasonably acceptable to the Tenant by which Landlord's Mortgagee shall agree not to

disturb Tenant's possession and occupancy of the Premises or join Tenant in any such action as a party defendant so long as Tenant is not in default in the performance or observance of any of the terms, covenants or conditions contained in the Lease. Landlord's inability to obtain such an instrument from Landlord's current Mortgagee shall not be a condition to Tenant's subordination agreements herein. Landlord must obtain such an instrument, in a form reasonably acceptable to Tenant, as a condition to Tenant's agreement to subordinate for any future mortgagee of the Building. Any reasonable fee associated with obtaining said instrument from Landlord's Mortgagee shall be paid by the Tenant.

- (b) In the event that any such first mortgage is foreclosed or a conveyance in lieu of foreclosure is made for any reason, Tenant shall, at the option of Landlord's Mortgagee or the grantee or purchaser in foreclosure, notwithstanding any subordination of any such lien to this Lease, attorn to and become the Tenant of the successor in interest to Landlord at the option of such successor in interest. Tenant covenants and agrees to execute and deliver, within ten (10) days following delivery of request by Landlord, Landlord's Mortgagee, or by Landlord's successor in interest and in the form requested by Landlord, Landlord's Mortgagee, or by Landlord's successor in interest, any additional documents evidencing the priority or subordination of this Lease with respect to the lien of any such first mortgage, which additional documents shall be satisfactory to Landlord, Landlord's Mortgagee, and Landlord's successors in interest but not more than two (2) times per year and at no cost to Tenant.
- (c) If Landlord's Mortgagee shall succeed to the interest of Landlord under this Lease, Landlord's Mortgagee shall assume and perform Landlord's obligations under this Lease only while it is the fee owner of the Building and shall not be (i) liable for any breach, act or omission of any prior landlord, including Landlord; (ii) subject to offsets, claims or defenses which Tenant might have against prior landlords; (iii) bound by the payment of Annual Base Rent or Additional Rent or other payment in lieu of rent which Tenant may have paid to any prior landlord for more than thirty (30) days in advance of its due date; (iv) bound by any assignment, surrender, termination, waiver, lease amendment or modification of or affecting this Lease made without its consent; or (v) bound by any of the construction obligations of Landlord under this Lease.
- (d) **Notices.** If Tenant is given written notice of the identity and address of Landlord's Mortgagee, then Tenant shall give to such Landlord's Mortgagee written notice of any default by Landlord under the terms of this Lease by registered or certified mail, and such Landlord's Mortgagee shall be given the opportunity to cure Landlord's default within the thirty (30) days following such written notice; provided, however, that said thirty (30) day period shall be extended so long as within said thirty (30) day period such party has commenced to cure the default and such party is proceeding with due diligence (including the exercise of its remedies against Landlord if necessary to obtain possession of the Premises) to effect such cure.

- (e) **Quiet Enjoyment.** Upon Tenant paying the Annual Base Rent and Additional Rent and performing all of Tenant's obligations under this Lease, Tenant may peacefully and quietly enjoy the Premises during the Term as against all persons or entities lawfully claiming by or through Landlord; subject, however, to the provisions of this Lease and to the rights of Landlord's Mortgagee.
35. **Agency Disclosure.** Robert C. Miller represents the Lessor in this transaction. Landlord will be responsible for the real estate commission per separate agreement with Berkshire Hathaway Home Services New England Properties Commercial Real Estate Group.
36. **No Variations.** This Lease constitutes the entire agreement between the parties concerning the subject matter hereof, and supersedes all prior and contemporaneous agreements, whether written or oral, between the parties. This Lease may be amended only by an instrument in writing which expressly refers to the Lease and specifically states that it is intended to amend it. No party is relying on any warranties, representations, or inducements not set forth herein.
37. **Governing Law.** This Lease shall be construed in accordance with the laws of the State of Connecticut, and the parties agree that it is executed and delivered in the State of Connecticut.
38. **Successors and Assigns.** This Lease and all covenants, conditions and obligations herein shall be binding upon the parties, their legal representatives, heirs, survivors, successors and permitted assigns. Neither the Lessor or any successor of Lessor shall bear any liability for breach of this Lease on or after conveyance of his or its interest in the Premises.
39. **Estoppel Certificates.** Upon not less than ten (10) days prior written request, Lessor and Lessee agree, each in favor of the other to execute, acknowledge and deliver a statement in writing certifying that this Lease is unmodified and in full force and effect (or, if there have been any modifications that the same are in full force and effect as modified and stating the modifications), and the dates to which the Base and Additional Rent hereunder and other charges have been paid and any other information reasonably requested. Any such statement delivered pursuant to this Paragraph may be relied upon by any prospective purchaser, mortgagee or lending source.
40. **No Waiver.** No relaxation which either party may give at any time regarding the performance of any obligation hereunder shall prejudice or be a waiver of any rights under this Lease.

41. **Recording.** This Lease shall not be recorded in its entirety. A memorandum of lease may be recorded which indicates the parties hereto, the length of term, the existence of term extensions, the right of first refusal and a description of the Premises so leased. Any costs or fees incurred to prepare or record such memorandum of lease shall be borne by the recording party.
42. **Headings.** Headings of clauses have been included for purposes of convenience only, and shall not affect the interpretation of this Agreement.
43. **Counterparts.** This Agreement may be executed in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same document. This Agreement shall become binding and enforceable upon a party at such time as a counterpart has been signed and either deposited in the mail, electronic delivery (such as email) or transmitted via facsimile to the other party.

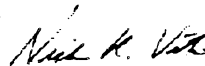
IN WITNESS WHEREOF, the parties hereto have executed this Lease effective on the date first above written.

LESSOR- *MAGEE AVENUE LLC*

LESSEE- Constitution Care LLC



By LEE ADAMO
MEMBER



By Nicholas Vita
Chief Executive Officer



CONFIDENTIAL SECURITY PLAN

1.0 INTRODUCTION

The Constitution Care LLC Security Plan¹ is a combination of next-generation technologies, talented security professionals, and a company-wide commitment to security and safety as paramount objectives. Led by Chief Security Advisor Bernard Sullivan, Constitution Care LLC intends to contract with **Sonitrol New England** to provide comprehensive security management. Sonitrol New England is an experienced, reliable and well-qualified Connecticut security firm servicing commercial enterprises in the state since 1972. The contractor's goal is to ensure absolute safety and security measures for the dispensary facility. The contractor is deeply experienced, with demonstrated reliability over many years of service to demanding clients.

As our affiliates have done in other jurisdictions, Constitution Care LLC also intends to contract with the Fraternal Order of Police ("FOP"), the world's largest organization of sworn law enforcement officers, to supply the facility with well-trained guards to be on duty during all business hours. The company intends to hire retired expert law enforcement officers, specifically with drug enforcement and larceny prevention backgrounds. In general, security personnel will prevent nuisance activity and crime, including investigating for any signs of diversion, theft or loss of Medical Marijuana products. Members of FOP have dedicated their lives to protecting and serving our communities and their members and leaders have a trusted working partnership with our team through the work they have done with us elsewhere. Constitution Care LLC welcomes their expertise and believes that the years of experience they bring to the table is a perfect match for registered dispensary facility needs.

In addition to security procedures set forth below, Constitution Care LLC aims to approach the safeguarding of our dispensary facility and the surrounding community in partnership with local law enforcement. In that effort, Constitution Care LLC will, once registered, request follow-up meetings with local law enforcement authorities to discuss security issues during the build-out, and to establish open lines of communication with key law enforcement personnel and community liaisons. Having already reached out to local law enforcement prior to submitting out application, we hope to continue to approach security challenges as partners with a shared interest in a safe community. Additionally, unforeseen security challenges that may arise can be more quickly surrounded and solved when working as a team.

Constitution Care LLC's core security principles guide the inner workings of the Constitution Care LLC Security Plan and its features. Our Core Security Principles are as follows:

¹ Constitution Care LLC respectfully requests that the information contained in this document be classified as exempt from disclosure under the Connecticut Freedom of Information Act. Pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute.



- Safeguarding the incoming transfer, storage and dispensation of the medicine.
- Providing a safe and secure environment for Constitution Care LLC dispensary facility staff and patients.
- Managing authorized ingress and egress to the dispensary facility and to the restricted access areas within the facility.
- Ensuring strict compliance with Connecticut law and Medical Marijuana program guidelines.

Constitution Care LLC has a strict policy against the possession and/or use of firearms by any person, including but not limited to dispensary facility employees, patients and primary caregivers. As such, no persons will be permitted to carry firearms while within the facility. There are no exceptions to this rule.

2.0 DIVERSION, THEFT, AND LOSS PREVENTION

Constitution Care LLC's ability to prevent diversion, theft and loss of Medical Marijuana to the black market stems from three areas in which the organization excels: our people, our investment in next-generation security equipment and protocols, and our best-practices Policies & Procedures.

2.1 Our People

Constitution Care LLC's ability to prevent theft begins with its people. Constitution Care LLC is comprised of dedicated professionals guided by the highest standards of integrity. Leading the team's security efforts is Chief Security Advisor Bernard Sullivan. Bernard Sullivan, a Connecticut native, has dedicated over 25 years of service to the City of Hartford Police Department, including positions as Sergeant, Lieutenant, Captain, and Chief of Police, and has over 45 years of collective experience in law enforcement, security, and public safety. He has been the recipient of a plethora of awards, honors and recognitions for his services, including the Hartford Police Department Merit Award for Valor and the Chief's Medal of Valor. Mr. Sullivan has also served in roles as Director of Corporate Security for ITT Hartford Insurance Group, Commissioner of Public Safety for the State of Connecticut, Acting Police Chief for Central Connecticut State University, Chief of Staff to Speaker of the House of Representatives for the state of Connecticut, and Vice Chair of the Sandy Hook Advisory Commission. Mr. Sullivan is a life member and past President of the Connecticut Police Chiefs Association, and also serves as President of the 100 Club of Connecticut, an organization that supports surviving family members of public safety personnel who were killed in the line of duty.

Constitution Care LLC also intends to contract with the Fraternal Order of Police ("FOP"), the world's largest organization of sworn law enforcement officers, to supply the facility with well-trained guards to be on duty during all business hours. The company intends to hire retired expert law enforcement officers, specifically with drug



enforcement and larceny prevention backgrounds. In general, security personnel will prevent nuisance activity and crime, including looking for any signs of diversion, theft or loss of Medical Marijuana products. Members of FOP have dedicated their lives to protecting and serving our communities. Constitution Care LLC welcomes their expertise and believes that the years of experience they bring to the table is a perfect match for registered dispensary facility needs.

The greatest threat of diversion, theft, and loss necessarily stems from the controlling organization itself. (Given our next-generation security equipment and procedures, outside access to the heavily monitored Medical Marijuana at the dispensary facility is unlikely.) Bernard Sullivan and the facility's Security Manager will assist Constitution Care LLC in vetting potential staff members to ensure only professional, like-minded and trustworthy employees are hired.

In addition to the background check required by the Department of Consumer Protection (the "Department") for the dispensary facility employee, employee candidates must also complete personality tests, undergo comprehensive dispensary facility training, and fulfill performance testing requirements.

Additionally, all employees of Constitution Care LLC, including security personnel, will receive a copy of our Safety Handbook during their orientation training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of patients, dispensary facility staff and the surrounding area.

In addition, Sonitrol New England will provide training to all personnel on the operation of the system. A certificate of completion of all training will be provided to trained participants.

Staffing the dispensary facility with the right people provides Constitution Care LLC the greatest opportunity to prevent theft and diversion.

2.2 Our Security Equipment and Protocols

Constitution Care LLC intends to contract with Sonitrol New England, an experienced, reliable and well-qualified security firm, to ensure absolute safety and security measures for the dispensary. The contractor is deeply experienced, with demonstrated reliability over many years of service to demanding clients. Sonitrol New England's primary focus and principal discipline is the protection of businesses and the safeguarding of the people, property and assets of its clients. The contractor's goal is to ensure absolute safety and security measures for the facility.

Based on the layout of the dispensary facility, Connecticut law, particularly sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes (the "Act") and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut



State Agencies (the “Regulations”), Constitution Care LLC Policies & Procedures, decades of crime prevention experience, and all applicable rules, regulations and guidelines, a comprehensive security system has been designed to monitor and protect the dispensary facility with increased attention to the most vulnerable areas. The system includes high-resolution, internet-protocol cameras, biometric locks, and live-streaming, encrypted video feeds to the internet (recorded digitally and remotely accessible), and various motion sensors and alarms.

The Constitution Care LLC security system features:

- Indoor, high-resolution, 360°, internet-protocol video cameras
- Outdoor, high-resolution, 90°, internet-protocol video cameras
- Outdoor, high-resolution, 180°, internet-protocol video cameras
- Live-streaming, encrypted video feeds via internet, remotely accessible
- Glass break detectors
- Biometric locks (thumbprint access)
- Motion sensors that instantaneously alert staff by remote device (cell phone) in the event of a potential unauthorized intrusion
- Panic buttons
- Cellular backup
- Closed-circuit television, digital storage

In addition to the security system consisting of a comprehensive surveillance system and alarm system, Constitution Care LLC will hire security personnel to routinely patrol the facility and neighborhood. Constitution Care LLC will employ internal loss-prevention methods, standard retail cash-handling procedures, and tracking of daily reimbursements and expenses as described in detail in the Constitution Care LLC Policies & Procedures Manual.

Constitution Care LLC also intends to utilize Adilas and Pioneer Rx software. This software and POS system is a unique seed-to-sale tracking of every gram of Medical Marijuana and derivative products to the .01g level. Processes unique to this software include tracking weight loss caused by evaporation. For example, every package of inventory is checked out, and any difference in weight between the package time and the check-out time is recorded. All gross and net weights are tracked, confirmed twice daily and signed off on by two members of the oversight team.



As demonstrated below, Constitution Care LLC will comply with all security requirements set forth by Connecticut's Act and Regulations.

2.3 Best-Practice Policies & Procedures

Constitution Care LLC has gone to great lengths to ensure its written policies are comprehensive, practical and suited for the industry. We have worked with leading experts to develop comprehensive guides. All employees of Constitution Care LLC, including security personnel, will receive a copy of our Safety Handbook during their orientation training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff and the surrounding area.

Constitution Care LLC is committed to employing and abiding by all of its Policies & Procedures.

2.4 Security Procedures to Prevent Diversion, Theft and Loss

Screening Process

Constitution Care LLC dispensary facility staff will carefully screen each new patient and primary caregiver to ensure that he or she is a registered in accordance with Connecticut's Act and Regulations. The screening process will include the following:

- Inspection and verification of the qualifying patient or primary caregiver registration certificate.
- Inspection of a Connecticut driver's license, State issued ID or Department of Motor Vehicles ID card establishing residency in the state that includes photo identification, name that matches the name on the registration certificate, age, and expiration date.

All returning patients or primary caregivers will be required to show their registration certificate as well as their Connecticut driver's license, State issued ID or Department of Motor Vehicles ID card to gain admittance to the dispensary facility.

Once inside the dispensary facility, all patients and/or primary caregivers are first required to present their registration certificate and Connecticut driver's license, State issued ID or Department of Motor Vehicles ID card to reception personnel before accessing facility services. Reception personnel will verify each patient's registration status using Constitution Care LLC's point-of-sale system. The point-of-sales system will not only verify that the qualified patient or primary caregiver is registered, it will also track the quantity and date of each Medical Marijuana sale to ensure strict



compliance with the Act and Regulations regarding per-patient quantity limits.

When patients and/or primary caregivers enter the dispensary department, they will then present their registration certificate one more time to the dispensary so that the dispensary can verify that the patient has properly checked in at reception and therefore can have Medical Marijuana products dispensed to them.

Furthermore, Constitution Care LLC will post, in a location that is visible from the point of entry to the dispensary department, signage that indicates the following:

- The obligation of the qualified patient or primary caregiver to produce a valid registration certificate issued by the Department of Consumer Protection;
- The obligation of the qualified patient or primary caregiver to produce a valid, government-issued, photo identification document displaying proof of age that matches the name on the registration certificate; and
- The sale and use of Medical Marijuana and the diversion of Medical Marijuana for non-medical purposes, including to a third party, is a crime in violation of Connecticut law.

Quantity Limits

Patients will be permitted to visit the dispensary facility no more than two times per day. Pursuant to the Connecticut Act and Regulations, Constitution Care LLC will limit patients' access to Medical Marijuana to no more than a one-month's supply, as determined by the Department of Consumer Protection, of Medical Marijuana products either at one (1) time or within a thirty (30)-day period.

Constitution Care LLC will utilize point-of-sale ("POS") software and bar-coding technology to help manage its transactions and track inventory. The patient database and POS software that Constitution Care LLC intends to use allows the tracking of individual patient purchases. All purchases will be tracked to alert staff when purchasing limits have been met. If a staff member attempts to authorize a sale over of the purchasing limit, the POS system will not allow the transaction to take place. Constitution Care LLC will maintain strict inventory controls to ensure stocking levels at the dispensary facility are commensurate with patients' needs and within the limits established by the Act and Regulations.

Site Patrol

Constitution Care LLC will ensure that a licensed guard is on duty at all times during business hours. Security personnel will routinely patrol the neighborhood to prevent nuisance activity or crime, looking for signs of diversion, preparation for illicit



consumption of medicine, and illicit consumption of medicine.

Constitution Care LLC will train security personnel in industry standards and crime prevention prior to deployment. All security personnel will be required to complete a nationally developed safety training program, a formal evaluation, and an orientation and annual training seminar as a condition of employment at Constitution Care LLC.

Constitution Care LLC security personnel will also be trained in conflict resolution and the handling of emergency situations, including procedures for communicating with local law enforcement agencies.

Moreover, Constitution Care LLC intends to provide patients and neighbors with the name, phone number, and e-mail address of an on-site community relations staff person who will be responsible for addressing any concerns posed by our neighbors. Constitution Care LLC will encourage all neighboring residences and businesses to call this person to try to solve operating problems, if any, prior to them making any calls or complaints to the city.

2.5 Plan to assist Local Law Enforcement and the Department of Consumer Protection with Enforcement

After over 25 years of service, our Chief Security Advisor, Bernard Sullivan, still maintains strong ties with Connecticut law enforcement agencies and personnel. Constitution Care LLC aims to have an open dialogue with the local Police Department—however, the Chief Security Advisor will facilitate communications to the extent necessary. Furthermore, the Security Manager will help ensure that Constitution Care LLC security protocols mesh seamlessly with law enforcement agency points of contact.

Additionally, Constitution Care LLC has incorporated strategically placed, internet-protocol security cameras which will stream encrypted feeds to the Web. If necessary or required by law, law enforcement agencies will be able to view our dispensary facility at any time through a wireless 3G or 4F Internet connection. Moreover, the feeds are digitally recorded and securely stored.

Finally, Constitution Care LLC looks forward to a strong partnership with the Department of Consumer Protection. In addition to complying with all enforcement rules and regulations, Constitution Care LLC will request meetings at the outset with the Commissioner and Department personnel who will have a role in the Medical Marijuana program. As with our organization internally, we believe the key to productive, meaningful relationships begins with open communication. Constitution Care LLC believes early meetings are integral to getting the program off on the right foot. Once the communication channels are open, we are confident that our responsive style will aid the Department with enforcement issues.



3.0 FACILITY COMPLIANCE WITH APPLICABLE LAW

Constitution Care LLC is committed to complying with all applicable Connecticut law, particularly in accordance with the dispensary facility operation requirements set forth in sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes (the “Act”) and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies (the “Regulations”). The Security Department will ensure strict compliance with sections 21a-408-33, 21a-408-35, 21a-408-36, 21a-408-37, 21a-408-51, 21a-408-62, 21a-408-63, and 21a-408-64 of the Regulations, as discussed in further detail hereinafter.

3.1 Compliance with Section 21a-408-33: Confidentiality of Information

Dispensary facility employees will not disclose patient-specific information received and records kept pursuant to the Regulations, except in the limited circumstances identified and set forth in section 21a-408-33 of the Regulations. All dispensary facility employees will sign a Code of Conduct before commencing employment acknowledging this rule and certifying to the strict adherence of the same. Additionally, security personnel will pay close attention to staff members’ disclosures to ensure compliance with Connecticut law.

Furthermore, security personnel will oversee the work of any electronic data intermediary to confirm they do not have access to any data involving Medical Marijuana, qualifying patients, primary caregivers or other data from a dispensary facility or an agent of the dispensary facility. If an issue arises, such security personnel will immediately intervene to prevent the unlawful breach of patient confidentiality. As an added measure, no electronic equipment utilized by the dispensary department will collect patient-specific data for use outside the dispensary department.

3.2 Compliance with Section 21a-408-35: Dispensary Facility Prohibitions

Security personnel will ensure that the dispensary department will only be open or operating when a dispensary is on the premises and directly supervising the activity within the dispensary department. At all other times, no person will be permitted in the dispensary department, and the department itself will be closed and properly secured in accordance with sections 21a-408-51 and 21a-408-62 of the Regulations.

Security Department staff will generally oversee dispensary facility activities from a security standpoint and enforce the following rules:

1. The dispensary department will not sell anything other than Medical Marijuana products and paraphernalia;
2. No food or beverages will be consumed by anyone, whether or not a qualifying patient, on the premises of the dispensary facility, except complimentary food and non-



alcoholic beverages made available to qualifying patients and primary caregivers who are at the dispensary facility for a pre-scheduled education, counseling or therapy program;

3. No person, except for a qualifying patient or primary caregiver, will open or break the seal placed on a Medical Marijuana product packaged by a producer;
4. No person, except a dispensary facility employee, or a production facility employee who is delivering Medical Marijuana products, shall be allowed on the premises of the dispensary facility without a qualifying patient or primary caregiver registration certificate issued by the Department or without sufficient proof of a waiver from the Commissioner of Consumer Protection (the "Commissioner") or the Commissioner's authorized representative; and
5. Any visitors on the dispensary facility premises authorized to enter the facility by the Commissioner or the Commissioner's authorized representative will wear a visitor identification badge at all times while on the premises and will be escorted by a dispensary or dispensary technician while in the dispensary department. All such visitors will log in and out, and will return the visitor identification badge upon exiting the premises.

3.3 Compliance with Section 21a-408-36: Procedures When Dispensary Department is Closed

At all times when the dispensary department is closed, the area will be securely locked and alarmed. Such alarm will be a separate alarm system than the other alarm systems used in the dispensary facility. The Security Manager will oversee the dispensary facility employees' access to the dispensary department by controlling which personnel have keys and access codes to such restricted areas. This procedure will ensure that only authorized dispensary facility employees will have access to the dispensary department. Only dispensaries will be given the authority to deactivate the alarm system.

When the dispensary department is closed, security personnel will oversee the proper storage of all Medical Marijuana products in the approved safe or vault within the dispensary department by authorized staff.

3.4 Compliance with Section 21a-408-37: Security of the Dispensary Department During Momentary Absences of a Dispensary

During times when there are no dispensaries and no dispensary technicians in the



dispensary department for a few moments (which is not anticipated during operating hours), security personnel will take appropriate measures to ensure the adequate security of the dispensary department. In particular, security personnel will prevent any unauthorized entry during such times. Furthermore, security personnel will ensure that a dispensary locks the dispensary department or uses the alarm system to prevent or immediately detect access to the department.

3.5 Compliance with Section 21a-408-51: Security Requirements for Dispensary Facilities

Security personnel will, within the parameters as set forth in the Act and Regulations, ensure that the Constitution Care LLC will:

1. Not maintain Medical Marijuana in excess of the quantity required for normal, efficient operations;
2. Store all Medical Marijuana in an approved safe or approved vault and in such manner as to prevent diversion, theft or loss;
3. Maintain all Medical Marijuana in a secure area or location accessible only to specifically authorized employees, which will only include the minimum number of employees essential for efficient operation;
4. Keep all approved safes and/or vaults securely locked and protected from entry, except for the actual time required to remove or replace the Medical Marijuana products;
5. Keep all locks and security equipment in good working order;
6. Not allow keys to be left in the locks and not store or place keys in a location accessible to persons other than specifically authorized employees;
7. Not allow other security measures, such as combination numbers, passwords or electronic or biometric security systems, to be accessible to persons other than specifically authorized employees;
8. Keep the dispensary department locked and protected from entry by unauthorized employees; and
9. Post a sign, which shall be at least twelve inches by twelve inches, at all entry ways into any area of the dispensary facility containing Medical Marijuana that states: "DO NOT ENTER – LIMITED ACCESS AREA – ACCESS LIMITED TO AUTHORIZED EMPLOYEES ONLY."



3.6 Compliance with Section 21a-408-62: Security Alarm Systems

The Security Department will ensure that the dispensary facility meets or exceeds the minimum security alarm system requirements set forth in the Regulations.

Commercial Grade Equipment

The dispensary facility will utilize a comprehensive, commercial-grade, state-of-the-art security system to prevent and detect diversion, theft or loss of Medical Marijuana. Such security system will include door sensors, perimeter alarms, motion detectors, video cameras, twenty-four hour recordings, duress alarms, panic alarms, holdup alarms, automatic voice dialers, failure notification systems, the ability to immediately produce a clear color still photo with a minimum dpi of 9600, date and time stamps embedded on all recordings, and the ability to remain operational during a power outage.

Video Cameras

Prior to opening, Constitution Care LLC will install and maintain a closed-circuit video surveillance system (CCTV) that will operate 24 hours per day, 7 days per week. The video surveillance system will effectively cover the interior and exterior of the dispensary facility, including parking areas, rear alley areas, all entrances and exits to the building, limited-access areas, and all areas where Medical Marijuana is stored, handled or dispensed.

Constitution Care LLC intends to install at least five (5) cameras in the interior of the facility, each high resolution with 360 degree view capability and internet-protocol with encrypted video feed. The proposed cameras will be tamper-proof, ultra-compact, and equipped to offer high-resolution video recording (2048 x 1536 IP 3 Megapixel). Each camera comes equipped with a built-in 4GB Micro SD Card for digital recording at the camera with two-way audio. The 360 degree all-around view can capture an entire room; the panorama function and a quad view will show images from four different angles simultaneously.

When ceiling-mounted, the hemispheric camera displays the image area of the entire room. The 360 degree image in the hemisphere cameras is convex, particularly near the image borders. These image sections are corrected for the viewer by the integrated distortion correction software, allowing a view of the scene from the usual perspective. The virtual PTZ/Zoom feature allows users to enlarge or move image sections within the hemisphere, just like a PTZ/Zoom camera. This is achieved without moving parts and allows one to view any area in the room (when ceiling-mounted; 180 degrees when wall-mounted). While a traditional analog system would require four cameras, one hemispheric camera allows users to see four directions simultaneously on the monitor in a quad view. The preset North position can be moved to any direction in the image; the camera generates the other three directions (East, South, West) automatically and stores them as separate views.



Constitution Care LLC intends to install at minimum five (5) indoor, high-resolution, IP video cameras at the following locations:

- One (1) - Located strategically in the ceiling of the reception area of the facility looking 360 degrees at entry/exit of the doors of premises, the reception area itself, and patient/employee activity;
- One (1) - Located strategically in ceiling of secured dispensary department looking 360 Degrees at entry/exit of the doors to the department, the dispensing area, the Medical Marijuana sales areas, all other areas where medicine is to be handled, and patient/employee activity;
- One (1) - Located strategically in ceiling of alternative services department looking 360 Degrees at entry/exit of the doors to the department, the alternative services department itself, and patient/employee activity;
- One (1) - Located strategically in ceiling of the surveillance room looking 360 Degrees at entry/exit of doors to the room, the surveillance room itself, and employee activity;
- One (1) – Located strategically in the ceiling of vault room looking 360 Degrees at entry/exit doors to the room, the areas where Medical Marijuana is being stored, and employee activity.

More cameras may be utilized after further consultation with Sonitrol New England upon Constitution Care LLC’s award of a dispensary facility license. All points of entry and exit will have video cameras angled so as to allow for the capture of clear and certain identification of any person entering or exiting the dispensary facility and all areas within the facility.

Additionally, Constitution Care LLC intends to install at least four (4) cameras on the exterior of the facility. The proposed cameras are ultra-rugged, tamper-proof, and equipped to offer two separate high-resolution image sensors for day/night video recording (2048 x 1536 IP 3 Megapixel). Each camera comes equipped with a built-in 4GB Micro SD Card for digital recording at the camera with two-way audio. The cameras offer a 180 degree view and are weatherproof from -30° to +60° C (-22° to +140° F) without the need for heating. The dual lens IP camera offers digital continuous zoom, pan and tilt and is integrated with a two-way audio microphone, speaker and PIR motion detector. Like the interior cameras, the exterior cameras will have an encrypted video feed.

The surveillance system will be pre-installed with battery packs which allows the system and all its components to remain fully operational during a power outage. If the system



shuts down for any reason, the battery packs immediately supply the necessary power to allow uninterrupted protection and alarm monitoring. Sonitrol New England will check battery status during routine system inspections and after each incidence of use to ensure batteries are adequately charged. Moreover, Constitution Care LLC intend to connect the alarm system to an industrial grade or commercial grade uninterruptible power supply (“UPS”), which can provide up to 72 hours of uninterrupted power to the system in case of an extended power outage. The digital video recorder and the cameras, as well as the surveillance room’s modem, router, wireless receiver, and monitors will connect to the UPS to ensure uninterrupted remote access to the system.

A failure notification system will be installed providing an alert to Sonitrol New England as well as to the dispensary facility, within five minutes of a triggering event causing the surveillance system’s failure by phone, email, and text message.

See below for the proposed camera technical specifications.

Outdoor / Indoor Bullet Camera Specifications:



- Processor: Ti DaVinci Series DSP
- Operating System: Embedded LINUX
- Resources: Simultaneous remote monitoring, local recording and remote control
- User Interface: WEB, CMS(DSS/PSS), DMSS, NVR
- Image Sensor: 1/3" 2.0 Megapixel SONY Progressive Scan Exmor CMOS
- Effective Pixels: 1920 (H) x 1080 (V)
- Electronic Shutter: Auto/Manual, 1/4~1/10000s
- Minimum Illumination: 0.1 Lux / F1.4 (Color), 0.01 Lux / F1.4 (B/W), 0 Lux When IR on
- Signal Noise Ratio: >50dB
- Gain Control: Auto/Manual
- White Balance: Auto/Manual
- Day/Night: ICR
- Lens Mount: CS Mount, Auto Iris, 3.3-12mm@F1.4
- IR Distance: Max. 100ft (18 Cold Light IR LEDs)
- Video Compression: H.264 / MJPEG
- Image Resolution: 1080P(1920×1080) / SXGA(1280×1024) / 1.3M(1280×960) / 720P(1280×720) / D1(704×480) / CIF(352×240)
- Encoding Speed: Main Stream-1080P/SXGA/1.3M/720P/D1(1~30fps), Extra Stream: D1/CIF (1~30fps)
- Bit Rate: 56Kbps~8192Kbps
- Snapshot: Fastest 1fps JPEG Capture
- Video Format: NTSC
- Analog Video Output: 1 Channel BNC(1.0Vp-p, 75Ω)
- Audio Compression: G.711a / G.711u / PCM
- Bit Rate: 128Kbps/64Kbps/10.2Kbps
- Input: 1 Channel 3.5mm JACK LINE IN
- Output: 1 Channel 3.5mm JACK SPEAK OUT
- Two-way Audio: The same with the audio input Channel
- Network: Ethernet: RJ-45 Port (10/100Base-T)
- Network Functions: HTTP, TCP/IP, ICMP, RTSP, RTP, UDP, SMTP, NTP, DHCP, DNS, IP Filter, PPPOE, DDNS, FTP, UPNP, Alarm Server

- Remote Operation: Monitor, PTZ control, Playback, System setting, File download, Log information, Maintenance & Upgrade
- Auxiliary Interface: SD Card Max. 32GB Micro SD Card, Local Storage
- Alarm Functions: 2 Input / 1 Output
- Power Supply: DC12V, PoE
- Power Consumption: Max 10W
- Ingress Protection: IP66
- Operating Environment: -10 ~+50°C / 10~90%RH
- Dimension: 12.07"× Φ4.09" (L×D)
- Weight: 2.8 lbs

PTZ Camera Specifications:



- Image Sensor: 2 Megapixel 1/3" Exmor CMOS
- Scanning System: Progressive
- Electronic Shutter Speed: 1/1 ~ 1/30,000s
- Min. Illumination: Color: 0.05Lux@F1.6 B/W: 0.005Lux@F1.6
- Day/Night: Auto(ICR) / Color / B/W
- Backlight Compensation: BLC / HLC / DWDR (Digital WDR)
- White Balance: Auto, ATW, Indoor, Outdoor, Manual
- Gain Control: Auto / Manual
- Noise Reduction: 2D / 3D
- Privacy Masking: Up to 24 areas
- Digital Zoom: 16x
- Lens Focal Length: 4.7mm ~ 94.0mm(20x Optical zoom)
- Max Aperture: F1.6 ~ F3.5
- Focus Control: Auto / Manual
- Angle of View: H: 55.4° ~ 2.9°
- Close Focus Distance: 10mm ~ 1000mm
- Pan/Tilt Range: Pan: 0° ~ 360° endless; Tilt: -2° ~ 90°, auto flip 180°
- Manual Control Speed: Pan: 0.1° ~ 300°/s; Tilt: 0.1° ~250°/s



- Preset Speed: Pan: 400°/s; Tilt: 300°/s
- Preset: 80(DH-SD), 255(Pelco-P/D)
- PTZ Mode: 5 Pattern, 8 Tour, Auto Pan, Auto Scan
- Speed Setup: Human-oriented focal length/ speed adaptation
- Power up Action: Auto restore to previous PTZ and lens status after power failure
- Idle Motion: Activate Preset/Pan/Scan/Tour/Pattern if there is no command in the specified period
- Time Task: Auto activation of Preset/Pan/Scan/Tour/Pattern by preset-time
- Protocol: DH-SD, Pelco-P/D (Auto recognition)
- Video Compression: H.264 / MJPEG
- Resolution: 1080P(1920×1080) / 720P(1280×720) / D1(704×576/704×480) / CIF(352×288/352×240)
- Frame Rate: Main Stream 1080P/720P(1 ~ 25/30fps), Sub Stream D1/CIF(1 ~ 25/30fps)
- Bit Rate: H.264: 56K ~ 8192Kbps, MJPEG: 56K ~ 20480Kbps
- Audio Compression: G.711a / G.711u (32kbps) / PCM (128kbps)
- Interface: 1/1 channel In/Out
- Network: Ethernet RJ-45 (10/100Base-T)
- Protocol: IPv4/IPv6, HTTP, HTTPS, SSL, TCP/IP, UDP, UPnP, ICMP, IGMP, SNMP, RTSP, RTP, SMTP, NTP, DHCP, DNS, PPPOE, DDNS, FTP, IP Filter, QoS, Bonjour
- ONVIF: ONVIF Ver. 2.0 conformance
- Max. User Access: 20 users
- Smart Phone: iPhone, iPad, Android, Windows Phone
- Auxiliary Interface: Memory Slot Micro SD, Max 32GB
- RS485: 1
- Alarm: 7/2 channel In/Out
- Power Supply: AC 24V/3A (±10%)
- Power Consumption: 15W, 25W(Heater on)
- Working Environment: -40°C ~ 60°C / Less than 90% RH
- Protection Level: IP67, IK10 optional
- Dimensions: Φ222(mm) x 322(mm)
- Weight: 5.0kg

360 Degree Camera Specifications:



Image Sensor	1/3 type MOS Sensor
Effective Pixels	Approx. 3.1 megapixels
Scanning Mode	Progressive
Scanning Area	4.51 mm (H) × 3.38 mm (V) {3/16 inches (H) x 1/8 inches (V)}
	Color: 1.5 lx (F2.4, Auto slow shutter: Off (1/30s), Gain:On(High))
	Color: 0.1 lx (F2.4, Auto slow shutter: Max. 16/30s, Gain:On(High)) *1
Minimum Illumination	BW: 1.2 lx (F2.4, Auto slow shutter: Off (1/30s), Gain:On(High))
	BW: 0.08 lx (F2.4, Auto slow shutter: Off (16/30s), Gain:On(High)) *1
White Balance	AWC (2,000 ~ 10,000 K), ATW1 (2,700 ~ 6,000 K), ATW2 (2,000 ~ 6,000 K)
Light Control Mode	Indoor scene (50 Hz / 60 Hz) / ELC
	With Super Dynamic On
	ELC (1/30 s)
	With Super Dynamic Off
Shutter Speed	ELC (1/30 s), ELC (3/100 s), ELC (3/120 s), ELC (2/100 s), ELC (2/120 s),ELC (1/100 s), ELC (1/120 s), ELC (1/250 s), ELC (1/500 s), ELC (1/1,000 s),ELC (1/2,000 s), ELC (1/4,000 s), ELC (1/10,000 s)
Super-Dynamic Dynamic Range	ON / OFF
Adaptive Black Stretch	52 dB typ. (only at Super-Dynamic On)
AGC	On/Off (only at Super-Dynamic Off)
	ON (HIGH) / ON (MID) / ON (LOW) / OFF



Electronic Sensitivity UP Day & Night(electrical)	OFF (1/30 s), Max. 2/30 s, Max. 4/30 s, Max. 6/30 s, Max. 10/30 s, Max. 16/30 s
Digital Noise Reduction	OFF / AUTO
Video Motion Detection	HIGH / LOW
Video analytics Face Detection	ON / OFF, 4 areas available Off/On/On with face frame display However, face detection is not supported when "Fisheye" or "Quad streams" is selected for the image type.
Auto mode:	Auto pan/ Preset sequence Auto mode can only be used when the image type is Quad PTZ or Single PTZ.
Self return:	10 s/ 20 s/ 30 s/ 1 min/ 2 min/ 3 min/ 5 min/ 10 min/ 20 min/ 30 min/ 60 min Self return can only be used when the image type is Quad PTZ or Single PTZ.
Privacy Zone	ON / OFF (up to 4 zones available) On/Off (up to 2 areas available)
VIQS	However, the VIQS function is not supported when "Quad PTZ", "Single PTZ" or "Quad streams" are selected.
Camera Title (OSD)	Up to 20 characters (alphanumeric characters, marks) , On/Off However, you can specify characters to be displayed on each of the four screens when "Quad streams" is selected.
Focal Length	Lens 0.837 mm
Angular Field of View	Horizontal: 182 °, Vertical: 176 °
2M Panorama [16:9]/ 2M Double Panorama [16:9]: 1M Panorama [16:9]/ 1M Double Panorama [16:9]: Panorama + Quad PTZ/ Panorama + Single PTZ/	Image Resolution *4 H.264(1): 1920x1080 / 640x360 / 320x180, up to 30 fps H.264(2): 640x360/320x180, up to 30 fps JPEG: 1920x1080/640x360/320x180, up to 30 fps H.264(1): 1280x720 / 640x360 / 320x180, up to 30 fps H.264(2): 640x360/320x180, up to 30 fps JPEG: 1280x720/640x360/320x180, up to 30 fps When using distribution of "Panorama" or "Double panorama" H.264(1): 1920x1080/640x360/320x180, up to 15 fps JPEG: 1920x1080/640x360/320x180, up to 15 fps



Double Panorama
+
**Quad PTZ/
Double Panorama**
+
Single PTZ:

When using distribution of "Quad PTZ" or "Single PTZ"
H.264(2): 1280x960/640x480/320x240, up to 15 fps
JPEG: 1280x960/640x480/320x240, up to 15 fps

Video Recording Capabilities

Every video camera utilized by the dispensary facility will record for 24 hours a day, 7 days a week. A synchronized and correctly set date and time stamp will be embedded on all recordings, which will appear in a manner so as not to significantly obscure the picture. All video recording will allow for the production and exporting of clear color still images with a minimum of 9600 dpi from any camera image (live or recorded) in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will be able to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system.

The video surveillance system will have the capability to record, archive and playback video feed for a minimum of six (6) months. The decentralized IP concept (discussed in the Video Storage section below) incorporates a digital memory (SD card) for long-term recording in every camera. The PC is now used only for viewing, not for analysis or recording.

As a result, the cameras can record events even without PC/DVR and digitally record videos with sound for archiving purposes. Additionally, the system will allow for the production of a videodisc directly from the DVR unit; the video on the disc will be viewable on a Windows PC and will include any required software needed to view the video.

The Security Manager will personally oversee the erasure of all recordings prior to disposal or sale of the dispensary facility.

Video Storage

Usually cameras only supply the images, while the processing and recording are done later on a central PC or Digital Video Recorder that uses video management software. This traditional, centralized structure is unsuitable for high-resolution video systems, since it requires not only high network bandwidth, but also needs enormous PC processing power to support several cameras. These PC/DVR systems typically have high failure rates because the PC's are consistently running, overheating and recording. They put considerable strain on the PC/DVR, because they are expected to process dozens of high-resolution live cameras 24/7. As such, Constitution Care LLC will utilize a decentralized IP system.

Unlike other systems, the decentralized IP concept incorporates a digital memory (SD card) for long-term recording in every camera. The PC is now used only for viewing, not for analysis or recording. As a result, the cameras can record events even without PC/DVR and digitally record videos with sound for archiving purposes.



The system will be monitored by security personnel on multiple screens (at least one 19-inch or greater call-up monitor), within the secured surveillance room. In addition, the surveillance room will include a video printer capable of immediately producing a clear color still image with a minimum of 9600 dpi from any camera image (live or recorded) in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will be able to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. The video surveillance system will use pan, tilt and zoom cameras located both inside and outside the facility. On-site security personnel will monitor all video feed from before opening until all persons have left the premises. Secured remote viewing will be available for security and safety personnel as well as senior management at any time through an Internet login system. In addition, Sonitrol New England will monitor the video feed 24 hours a day.

All recordings will be retained for at least six (6) months and made available for immediate viewing by the Commissioner or the Commissioner's authorized representative upon request. If Constitution Care LLC is aware of a pending criminal, civil or administrative investigation or legal proceeding for which a recording may contain relevant information, the Security Manager will ensure that the dispensary facility retains an unaltered copy of the recording until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the dispensary facility manager that it is not necessary to retain the recording.

Alarm System

Constitution Care LLC will install, maintain and use a professionally monitored trespass, robbery and burglary alarm system. Sonitrol New England, a recognized commercial security firm, will install the alarm/intrusion detection system. This system will be in-use and monitored 24 hours each day and consists of a door sensors, perimeter alarms, motion detectors, duress alarms, panic alarms, and holdup alarms. The alarm system will have an automatic voice dialer capable of sending a prerecorded voice message to law enforcement, public safety and/or emergency services agency requesting dispatch. A failure notification system will be installed providing an alert to the dispensary facility, particularly the Security Manager and Dispensary Facility Manager, within five minutes of the alarm system's failure by phone, email, and text message.

The alarm system will be designed to provide protection to the building perimeter and interior of the dispensary facility. The system will include the following components, at minimum:

Seven (7) - Single Door Sensor Locations:

- One (1)- Located strategically on exterior perimeter door of the reception area (i.e. the perimeter of the dispensary facility)



- One (1)- Located strategically on interior door to the dispensary department
- One (1)- Located strategically on interior door to the alternative services department
- One (1)- Located strategically on interior door to the surveillance room
- One (1)- Located strategically on interior door to the office area
- One (1)- Located strategically on interior door to the vault room
- One (1)- Located strategically on interior door to the break room

Nine (9) - Motion Detector Locations:

- Three (3)- Located strategically in ceiling of the reception area
- Two (2)- Located strategically in ceiling of the dispensary department
- One (1)- Located strategically in ceiling of the alternative services area
- One (1)- Located strategically in ceiling of the office area
- One (1)- Located strategically in ceiling of the vault room
- One (1)- Located strategically in ceiling of the surveillance room

Seven (7) – Panic Alarm Locations:

- One (1)- Located strategically in the reception area
- One (1)- Located strategically in the dispensary department
- One (1)- Located strategically in the alternative services area
- One (1)- Located strategically in the office area
- One (1)- Located strategically in the vault room
- One (1)- Located strategically in the surveillance room
- One (1)- Located strategically in the break room

Seven (7) – Holdup Alarm Locations:

- One (1)- Located strategically in the reception area



- One (1)- Located strategically in the dispensary department
- One (1)- Located strategically in the alternative services area
- One (1)- Located strategically in the office area
- One (1)- Located strategically in the vault room
- One (1)- Located strategically in the surveillance room
- One (1)- Located strategically in the break room

Constitution Care LLC's alarm system will also utilize a duress alarm, generated by the entry of a designated code into an arming station in order to signal that the alarm user is being forced to turn off the system. Constitution Care LLC intends to use a UL commercial encrypted DMP XR 500 Security Control Device.

More alarms may be added to the system after further consultation with Sonitrol New England upon Constitution Care LLC's award of a dispensary facility license. In particular, Constitution Care LLC will install audio glass break frequency detectors near all glass windows within the dispensary facility to further secure the perimeter of the dispensary facility. Intrusion detection devices will be placed at all exterior doors and windows, roof entry points, and reception desks. All dispensary facility employees will be trained on the procedures for triggering the panic, holdup, and duress alarms.

The alarm system will monitor all sensors on a 24/7 basis as designated by a pre-determined time schedule that will be established. Security personnel and Sonitrol New England will receive notification when an alarm is triggered.

The alarm system will be pre-installed with battery packs which allows the system and all its components to remain fully operational during a power outage. If the system shuts down for any reason, the battery packs immediately supply the necessary power to allow uninterrupted protection and alarm monitoring. Sonitrol New England will check battery status during routine system inspections and after each incidence of use to ensure batteries are adequately charged. Moreover, Constitution Care LLC intend to connect the alarm system to an industrial grade or commercial grade uninterruptible power supply ("UPS"), which can provide up to 72 hours of uninterrupted power to the system in case of an extended power outage. The control panel and alarms will connect to the UPS to ensure uninterrupted power to the system.

A failure notification system will be installed providing an alert to Sonitrol New England as well as to the dispensary facility, within five minutes of a triggering event causing of the surveillance system's failure by phone, email, and text message.

The alarm system will be inspected and all devices tested by Sonitrol New England to ensure proper functioning at least twice per year.

See the control panel technical specifications on the following pages for additional alarm system information.



SPEC SHEET



NYC
MEA



**NETWORK
MONITORING!**



*The most impressive array
of integration features*



- UL Listed for Burglary, Fire, Access Control
- Suitable for Bank and Government installations
- On-board Ethernet connection
- Flash Updateable: No more firmware chips to replace
- Built-in AES Encryption
- Provides up to 500 DMP 1100X Wireless devices
- Select Area, All/Perimeter, or Home/Sleep/Away operation

DMP XR500 Series Command Processor™ Panels meet all your burglary, fire and access control integration needs.

XR500 SERIES ACCESS/BURGLARY/FIRE 574-ZONE COMMAND PROCESSOR™ PANEL

SYSTEM FEATURES

- 32 individual reporting areas, with common areas
- Up to 16 supervised door access-points and/or keypads
- Output Groups: Maximum functionality—Minimum programming
- Up to 502 fully-programmable Form C relays
- Up to 562 two-wire smoke detector or fire-initiating zones
- 10,000 user codes with 99 profiles
- 12,000 event buffer
- Up to four independent shift schedules per area OR use one shift schedule to control all areas
- Up to 100 output schedules to control relays and panel outputs
- Up to 20 holiday dates for shift and output schedules
- Optional user authority to temporarily extend shift schedules
- Serial 3 digital dialer or CID reporting to multiple receivers
- Built-in phone line monitor
- Built-in DB-9 RS-232 or LX-Bus (Selectable)
- Multi-lingual menus available

- Built-in remote or on-site feature upgrade capability
- 1.5 Amps 12 VDC smoke and auxiliary output with OVC protection
- 16.5 VAC 50 VA plug-in transformer included
- 1.5 Amps 12 VDC supervised bell output
- Multiple on-board status LEDs

XR500N/XR500E SYSTEM FEATURES

- On-board Ethernet
- Bank, Safe and Vault Operation
- Two Man Rule, Panic Button Test and Early Morning Ambush

XR500E SYSTEM FEATURES

- Built-in AES (Advanced Encryption Standard) Encryption
- NIST Certified and UL Listed Encryption
- Unique user-programmable passphrase for greater security





XR500 SERIES

NETWORK COMMUNICATION

The XR500N Network version is the perfect solution for multi-site applications where the Internet or LAN/WAN is available.

Built-in Ethernet communication enhances network options and provides UL High Line Security (UL AA). Both UDP and TCP communications are supported.

ENCRYPTION

The XR500E provides encrypted data transmission and is ideal for secure environments where encrypted data is required. Using AES (Advanced Encryption Standard) Encryption ensures secure data transmission by using a unique alphanumeric passphrase. UL Listed and NIST Certified Encryption.

COMMUNICATION

The XR500 Series is unmatched in its communication capability with Serial 3 digital dials, CID and Network Monitoring. In addition, the XR500 Series can report to multiple central station receivers. DMP Serial 3 format supports 16-character user, zone and area names to decrease the central station response time and limit dependence on automation literal tables for message conversion.

BUILT-IN PROGRAMMER AND DIAGNOSTICS

Enables installers and service technicians to fully program the system and run diagnostics from any DMP LCD keypad.

CANCEL/VERIFY

In a Home/Sleep/Away or All/Perimeter system, CANCEL a burglary alarm or VERIFY that a valid burglar alarm has occurred. Selecting VERIFY manually verifies the alarm and an alarm verification message is sent to the Central Station.

FLASH UPDATEABLE

The XR500 Series panel accepts software updates from a remote location using Remote Link™ software. As new XR500 feature updates release, perform the flash update remotely. No need to make a trip to the site to update the panel with the latest software version.

AREAS

Program up to 32 areas with a variety of options, including independent arming. Each area has a unique name and may have its own account number.

Common areas automatically arm when the last independent area is armed and disarm when the first independent area is disarmed. This is ideal for lobbies or areas where users need common access to specific areas only.

AREA DISPLAY

To provide more system flexibility, any combination of areas may be assigned to a particular keypad. In this manner, a 32-area system could function as 16 mini-systems, each having two areas of protection that are controlled from a single keypad.


ALL/PERIMETER OR HOME/SLEEP/AWAY OPTIONS

The XR500 Series panels support All/Perimeter or Home/Sleep/Away operation.

When All/Perimeter operation is selected, Area 1 is the Perimeter and can be separately armed allowing Area 2, the Interior, to remain unarmed while you are inside.

When Home/Sleep/Away operation is selected, Areas 1 and 2 operate as in an All/Perimeter system. Area 3 is the Bedroom area and allows users to arm the perimeter and interior at night while leaving the bedroom area disarmed.

DMP WIRELESS

The easily programmable  900MHz frequency-hopping spread-spectrum DMP 1100X Series wireless system features Two-way communication for superior operation, supervision and battery life. Two-way communication minimizes repetitive signaling and helps to quickly identify missing transmitters. Simple keypad access can be used to verify that wireless device zones are in working order.

ZONE EXPANSION

The XR500 provides up to 574 zones, programmable for burglary, fire and access applications. The system contains eight burglary zones and two Class B 12 VDC powered zones. Up to 64 zones are available on 16 keypad addresses and up to 100 zones are available on the built-in LX-Bus. Add up to 500 zones using Expansion Modules.

CROSS-ZONING

This powerful feature allows zones to be programmed to report alarms only when one or more zones trip twice within 4 to 250 programmable seconds. If only one zone trips within the specified time, a fault report is sent to the central station.

10,000 USER CODES

Each user can be assigned to one of 99 different profiles that provide access to any combination of areas.

12,000 EVENT MEMORY

The Display Events feature allows users to view up to 2,000 stored openings and closings, zone events, user code and schedule changes and supervisory events. Sort events by a particular user, door and date range. The remaining 10,000 events detail door access granted events separately for easy review. Events may be viewed at any system keypad or uploaded to Remote Link™ software.

EVENTS MANAGER

Save dial-up monitoring costs by using the Events Manager option to buffer specific non-alarm reports. Automatically download them to the receiver when memory is full or keep them in memory until downloaded with DMP Remote Link™ Software.



SPEC SHEET

FIRE DRILL AND ONE-MAN WALK TEST

Users can test fire notification bells using the Fire Drill feature. A special code is also available for installers to test the system. The one-man walk test feature allows a single technician to check the panel response to burglary, fire, panic and supervisory zones.

OUTPUTS

The XR500 allows the use of two SPDT relay outputs and four open-collector outputs, which may be activated by zone or system events, by schedule, through the User Menu or when a card is presented. Output Groups allow multiple outputs to activate with a single event and/or can be assigned to a particular user profile. Up to 500 outputs are available on the XR500 LX-Bus when optional output expanders are used.

OUTPUT SCHEDULES

Achieve maximum system flexibility with 100 programmable schedules that simplify planning and operations. Control any contact-activated device with schedules that automatically regulate relays and switched-ground outputs.

DOOR STRIKE SCHEDULES WITH OVERRIDE

Specific doors may use output schedules to unlock during certain times of the day or night, or the card reader can be completely disabled when desired. The schedule override feature keeps doors locked should the business open later or close earlier than scheduled.

SHIFT SCHEDULES WITH HOLIDAYS

Up to four independent Shift schedules are available for each of the 32 areas. Shift schedules are used when areas are programmed to automatically arm or disarm and to transmit area Late-to-Close reports. Shift schedules are assigned to user authorities, called Profiles, to define scheduled permissions for system users. Override normal day-to-day schedules up to a year in advance with up to 20 user-selectable Holiday Dates. Independent holiday schedules are available for each shift, output and door-strike schedule.

MULTI-LINGUAL DISPLAY OPTION

XR500 Series systems may be programmed to display the User Menu and Status Display text in multiple languages. When the Command key is pressed, the option to choose a language displays. Select the language to use. The language chosen continues to display at the keypad until another language is chosen.

KEYPAD SHORTCUT KEYS

Keypad shortcut keys are provided to simplify operation and allow the user to arm, monitor or reset the system.

THINLINE™ AND AQUALITE™ KEYPADS

The stylish and sleek 7000 Series keypads provide three 2-button Panic keys, AC power and Armed LEDs, 32-character display, backlit logo and keyboard plus an internal speaker. Aqualite Series keypads offer a brilliant Aqua colored LCD display and backlighting.



Aqualite/Thinline Keypad

VALUABLE VISUAL ALARM INDICATOR

In a normal state, both the keypad and logo backlighting remain Blue on Aqualite keypads or Green on Thinline keypads. However, during an alarm state, the keypad and logo turn Red. The change in color allows persons on-site to instantly recognize an alarm condition.



Red Backlighting for Alarm Conditions

7760 CLEAR TOUCH™

An attractive new user interface featuring a glass touchscreen instead of traditional keys. The Blue touchscreen display turns Red for alarm conditions. Available in White, Black or Platinum, the 7760 adds elegance and style to any installation.



7760 Clear Touch™ Keypad

16 INDEPENDENT ACCESS CONTROL DOORS

Any access control reader with a 26-40 bit Wiegand output can be connected to the XR500 Series panel. Attach card reader inputs to up to 16 different locations.

ACCESS CONTROL

The XR500 system can restrict access by schedule, arming level or other criteria. The specific reason for access denial can be displayed on the keypad, stored in events, logged on a local printer (DMP 462P required), sent to the central station and to DMP Advanced Reporting software.

AUTOMATIC BURGLARY SYSTEM DISARMING

The XR500 is an integrated burglary, fire and access control system that can be configured for users to gain access and disarm the area using a single card read!

ANTI-PASSBACK

Specific doors and readers can be designated for access to, or egress from, specific areas in the system. This operation requires users to card in and card out of a specific area. Users failing to egress the area are not allowed access into the area again until authorized by the system administrator.





XR500 SERIES

KEYPADS

7000	Series Thinline Keypads
7000A	Series Aqualite Keypads
7760	Clear Touch Keypad
630F	LCD Remote Fire Command
690/790	Series LCD Security Command
ePAD™	Virtual Keypad

EXPANSION MODULES

708	Bus Extender
710/710F	Bus Splitter/Repeater
711	Single Zone Expansion
712-8	8-zone Expansion
714	4-zone Class B Expansion
714-8	8-zone Class B Expansion
714-16	16-zone Class B Expansion
715	4-zone 2-wire smoke Expansion
715-8	8-zone 2-wire smoke Expansion
715-16	16-zone 2-wire smoke Expansion
716	Output Expansion, 4 Form C relays, 4 open collector outputs
717	Graphic Annunciator: 20 open collector outputs
725	4-zone Expansion, 24 VDC
736P	Radionics Interface
739	X-10 Interface

INTERFACE CARDS

461	Interface Adaptor Card
462N	Network Interface Card
462P	Printer Interface Card
481	Expansion Interface Card

AUXILIARY MODULES

860	Relay Output Module
865	Style Y/Z Notification Circuit Module
866	Style W Notification Circuit Module
867	LX-Bus Notification Circuit Module
869	Style D Initiating Circuit Module
893A	Dual Phone Line Module

PULL STATIONS

850	Series Pull Stations
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SMOKE/HEAT DETECTORS

521B/BXT	Addressable Smoke, CleanMe
N56-100W	Detector Base
521LX/LXT	Addressable Smoke/Heat CleanMe
SLR-835B	Conventional Smoke
SLR-835BH	Conventional Smoke/Heat

TRANSFORMERS

322	Wire-in 56 VA
327	Plug-in 50 VA (Included)
323	Wire-in 56 VA (350 or 350A enclosure required)

POWER SUPPLIES

502-12	2 Amps @ 12 VDC
505-12/LX	5 Amps @ 12 VDC
505-12L	5 Amps @ 12 VDC
505-12A	5 Amps @ 12 VDC

INTRUSION DETECTORS

Sentrol®	Contacts and Sensors
Optex	PIRs
Potter	Contacts and Sensors
Tane	Contacts and Water Sensors
Virtually any other Intrusion Detectors	

ACCESS CONTROL

733 or 734	Wiegand Interface Module
OP-08CB	REX Motion Detector
PB-2	Request-to-Exit Button
Proximity Readers and Credentials	
DMP ProxPatch	

CENTRAL STATION RECEIVERS

SCS-1R	Security Control Receiver
SCS-105	Single-Line DMP Serial 3 Receiver
Compatible with Central Station Receivers that accept Standard CID, DD, or DMP Serial 3 messaging	

WIRELESS

738A	Ademco 32-point Expansion Module
738I	ITI 96-point Expansion Module

DMP WIRELESS

1100X	Wireless Receiver
1101	Universal Transmitter, Internal and External Contacts
1102	Universal Transmitter, External Contact
1114	Wireless Four-Zone Expander
1116	Wireless Relay Output
1117	Wireless LED Annunciator
1118	Wireless Remote Indicator Light
1121	Pet Immune PIR Motion Detector
1124	360° Coverage PIR Motion Detector
1125	PIR Motion Detector
1129	Glassbreak Detector
1139	Bill Trap
1142	Two-Button Hold-up Transmitter
1142BC	Two-Button Belt Clip Hold-up Transmitter
1145	Four-Button Key Fob
1146	Two-Button Key Fob
1147	One-Button Key Fob
1161	Residential Smoke Detector
1162	Residential Smoke/Heat Detector



ACCESSORIES

300	Four-wire Harness
303	Silence/Reset Push-Button
305	Plug-in Output Relay
306	Tamper Harness
307-5	Screw-On Tamper Switch
3012	Clip-On Tamper Switch
335	Intrusion Siren
370	Lightning Suppressor
374	Surge Voltage Suppressor
382-6	AnyNET-DMP Cable (6')
382-50	AnyNET-DMP Cable (50')
399	Programming Harness
431	Output Harness
861	Power Distribution Module

COMPUTER SOFTWARE

Remote Link Programming Software	
System Link End-User Management Software	
Link Server Application	

<p>SYSTEM SPECIFICATIONS</p> <p>Primary Power (included) 16.5 VAC 50 VA transformer</p> <p>Secondary Power 12 VDC Battery</p> <p>Models 365, 366, 367, 368 or 369</p> <p>Output Rating</p> <p>Bell 1.5 Amps at 12 VDC</p> <p>Smoke and Auxiliary 1.5 Amps at 12 VDC</p> <p>Current Draw 180mA</p> <p>Enclosures:</p> <p>Material Cold-rolled steel</p> <p>Model 350 17.5" W x 13.5" H x 3.5" D (Gray or Red)</p> <p>Model 350A (Gray) 17.5" W x 13.5" H x 3.75" D</p> <p>Model 352X (Gray) 14.5" W x 32" H x 4.0" D</p> <p>Model 341 (Gray) 12.75" W x 6.55" H x 2.9" D</p>	<p>LISTINGS AND APPROVALS</p> <p>Refer to the XR500 Series Installation Guide (LT-0681), XR500 Series Programming Guide (LT-0679) and specific compliance listings for installation and programming requirements necessary to meet a particular approval.</p> <p>Underwriters Laboratories (UL) Listed</p> <p>UL Bank, Safe and Vault</p> <p>UL AA High Line Security</p> <p>UL Encrypted High Line Security</p> <p>Underwriters Laboratories Canada (ULC) Listed</p> <p>NIST Validated XR500E Encrypted Command Processor Certificate #130</p> <p>ANSI/SIA CP-01-2000 False Alarm Reduction</p> <p>New York City (MEA)</p> <p>California State Fire Marshal (CSFM)</p> <p>FCC Part 15</p> <p>FCC Part 68</p> <p>For additional information, visit www.dmp.com and select Compliance.</p>	
	<p>800-641-4282</p> <p>www.dmp.com</p> <p>Made in the USA</p>	<p>INTRUSION • FIRE • ACCESS • NETWORKS</p> <p>2500 North Partnership Boulevard</p> <p>Springfield, Missouri 65803-8877</p>

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Maintenance and Access to the Security System Equipment

In order to ensure that the dispensary facility is secured and effectively monitored, Constitution Care LLC is committed to maintaining an electronic recording system that is in good working order at all times so as to prevent any theft, loss, destruction or alterations. Each dispensary facility employee or security system service employee who has been authorized to oversee the functioning of the security system will be required to report any malfunctioning of the system to the Dispensary Facility Manager and Security Manager immediately.

In addition, Sonitrol New England will inspect the security system at least two times a year to ensure that all components function correctly. The inspection consists of a system/communications test, system reset, check of all devices and equipment for proper operations, adjustment or replacement, including cleaning of all lenses, equipment or devices, replacement of any system batteries, if needed, and verification and updating of all subscriber information.

In order to attain the utmost safety and protection for the dispensary facility, security staff will limit access to the surveillance area to only those persons essential to surveillance operations. Biometric locks will be used to secure the surveillance room, requiring all authorized employees to verify their fingerprint in order to gain access. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the surveillance room. Such surveillance area will always be locked and will not be used for any other function.

When appropriate, security staff will permit access to law enforcement agencies, security system service employees, the Commissioner or the Commissioner's authorized representative, and others when specifically approved by the Commissioner. The Security Department will maintain and make available upon request to the Commissioner or the Commissioner's authorized representative a current list of authorized dispensary facility employees and security system service employees that have access to the surveillance area.

Below are technical specifications for our intended biometric lock system:





Specifications:	
Fingerprint sensor:	CMOS Optical sensor
Scanning time:	<0.4 second>
Recognition time:	<0.2 second>
FAR/False acceptance rate:	<1/100,000
FRR/False rejection rate:	<3/100
Operating voltage:	6 AA 9VDC alkaline batteries
Weight:	10 lbs
Operating Temperature:	32° F to 113° F
Outdoor Dimensions:	10 13/16" x 3" x 1 23/32
Indoor Dimensions:	10 13/16" x 3" x 1 7/16"; lock tongue: 3 15/16" x 2 3/8" x 1"
Door Thickness:	1 1/2" to 2 5/32"

Lighting

Constitution Care LLC will ensure sufficient lighting on the outside perimeter of the registered premises to be used each day between sunrise and sunset. Such lighting will adequately illuminate the registered dispensary facility and its immediate surrounding area, including parking and entry areas. Specifically, Constitution Care LLC intends to install 400-watt HID metal halide security lights.

Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates within 40 feet of the building. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

3.7 Compliance with Section 21a-408-63: Reportable Events

The Security Department of Constitution Care LLC’s top priority is the safety and security of our patients, staff, records and inventory. Upon becoming aware of discrepancies identified during inventory, diversions, theft, loss, or unauthorized destruction of any Medical Marijuana or any loss or unauthorized alteration of records related to Medical Marijuana or qualifying patients, dispensary facility employees will immediately notify the Security Manager and the Dispensary Facility Manager. Once made aware, a dispensary will immediately notify the appropriate law enforcement authorities and the Drug Control Division of the Department of Consumer Protection.

All notices made pursuant to section 21a-408-63(a) of the Regulations to the Department



of Consumer Protection will include signed statements detailing the circumstances of the event, including an accurate inventory of the quantity and brand names of any Medical Marijuana diverted, stolen, lost, destroyed or damaged. Such signed statements will also include a confirmation that the local law enforcement authorities were notified. Such notices will be made as soon as practical, but in no case later than 24 hours after the discovery of the event.

Dispensary facility staff will immediately inform the Security Manager and the Dispensary Facility Manager of any of the following events:

1. An alarm activation or other event that requires response by public safety personnel;
2. A breach of security;
3. The failure of the security system, including the surveillance system and the alarm system, due to a loss of electrical support or mechanical malfunction that is expected to last longer than five minutes; and
4. Corrective measures taken, if any.

Once notified of any of the above triggering events by staff, a dispensary will in turn notify the Drug Control Division of the Department of Consumer Protection of the same no later than the next business day, followed by a written notification no later than ten business days after the triggering event.

3.8 Compliance with Section 21a-408-64: Disposal of Marijuana

Constitution Care LLC security personnel will oversee the proper disposal of all undesired, excess, unauthorized, obsolete, adulterated, misbranded or deteriorated Medical Marijuana by a dispensary. Such disposal will be conducted in the following manner:

1. By surrender without compensation 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 Medical Marijuana non-recoverable.

Security personnel will also oversee the completion of the required records of such disposal by a dispensary. Such records will indicate the date and time of disposal, the manner of disposal, the brand name and quantity of the Medical Marijuana disposed of, and the signatures of the persons disposing of the Medical Marijuana, the authorized representative of the Commissioner and any other persons present during the disposal.



Such records will be maintained and made available in accordance with section 21a-408-70 of the Regulations.

4.0 SECURITY TRAINING

Constitution Care LLC will train security personnel in industry standards and crime prevention prior to deployment. All security personnel will be required to complete a nationally developed safety training program, a formal evaluation, and an orientation and annual training seminar as a condition of employment within Constitution Care LLC's dispensary facility.

All dispensary facility personnel in every department will be trained in conflict resolution and the handling of emergency situations, including procedures for communicating with local law enforcement.

Furthermore, all dispensary facility employees, including security personnel, will receive a copy of Constitution Care LLC's Safety Handbook during their orientation training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of patients, dispensary facility staff, and the surrounding area.

In addition, Sonitrol New England will provide training to dispensary facility employees on the operation of the alarm and camera systems, if appropriate given the staff member's responsibilities within the organization. A certificate of completion for all training will be provided to trained participants.

5.0 SECURITY REPORTS

5.1 Incident Log

Constitution Care LLC will utilize incident logs (to be called an Incident Report) to document the occurrence of specific events. Security incidents will be reported in order to provide information to corporate management for decision-making purposes, particularly in regards to the recovery of lost or stolen property, restitution for losses, and facilitation in the formulation of future risk-reduction practices, policies and procedures. Each Security Incident Report must be classified using one of the following:

- Security incident/law violation which may result in the dismissal or prosecution of employee(s)
- Alarm/false - fire
- Alarm/false - security
- Arrests by law enforcement



- Assault, attack, molestation or threats to employees while on company property or in the performance of their work
- Break & enter - building
- Burglary or attempted burglary of the Constitution Care LLC building(s)
- Confrontations between staff and others
- Damaged Property - malicious or extensive
- Disturbance - employee/patient/contractor/visitor
- Drug abuse
- Fire
- Found property
- Incidents which have a potential for receiving media coverage
- Injuries to staff, contractors, visitors, patients
- Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals
- Lost or stolen medicine
- Missing property - facility/personal
- Misuse of company information and data processing where financial gain or damage to Constitution Care LLC is involved
- Reports of substance abuse or sale of narcotics on property
- Robbery - armed/unarmed, or attempted robbery committed on Constitution Care LLC property, or of a Constitution Care LLC employee in the course of company business, regardless of whether anything was taken
- Sexual incident - harassment/assault/obscene call/other
- Suspicious person - contact
- Suspicious person - no contact
- Suspicious circumstances - general
- Theft or vandalism of Constitution Care LLC property by an employee
- Theft or loss of Constitution Care LLC credit cards
- Theft, forgery or alteration of Constitution Care LLC checks
- Theft, unauthorized disclosure, loss, malicious destruction of Constitution Care LLC proprietary information, or



physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same

- Threat - bomb
- Threat - other, received by staff, visitors or contractors
- Trespass
- Vandalism - facility/personal/vehicle
- Violation of any other law on company premises

In general, all thefts, damage or loss over \$500 will be reported immediately. All security incidents listed above will be reported to the Security Manager. Follow-up reports will be submitted concerning any significant developments relating to the incident. All incidents must be formally handled to completion.

5.2 Condition Report Classifications

The following should be reported within a 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 building or personnel (life-safety)
- Computer viruses
- Environmental conditions threatening property
- Information threatening the reputation of Constitution Care LLC
- Lights left on
- Lights left off
- Labor disputes
- Malfunction - locks and key
- Maintenance problem - lights out, broken locks, water leaks, broken windows, etc.
- Miscellaneous
- Natural disasters
- Potential fire hazards
- Open doors and windows



- Strange odors
- Unlock request
- Unsafe condition

All security conditions listed above should be reported to the Security Manager. Follow-up reports should be submitted concerning any significant developments relating to the situation. All security conditions must be formally handled to completion.

5.3 Reporting to the Local Law Enforcement

In a non-emergency incident, or when life/safety is not a concern, security personnel are required to work with the Security Manager prior to reporting a relevant security incident to law enforcement authorities.

Any incident involving lost or stolen medicine must be reported to the local police department via a police report. All reports must be made within 24 hours of becoming aware of the theft or loss.

To notify the law enforcement, staff will do one of the following:

- Call 911
- File in-person with the local police department
- Submit a written report to the local police department

Constitution Care LLC will investigate all work-related accidents in a timely manner. The Security Manager is responsible for accident investigation; other management personnel will be involved as needed.

All incidents are documented on individual Incident Reports, but they are also tracked by type, location and number of incidents on a monthly Incident Summary. There is one Incident Summary “By Type,” and one “By Location.” Incident Summaries are completed at each month’s end and submitted to the Security Manager and Dispensary Facility Manager along with a copy of all Incident Reports for that month. All Incident Reports should be maintained indefinitely by the Security Department.

6.0 PROCEDURE FOR PREVENTING THE USE OF MEDICAL MARIJUANA WITHIN THE PREMISES

Constitution Care LLC prohibits the consumption of Medical Marijuana within the dispensary facility. The facility will ensure compliance in various ways including stated policy, ample signage, and various handbooks, the receipt of which must be acknowledged in writing by patients and staff. Constitution Care LLC will further explain orally to its patients upon orientation that consumption is prohibited on site, and

discuss in detail a patient's rights under the Act and Regulations. Additionally, all dispensary facility employees will be required to sign a Code of Conduct policy that includes an acknowledgment of the prohibition of on-site consumption and a certification that they will abide by such restriction.

Any employee caught violating this policy will be subject to disciplinary action including termination and possible involvement of law enforcement authorities if the employee is not a registered patient. In addition, the Security Manager and/or security personnel will frequently patrol the dispensary facility and surrounding area for unlawful consumption of Medical Marijuana.

7.0 PROCEDURE FOR PREVENTING ENTRY TO RESTRICTED ACCESS AREAS

The access control system that Constitution Care LLC intends to use has been designed to provide accountability and limit access to various areas of the registered dispensary facility – particularly those areas that house critical assets such as the vault, the dispensary department, and surveillance room. Using state-of-the-art technology, the access system intended to be utilized will grant entry to areas of the registered dispensary facility through the use of card readers and biometric locks that require thumbprint recognition for access. The access system will allow the security department to maintain a full audit trail of everyone who enters or leaves any secure area of the dispensary facility.

As an additional measure to prevent unauthorized entry to limited-access areas of the dispensary facility, security personnel will ensure that all locks and security equipment in the facility are in good working order at all times, particularly the locks to the dispensary department, surveillance room, and the vault room (entry to such areas will be locked at all times). Security personnel will monitor the premises to make sure no keys or access cards are left unattended or stored in a location accessible to persons other than specifically authorized employees.

Constitution Care LLC will also post a sign, which will be at least twelve inches by twelve inches, at all entry ways into any area of the dispensary facility containing Medical Marijuana that states: “DO NOT ENTER – LIMITED ACCESS AREA – ACCESS LIMITED TO AUTHORIZED EMPLOYEES ONLY.”

Furthermore, security personnel will visually monitor employee entry to limited-access areas of the dispensary facility. All employees will be required to obtain and have on their persons a valid registration certificate while working at the dispensary facility. Only those employees possessing a valid registration certificate who have been authorized by management to enter restricted-access areas will be able to enter through the use of biometric fingerprint readers as described below.



Equipment Preventing Access

Constitution Care LLC intends to use the XR500 Series Access/Burglary/Fire 574-Zone Command Processor Panel. The XR500 is an integrated burglary, fire and access control system that can be configured for users to gain access and disarm the area using a single card reader. The XR500 system can restrict access by schedule, arming level, or other criteria.

The specific reason for access denial can be displayed on the keypad, stored in events, logged on a local printer, sent to the central station, and to DMP Advanced Reporting software. An anti-passback feature is also available. Any access control reader with a Wiegand output can be connected to the XR500 series panel. Card reader inputs can be attached to up to 16 different locations.

Constitution Care LLC intends to install at least four (4) alarm control keypads (LCD touchpad terminals) at the following locations:

- One (1) - Secured reception area (Armed Area 1)
- One (1) – Dispensary department area (Armed Area 2)
- One (1) – Alternative services department area (Armed Area 3)
- One (1) – Vault room area (Armed Area 4)

In addition, Constitution Care LLC intends to install at least seven (7) full-featured Biometric Fingerprint Reader Access Control Devices with HID Proximity and Integrated Pin Pad at the following locations to control access to areas of the facility:

- One (1) – Secured reception area (Armed Area 1)
- One (1) - Dispensary department entrance (Armed Area 2)
- One (1) – Alternative services department entrance (Armed Area 3)
- One (1) – Break room entrance (Armed Area 4)
- One (1) - Vault room entrance (Armed Area 5)
- One (1) - Office entrance (Armed Area 6)
- One (1) - Surveillance room entrance (Armed Area 7)

8.0 CLOSING PROCEDURES

At the end of each day, after the dispensary facility closes for business, the Security Manager and/or security guard will have a brief meeting with Constitution Care LLC staff to discuss the events of the day and to resolve any outstanding issues.



The closing Security Manager and/or security guard are required to stay on-site until all dispensary facility employees have left the building. Security personnel will always be the last to leave the property, without exception. There is not an exact shift end time since the needs of the dispensary facility will vary from day to day.

Once EVERYONE, including staff, is out of the building, the Security Manager and/or security guard does the final end-of-day internal sweep of the building, walking through the entire building to ensure no one is left in the building, closing and securing all doors and windows, and turning off all lights that need to be turned off using a closing checklist.

The authorized closer (Dispensary Facility Manager or Security Manager) then performs a second sweep of the building to “double check” that all is secure, sets the alarm, exits the building, and locks the front door.

9.0 VAULT ROOM AND STORAGE OF PRODUCTS

Constitution Care LLC intends to store all Medical Marijuana in a private, secured vault that is climate-controlled and monitored by an external service, 24-hours a day, for both security and changes in environment (temperature and humidity). In addition to using a traditional TL-30 rated safe that will be placed in the vault for storage purposes, Constitution Care LLC will convert a storage space into a walk-in safe (“vault”). Constitution Care LLC will need to store a requisite amount of processed products (within the standards of applicable regulations and law), along with a secure/locked freezer and refrigerator to store alternative Medical Marijuana products (such as baked goods), requiring the conversion of the storage space into a vault room rather than simply having a single, stand-alone safe. Constitution Care LLC will store cash, the vast majority of packaged product and other valuables in the secure TL-30 rated safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of the XR500 access control system that Constitution Care LLC intends to install. For example, only employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials stored in the access control system. Additionally, only a limited number of authorized employees possessing a valid registration certificate will be granted access to the secured storage and staging areas. The vault room will also be protected by a volumetric alarm and motion sensors. All limited access rooms will be monitored for security, temperature and humidity controls 24-hours a day by Sonitrol New England. Should alarms go off for security or changes in the environment, staff will be alerted promptly.

Constitution Care LLC will use sophisticated product-tracking software to monitor



inventory and sales transactions. Should any Medical Marijuana be identified as lost or stolen, Constitution Care LLC will report this to local law enforcement by filing a police report within 24 hours of becoming aware of the theft or loss.

10.0 MEDICAL MARIJUANA DELIVERIES

10.1 Registered Producer Facility Relationships

Constitution Care LLC's Dispensary Facility Manager and Inventory Manager will conduct an in-person meeting with a representative from the registered production facility prior to purchasing medicine. This policy will help Constitution Care LLC staff to build one-on-one relationships with the registered producers in order to ensure understanding of their unique and customized strains and products.

The in-person meeting also serves a security purpose in that personnel from both companies have an opportunity to evaluate the level of security under which each is operating.

10.2 Constitution Care LLC Receiving Policies

Company policies regarding receiving Medical Marijuana products are as follows:

- Times for delivery are not set up on a weekly timed schedule. For security reasons, the days of the week and times are changed regularly to thwart any possibility of robbery.
- Deliveries of product are not announced on any company calendar, nor are they put into any online calendar for view by the general public.
- Staffing at Constitution Care LLC must be adequate and security must be in place at the dispensary facility during delivery in order to ensure the safety of all parties.
- All receiving of deliveries must take place within a secure locked area of the facility to ensure safety for Constitution Care LLC employees. A member of Constitution Care LLC's security team must be present when production facility delivery staff arrives. This security guard will assist the production facility employee in entering the building expeditiously so as to prevent theft or cause suspicion by the general public.
- Unpacking and weighing of all deliveries must take place in a



secure locked area of the facility with approved personnel only; there is no unpacking in view of the general public, unapproved personnel, patients or primary caregivers.

10.3 Receiving Process

Constitution Care LLC will require notification from the registered production facility via telephone that the producer delivery team is approximately five minutes from arrival. This will allow the dispensary facility to alert the security team of the pending arrival. Upon arrival in the dispensary facility parking lot, the production delivery team will be instructed by security personnel to move the delivery vehicle to a secured parking area. The delivery team will be instructed by security personnel to exit the delivery vehicle and display their registration certificates and any additional identification cards provided by the production facility for verification authority. Identification and verification of delivery personnel must take place prior to accepting any delivery.

After identification and verification of delivery employees, authorized Constitution Care LLC staff, including security personnel, and the production delivery team will move into a secured and locked area of the dispensary facility where the delivery will be reviewed for accuracy. The delivery team will provide Constitution Care LLC staff with an invoice (and any additional product information) that details the order in accordance with the Act and Regulations.

The delivery team and either the Dispensary Facility Manager or the Inventory Manager will check each line of the invoice (and weigh each product, when applicable) under surveillance by the internal camera system to confirm each individual line-item has been delivered. Once verification is complete, the dispensary facility representative will sign and timestamp the packaging invoice under the supervision of the security personnel; Constitution Care LLC and the production facility will each retain a copy of the signed invoice. All invoices will be stored and maintained by Constitution Care LLC in accordance with section 21a-408-70 of the Regulations.



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Appendix B

Dispensary Facility Backer Information Form

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.



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 type="checkbox"/> Corporation	<input checked="" type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other: _____
---	---	--	---	---	--	--

2. Legal Name of Backer:

Columbia Care CT LLC

3. Trade Name of Backer (if applicable):

n/a

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

1131-O Tolland Turnpike

5. City:

Manchester

6. State:

CT

7. Zip Code:

06042

8. Daytime Telephone Number:

(203) 442-9000

9. Fax Number:

N/A

10. E-mail Address:

bmayerson@gmail.com

Section B: Backer Members

If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.

Each member of a backer identified in response to this section must complete either:

- Appendix C if they are also a director, owner, officer or other high-level employee of the applicant; or
- Appendix E in all other instances.

11. Name (First, Middle, Last):

Col. Care (Delaware) LLC a/k/a Columbia Care

12. Percentage of ownership

100%



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

Section D: Legal Proceedings

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

Yes No

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

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

Yes No

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

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

Yes No

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

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

Yes No

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

Section E: Criminal Actions

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

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



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Section F: Criminal Background Check

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

26. Signature:



27. Date Signed:
11/13/13

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

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

28. Signature:



29. Date Signed:
11/13/13



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Appendix C

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

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.



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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): Nicholas D Tamborrino		
2. Street Address (including Apartment or Suite #): 428 Old Mill Rd		
3. City: Fairfield	4. State: CT	5. Zip Code: 06824
6. Title: Dispensary Facility Manager	7. Telephone Number: (860) 508-5250	8. E-mail Address: ntamborrino@hotmail.com
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]	11. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female

Section B: Employment Information

12. Current or Most Recent Employer: 13. Yale New Haven Health System		Date of Employment: Start Date: 01/2012 End Date: :	
14. Employer Address (including Apartment or Suite #): 99 Hawley Lane			
15. City: Stratford		16. State: CT	17. Zip Code: 06610
18. Telephone Number: (203) 688-2294	19. Fax Number: (203) 688-1488	20. E-mail Address: linda.skarupa@ynhh.org HR	

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.



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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.

29. State CT	30. Issue Date (month/year): 07/31/2002 Expiration Date (month/year): 01/31/2014	31. Type: Pharmacist	32. Number: 9771
33. State	34. Issue Date (month/year): Expiration Date (month/year):	35. Type:	36. Number:



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Section G: Legal Proceedings

37. 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.

38. 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.

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

Yes No

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

40. 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 H: Criminal Actions

41. 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 I: 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.

42. Signature:



Michael J. Henderson

43. Date Signed:

11/05/2013



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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.

44. Signature:



45. Date Signed:

11/05/2015

Nicholas Tamborrino, PharmD, MBA

Pharmacy Business Experience

I'm extremely passionate about the pharmacy profession and my willingness to succeed will make me an imperative asset to the Connecticut Medical Marijuana Program. My past work experiences have given me a great foundation and understanding in all areas of pharmacy practice. In addition, my business degree has given me invaluable insight into the core elements necessary to operate a business.

Over the past year, I've executed due diligence by dedicating an incredible number of hours researching all topics related to medical marijuana. I consider myself well educated and comfortable in various capacities such as accounting, insurance, banking, pricing, and various product formulations. Considering the knowledge I've found and learned over the past two years, I've set myself up to master every aspect of the medical marijuana business.

Throughout my work experience, not only have I learned the clinical and operational aspects of pharmacy practice, but I've also learned the importance of building professional relationships and putting the needs of the patient first. Working in multiple areas of pharmacy, I've always considered the patient when making clinical decisions and assuring their best interest is always met. I will continue my devotion to the pharmacy profession and apply my knowledge, skills, and experience to assure optimal drug therapy outcomes. Whether gaining trust from a patient at a retail pharmacy, suggesting a medication to a provider at Bridgeport Hospital, or training the pharmacy department at Yale New Haven Health System, I've appreciated the importance and significance of this. Building professional relationships and collaborating to improve patient care is a key factor in all pharmacy practices and I intend to continue this philosophy at the medical marijuana dispensary level.

I understand that a great part of this program's success relies on communication and education to multiple levels. Through my motivation and dedication to this program, I'm prepared to help disseminate education wherever the need may be. My patients will be well educated on their therapy through monthly counseling meetings where medication history and marijuana strain discussions will take place. I plan to volunteer at local community events to help educate and listen to concerns surrounding medical marijuana. I've recently taken the initiative to begin educating local police departments from a pharmacist perspective to help them understand the structure of this program. The patient and their safety has always been a centered focus in practice.

While attending the University of Connecticut's School of Pharmacy in 2000, I was selected to work within Bristol-Myers Squibb's summer internship program. I worked in the Clinical Supply Operation division for two summers which sparked my interest in research. I was responsible for the labeling of study drugs world-

wide using cutting edge labeling software. Upon graduation from pharmacy school in 2002, I began my career in a retail pharmacy to help familiarize myself with the everyday tasks associated in that setting. There I quickly took on manager roles participating in scheduling of technicians and weekly inventory counts of scheduled II medications. In 2004, I was offered a clinical pharmacist position at Bridgeport Hospital which has allowed me to practice pharmacy using my clinical skillset. In collaboration with other healthcare providers, I have built a solid trust allowing me to comfortably make drug therapy recommendations. Shortly after joining, I was nominated to be a member of the Institutional Review Board for Bridgeport Hospital. I represented the pharmacy department and reviewed all research study protocols occurring at the hospital. Since 2006, I've maintained working evenings at two local hospitals. I received numerous awards throughout my career at Bridgeport; the most recent being a hospital wide "Great Catch" award in May 2012 where I prevented a major medication error which could have been detrimental to the patient.

In 2006, I joined Caremark as a Clinical Advisor responsible for 200 accounts in the New York and Connecticut. I was part of a unique group called Clinical Consulting, consisting of 100 pharmacists spread throughout the United States. The group received contracts by national and local health plans or employers. I was responsible for building relationships and educating key opinion leaders on the latest trends in multiple disease states.

While finishing my Masters in Business Administration, I took on a role in healthcare informatics. In 2012, I joined Yale New Haven Health System's Epic project as a physician trainer. I was responsible for curriculum development and testing for the new electronic EMR system. In late 2012, I received Epic Inpatient Pharmacy and Oncology certifications. I'm currently responsible for curriculum build and clinical workflow training for all pharmacy staff at all Yale New Haven Health System Hospitals. In addition, I've taken on an analyst roles and responsibilities for the build and maintenance of medications in the Epic database.

Applicant qualifications:

University of Connecticut School of Pharmacy, PharmD 2002

University of Connecticut School of Business, MBA 2011

Connecticut Pharmacist #9771

Connecticut Pharmacist Association Member

The Canadian Consortium for the Investigation of Cannabinoids (CCIC) Member

Nicholas Tamborrino, PharmD, MBA

Pharmacy Business Experience

Bridgeport Hospital Pharmacy

Location: Bridgeport, CT

Titles: Clinical Pharmacist (08/04-present), Institutional Review Board (10/04-11/05)

Responsibilities:

- Managed the storage and preparation of Clinical Study Drugs at Bridgeport Hospital. (2004)
- Involved in pharmacokinetic monitoring of aminoglycosides and vancomycin.
- Monitor and dosing of Warfarin for patients receiving anticoagulation therapy.
- Dose and preparation of chemotherapy agents.
- Compounds and dispenses pharmaceuticals, including sterile, chemotherapy, and parenteral nutrition products accurately using USP 797 guidelines.
- Manage inventory and dispensing of scheduled II,III,IV,V medications.
- Oversee pharmacy technician duties relating to the dispensing of medications.
- Interpretation of medication orders (verbal and electronic) and transcribes to computerized patient medication profiles accurately.
- Maintains accurate and complete patient medication profiles.
- Monitors drug therapy regimens for contraindications, drug-drug interactions, drug-food interactions, allergies, and appropriateness of drug and dose.
- Participates in the quality improvement and medication use review activities of the department.
- Collects data; conducts quality monitors and inspections; and maintains log, records, and other documentation as assigned.
- Participates in the development and presentation of orientation, education, and training programs to the pharmacy, medical, nursing, and other staffs.
- Sustains the formulary by minimizing non-formulary procurements, utilizing therapeutic protocols and promoting rational drug therapy selection.

St. Vincent's Medical Center Pharmacy

Location: Bridgeport, CT

Titles: Clinical Pharmacist Per-diem (01/09-present)

Responsibilities:

- Act as clinical support for ICU and Telemetry floors.
- Compounds and dispenses pharmaceuticals, including sterile, chemotherapy, and parenteral nutrition products accurately using USP 797 guidelines.
- Ensure proper dosing on all medications and adjusting doses according to renal Drug Use Evaluation (DUE) protocols.
- Manage inventory control and dispensing of scheduled II-III-IV-V medications.
- Monitors drug therapy regimens for contraindications, drug-drug interactions, drug-food interactions, allergies, and appropriateness of drug and dose.
- Supervise and direct pharmacy support personnel during evening and weekend shifts.
- Verifies the daily activities assigned to pharmacy technicians are complete and accurate.
- Verifies prepackaging of medications is checked and correctly labeled,
- Assisted in protocol development and implementation of vancomycin protocol for ED patients.

Walgreen's Pharmacy

Location: Norwalk, CT

Titles: Retail Pharmacist/ Assistant Pharmacy Manager (03/02-09/05)

Employment voluntarily ended in September 2005 to focus in clinical areas of pharmacy practice.

Responsibilities:

- Managed customer relationships including, patient counseling, complaint resolution, quality assurance, and adherence to practices promoting customer satisfaction.
- Developed and maintained good working collaborative practice with physicians and other healthcare professionals maximizing patient outcomes.
- Maintained all state and federal record keeping for legend drugs and controlled substances.
- Responsible for weekly inventory counts on all scheduled II medications.
- Coordinated the pharmacy schedule; direct and monitoring of pharmacy personnel and performance by providing ongoing proactive, constructive feedback, training, and evaluations; making recommendations for hiring and promotion.
- Performed all activities related to the preparation, dispensing, and sale of prescription and pharmacy-related products.
- Focused on customer satisfaction and needs, ensuring that customers were provided excellent customer service through use of best practices and prompt communication with physicians, vendors, and colleagues.
- Ensured all work processes were performed efficiently and effectively at each work station by prioritizing workload and organizing workflow.
- Maintained proper pharmacy and general safety procedures and standards. Enforced compliance with all local, state, and federal laws, company policies and procedures, and state regulations regarding intern, technician, and assistant training and licensure.
- Assisted in pharmacy operations to achieve business objectives by increasing sales and gross margins, managing equipment, limiting expenses, directing operations to minimize wait times, monitoring department performance metrics, upholding proper pharmacy and general safety procedures and standards, and partnering with management in developing and implementing store programs to help meet sales objectives and increase prescription volume.

Nicholas Tamborrino, PharmD, MBA

Other Relevant Business Experience

In February 2006, I joined Caremark as a Clinical Advisor where I was responsible for Connecticut and New York (Westchester County) territories. The group consisted of 100 pharmacists throughout the US market. The goal was to work with targeted physicians and key opinion leaders in specific therapeutic areas. We often partnered with employers and health plans to focus in areas designed to decrease costs for Caremark plan participants. In addition, I often provided clinical and basic pharmacy services to targeted physician offices. This work experience has provided me with great insight in finding ways to help improve patient care by collaborating with other healthcare providers. Building professional relationships is a key factor in all pharmacy practices and I intend to continue this philosophy at the medical marijuana dispensary level.

CVS/Caremark

Services offered: Pharmacy Benefit Management Consulting Services

Location: Connecticut/ New York (Westchester County)

Titles: Clinical Advisor

Dates associated with business: 2006-2012

The Clinical Consulting division was eliminated after the merger with CVS due to funding/budget cuts.

Responsibilities:

- Collaborated with physicians to positively influence patient outcomes both clinically and economically.
- Responsible for academic detailing of Primary Care and Specialty physicians in Disease State Management areas of asthma, cardiovascular disease, diabetes, dyslipidemia, mental health and osteoporosis plus specialty areas of cardiology, endocrinology, gastroenterology, pulmonology, psychiatry, rheumatology, and metabolic disorders.
- Conducted face to face interactions with high value physicians and key opinion leaders (KOL) to improve patient care through utilization/safety reviews and education tools referencing current clinical guidelines.
- Committee member that focused on gathering market intelligence, identifying future trends, and providing competitive insights for program initiatives and improvements.
- Collaborated with mail-order operations to develop a Physician Help Desk.
- Provided ongoing staff development and training for direct physician interaction, formulary management, and client presentations.
- Provided relevant clinical messages to targeted physicians based on company goals & business requirements.
- Demonstrated effective teamwork capabilities through weekly huddles designed to share best practices that create value by enhancing physician encounters.

Awards

- 2006 & 2007 Caremark Silver Impact Award
- 2007 Accrediting Consulting Excellence (ACE) Level 1
- 2009 Designed and implemented national training module.
- 2009 & 2010 Caremark Gold impact Award

Nicholas Tamborrino, PharmD, MBA

Other Relevant Business Experience

In 2010, I founded Ebbpoint Surf Fishing, LLC which specializes in custom surf fishing equipment for Northeast fisherman. I've created a niche market providing Dacron sailcloth equipment that can withstand the harsh salt water environment known to extreme fisherman. Growing up and chasing the striped bass along the Northeast beaches, I developed a passion and respect for surf fishing. During the 2009 fall semester, while completing an entrepreneur course during business school, I decided to combine my passion with my business skillset to form Ebbpoint Surf Fishing. Throughout this experience, not only have I built a solid reputation, but I've learned what it takes to bring new innovative products to the market. I understand the important business skills needed to succeed to such as educating, branding, marketing, outsourcing, financing, and creative thinking. Through this experience, I feel that creating new products has better prepared me for Connecticut's Medical Marijuana Program. Connecticut's MMP is a new innovative pharmacist-driven model that is exciting and I look forward to my professional participation.

Ebbpoint Surf Fishing, LLC

Products or Services offered: Fishing apparel/equipment

Location: Fairfield, CT

Titles: Owner, Director of design

Dates associated with business: 2009-present

Responsibilities:

- Collaborate with the manufacturing team and sales to develop line direction for customer needs.
- Participate in an environment that encourages innovation, creativity, and research while maintaining brand integrity and awareness of competitor threats and overall development direction.
- Collaborate and develop close working relationships with design, production, and sourcing.
- Prioritize and troubleshoot from initial concept stage through production.
- Develop research tools to stay on top of trends through customer feedback.
- Develop and maintain relationship with domestic contacts to ensure project accuracy and pricing expectations.
- Creating concept drawings and producing computer generated templates.
- Coordinating material purchases and laser cutting processes.
- Mentor to product builder
- Responsible for project planning and budget costs.
- Develop technical specifications on future products.
- Track and manage workflow and workload for products.



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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):			Nicholas Vita		
2. Street Address (including Apartment or Suite #):			12 86th Street, Apt. 1127		
3. City:		New York		4. State:	5. Zip Code:
				NY	10028
6. Title:		7. Telephone Number:		8. E-mail Address:	
Member/Chief Executive Officer		(917) 703-9208		nkvita@aol.com	
9. Date:	10. Social Security Number:			11. Gender:	
				<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	

Section B: Employment Information

12. Current or Most Recent Employer: 13.		Date of Employment:	
Apelles Investment Management		Start Date: 06/2006	
		End Date: : present	
14. Employer Address (including Apartment or Suite #):			
767 Third Avenue, 17th Floor			
15. City:		16. State:	
New York		NY	
		17. Zip Code:	
		10017	
18. Telephone Number:		19. Fax Number:	
(212) 888-5280		n/a	
20. E-mail Address:			
n/a			

Section C: Pharmacy Business Experience

21. Do you have any experience controlling, managing, operating or working for a pharmacy?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
22. Are you currently associated with a pharmacy in any state?	
<input type="checkbox"/> Yes <input checked="" 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, how those allegations were resolved. 	



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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.

29. State n/a	30. Issue Date (month/year): Expiration Date (month/year): n/a	31. Type: n/a	32. Number: n/a
33. State n/a	34. Issue Date (month/year): Expiration Date (month/year): n/a	35. Type: n/a	36. Number: n/a



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Section G: Legal Proceedings

37. 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.

38. 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.

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

Yes No

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

40. 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 H: Criminal Actions

41. 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 I: 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.

42. Signature:



Nick R. VCC

43. Date Signed:

11/13/13



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Section D: Criminal Actions

24. 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 E: 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.

25. Signature:



Nick R. Vito

26. Date Signed:

11/13/13

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

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

27. Signature:



Nick R. Vito

28. Date Signed:

11/13/13

Nicholas Vita
Appendix C
Section D: Marijuana Business Experience
Question 26

Ventureforth LLC

- Business Name: Ventureforth LLC (hereinafter, “Ventureforth”)
- Business Location: Washington D.C.
- All titles and Responsibilities held by you at business, including the time frame for each:
Chief Executive Officer, Member of Board of Directors, October 2011 to Present
 - As the lead Member of the Board of Ventureforth, I managed and oversaw the successful submission of a request for proposal (RFP) to the Washington D.C. Department of Health (DOH). The DOH awarded Ventureforth both a dispensary license (one of three to be issued) and a cultivation license (one of five to be issued) in Washington, D.C. Our company received the first license awarded in Washington, D.C. and was the first dispensary to begin operating. Ventureforth was the only group awarded both a cultivation and a dispensary license in a highly competitive process with several hundred applicants.
 - I arranged a capital raise of over \$2.2mm to finance the construction and buildout of infrastructure for each location and team. As CEO (as of December 2011), I currently oversee a team of 8 employees between both locations.
 - Ventureforth currently has over 55% of the market share in one of the nation’s only for profit markets. I oversaw an increase in revenue from zero to over \$1000 per day and reduced operating costs by over 60% to bring company to breakeven.
 - I also served as a liaison to numerous local community groups, including a law enforcement and police – implemented charity care program, and several philanthropic giving initiatives.
- The Date of your association with the business: December 2011 - Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - I am currently the Chief Executive Officer.
- 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.
 - Ventureforth has never been accused of violating any law or regulation during the time I have been associated with the business.

Salubrious Wellness Clinic, Inc. (d.b.a. SWC Tempe)

- Business Name: Salubrious Wellness Clinic, Inc. (d.b.a. SWC Tempe) (hereinafter, “SWC Tempe”)
- Business Location: Tempe, Arizona
- All titles and Responsibilities held by you at business, including the time frame for each: Chief Executive Officer and Member of the Board of Trustees, March 2013 – Present.
 - Negotiated acquisition of supermajority control interest in the business and oversaw the final review of the license application for SWC Tempe.
 - SWC Tempe was awarded an Approval To Operate license by the State of Arizona after it achieved a perfect score (no deficiencies) on its license application in the highly competitive and coveted Tempe market. Following licensure, I managed the design, permitting, and the build-out processes, completing these processes in two months.
 - As Chief Executive Officer, I structured a partnership with local operators and built a team to operate both a 1,000 square foot dispensary and a 30,000 square foot cultivation facility at separate locations. I now oversee a team of 18 employees at two facilities. Our dispensary treats over 100 patients per day, seven days per week.
 - I was responsible for the development of proprietary inventory and efficient point-of-sale (POS) tracking processes as well as inventory procurement techniques.
 - I directed and participated in the development and implementation of all policies and procedures as well as all sales and marketing initiatives. Sixty days after the date SWC Tempe opened, the business became cash flow positive. I was involved with the development of the sales and marketing initiatives that have increased the business’ sales basis from zero to an average of over \$2,500.00 per day.
 - I implemented a charity care program and several philanthropic giving initiatives in the Tempe community and have served as a liaison with local law enforcement.
- The Date of your association with the business: March 2013 to Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why; and
 - I am currently the Chief Executive Officer.
- 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.
 - SWC Tempe has never been accused of violating any law or regulation during the time I have been associated with the business.

203 Organix, LLC. (203 Organix)

- Business Name: 203 Organix, LLC (hereinafter “203 Organix”)

- Business Location: Prescott, Arizona
- All titles and Responsibilities held by you at business, including the time frame for each:
 - Chief Executive Officer and Member of the Board of Trustees, April 2013 – Present.
 - Negotiated acquisition of 100% control interest in highly coveted Prescott market and oversaw the final review of the license application for 203 Organix.
 - 203 Organix was awarded an Approval To Operate license by the State of Arizona after it achieved a perfect score (no deficiencies) on its license application in a highly competitive process. Following licensure, I managed the design, permitting, and the build-out processes, completing these processes in two months.
 - As Chief Executive Officer, I structured a partnership with local operators and built a team to operate both a 4,000 square foot dispensary and a +35,000 square foot cultivation facility at separate locations. I now oversee a team of 18 employees at two facilities. Our dispensary treats over 75 patients per day, seven days per week.
 - I was responsible for the development of proprietary inventory and efficient point-of-sale (POS) tracking processes as well as inventory procurement techniques.
 - I directed and participated in the development and implementation of all policies and procedures as well as all sales and marketing initiatives. Sixty days after the date SWC Tempe opened, the business became cash flow positive. I was involved with the development of the sales and marketing initiatives that have increased the business' sales basis from zero to an average of over \$2,500.00 per day.
 - I implemented a charity care program and several philanthropic giving initiatives in the Prescott community and have served as a liaison with local law enforcement.
- The Date of your association with the business: April 2013 - Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why; and
 - I am currently the Chief Executive Officer of 203 Organix.
- 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.
 - 203 Organix has never been accused of violating any law or regulation during the time I have been associated with the business.

All Greens, Inc.

- Business Name: All Greens, Inc. (hereinafter, “All Greens”)
- Business Location: Surprise, Arizona
- All titles and Responsibilities held by you at business, including the time frame for each:
 - Co-Chief Restructuring Officer, Manager, April 2013 – September 2013
 - I served as the court appointed Co-Chief Restructuring Officer for All Greens Inc. when a legal dispute caused the business to enter into a receivership.

- As Chief Restructuring Officer (CRO), I was assigned the task of securing financing and developing a business plan with long term viability for All Greens. I secured debtor-in-possession financing, built a team of experienced personnel, and developed systems to launch a successful business.
 - I was the first court-appointed manager for a medical marijuana licensee in first the first restructuring/distressed workout in the history of the Arizona medical marijuana program.
 - As CRO and Manager, I oversaw a team of 8 facility employees and five contractors. I began with a sales basis of zero and built the business to generate an average of over \$1,500.00 per day.
 - In September 2013, I completed the court assignment ahead of time, under budget, and transitioned the business to the court's Receiver subsequent to receiving a perfect score on its application and being awarded a license by State of Arizona regulators.
- The Date of your association with the business: April 2013 – September 2013
 - Whether you currently have a role at the business and, if not, when your involvement terminated and why; and
 - I no longer have a role with All Greens. My involvement in the company was limited to completing my assignment from the court which ended in September 2013.
 - 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.
 - All Greens was never accused of violating any law or regulation during the time I was associated with the business.

Nicholas Vita

Appendix C

Section E: Other Relevant Business Experience

Section 28

Apelles Investment Management, LLC

- The business name: Apelles Investment Management, LLC (“AIM”)
- Products or services offered: Investment Capital
- The business location: New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Managing Partner: Responsible for sourcing, researching, analyzing, and overseeing investments with a focus on public and private equity; mezzanine financings; high yield, bank, distressed and structured debt, and late-stage venture investments. Responsible for Firm build-out and oversight of all operations (business, legal, infrastructure) and team of five investment and operations professionals;
 - Chief Executive Officer, *Apelles Public/Private Partnerships, LLC* (infrastructure investment arm): Responsible for sourcing, structuring, and negotiating customized cross-capital structure investments throughout the privatized military infrastructure housing/lodging sectors. Oversees team of nine investment and operations professionals. Member of the Management and Investment Committees.
- The dates of your association with the business: June 2006 - Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I am still involved with the business as a Senior Partner.
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations;
 - Apelles Investment Management has never been accused of violating any laws or regulations during the time I have been associated with the business.
- How this experience is relevant to the department’s evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with AIM will be directly relevant to the successful operation of a healthcare business.
 - Having over 20 years of working in healthcare finance as a capital provider, strategic advisor, executive officer, member of corporate and philanthropic boards, restructuring officer (for both products companies and service providers), I have a broad understanding of the risks and difficulties in operating a young company in a highly regulated industry and environment. Establishing best practices and lessons

learned early on in the company's development will make the difference between success and failure. Operating as a community partner is one of the hallmarks for a successful healthcare business that we embrace with every new jurisdiction and venture. After working for many of the world's most successful companies, seeing how managers and executives make good and bad decisions has honed my instincts to recognize when to add more resources or change approaches. This aspect of risk assessment and capital allocation enables companies to remain dynamic and opportunistic without wasting precious resources. All of these perspectives will contribute to the continuous dialogue and decision making processes to ensure our companies live up to their mission and goals.

ARX Investment Management, L.P.

- The business name: ARX Investment Management, L.P. (hereinafter “ARX”)
- Products or services offered: ARX provides investment management services.
- The business location: New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each:
 - General Partner, Portfolio Manager – Healthcare Sector: Portfolio Manager for multi-billion dollar global credit hedge fund. Responsible for sourcing and analyzing investment opportunities and maintaining industry (executive management, mid-level operators and consultants) and governmental (federal, state and local) contacts. Member of Investment Committee (for all industrial sectors). Provided coverage for all healthcare sub-sectors’ public and private investments (long/short) across all asset classes (revolvers, term loans, distressed, High Yield and Investment Grade debt, convertible securities, preferred and common equity). Strategy focused on exploiting cross-capital structure valuation based inefficiencies in highly levered, stressed and distressed credits. Experience with management negotiations/bondholder groups in covenant breach/consent solicitations, debt/equity swaps and pre and post petition corporate restructurings. .
- The dates of your association with the business: November 2002 – June 2006.
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I do not currently have a role with ARX. I amicably left the organization in June 2006 to co-found Apelles Investment Management, LLC.
- 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;
 - ARX was never accused of violating any laws or regulations during the time I was associated with the business.

- How this experience is relevant to the department’s evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with ARX will be directly relevant to the successful operation of a healthcare business.
 - Learning to establish linkages between operations, capital allocation, market perceptions and operational performance is a key skill that will be required to build this company and participate successfully as a market leader.

Goldman, Sachs & Co. Inc.

- The business name: Goldman, Sachs & Co. Inc. (hereinafter “Goldman Sachs”)
- Products or services offered: Goldman Sachs is a leading global investment banking, securities and investment management firm that provides a wide range of financial services.
- The business location: New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Vice President, Investment Banking Division – Healthcare Department, March 2001 – November 2002: Team leader responsible for structuring, developing, and executing transactions across all strategic advisory and financing product lines. Analyzed and implemented strategic alternatives for healthcare clients including mergers, acquisitions, leveraged buyouts, spinoffs, raid defenses, and restructurings. Developed strong personal relationships with senior management teams throughout healthcare sector in U.S., Europe, and Asia.
 - Associate, Investment Banking Division – Healthcare Department, August 1998 – March 2001: Direct promote from Analyst to Associate program.
 - Analyst, Investment Banking Division – Healthcare Department, February 1997 – August 1998: Lateral hire from S.G. Warburg.
- The dates of your association with the business: February 1997 – November 2002
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I do not currently have a role with Goldman Sachs. I amicably left the organization in 2002 to begin my work with ARX Investment Management.
- 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;
 - To the best of my knowledge, Goldman Sachs was not alleged to have violated any laws or regulations during the time I was associated with this business.

- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Goldman Sachs will be directly relevant to the successful operation of a healthcare business.
 - I learned first-hand how to build, finance, operate, research and execute on strategies for companies in the healthcare sector. My experience also reinforced the importance of collaboration, teamwork and professionalism. My years at Goldman taught me to work with management teams, competitors, politicians and all stakeholders to achieve a common goal. I also learned the importance of corporate culture and establishing independent systems to ensure accountability, support and reward for all involved parties. Consensus and mutual support were critical factors in establishing positive momentum for companies all over the world.

S.G. Warburg & Co., Inc.

- The business name: S.G. Warburg & Co., Inc.
- Products or services offered: Investment Banking.
- The business location: New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Analyst Investment Banking Division – Mergers & Acquisitions, July 1995 – February 1997: Analyzed and executed acquisitions (cross-border and domestic), divestitures, mergers, leveraged buy-outs, joint ventures and related financings. Developed analytical models for corporate strategic and transaction valuations. Served on transaction teams in North America, Latin America, and Europe.
- The dates of your association with the business: July 1995 – February 1997
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I do not currently have a role with S.G. Warburg. My involvement ended amicably when I was hired by Goldman Sachs in 1997.
- 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;
 - S.G. Warburg was never alleged to have violated any laws or regulations during my time with the business.
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with S.G. Warburg will be directly relevant to the successful operation of a healthcare business.

- I learned first-hand how to build, finance, operate, research and execute on strategies for companies in many industrial sectors. I also learned the importance of collaboration, teamwork, professionalism and attention to detail. My years at Warburg taught me to work in different cultural environments around the globe with management teams, competitors, politicians and all stakeholders.



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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): Michael Abbott		
2. Street Address (including Apartment or Suite #): 17 East 80th Street		
3. City: New York	4. State: NY	5. Zip Code: 10075
6. Title: Member/Chairman	7. Telephone Number: (212) 396-9210	8. E-mail Address: abbotm@mac.com
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]	11. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female XXX

Section B: Employment Information

12. Current or Most Recent Employer: 13. Raptor Group		Date of Employment: Start Date: 2012 End Date: : present	
14. Employer Address (including Apartment or Suite #): 401 W. 14th Stree, 4th Floor			
15. City: New York	16. State: NY	17. Zip Code: 10014	
18. Telephone Number: (212) 200-0900	19. Fax Number: n/a	20. E-mail Address: n/a	

Section C: Pharmacy Business Experience

21. Do you have any experience controlling, managing, operating or working for a pharmacy? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No XXX
22. Are you currently associated with a pharmacy in any state? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No XXX
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, how those allegations were resolved.



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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.

29. State n/a	30. Issue Date (month/year): Expiration Date (month/year): n/a	31. Type: n/a	32. Number: n/a
33. State n/a	34. Issue Date (month/year): Expiration Date (month/year): n/a	35. Type: n/a	36. Number: n/a



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Section G: Legal Proceedings

37. 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.

38. 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.

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

Yes No

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

40. 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 H: Criminal Actions

41. 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 I: 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.

42. Signature:



43. Date Signed:

11/13/13



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Section D: Criminal Actions

24. 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 E: 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.

25. Signature:



26. Date Signed:

11/13/13

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

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

27. Signature:



28. Date Signed:

11/13/13

Michael Abbott

Appendix C

Section D: Marijuana Business Experience

Question 26

Ventureforth LLC

- Business Name: Ventureforth LLC (hereinafter, “Ventureforth”)
- Business Location: Washington D.C.
- All titles and Responsibilities held by you at business, including the time frame for each:
Chairman of the Board of Trustees, December 2011 – Present
 - As Chairman of Ventureforth, I was responsible for the successful submission of a request for proposal (RFP) to the Washington D.C. Department of Health (DOH). The DOH awarded Ventureforth both a dispensary license (one of three to be issued) and a cultivation license (one of five to be issued) in Washington, D.C. Our company received the first license awarded in Washington, D.C. and was the first dispensary to begin operating. Ventureforth was the only group awarded both a cultivation and a dispensary license in a highly competitive process with several hundred applicants.
 - I helped raise over \$2.0mm in capital to finance the construction and buildout of infrastructure for each location and team. I oversee a team of 8 employees between both locations.
 - Ventureforth currently has over 65% of the market share in one of the nation’s only for profit markets. I oversaw an increase in revenue from zero to over \$1,000.00 per day and reduced operating costs by over 60% to bring company to breakeven.
 - I also served as a liaison to numerous local community groups, including a law enforcement and police – implemented charity care program, and several philanthropic giving initiatives.
- The Date of your association with the business: 2011 – Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why; and
 - I am currently the Chairman of the Board of Trustees.
- 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.
 - Ventureforth has never been accused of violating any law or regulation during the time I have been associated with the business.

Salubrious Wellness Clinic, Inc. (d.b.a. SWC Tempe)

- Business Name: Salubrious Wellness Clinic, Inc. (d.b.a. SWC Tempe) (hereinafter, “SWC Tempe”)

- Business Location: Tempe, Arizona
- All titles and Responsibilities held by you at business, including the time frame for each: Chairman of the Board of Trustees, March 2013 – Present.
 - Negotiated acquisition of supermajority control interest in highly coveted Tempe market and oversaw the final review of the license application for SWC Tempe;
 - SWC Tempe was awarded a license by the State of Arizona after it achieved a perfect score (no deficiencies) on its license application in the highly competitive and coveted Tempe market. Following licensure, I co-managed the design, permitting, and the build-out processes, completing these processes in two months.
 - As Chairman, I helped structure a partnership with local operators and built a team to operate both a 1,000 square foot dispensary and a 25,000 square foot cultivation facility at separate locations. I now oversee a team of 12 employees that treats over 100 patients per day, seven days per week.
 - I was responsible for the development of proprietary inventory and efficient point-of-sale (POS) tracking processes as well as inventory procurement techniques.
 - I oversee development and implementation of all policies and procedures as well as all sales and marketing initiatives. Sixty days after the date SWC Tempe opened, the business became cash flow positive. My sales and marketing initiatives increased the business' sales basis from zero to an average of over \$2,500.00 per day.
 - I helped implement a charity care program and several philanthropic giving initiatives in the Tempe community. I have also served as a liaison with local law enforcement.
- The Date of your association with the business: March 2013 – Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - I am currently the Chairman of the Board of Trustees.
- 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.
 - SWC Tempe has never been accused of violating any law or regulation during the time I have been associated with the business.

203 Organix, LLC. (203 Organix)

- Business Name: 203 Organix, LLC (hereinafter “203 Organix”)
- Business Location: Prescott, Arizona
- All titles and Responsibilities held by you at business, including the time frame for each:
 - Chairman of the Board of Trustees, April 2013 – Present.
 - Negotiated acquisition of supermajority control interest in highly coveted Tempe market and oversaw the final review of the license application for 203 Organix.

- 203 Organix was awarded a license by the State of Arizona after it achieved a perfect score (no deficiencies) on its license application in a highly competitive process. Following licensure, I managed the design, permitting, and the build-out processes, completing these processes in two months.
- As Chairman, I structured a partnership with local operators and built a team to operate both a 4,000 square foot dispensary and a 35,000 square foot cultivation facility at separate locations. I now oversee a team of 11 employees that treats over 75 patients per day, seven days per week.
- I was responsible for the development of proprietary inventory and efficient point-of-sale (POS) tracking processes as well as inventory procurement techniques.
- I oversee development and implementation of all policies and procedures as well as all sales and marketing initiatives. Sixty days after the date SWC Tempe opened, the business became cash flow positive. My sales and marketing initiatives increased the business' sales basis from zero to an average of over \$2,500.00 per day.
- I helped implement a charity care program and several philanthropic giving initiatives in the Prescott community. I have also served as a liaison with local law enforcement.
- The Date of your association with the business: April 2013 – Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why; and
 - I am currently the Chairman of the Board of Trustees for 203 Organix.
- 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.
 - 203 Organix has never been accused of violating any law or regulation during the time I have been associated with the business.

All Greens, Inc.

- Business Name: All Greens, Inc. (hereinafter, "All Greens")
- Business Location: Surprise, Arizona
- All titles and Responsibilities held by you at business, including the time frame for each:
 - Co-Chief Restructuring Officer, April 2013 – September 2013
 - I served as the Co-Chief Restructuring Officer for All Greens Inc. when a legal dispute caused the business to enter into a receivership.
 - I was assigned the task of securing financing and developing a business plan with long term viability for All Greens. I secured debtor-in-possession financing, built a team of experienced personnel, and developed systems to launch a successful business.
 - I was successfully selected to implement the first restructuring/distressed workout in the history of the Arizona medical marijuana program.

- I oversaw a team of 8 employees. I began with a sales basis of zero and built the business to generate an average of over \$1,500.00 per day.
 - In September 2013, I completed the court assignment ahead of time, under budget, and transitioned the business to the court's Receiver subsequent to receiving a perfect score on its application and being awarded a license by State of Arizona regulators.
-
- The Date of your association with the business: April 2013 – September 2013
 - Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - I no longer have a role with All Greens. My involvement ended in September 2013 upon the successful completion of the court's assignment.
 - 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.
 - All Greens was never accused of violating any law or regulation during the time I was associated with the business.

Michael Abbott
Appendix C
Section E: Other Relevant Business Experience
Question 28

Raptor Group

- The business name: Raptor Group Holdings LP (hereinafter “Raptor Group”)
- Products or services offered: The Raptor Group is a diversified financial services firm founded by James Pallotta that provides investment management and advisory services. The firm primarily invests in public and private equities across a broad spectrum of phases, sectors, geographies and asset classes. Our clients include high-net-worth individuals, family offices, funds of hedge funds, retail platforms, private banks, pensions, foundations, endowments, entrepreneurs, private organizations and properties.
- The business location: New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Managing Director, 2012 - Present: Management, oversight and development of the firm's different portfolio companies, co-investments and co-mingled funds.
 - I am also a member of Raptor’s executive committee. As part of my duties, I manage and mentor the executives and staff of various companies that Raptor invests in;
 - I help run a family office which invests in a great many different types of investments which include companies in the medical sphere, pharmaceuticals, medical devices and healthcare generally; As part of our investment activity, Raptor participates in advocacy for patient conditions, cost of products, and medical research and development;
 - I assist Raptor with a great number of philanthropic causes; We have a deep understanding of community needs and how to link those with philanthropic efforts, including philanthropic work with numerous hospitals in the Massachusetts area.
- The dates of your association with the business: 2012 – Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I am currently the Managing Director of Raptor Group.
- 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;
 - The Raptor Group has never been accused of violating any laws or regulations during the time I have been associated with the business.
- How this experience is relevant to the department’s evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Raptor will be directly relevant to the department’s evaluation of this application. I have specialized knowledge of numerous healthcare and medical

companies which will inform my ability to run a medical marijuana business. I will also be able to successfully manage and train individuals to run the business.

Helios Advisors LLC

- The business name: Helios Advisors LLC (hereinafter “Helios”)
- Products or services offered: Commodities Specialist Hedge Fund.
- The business location: New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Owner/General Partner, 2006 – 2012: In 2006, I founded Helios as a hedge fund which specialized in commodities investment. I was responsible for financial accounting, compliance, risk management, and financial reporting.
- The dates of your association with the business: 2006 – 2012
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Helios. I sold my equity stake in 2012 to reinvest my assets in other areas.
- 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
 - Helios was never accused of violating any laws or regulations in the time period in which I was associated with the business.
- How this experience is relevant to the department’s evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Helios will be relevant to my ability to successfully manage the business financially through my skills in accounting, compliance, risk management, and preparing financial reports.

Cornell University

- The business name: Cornell University (hereinafter “Cornell”)
- Products or services offered: Investment.
- The business location: Ithaca, NY
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Chief Investment Officer, 2010 – 2011: I served Cornell as the Chief Investment Officer and was in charge of developing and implementing strategies for investing Cornell’s endowment in a socially responsible manner. As part of my duties, I was also responsible for all reporting to the Cornell Administration and Board of Trustees regarding my investment strategies. I also sat on the management committee for the University.

- I was responsible for risk management, conflict avoidance, asset allocation, financial control, and management of 27 people.
- The endowment increased 19.3%, from \$4.3 to \$5.2 billion, during my tenure.
- The dates of your association with the business: 2010 – 2011
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Cornell. My involvement ended in 2011 when I accepted an offer to work with Raptor (see above).
- 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;
 - Cornell was never accused of violating any laws or regulations during the time period I was associated with the business.
- How this experience is relevant to the department’s evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Cornell will be relevant to my ability to successfully manage complex financial matters and a large staff of employees. I will also be able to use my expertise in risk management, conflict avoidance and implementing financial controls.

Robeco Sage Capital Management

- The business name: Robeco Sage Capital Management (hereinafter “Robeco”)
- Products or services offered: Investment
- The business location: New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Chief Executive Officer, Head of Investment Committee, 2006 - 2010: Managed over \$2 billion of multi-strategy fund of hedge fund. The hedge fund focused on many endowments, foundations, and not for profits entities. I was responsible for financial accounting, reporting, compliance, risk management, and oversight.
- The dates of your association with the business: 2006 – 2010
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Robeco. I left the business in 2010 to become the Chief Investment Officer at Cornell University.
- 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
 - Robeco was never accused of violating any laws or regulations during my time with the business.

- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Robeco will be relevant to my ability to successfully manage the business financially through my skills in accounting, compliance, risk management, and preparing financial reports.

Elysium Capital Group

- The business name: Elysium Capital Group (hereinafter "Elysium")
- Products or services offered: Financial services
- The business location: Stamford, CT
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Founding Partner, Chief Operating Officer and Member of Investment Committee, 2002 – 2006: Co-founded Stamford based company providing financial services, namely, investment advisory services, investment management services and asset management services; Managed a staff of 14 people. Responsible for financial accounting, reporting, risk management, compliance, and oversight.
- The dates of your association with the business: 2002 – 2006
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I am no longer associated with the Elysium. My involvement ended in 2006 so that I could pursue a role with Robeco Sage.
- 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;
 - Elysium was never accused of violating any laws or regulations during the time I was associated with the business.
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Elysium will be relevant to my ability to successfully manage the business financially through my skills in accounting, compliance, risk management, and preparing financial reports.

Goldman Sachs

- The business name: The Goldman Sachs Group, Inc. (hereinafter "Goldman")
- Products or services offered: Investment
- The business location: New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each:

- Executive Director, Head of U.S. Structured Products (Trading and Sales), 1996 - 2002: My responsibilities as Head of U.S. Structured Products focused heavily on developing and implementing trading strategies. In this position, I also gained substantial experience with developing and implementing operations technology, organizing data, and building systems that accumulated data.
- The dates of your association with the business: 1996 – 2002
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Goldman. I left the business in 2002 to start a financial services company.
- 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;
 - Goldman may have been subject to and part of securities litigation throughout the period I was associated with the business. However, I was never involved in any allegations of wrongdoing during my time with the business.
- How this experience is relevant to the department’s evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Goldman allowed me to develop expertise in operations technology and organizing data. This will be relevant to my ability to successfully collect data on patients and implement technology which will allow the business to deliver superior services.

Swiss Bank/O’Connor Partners

- The business name: Swiss Bank/O’Connor Partners (hereinafter “Swiss Bank”)
- Products or services offered: Investment
- The business location: Chicago, IL
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Director, Co-Head Equity-Linked, Capital Markets, Syndicate and Corporate Derivatives, 1994 – 1996: I was responsible for financial accounting, compliance, risk management, and financial reporting.
- The dates of your association with the business: 1994 – 1996
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Swiss Bank. I left the business in 1996 to pursue an opportunity with Goldman Sachs.
- 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;

- To my knowledge, Swiss Bank was never accused of violating any laws or regulations during the time I was associated with the business.
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Swiss Bank will be relevant to my ability to successfully manage the business financially through my skills in accounting, compliance, risk management, and preparing financial reports.

Swiss Bank Corporation

- The business name: Swiss Bank Corporation (hereinafter "Swiss Bank Corp")
- Products or services offered: Investment
- The business location: London, UK
- All titles and responsibilities held by you at the business, including the time frame for each:
 - Manager, Equity and Equity-Linked Capital Markets, 1990 – 1994: I was responsible for accounting, compliance, risk management and preparing financial reports relative to various investments.
- The dates of your association with the business: 1990 – 1994
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Swiss Bank Corp. I left the business in 1994 to pursue an opportunity in Chicago with its affiliate Swiss Bank/O'Connor Partners.
- 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;
 - To my knowledge, Swiss Bank Corp was never accused of violating any laws or regulations during the time I was associated with the business.
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience with Swiss Bank will be relevant to my ability to successfully manage the business financially through my skills in accounting, compliance, risk management, and preparing financial reports

London Metropolitan Police

- The business name: London Metropolitan Police
- Products or services offered: Law enforcement.
- The business location: London, UK
- All titles and responsibilities held by you at the business, including the time frame for each:

- Police Officer, 1983 – 1987: I was a uniformed police officer for two years in which I was responsible for all aspects of crime investigation and prevention. I was also a member of the district support unit/regional narcotics group investigating serious drug-related crimes;
- As part of my duties, I was also responsible for community outreach and community policing;
- The dates of your association with the business: 1983 – 1987
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I am no longer affiliated with the London Metropolitan Police. My involvement ceased in 1987 upon my decision to study law.
- 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;
 - To my knowledge, the London Metropolitan Police was not accused of violating any laws or regulations during the time period I was associated with the organization.
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience as a police officer will be relevant to my ability to successfully run a business in which security is of paramount importance. I am trained in all aspects of crime detection and investigation as well as the safe handling of narcotics. I will also be able to successfully develop and implement community initiatives and philanthropic activities.



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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): Robert Mayerson		
2. Street Address (including Apartment or Suite #): 139 Stow Road		
3. City: Harvard	4. State: MA	5. Zip Code: 01451
6. Title: Member/CFO	7. Telephone Number: (978) 771-1434	8. E-mail Address: bmayerson@gmail.com
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]	11. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female

Section B: Employment Information

12. Current or Most Recent Employer: 13. Eastern Mountain Sports, Inc.		Date of Employment: Start Date: 05/2006 End Date: : present	
14. Employer Address (including Apartment or Suite #): 1 Vose Farm Road			
15. City: Peterborough	16. State: NH	17. Zip Code: 03458	
18. Telephone Number: (603) 924-7231	19. Fax Number: n/a	20. E-mail Address: n/a	

Section C: Pharmacy Business Experience

21. Do you have any experience controlling, managing, operating or working for a pharmacy? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22. Are you currently associated with a pharmacy in any state? <input type="checkbox"/> Yes <input checked="" 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, how those allegations were resolved.



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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.

29. State n/a	30. Issue Date (month/year): n/a Expiration Date (month/year):	31. Type: n/a	32. Number: n/a
33. State n/a	34. Issue Date (month/year): n/a Expiration Date (month/year):	35. Type: n/a	36. Number: n/a



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Section G: Legal Proceedings

37. 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.

38. 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.

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

Yes No

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

40. 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 H: Criminal Actions

41. 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 I: 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.

42. Signature:



43. Date Signed:
11/13/13



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Section D: Criminal Actions

24. 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 E: 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.

25. Signature:



26. Date Signed:

11/13/13

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

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

27. Signature:



28. Date Signed:

11/13/13

Robert Mayerson

Appendix C

Section D: Marijuana Business Experience

Question 26

Columbia Care LLC

- Business Name: Columbia Care LLC (hereinafter, “Columbia Care”)
- Business Location: Delaware
- All titles and Responsibilities held by you at business, including the time frame for each:
Partner, President and Member of the Board of Directors, June 2013 - Present
 - I am responsible for developing and implementing business strategies for the operation of medical marijuana dispensaries in various states, including existing dispensary locations in Washington D.C. and Arizona. My responsibilities include financial accounting, risk management, compliance, oversight, and management of numerous employees. I am also responsible for analyzing and selecting optimal commercial real estate.
- The Date of your association with the business: June 2013 – Present
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - I am currently the President and a Member of the Board of Directors as well as a partner.
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations.
 - Columbia Care has never been accused of violating any law or regulation during the time I have been associated with the business.

Robert Mayerson
Appendix C
Section E: Other Relevant Business Experience
Question 28

Eastern Mountain Sports, Inc.

- The business name: Eastern Mountain Sports, Inc. (hereinafter “EMS”)
- Products or services offered: Retailer of high quality outdoor gear and apparel.
- The business location: Peterborough, NH
- All titles and responsibilities held by you at the business, including the time frame for each: President, Chief Operating Officer, Chief Financial Officer, May 2006 – January 2013:
 - Responsible for Store Operations, Real Estate & Construction, Logistics & Distribution, Finance, Information Technology and Non-Trade Procurement.
 - Co-led successful process to sell the company to new private equity investors in Fall 2012.
 - Helped engineer dramatic transformation of company. Between 2006 and 2010 we closed 29 stores, opened 20 newer format locations, revamped the product mix, sharpened focus on EMS brand products, improved the in-store customer experience and focused on cost reduction. We improved gross profit by 430 bp, and operating expenses by 510 bp. The years 2009 and 2010 were the company’s two best in terms of profitability in nearly a decade.
 - Completed three-part financing in July 2009 which included an infusion of \$10 mil. of new equity from existing private equity holders, restructuring of subordinated debt to reduce cash interest and implementation of \$40 mil. asset-based financing with new lenders.
 - Negotiated complex transaction for relocation of store in Soho which netted company nearly \$4 mil. in cash after paying for cost of build-out of new prototype there.
 - Improved store level standards and improved processes and communications between stores and headquarters to drive greater efficiency. Focused on ensuring the right people working in our stores to provide superior and differentiated customer service. Resulted in vastly improved store selling metrics and customer satisfaction.
 - Proposed and implemented customer rewards program and database in 2012 to enable a more quantitative, customer centric business model
 - Proposed and implemented EMS Brand Credit Card for customers in Spring 2007
- The dates of your association with the business: May 2006 – January 2013
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with EMS. Following the sale of the business in the Fall of 2012, I remained as consultant for approximately six months but I am no longer

- performing such services. The new owners combined the company with another retailer in their portfolio and wanted to bring in their own management team.
- 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;
 - In 2010, the New York District Attorney alleged that EMS, along with numerous other retailers including Home Depot, had been selling knives which were illegal under New York law. EMS negotiated a deferred prosecution agreement in which it agreed to remove the knives from its stores. The deferred prosecution agreement successfully ended after a year in full compliance.
 - EMS was not accused of violating any other laws or regulations during the time I was associated with the business.
 - How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My role with EMS is directly relevant to the operation of a patient (customer) focused business that involves a retail component (dispensary facility) and a production facility. I have significant expertise and success in running the front end and back end of a patient (customer) facing business from the perspective of operations, finance, distribution and systems.

Staples, Inc.

- The business name: Staples, Inc. (hereinafter "Staples")
- Products or services offered: Office supplies retailer.
- The business location: Framingham, MA
- All titles and responsibilities held by you at the business, including the time frame for each: Senior Vice President, Treasurer, September 2002 – May 2006:
 - Asked to return to Staples in previous role held from 1993 to 2000. Responsible for Treasury, Tax and Risk Management. Administrative oversight of Internal Audit function. Treasury responsibilities included all financing, mergers and acquisitions and cash management.
 - Led acquisition of delivery businesses in China and Argentina/Brazil. Responsible for ongoing operational interface between those entities and respective operating functions at headquarters. Led effort to pursue additional acquisition targets in China. Was appointed to Board of the China entity. Developed strategy for entry into India, which was subsequently executed.
 - Recommended and implemented target capital structure and responsible for initiation of annual cash dividend. Led share repurchase efforts as well. Developed and implemented strategy for investment of \$1.5 bil. of excess cash.
 - Member of Disclosure Committee. Co-led adoption of Sarbanes Oxley and developed framework to ensure global legal entity compliance.

- Established captive insurance subsidiary
- After a period of outsourcing, brought the Tax group back into company as internal resources. Established new legal entity structure for international operations.
- Implemented corporate-owned life insurance (COLI) for funding of deferred executive compensation plan.
- The dates of your association with the business: September 2002 – May 2006
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Staples. I amicably left the business in 2006 to pursue an opportunity for promotion and a broader operational role with Eastern Mountain Sports, Inc. as a senior executive.
- 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
 - In 2006, a shareholder derivative lawsuit was filed against Staples as well as numerous Staples executives and board members. It was alleged that stock options held by certain employees were backdated for their personal benefit. However, I was not involved with the backdating of any stock options and was only named in the suit because I was an officer of the company at the time. The parties eventually reached a settlement agreement out of court.
 - To my knowledge, Staples was not accused of violating any other laws or regulations during the time I was associated with the business.
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience at Staples from 2002 to 2006, together with the period from 1993 to 2000 (see below) is directly relevant to this new opportunity given my success in helping to create and manage a leading retailer. This involved directing strategy, raising capital, developing and maintaining strong controls, managing large groups of people and helping to keep costs under control.

Tilion Inc.

- The business name: Tilion Inc. (hereinafter "Tilion")
- Products or services offered:
- The business location: Maynard, MA
- All titles and responsibilities held by you at the business, including the time frame for each: Chief Financial Officer, 2000 – 2002.
 - Responsible for all aspects of Finance, Human Resources, Legal and Operations for this software/ service provider start-up. Joined the company at its founding. Company's principal investors included North Bridge Venture Partners and Venrock Associates.

- Led second fund-raising round in difficult macro environment (11/00). Raised \$36 mil. at pre-money valuation significantly in excess of first round valuation. Financing round included existing as well as new investors.
- Negotiated and implemented 2 separate financing lines totaling just under \$3 mil.
- The dates of your association with the business: 2000 – 2002
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Tilion. My involvement ended in 2002 when the business was unable to achieve commercial success, primarily given the end of the so-called “dotcom” bubble.
- 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;
 - Tilion was never accused of violating any laws or regulations during the time period I was associated with the business.
- How this experience is relevant to the department’s evaluation of the RFA response of the applicant with whom you are associated.
 - Tilion was a startup and in that regard I was involved in every aspect of the business at a very granular and hands-on level.

Staples Inc.

- The business name: Staples Inc. (hereinafter “Staples”)
- Products or services offered: Office supplies retailer.
- The business location: Framingham, MA
- All titles and responsibilities held by you at the business, including the time frame for each: Senior Vice President, Corporate Controller, 1997 – 2000, Senior Vice President, Treasurer 1993 – 1997.
 - Responsible for Financial Planning and Analysis, General Accounting, Margin & Inventory Control, Financial Services (e.g. Accounts Payable, Accounts Receivable and Payroll), Loss Prevention, Financial Systems Integration and Strategic Sourcing. Led staff of 250+ through 7 direct reports.
 - As Senior Vice President and Corporate Controller, I led a successful corporate-wide program to identify and deliver \$100 mil. of savings from process improvements, centralized procurement and best practice adoption (1998).
 - Led effort to reduce G&A spending primarily through process changes and centralization. Achieved \$17 mil. of \$22 mil. target prior to leaving company.
 - Responsible for integrating finance and non-product procurement of two large acquired companies; efforts generated more than \$3 mil. in operating synergies.
 - Created centralized procurement group and saved over \$10 mil. in first year.
 - Implemented corporate EIS system.

- Wrote most major Investor Relations presentations for CEO and COO in 1998-1999 period.
- As Senior Vice President and Treasurer, Responsible for Treasury, Tax, Risk Management, Strategic Planning (and Investor Relations at various times). Treasury responsibilities included all financing, mergers and acquisitions and cash management. Strategic planning responsibilities included direction of annual strategy review with senior management and establishment of long-term sales and earnings targets. Led staff of 50.
- Completed 8 acquisitions (valuation, negotiation and documentation), including buy-out of joint venture partner in Europe. Evaluated 45 other target companies in the U.S. and abroad.
- Executed 2 separate public financings for \$500 mil. (convertible and straight debt) and 2 secondary equity offerings. Participated in road shows for each.
- Implemented \$350 mil. revolving credit facility on very favorable terms.
- Managed company from high-yield credit to investment grade during tenure.
- Implemented ideas in 12-month period that generated \$25 mil. in savings over 3 years.
- Developed cash flow forecasting which was critical during most rapid growth phase.
- Internal "champion" for focus on financial returns
- Part of small team dedicated to fight the FTC in court over potential merger with Office Depot
- The dates of your association with the business: 1993 – 2000
- Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I no longer have a role with Staples. I left the business amicably in 2000 to pursue an alternative promotional and economic opportunity with Tilion. I was asked by the Chairman to return to the company in 2002 after my experience with Tilion ended.
- 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
 - Staples was never accused of violating any laws or regulations during the time period I was associated with the business
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - My experience at Staples from 1993 to 2000, together with the period from 2002 to 2006 (see above) is directly relevant to this new opportunity given my success in helping to create and manage a leading retailer. This involved directing strategy, raising capital, developing and maintaining strong controls, managing large groups of people and helping to keep costs under control.

PepsiCo Inc.

- The business name: PepsiCo Inc. (hereinafter “Pepsi”)
- Products or services offered: Multinational corporation specializing in food and beverages (and, at the time, restaurants).
- The business location: Purchase, NY
- All titles and responsibilities held by you at the business, including the time frame for each: Director of Corporate Finance 1991 – 1993, Director of Planning, PepsiCo Food Service International 1989 – 1991, Director of Investor Relations, PepsiCo Inc. 1987 – 1989, Manager, Short-Term Financing, PepsiCo Inc. 1985 – 1987, Senior Treasury Analyst, PepsiCo Inc. 1984 – 1985, Treasury Analyst, PepsiCo Inc. 1982 - 1984
 - As *Director of Corporate Finance*, I was responsible for long term capital planning, capital structure analysis and financial risk management within Treasury group. In addition, responsibilities included rating agency and board presentations, acquisition analysis, dividend policy and PepsiCo's shareholder value framework.
 - Conducted detailed analysis of foreign exchange exposures at the corporate, divisional and country levels. Developed exposure management policy to facilitate operating decisions at the division level and enhance performance measurement.
 - Initiated corporate-wide review and risk assessment of international investment plans by division for next 5 years. Findings helped lead to more aggressive investment in Eastern Europe and Latin America.
 - Prepared and presented strategic review of PepsiCo's business outlook and spending plans to rating agencies. Rating upheld despite aggressive investment spending plans.
 - As *Director of Planning*, I was responsible for the planning of PepsiCo's \$250 mil. international restaurant division (Pizza Hut and Taco Bell). Traveled extensively to review plans and operations of all international business units, including company-owned, joint venture and franchise operations. Managed a staff of five.
 - Developed universal reporting format for submission of plan data which shortened the time required to roll-up field-based plans. Made financial reporting more insightful and descriptive and improved timeliness of reporting to senior management.
 - Performed analysis of several potential acquisitions, franchise buy-outs and joint ventures. Completed \$10 mil. joint venture in South Korea.
 - Provided financial framework to assist marketing programs and operations initiatives. Developed turn-around strategy for a developing European market. Member of 3-person team which developed strategy to aggressively build pizza delivery business in the UK.
 - As *Director of Investor Relations*, I was responsible for marketing PepsiCo as a long term investment to institutional investors. I developed and maintained communications with securities analysts and portfolio managers regarding PepsiCo's performance and outlook. I also wrote speeches for Chairman/CEO and CFO.

- IR program recognized as one of top 10 in U.S. by Institutional Investor Magazine in 1989.
 - Led successful targeting effort in the U.S.; Developed investor relations program in Europe.
 - Developed highly successful multi-media presentation for international investors that was delivered by Chairman and senior managers in 18 cities.
 - As *Manager of Short Term Financing*, Developed and executed trading strategies with respect to PepsiCo's short-term financing needs, including commercial paper portfolios totaling \$2 billion, marketable securities portfolios totaling \$1 billion and all foreign exchange trades. Managed one professional trader.
 - Negotiated and executed European commercial paper program and medium-term note programs; implemented and managed Australian dollar commercial paper program
 - Hedged \$100 mil. bond issue through forward purchase of U.S. Treasury notes.
 - Managed \$125 mil. arbitrage portfolio; generated pre-tax profits of \$200,000 in first year.
 - As *Senior Treasury Analyst*, I was responsible for analysis of long-term financing proposals, derivative products and preparation of presentations to rating agencies.
 - Completed deals included the following: PepsiCo's first currency swap (in conjunction with a bond issue); Two bond issues (Swiss Franc and Australian Dollar) totaling \$200 mil.; and Structured off-shore purchase of \$200 mil. of receivables
 - As *Treasury Analyst*, my initial responsibilities included determination of daily funding or investment requirements and execution of all wire transfers. Moved to cash management projects in 1983. Performed disbursement and collection studies and worked with outside consultants to design computerized cash management system.
- The dates of your association with the business: 1982 – 1993
 - Whether you currently have a role at the business and, if not, when your involvement terminated and why:
 - I am no longer associated with the PepsiCo Inc. My involvement ended amicably in 1993 so that I could pursue a promotional opportunity with Staples Inc.
 - 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;
 - To the best of my knowledge, PepsiCo was never accused of violating any laws or regulations during the time period I was associated with the business
 - How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - PepsiCo was (and still is) considered one of the great training grounds for financial talent in corporate America. I gained significant financial and strategic expertise during my 11 years with this company.



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Appendix D

Dispensary Facility Manager Information Form

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.



Medical Marijuana Program

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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): Nicholas D Tamborrino				
2. Home Address (including Apartment or Suite #): 428 Old Mill Rd			3. City: Fairfield	
4. State: CT	5. Zip Code: 06824	6. Date of Birth: [REDACTED]	7. Telephone Number: (860) 508-5250	
8. Social Security Number: [REDACTED]			9. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	
10. E-mail Address: ntamborrino@hotmail.com			11. Connecticut Pharmacist License Number: 9771	

Section B: Employment Information

12. Current or Most Recent Employer: 13. Yale New Haven Health System		Date of Employment: Start Date: 01/03/2012 End Date: :	
14. Employer Address (including Apartment or Suite #): 99 Hawley Lane			
15. City: Stratford		16. State: CT	17. Zip Code: 06610
18. Daytime Telephone Number: (203) 688-2294	19. Fax Number: (203) 688-1488	20. E-mail Address: linda.skarupa@ynhh.org HR	

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.



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Section D: Criminal Actions

24. 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 E: 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.

25. Signature:



Michael D. Tamburro

26. Date Signed:

11/05/2013

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

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

27. Signature:



Michael D. Tamburro

28. Date Signed:

11/05/2013

Nicholas Tamborrino, PharmD, MBA

Pharmacy Business Experience

I'm extremely passionate about the pharmacy profession and my willingness to succeed will make me an imperative asset to the Connecticut Medical Marijuana Program. My past work experiences have given me a great foundation and understanding in all areas of pharmacy practice. In addition, my business degree has given me invaluable insight into the core elements necessary to operate a business.

Over the past year, I've executed due diligence by dedicating an incredible number of hours researching all topics related to medical marijuana. I consider myself well educated and comfortable in various capacities such as accounting, insurance, banking, pricing, and various product formulations. Considering the knowledge I've found and learned over the past two years, I've set myself up to master every aspect of the medical marijuana business.

Throughout my work experience, not only have I learned the clinical and operational aspects of pharmacy practice, but I've also learned the importance of building professional relationships and putting the needs of the patient first. Working in multiple areas of pharmacy, I've always considered the patient when making clinical decisions and assuring their best interest is always met. I will continue my devotion to the pharmacy profession and apply my knowledge, skills, and experience to assure optimal drug therapy outcomes. Whether gaining trust from a patient at a retail pharmacy, suggesting a medication to a provider at Bridgeport Hospital, or training the pharmacy department at Yale New Haven Health System, I've appreciated the importance and significance of this. Building professional relationships and collaborating to improve patient care is a key factor in all pharmacy practices and I intend to continue this philosophy at the medical marijuana dispensary level.

I understand that a great part of this program's success relies on communication and education to multiple levels. Through my motivation and dedication to this program, I'm prepared to help disseminate education wherever the need may be. My patients will be well educated on their therapy through monthly counseling meetings where medication history and marijuana strain discussions will take place. I plan to volunteer at local community events to help educate and listen to concerns surrounding medical marijuana. I've recently taken the initiative to begin educating local police departments from a pharmacist perspective to help them understand the structure of this program. The patient and their safety has always been a centered focus in practice.

While attending the University of Connecticut's School of Pharmacy in 2000, I was selected to work within Bristol-Myers Squibb's summer internship program. I worked in the Clinical Supply Operation division for two summers which sparked my interest in research. I was responsible for the labeling of study drugs world-

wide using cutting edge labeling software. Upon graduation from pharmacy school in 2002, I began my career in a retail pharmacy to help familiarize myself with the everyday tasks associated in that setting. There I quickly took on manager roles participating in scheduling of technicians and weekly inventory counts of scheduled II medications. In 2004, I was offered a clinical pharmacist position at Bridgeport Hospital which has allowed me to practice pharmacy using my clinical skillset. In collaboration with other healthcare providers, I have built a solid trust allowing me to comfortably make drug therapy recommendations. Shortly after joining, I was nominated to be a member of the Institutional Review Board for Bridgeport Hospital. I represented the pharmacy department and reviewed all research study protocols occurring at the hospital. Since 2006, I've maintained working evenings at two local hospitals. I received numerous awards throughout my career at Bridgeport; the most recent being a hospital wide "Great Catch" award in May 2012 where I prevented a major medication error which could have been detrimental to the patient.

In 2006, I joined Caremark as a Clinical Advisor responsible for 200 accounts in the New York and Connecticut. I was part of a unique group called Clinical Consulting, consisting of 100 pharmacists spread throughout the United States. The group received contracts by national and local health plans or employers. I was responsible for building relationships and educating key opinion leaders on the latest trends in multiple disease states.

While finishing my Masters in Business Administration, I took on a role in healthcare informatics. In 2012, I joined Yale New Haven Health System's Epic project as a physician trainer. I was responsible for curriculum development and testing for the new electronic EMR system. In late 2012, I received Epic Inpatient Pharmacy and Oncology certifications. I'm currently responsible for curriculum build and clinical workflow training for all pharmacy staff at all Yale New Haven Health System Hospitals. In addition, I've taken on an analyst roles and responsibilities for the build and maintenance of medications in the Epic database.

Applicant qualifications:

University of Connecticut School of Pharmacy, PharmD 2002

University of Connecticut School of Business, MBA 2011

Connecticut Pharmacist #9771

Connecticut Pharmacist Association Member

Nicholas Tamborrino, PharmD, MBA

Pharmacy Business Experience

Bridgeport Hospital Pharmacy

Location: Bridgeport, CT

Titles: Clinical Pharmacist (08/04-present), Institutional Review Board (10/04-11/05)

Responsibilities:

- Managed the storage and preparation of Clinical Study Drugs at Bridgeport Hospital.(2004)
- Involved in pharmacokinetic monitoring of aminoglycosides and vancomycin.
- Monitor and dosing of Warfarin for patients receiving anticoagulation therapy.
- Dose and preparation of chemotherapy agents.
- Compounds and dispenses pharmaceuticals, including sterile, chemotherapy, and parenteral nutrition products accurately using USP 797 guidelines.
- Manage inventory and dispensing of scheduled II,III,IV,V medications.
- Oversee pharmacy technician duties relating to the dispensing of medications.
- Interpretation of medication orders (verbal and electronic) and transcribes to computerized patient medication profiles accurately.
- Maintains accurate and complete patient medication profiles.
- Monitors drug therapy regimens for contraindications, drug-drug interactions, drug-food interactions, allergies, and appropriateness of drug and dose.
- Participates in the quality improvement and medication use review activities of the department.
- Collects data; conducts quality monitors and inspections; and maintains log, records, and other documentation as assigned.
- Participates in the development and presentation of orientation, education, and training programs to the pharmacy, medical, nursing, and other staffs.
- Sustains the formulary by minimizing non-formulary procurements, utilizing therapeutic protocols and promoting rational drug therapy selection.

St. Vincent's Medical Center Pharmacy

Location: Bridgeport, CT

Titles: Clinical Pharmacist Per-diem (01/09-present)

Responsibilities:

- Act as clinical support for ICU and Telemetry floors.
- Compounds and dispenses pharmaceuticals, including sterile, chemotherapy, and parenteral nutrition products accurately using USP 797 guidelines.
- Ensure proper dosing on all medications and adjusting doses according to renal Drug Use Evaluation (DUE) protocols.
- Manage inventory control and dispensing of scheduled II-III-IV-V medications.
- Monitors drug therapy regimens for contraindications, drug-drug interactions, drug-food interactions, allergies, and appropriateness of drug and dose.
- Supervise and direct pharmacy support personnel during evening and weekend shifts.
- Verifies the daily activities assigned to pharmacy technicians are complete and accurate.
- Verifies prepackaging of medications is checked and correctly labeled,
- Assisted in protocol development and implementation of vancomycin protocol for ED patients.

Walgreen's Pharmacy

Location: Norwalk, CT

Titles: Retail Pharmacist/ Assistant Pharmacy Manager (03/02-09/05)

Employment voluntarily ended in September 2005 to focus in clinical areas of pharmacy practice.

Responsibilities:

- Managed customer relationships including, patient counseling, complaint resolution, quality assurance, and adherence to practices promoting customer satisfaction.
- Developed and maintained good working collaborative practice with physicians and other healthcare professionals maximizing patient outcomes.
- Maintained all state and federal record keeping for legend drugs and controlled substances.
- Responsible for weekly inventory counts on all scheduled II medications.
- Coordinated the pharmacy schedule; direct and monitoring of pharmacy personnel and performance by providing ongoing proactive, constructive feedback, training, and evaluations; making recommendations for hiring and promotion.
- Performed all activities related to the preparation, dispensing, and sale of prescription and pharmacy-related products.
- Focused on customer satisfaction and needs, ensuring that customers were provided excellent customer service through use of best practices and prompt communication with physicians, vendors, and colleagues.
- Ensured all work processes were performed efficiently and effectively at each work station by prioritizing workload and organizing workflow.
- Maintained proper pharmacy and general safety procedures and standards. Enforced compliance with all local, state, and federal laws, company policies and procedures, and state regulations regarding intern, technician, and assistant training and licensure.
- Assisted in pharmacy operations to achieve business objectives by increasing sales and gross margins, managing equipment, limiting expenses, directing operations to minimize wait times, monitoring department performance metrics, upholding proper pharmacy and general safety procedures and standards, and partnering with management in developing and implementing store programs to help meet sales objectives and increase prescription volume.



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Appendix E

Backer Members

Authorization for Release of Personal History Form

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.



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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): 87		Col Care (Delaware) LLC a/k/a Columbia Care	
2. Street Address (including Apartment or Suite #):		874 Walker Road, Suite C	
3. City:	Dover	4. State:	5. Zip Code:
		DE	19904
6. Daytime Phone Number:	7. Fax Number:	8. E-mail Address:	
(203) 442-9000	n/a	n/a	


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: 11/13/2013
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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: 11/13/2013
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Appendix F

Executive Summary

In Re: RFA Section A Question 2

EXECUTIVE SUMMARY

1.0 EXECUTIVE SUMMARY OVERVIEW

The following pages contain Constitution Care LLC's executive summary identifying the company's qualifications, experience and industry knowledge relevant to the development and operation of a dispensary facility.

Constitution Care LLC's (CC) mission is to be Connecticut's (CT) premier provider of Medical Marijuana services and products by offering patients a safe, natural way to alleviate suffering and improve lives. We are committed to consistently exceeding expectations by leading the industry in patient care, innovation, social responsibility, education, and compliance. Across the country, we partner with local leaders, law enforcement, healthcare providers, and patient advocacy groups by offering philanthropic support. As demonstrated by our partnerships with UConn School of Pharmacy and the Connecticut Pharmacists Association, as described below, we will continue to work directly with local scientific, healthcare and research institutions.

CC is comprised of experts from the pharmacy, clinical research, medicine, security, community engagement, technology, finance, legal/compliance, government, retail, and education fields. As an experienced operator in other highly regulated Medical Marijuana programs, our team, substantial capital base and national platform offers CT proven execution and resources to ensure successful and compliant operations. Our company pledges: Quality, Experience, Security, Responsibility and Compliance.

QUALITY: At CC, our primary goal is to provide the best care in a secure and therapeutic environment. We believe in treating one patient at a time, and every aspect of our business is driven by a combination of patient needs, our experience, and regulatory compliance. Our guiding principle is that internal standards should always exceed State requirements- our model begins with passionate personnel and intense training, and ends with the highest quality patient service. Training goes beyond product knowledge as we effectively leverage our real-world experience in other jurisdictions to ensure staff is prepared for the demands and expectations of both regulators and our patients. We stress discipline and teamwork as we strive to alleviate patient suffering while maintaining strict program compliance. The result is an unmatched level of service.

EXPERIENCE: CC has built the most comprehensive and diversified team of established professionals specifically selected to operate medically-focused facilities in highly regulated markets such as CT, each with years of relevant experience. A common vision unites us as a model company providing an unforgettable patient experience full of compassion and integrity.

Corporate Leadership is comprised of proven executive officers drawn from some of the most successful global companies, including Staples, Amgen, Eastern Mountain Sports and Goldman Sachs.

Healthcare/Research Team is comprised of leading physicians, researchers and pharmacists whose previous experience originates from many of the world's finest research, medical and healthcare policy institutions such as the Yale-New Haven Medical System, UConn School of Pharmacy, Harvard Medical School, Dana Farber Cancer Institute, Cornell-Weil Medical Center, and University of Pennsylvania Medical School.

Compliance Team is comprised of retired public servants and Medical Marijuana legal/policy experts knowledgeable in relevant law, and includes consultants and advisors, one of whom served as Speaker of the House in the CT House of Representatives for six years.

Security Team is comprised of retired CT law enforcement members, including a former Hartford Chief of Police, current President of the 100 Club, Member of the Sandy Hook Advisory Commission and former commissioner at the CT Department of Public Safety, a retired Marines Special Operations Command with extensive combat expertise including embassy protection, and several retired local and federal narcotics interdiction team members.

Capital. CC brings substantial financial and operational resources to ensure it will be a successful, sustainable, and reliable partner for the State. Our access to financial and human capital will serve as the foundation for the infrastructure needed to build state-of-the-art facilities, develop

and employ fully-integrated, compliant proprietary security systems and protocols, and train personnel to ensure the absolute best patient experience and strict regulatory compliance.

Proven Execution. CT's program is nascent, but CC brings the unique experience of having built a marketplace for the young Washington, DC program. CC will employ lessons learned in DC to build an effective infrastructure supporting CT's new program, leading the market-creation process through education, outreach, public service initiatives, and regulatory support. We know firsthand the program's success is dependent on the support of program participants- with a modest initial patient base, the lead-time, discipline and capital required to build a self-sustaining market will be challenging, so all stakeholders must collaborate and rely upon substantial resources and domain expertise. CC is committed to this long-term investment.

Affiliates. Our affiliate was the first approved licensee to operate in DC and we now boast over 55% market share. DC currently has the most restrictive program in the US, with Federal and local oversight- our operations, policies and procedures are reviewed by the Department of Health, Metropolitan Police Department, Department of Protective Services and Department of Environmental Protection with zero deficiencies. We were asked to serve as advisor for DC's revised law enforcement policies based on the quality of our safety and compliance measures implemented in partnership with the Fraternal Order of Police.

We are licensed to operate two dispensary facilities and two cultivation centers in Arizona, the nation's second most stringently regulated program and currently the most highly regulated not-for profit Medical Marijuana market. Again, we are market leaders. We remain one of the only licensees certified with perfect scores during compliance reviews with the Department of Health, Prescott and Tempe Police Departments, Tempe Department of Protective Services and Department of Environmental Protection. Furthermore, we are one of the only groups in the US to have been selected in a competitive process to serve as a Medical Marijuana Licensee Manager for

a Court Appointed Trustee during a receivership. We successfully completed an organizational workout on behalf of the Court prior to transitioning the asset back to the Trustee as required.

SECURITY: At CC, security is paramount. We establish and maintain security protocols that exceed all legal requirements. We utilize advanced systems complete with high-resolution PTZ cameras, magnetically-sealed doors, biometric access technology, motion detectors, TL-30 safes, reinforced vault rooms, proprietary protocols, remote camera access and wireless emergency notification. We have developed proprietary cash management, inventory control systems, HIPAA compliant IT systems and patient POS/CRM/EMR systems that exceed the requirements of pharmacies and the CT program regulations to ensure real-time access and redundant oversight of products and corporate assets. By combining best-in-class systems and pharmacy policies and procedures with these security protocols, we intend to operate without incident.

COMPLIANCE: Our policy is to exceed the standards for compliance set forth by State regulations. We are committed to partnering with law enforcement and government authorities to ensure every operational aspect exceeds all standards. We will utilize Pioneer Rx as our primary pharmacy IT/EMR platform in conjunction with several other integrated POS, CRM and inventory tracking systems to maintain redundant layers of oversight, patient support, company records and data collection. We have developed proprietary record-keeping processes for financial and compliance purposes. CC's policies and procedures incorporate duplicative checks and balances drawn from our operational experiences and have been adjusted to reflect CT's unique program. The lengths we take to ensure inventory oversight, chain of custody management and security enable us to operate within stricter tolerances than those required by law.

Our affiliates have never had a material breach of compliance and maintain among the best compliance records in the country. In the event of a deficiency, we are committed to remediate deficiencies immediately regardless of cost, and follow up to ensure the resumption of

on-going compliance. Our internal policies reward self-reporting and require a response plan for immediate remedial actions. In CT, CC will continue to leverage its business experiences to ensure our proven operating systems and domain expertise lead to the safe and compliant provision of Medical Marijuana products and services.

RESPONSIBILITY: Our team is comprised of CT residents who have already commenced outreach initiatives to support local leaders and organizations including law enforcement, medical experts, universities, non-profits and advocacy groups. We have partnered with the Connecticut Pharmacists Association to fund and conduct primary outcomes-based research, and have partnered with UConn's Health Outcomes Policy and Economics (HOPE) Collaborative Group to create a patient registry to scientifically assess the effectiveness and safety of Medical Marijuana through the collection of patient-reported outcomes. The HOPE/CC program will be the first collected and published dataset on Medical Marijuana outcomes in the US.

Our affiliates were the first in their respective states to voluntarily institute subsidy care programs for qualifying patients, such as seniors, veterans and low-income patients, and we are committed to do the same in CT. Our corporate policy is to allocate up to 15% of operating profit to local charitable programs including food banks, veteran groups, law enforcement/first responders, education, rehabilitation and low-income housing. With the guidance of local leadership, we have selected programs that directly support our local communities.

Above all, CC is an organization that truly believes in our mission to serve our patients, and we are dedicated to mitigating their conditions, providing holistic symptom management, and helping patients live the best possible life. Our bottom line will always be our patients.



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Appendix G

Financial Statement of Business Transactions

In Re: RFA Section A Question 3

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

BUSINESS TRANSACTIONS

1.0 DISPENSARY FACILITY BUSINESS TRANSACTIONS OVERVIEW

Constitution Care LLC's financial statement setting forth the elements and details of all business transactions connected with the Connecticut dispensary facility license application up through November 1, 2013 can be found on the following pages.

5:53 PM

11/13/13

Accrual Basis

Constitution Care LLC
Balance Sheet
As of November 13, 2013

	<u>Nov 13, 13</u>
ASSETS	
Other Assets	
Security Deposits Asset	42,053.34
Total Other Assets	42,053.34
TOTAL ASSETS	<u>42,053.34</u>
LIABILITIES & EQUITY	
Liabilities	
Long Term Liabilities	
Due to Columbia Care LLC	106,008.34
Total Long Term Liabilities	106,008.34
Total Liabilities	106,008.34
Equity	
Net Income	-63,955.00
Total Equity	-63,955.00
TOTAL LIABILITIES & EQUITY	<u>42,053.34</u>

5:55 PM

11/13/13

Accrual Basis

Constitution Care LLC
Profit & Loss
September 1 through November 13, 2013

	<u>Sep 1 - Nov 13, 13</u>
Ordinary Income/Expense	
Expense	
Contractor Wages	25,000.00
Legal Fees	23,015.00
Professional Fees	9,580.00
Rent Expense	6,360.00
Total Expense	<u>63,955.00</u>
Net Ordinary Income	<u>-63,955.00</u>
Net Income	<u><u>-63,955.00</u></u>



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Appendix H1

Proposed Dispensary Facility Location

In Re: RFA Section B Question 1

LOCATION OF THE PROPOSED FACILITY

1.0 DISPENSARY FACILITY LOCATION

Constitution Care LLC's proposed dispensary facility is located at the following address:

46-50 Magee Avenue
Stamford, Connecticut 06902



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Appendix H2

Authorization to Conduct Business in Connecticut

In Re: RFA Section B Question 2

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

AUTHORITY TO CONDUCT BUSINESS

1.0 AUTHORITY TO CONDUCT BUSINESS IN CONNECTICUT OVERVIEW

Constitution Care LLC has documents sufficient to establish that it 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.

The following documents are attached hereto sufficient to establish the above criteria:

- Articles of Organization
- Certificate of Legal Existence
- Notice of Employer Identification Number
- Sale and Use Tax Permit
- Letter of compliance from the municipality

Please find the above identified documents on the following pages:



SECRETARY OF THE STATE OF CONNECTICUT

MAILING ADDRESS: COMMERCIAL RECORDING DIVISION, CONNECTICUT SECRETARY OF THE STATE, P.O. BOX 150470, HARTFORD, CT 06115-0470
DELIVERY ADDRESS: COMMERCIAL RECORDING DIVISION, CONNECTICUT SECRETARY OF THE STATE, 30 TRINITY STREET, HARTFORD, CT 06108
PHONE: 860-509-6003 WEBSITE: www.concord-sots.ct.gov

ARTICLES OF ORGANIZATION
LIMITED LIABILITY COMPANY - DOMESTIC

C.G.S. §§34-120; 34-121

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

FILING PARTY (CONFIRMATION WILL BE SENT TO THIS ADDRESS): NAME: Robert K. Mayerson ADDRESS: 139 Stow Road CITY: Harvard, MA STATE: ZIP: 01451		FILING FEE: \$120 MAKE CHECKS PAYABLE TO "SECRETARY OF THE STATE"
1. NAME OF LIMITED LIABILITY COMPANY - REQUIRED: (MUST INCLUDE BUSINESS DESIGNATION I.E. LLC, L.L.C., ETC.) Constitution Care LLC		
2. DESCRIPTION OF BUSINESS TO BE TRANSACTED OR PURPOSE TO BE PROMOTED - REQUIRED: ATTACH 8 1/2 X 11 SHEETS IF NECESSARY. The purpose of the limited liability company is to engage in any lawful act or activity for which a limited liability company may be formed under the Connecticut Limited Liability Company Act		
3. LLC'S PRINCIPAL OFFICE ADDRESS - REQUIRED: (NO P.O. BOX) PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE. ADDRESS: 1131-0 Tolland Turnpike Suite 297 CITY: Manchester STATE: CT ZIP: 06042		
4. MAILING ADDRESS, IF DIFFERENT THAN #3: PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE. ADDRESS: CITY: STATE: ZIP:		
5. APPOINTMENT OF STATUTORY AGENT FOR SERVICE OF PROCESS - REQUIRED: (COMPLETE A OR B NOT BOTH) <input type="checkbox"/> A. IF AGENT IS AN INDIVIDUAL. PRINT OR TYPE FULL LEGAL NAME:		
BUSINESS ADDRESS (P.O. BOX NOT ACCEPTABLE) IF NONE, MUST STATE "NONE" ADDRESS: CITY: STATE: ZIP:		CONNECTICUT RESIDENCE ADDRESS (P.O. BOX NOT ACCEPTABLE) ADDRESS: CITY: STATE: ZIP:
SIGNATURE ACCEPTING APPOINTMENT:		

FILING PG 02 OF 02 VOL B-01855
FILED 10/03/2013 09:00 AM PAGE 01252
SECRETARY OF THE STATE
CONNECTICUT SECRETARY OF THE STATE

B. IF AGENT IS A BUSINESS:

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

Corporation Service Company

CT BUSINESS ADDRESS (P.O. BOX UNACCEPTABLE)

ADDRESS: 50 Weston Street

CITY: Hartford

STATE: Connecticut

ZIP: 06120-1537

SIGNATURE ACCEPTING APPOINTMENT ON BEHALF OF AGENT:

Linda Snook

PRINT NAME & TITLE OF PERSON SIGNING:

Linda Snook
Assistant VP

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

NAME	TITLE	BUSINESS ADDRESS (No. P.O Box) IF NONE, MUST STATE "NONE"	RESIDENCE ADDRESS: (No. P.O Box)
Columbia Case CT, LLC	Member	1131-0 Tolland Turnpike, Suite 296 Manchester, CT 06042	1131-0 Tolland Turnpike Suite 296 Manchester, CT 06042

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

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

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

DATED THIS 30 DAY OF October, 2013

NAME OF ORGANIZER (PRINT OR TYPE)	SIGNATURE
ROBERT MAYERSON	<i>RM</i>

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

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

OCTOBER 4, 2013

ROBERT K. MAYERSEO
139 STOW ROAD
HARVARD, MA 01451

RE: Acceptance of Business Filing

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

Business Name:
CONSTITUTION CARE LLC

Work Order Number: 2013291388-003
Business Filing Number: [REDACTED]
Type of Request: ARTICLES OF ORGANIZATION
File Date/Time: OCT 03 2013 09:00 AM
Effective Date/Time:
Work Order Payment Received: 550.00
Payment Received: 170.00
Credit on Account: .00
Customer Id: [REDACTED]
Business Id: [REDACTED]

RUBY VEAL
Commercial Recording Division
860-509-6003
WWW.CONCORD.SOTS.CT.GOV

BUSINESS FILING REPORT

WORK ORDER NUMBER:2013291388-003

BUSINESS FILING NUMBER: [REDACTED]

BUSINESS NAME:

CONSTITUTION CARE LLC

BUSINESS LOCATION:

1131-0 TOLLAND TURNPIKE
SUITE 297
MANCHESTER,CT 06042

MEMBER INFORMATION FOR ONE MEMBER:

NAME:COLUMBIA CARE CT, LLC
TITLE:MEMBER

** END OF REPORT **

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

OCTOBER 4, 2013

ROBERT K. MAYERSEO
139 STOW ROAD
HARVARD, MA 01451

RE: Request for Information

Work Order Number: 2013291388-004
Type of Request: CERTIFIED COPY
Work Order Payment Received: 550.00
Payment Received: 105.00
Credit on Account: .00
Customer Id: [REDACTED]

Attached is the information you requested.

Copies of most filings may be requested from our office. Due to the implementation of CONCORD, you may receive more information than you requested. Please read your request for information carefully.

RUBY VEAL
Commercial Recording Division
860-509-6003

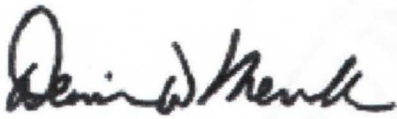
Office of the Secretary of the State of Connecticut

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

CONSTITUTION CARE LLC

a domestic limited liability company, were filed in this office on October 03, 2013.

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



Secretary of the State

Date Issued: October 07, 2013

Date of this notice: 09-30-2013

Employer Identification Number:
[REDACTED]

Form: SS-4

Number of this notice: CP 575 A

CONSTITUTION CARE LLC
CONSTITUTION CARE
% ROBERT MAYERSON MBR
1131 TOLLAND TPKE STE O
MANCHESTER, CT 06042

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN [REDACTED]. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

Based on the information received from you or your representative, you must file the following form(s) by the date(s) shown.

Form 941	04/30/2014
Form 940	01/31/2015
Form 1065	04/15/2014

If you have questions about the form(s) or the due date(s) shown, you can call us at the phone number or write to us at the address shown at the top of this notice. If you need help in determining your annual accounting period (tax year), see Publication 538, *Accounting Periods and Methods*.

We assigned you a tax classification based on information obtained from you or your representative. It is not a legal determination of your tax classification, and is not binding on the IRS. If you want a legal determination of your tax classification, you may request a private letter ruling from the IRS under the guidelines in Revenue Procedure 2004-1, 2004-1 I.R.B. 1 (or superseding Revenue Procedure for the year at issue). Note: Certain tax classification elections can be requested by filing Form 8832, *Entity Classification Election*. See Form 8832 and its instructions for additional information.

A limited liability company (LLC) may file Form 8832, *Entity Classification Election*, and elect to be classified as an association taxable as a corporation. If the LLC is eligible to be treated as a corporation that meets certain tests and it will be electing S corporation status, it must timely file Form 2553, *Election by a Small Business Corporation*. The LLC will be treated as a corporation as of the effective date of the S corporation election and does not need to file Form 8832.

If you are required to deposit for employment taxes (Forms 941, 943, 940, 944, 945, CT-1, or 1042), excise taxes (Form 720), or income taxes (Form 1120), you will receive a Welcome Package shortly, which includes instructions for making your deposits electronically through the Electronic Federal Tax Payment System (EFTPS). A Personal Identification Number (PIN) for EFTPS will also be sent to you under separate cover. Please activate the PIN once you receive it, even if you have requested the services of a tax professional or representative. For more information about EFTPS, refer to Publication 966, *Electronic Choices to Pay All Your Federal Taxes*. If you need to make a deposit immediately, you will need to make arrangements with your Financial Institution to complete a wire transfer.

The IRS is committed to helping all taxpayers comply with their tax filing obligations. If you need help completing your returns or meeting your tax obligations, Authorized e-file Providers, such as Reporting Agents (payroll service providers) are available to assist you. Visit the IRS Web site at www.irs.gov for a list of companies that offer IRS e-file for business products and services. The list provides addresses, telephone numbers, and links to their Web sites.

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.

IMPORTANT REMINDERS:

- * Keep a copy of this notice in your permanent records. **This notice is issued only one time and the IRS will not be able to generate a duplicate copy for you.** You may give a copy of this document to anyone asking for proof of your EIN.
- * Use this EIN and your name exactly as they appear at the top of this notice on all your federal tax forms.
- * Refer to this EIN on your tax-related correspondence and documents.

If you have questions about your EIN, you can call us at the phone number or write to us at the address shown at the top of this notice. If you write, please tear off the stub at the bottom of this notice and send it along with your letter. If you do not need to write us, do not complete and return the stub.

Your name control associated with this EIN is CONS. You will need to provide this information, along with your EIN, if you file your returns electronically.

Thank you for your cooperation.

MAYOR
MICHAEL A. PAVIA



CITY OF STAMFORD
OFFICE OF LEGAL AFFAIRS
888 WASHINGTON BOULEVARD
P.O. BOX 10152
STAMFORD, CT 06904 - 2152
Tel: (203) 977-4081
Fax: (203) 977-5560

DIRECTOR OF LEGAL AFFAIRS
AND CORPORATION COUNSEL
JOSEPH J. CAPALBO, II

DEPUTY CORPORATION COUNSEL
VIKKI COOPER

ASSISTANT CORPORATION COUNSEL
BARBARA L. COUGHLAN
CHRIS DELLASELVA
DANA B. LEE
BURT ROSENBERG
MICHAEL S. TOMA

November 14, 2013

Mr. William M. Rubenstein
Commissioner
Department of Consumer Protection
165 Capital Avenue
Hartford, CT 06106

Re: Constitution Care, LLC
46-50 Magee Avenue, Stamford, CT
Medical Marijuana Dispensary

Dear Commissioner Rubenstein:

The City of Stamford has been approached by Constitution Care, LLC concerning its intent to open and operate a medical marijuana dispensary at 46-50 Magee Avenue in Stamford, Connecticut.

It is our opinion that a marijuana dispensary facility operating pursuant to Public Act 12-55 and the regulations promulgated thereunder is a permitted use under the Stamford Zoning Regulations as a "drug store." Accordingly, since that use is permitted in the MG Zone which includes the property at 46-50 Magee Avenue in Stamford, Connecticut, this letter will confirm that the marijuana dispensary facility proposed by Constitution Care, LLC at that site is permitted as of right.

Should you have any questions or if I can be of any assistance, please feel free to contact me.

Sincerely,

Joseph J. Capalbo, II
Director of Legal Affairs & Corporation Counsel

JJC/jjd



MEMORANDUM

Attorneys at Law

To: Joseph Capalbo, Esq., City of Stamford Corporation Counsel
Dana Lee, Esq., City of Stamford Law Department

From: Michael J. Cacace, Esq., Attorney for Constitution Care, LLC

Date: November 6, 2013

Re: 46-50 Magee Avenue

This firm represents Constitution Care, LLC in connection with its intent to open a “drug store” at 46-50 Magee Avenue, Stamford, Connecticut. Constitution Care, LLC is also in the process of applying to the Connecticut Department of Consumer Protection (“DCP”) to operate a medical marijuana dispensary facility at the premises located at 46-50 Magee Avenue, Stamford, Connecticut pursuant to PA-12-55. The application to DCP must be submitted no later than November 15, 2013. DCP requires the applicant to submit documentation showing that the proposed location is in conformity with the local zoning requirements. Therefore, Constitution Care, LLC requests that the enclosed letter to DCP be countersigned by a City official indicating that a medical marijuana dispensary facility is a permitted use at 46-50 Magee Avenue, said site being located within the M-G zoning district.

In support of its request, Constitution Care, LLC submits the following:

A Medical Marijuana Dispensary Facility is a “Drug Store”; and as a “Drug Store” is a permitted, “as of right” use in the M-G Zoning District.

A drugstore is a permitted use in the M-G (General Industrial) Zoning District. See City of Stamford Zoning Regulations, Appendix A, Table II, Item 92, a copy of which is attached hereto. The property located at 46-50 Magee Avenue is located within the M-G zoning district. See attached Zoning Map.

In evaluating whether a drug store includes a medical marijuana dispensary use within the M-G Zone, one must first consider any defined terms in the Zoning Regulations. In this case a “drugstore” or “drug store” is not defined. “When a term is defined, it is not necessary...to consider its common and ordinary meaning. If however it is not otherwise defined, a word has its usual and customary meaning...” *R & R Pool & Patio, Inc. v. Zoning Bd. of Appeals of Town of*

Ridgefield, 129 Conn. App. 275, 288-89 (2011).

“If a statute or regulation does not sufficiently define a term, it is appropriate to look to the common understanding of the term as expressed in a dictionary.” *State v. Indrisano*, 228 Conn. 795, 809, 640 A.2d 986, 994 (1994); *also see, Lees v. Middlesex Ins. Co.*, 229 Conn. 842, 849 (1994). The American Heritage Dictionary of the English Language, Fourth Edition, defines “drugstore” as a “store where prescriptions are filled and drugs and other articles are sold; a pharmacy.” Similarly, the Merriam-Webster Dictionary defines “drugstore” as a “retail store where medicines and miscellaneous articles are sold.” Moreover, Black’s Law Dictionary, revised Fourth Edition defines “drug store” as “a place where drugs are sold.”

Clearly, the use proposed by Constitution Care, LLC for the site at 46-50 Magee Avenue, Stamford, Connecticut complies with these definitions. A pharmacist will be on site whenever the store is open as required by Sections 21a-408 et seq C.G.S. and the regulations promulgated thereunder. There will be the sale of medicines, drugs and miscellaneous articles and prescriptions will be filled and sold. Under Connecticut Law, only pharmacists may act as dispensaries within the facility. The store will not be limited to selling legalized medical marijuana authorized by Public Act 12-55 but will also fill other prescriptions for sale at retail. Pursuant to Public Act 12-55, Connecticut has reclassified medical marijuana as a Schedule II controlled substance, meaning that it can be legally produced, prescribed and dispensed like other prescription drugs. Only medical marijuana is legalized in Connecticut and should not be associated with recreational use. Constitution Care, LLC proposes to dispense medical marijuana for palliative use to qualifying patients under a prescription-based program.

The fact of the matter is that not every drug store can be a medical marijuana dispensary facility pursuant to Public Act 12-55 and the regulations promulgated thereunder (Section 21a-408-1 to 21a-408-70) since the state regulations for such facilities are much more strict. On the other hand, all properly licensed medical marijuana dispensary facilities are properly categorized as “drug stores.”

In sum, the use proposed by Constitution Care, LLC for the property located at 46-50 Magee Avenue, Stamford, Connecticut is a “drug store” for purposes of the Stamford Zoning Regulations.

The above legal opinion is limited to an interpretation of the City of Stamford Zoning Regulations and their impact on Connecticut State Law. No other representations are made regarding any other existing laws, codes, statutes or regulations.

November 6, 2013

Mr. William M. Rubenstein
Commissioner
Department of Consumer Protection
165 Capital Avenue
Hartford, CT 06106

Re: Constitution Care, LLC
46-50 Magee Avenue
Stamford, Connecticut
Medical Marijuana Dispensary

Dear Commissioner Rubenstein:

The City of Stamford has been approached by Constitution Care, LLC concerning its intent to open and operate a medical marijuana dispensary at 46-50 Magee Avenue in Stamford, Connecticut.

It is our opinion that a marijuana dispensary facility operating pursuant to Public Act 12-55 and the regulations promulgated thereunder is a permitted use under the Stamford Zoning Regulations as a "drug store." Accordingly, since that use is permitted in the MG Zone which includes the property at 46-50 Magee Avenue in Stamford, Connecticut, this letter will confirm that the marijuana dispensary facility proposed by Constitution Care, LLC at that site is permitted as of right.

Should you have any questions or if I can be of any assistance, please feel free to contact me.

Sincerely,

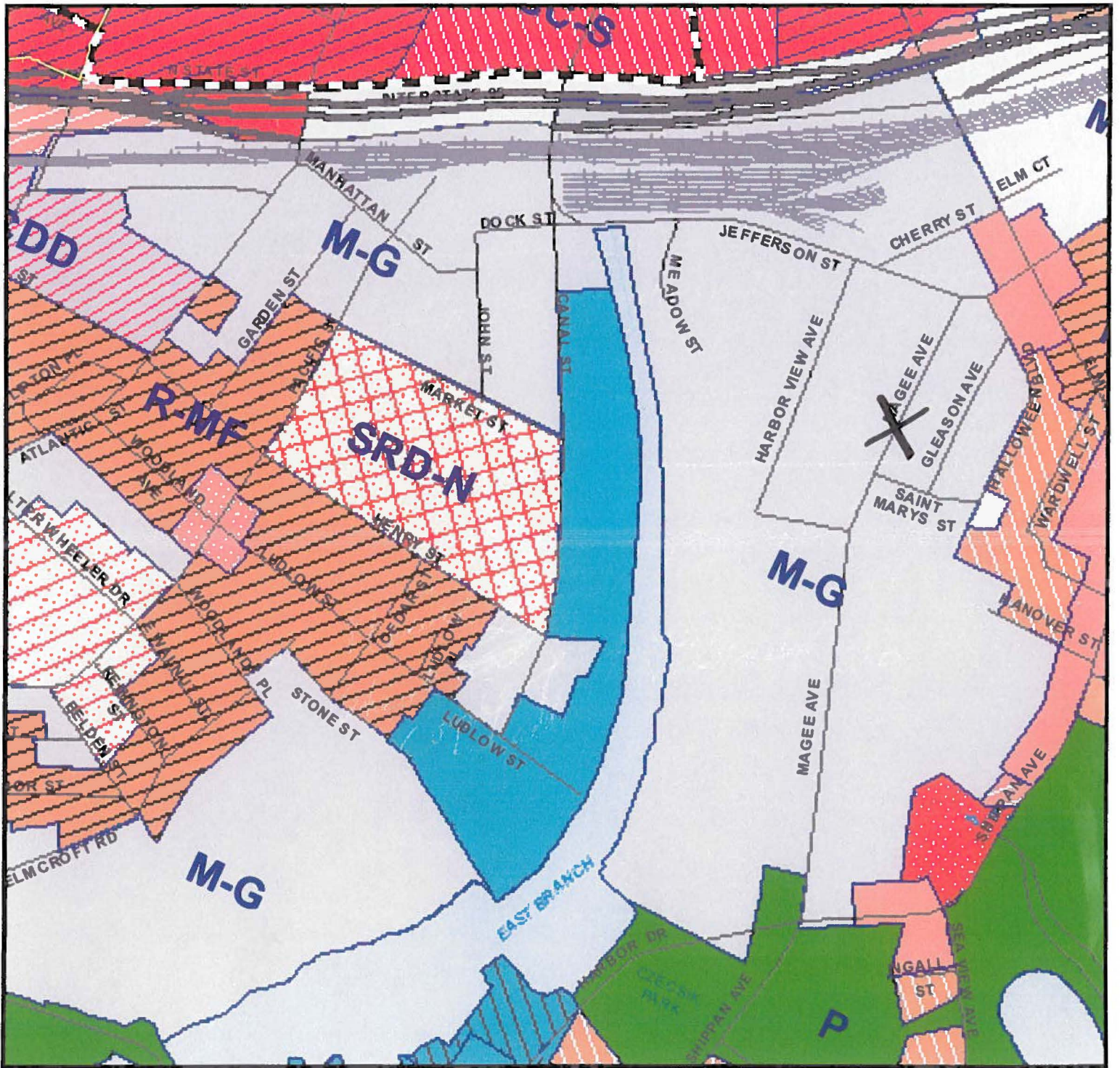


TABLE II (Continued)

PERMITTED USES IN COMMERCIAL AND INDUSTRIAL DISTRICTS ONLY	COMMERCIAL								INDUSTRIAL	
	C-N	C-B	C-L	C-G	CC-N	C-I	C-S	CC-S	M-L	M-G
77 - Canvas Products Mfg.....	-	-	-	-	-	-	x	-	x	x
78 - Carpentry, Woodworking Shop.....	-	-	-	-	-	x	x	-	x	x
79 - Casting, Foundry.....	-	-	-	-	-	-	-	-	-	x
80 - Chemical Mfg. & Storage.....	-	-	-	-	-	-	-	-	-	A
81 - Christmas Trees, Holly Wreaths & Similar Christmas Decorations, the sale of.....	x	x	x	x	x	x	x	XM	x	x
81.5 Radio Controlled Miniature Car Facility	-	-	-	-	-	-	-	-	-	x
82 - Clothing Store.....	x	x	x	x	x	x	-	-	-	-
83 - Coal Storage and Sales.....	-	-	-	-	-	-	-	-	-	x
84 - Color Scanning Shop (26), except no limit on employees in Industrial Districts and CC-S District.....	-	-	-	-	-	x	x	x	x	x
85 - Commercial - Apartment Building (86).....	-	-	-	-	x	-	-	-	-	-
86 - Confectionery Store.....	x	x	x	x	x	x	-	XM	-	-
87 - Contractor's Material & Equipment Storage Yard & Building.....	-	-	-	-	-	-	x	-	x	x
87.1 Copy and Communication Center (26.2).....	x	x	x	-	x	-	-	-	-	-
88 - Custom Tailor, Dressmaker, Milliner.....	x	x	x	x	x	x	-	XM	-	-
89 - Crematory, except in cemetery (28.1).....	-	-	x	-	x	-	-	-	-	x
90 - Department Store.....	-	-	x	x	x	x	-	-	-	-
92 - Drug Store.....	x	x	x	x	x	x	x	XM	x	x



CONSTITUTION
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Appendix H3

Property Owner and Landlord Statement of Consent

In Re: RFA Section B Question 3

STATEMENT FROM PROPERTY OWNER AND LANDLORD

1.0 PROPERTY OWNER AND LANDLORD CONSENT OVERVIEW

Constitution Care LLC has obtained a signed statement from the property owner and landlord certifying that they acknowledge and have consented to the company's operation of a dispensary facility in accordance with all applicable Connecticut laws on the premises.

Please find the signed statement from the property owner and landlord on the following pages:

November 11th, 2013

Mr. Lee Adamo
Property Owner – 46-50 Magee Avenue, Stamford, CT
P.O. Box 2284
Amagansett, NY 11930

To Constitution Care LLC, the Connecticut Department of Consumer Protection, and the
Dispensary Facility Application Review Committee:

I am the owner and landlord of the property located at 46-50 Magee Avenue, Stamford, CT (the "Property"). As the owner and landlord of the Property, I fully support Constitution Care LLC's business plan to operate, if licensed, a Connecticut dispensary facility in full compliance with Connecticut law, including sections 21a-408 *et seq.* of the Connecticut General Statutes and sections 21a-408-1 *et seq.* of the Regulations of Connecticut State Agencies. After close scrutiny I find Constitution Care LLC's approach and demeanor to be extraordinarily professional, which is the primary reason I chose to lease the Property to this organization.

As owner and landlord of the Property, I hereby certify, acknowledge and consent to Constitution Care LLC's use of the Property to operate a dispensary facility upon the successful award of a dispensary facility license from the Department of Consumer Protection.

If you have any questions or concerns regarding the contents of this letter, please contact me at your convenience.

Best regards,

A handwritten signature in black ink, appearing to read "Lee Adamo", written over a horizontal line.

Mr. Lee Adamo, Owner and Landlord of the Property



CONSTITUTION
C A R E

Appendix H4

Exterior Graphic Materials

In Re: RFA Section B Question 4

GRAPHIC MATERIALS ON THE FACILITY EXTERIOR

1.0 TEXT AND GRAPHIC MATERIALS ON THE FACILITY EXTERIOR OVERVIEW

Constitution Care LLC will only have a single sign on the exterior of the proposed dispensary facility. Such signage will be 16 inches in height by 18 inches in width and will only feature the company's logo. It will not advertise Medical Marijuana brand names or utilize graphics related to Medical Marijuana or paraphernalia.

A mock-up of the compliant external signage can be found on the following pages:

Constitution Care | 46-50 Magee Avenue, Stamford, CT | Design Development | November 8, 2011





A Typical Logo Size
Scale: 1/4" = 1'-0"

Specifications

Qty = 1

Standard Logo Size

Colors & Materials

Full color digital print



Project:
Constitution Care

Sales: Mike Patenaude
Date: 11.08.13
Designer: DRL

Note:
This is an original unpublished drawing created by Poyant Signs, Inc. It is submitted for your personal use in connection with a project being planned for you by Poyant Signs, Inc. It is not to be shown to anyone outside your organization, nor is it to be reproduced, copied or exhibited in any fashion until transferred.

Revisions:



This sign is intended to be installed in accordance with the requirements of Article 600 of the National Electrical Code and / or other applicable local codes. This includes proper grounding and bonding of the sign.

Approved By:

Date:

Logo Details



CONSTITUTION
CARE

46-50 Magee Avenue
Stamford, CT

Project: 9090
Constitution Care

Sales: Mike Patenaude
Date: 11.08.13
Designer: DRL

Note:
This is an original unpublished drawing created by Poyant Signs, Inc. It is submitted for your personal use in connection with a project being planned for you by Poyant Signs, Inc. It is not to be shown to anyone outside your organization, nor is it to be reproduced, copied or exhibited in any fashion until transferred.

Revisions:



This sign is intended to be installed in accordance with the requirements of Article 600 of the National Electrical Code and / or other applicable local codes. This includes proper grounding and bonding of the sign.

Approved By: _____

Date: _____

Entrance Awning



A Photo Comp - Proposed
Not to Scale



B Photo Comp - Existing
Not to Scale

Specifications

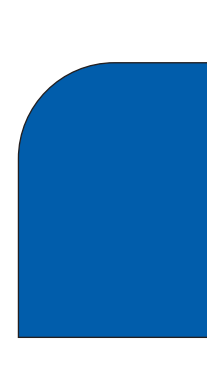
Qty = 1

New Non-Illuminated Awning

- Aluminum awning frame covered with cooley substrate, full color digitally printed logo graphic applied to face
- Install above entrance as shown

Colors & Materials

Full color digital print



C Awning Side View
Not to Scale



CONSTITUTION
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Appendix H5

Photographs of Surrounding Neighborhood

In Re: RFA Section B Question 5

PHOTOGRAPHS OF SURROUNDING NEIGHBORHOOD AND BUSINESSES

1.0 PHOTOGRAPHS OF SURROUNDING NEIGHBORHOODS AND BUSINESSES

Below are 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.

Constitution Care LLC’s Proposed Dispensary Facility

The photograph below depicts the proposed dispensary facility site. It is the unit with windows and a glass door located directly behind the green dumpster.



Surrounding Neighborhood and Businesses

The photographs below depict the structures and businesses within the immediate neighborhood of the proposed dispensary facility location.











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Appendix H6

Site Plan

In Re: RFA Section B Question 6

SITE PLAN

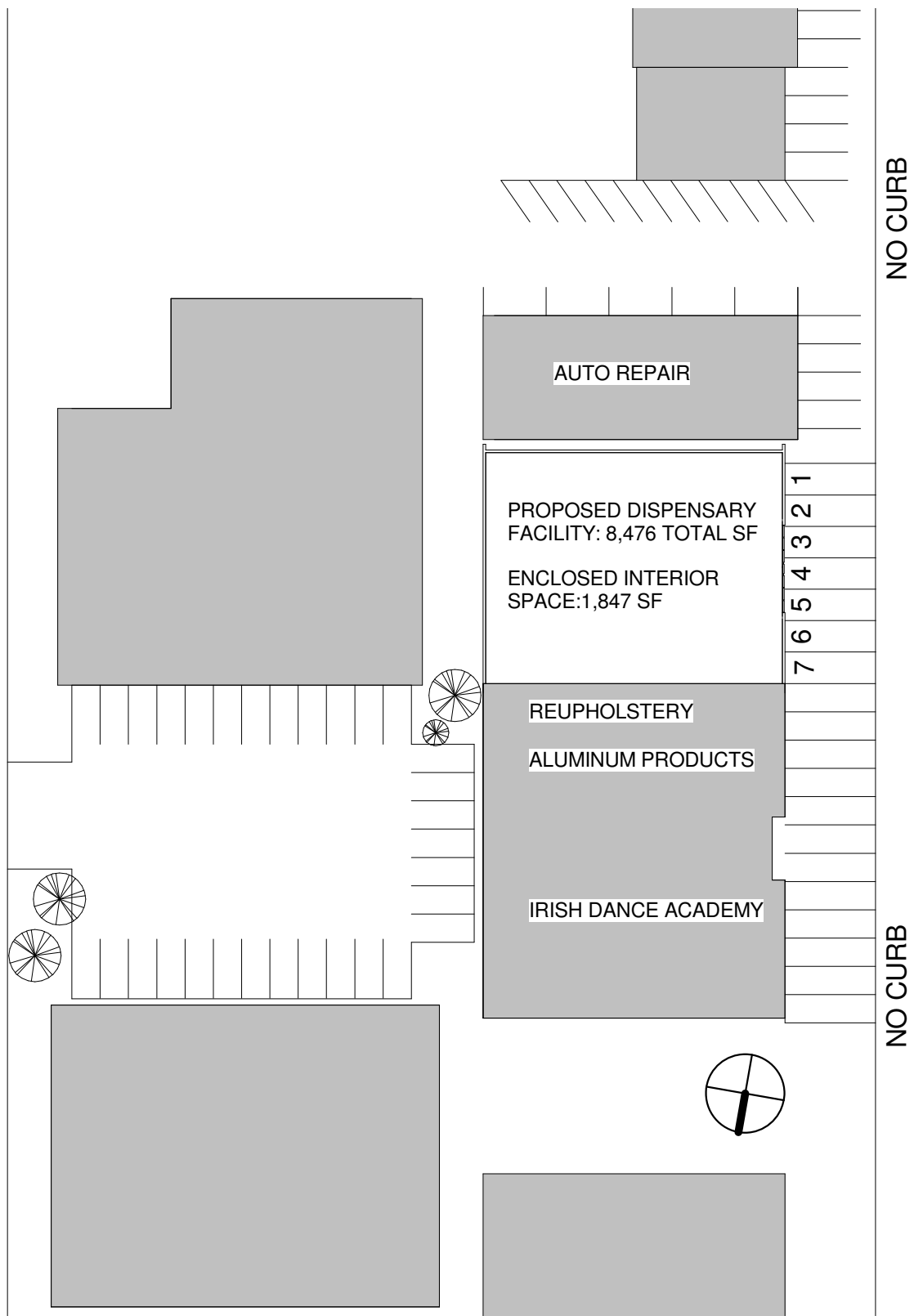
1.0 SITE PLAN OVERVIEW

Constitution Care LLC has retained Elton + Hampton Architects to create a site plan drawn to scale of the proposed dispensary facility showing streets, property lines, buildings, parking areas, and outdoor areas within the same block as the dispensary facility.

The Site Plan can be found on the following pages:

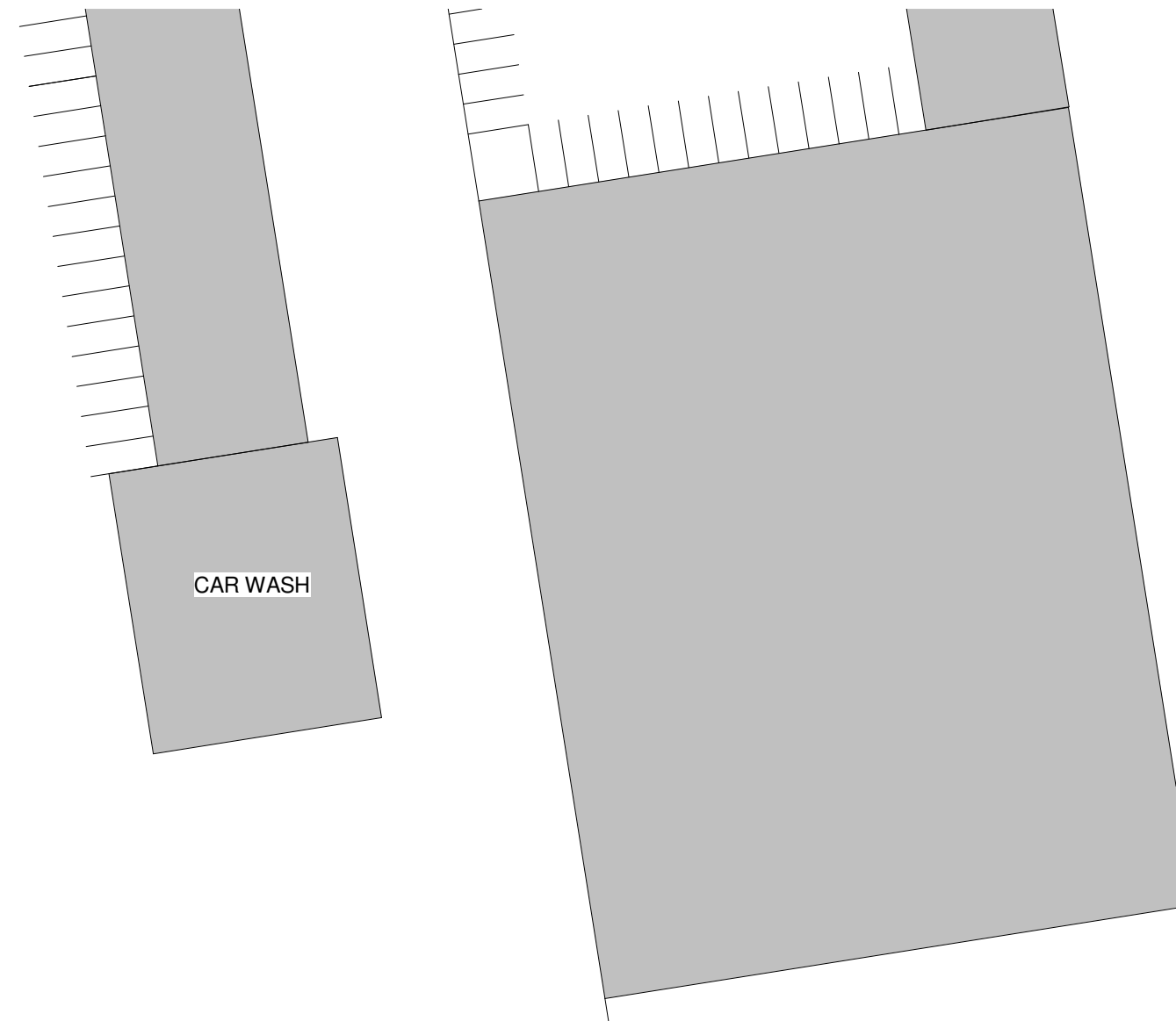
GLEASON AVENUE

MAGEE AVENUE



NO CURB

NO CURB



1 Site Plan
1" = 50'-0"

Elton + Hampton Architects
 103 Terrace Street,
 Roxbury, MA 02120
 (617) 708-1071

Constitution Care
 46-50 Magee Avenue
 Stamford, CT 06902

No.	Description	Date
1	Revision 1	Date 1

Site Plan		ST-00
Project number	STAMFORD	
Date	10.28.13	
Drawn by	Melissa Piper	
Checked by	Bruce Hampton	Scale 1" = 50'-0"



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Appendix H7

Proximity Map

In Re: RFA Section B Question 7

PROXIMITY MAP

1.0 PROXIMITY MAP OVERVIEW

Constitution Care LLC has retained Dubiel Associates, an East Hartford based Connecticut certified land surveying company, to create a proximity map that identifies 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.

The Proximity Map and the narrative supplement identifying the exact distance of any sensitive uses within 1000 feet can be found on the following pages:

DUBIEL ASSOCIATES

SURVEYING - ENGINEERING - PLANNING - DESIGN
34 Connecticut Boulevard, East Hartford, CT 06108 860-528-9081

1000 FOOT RADIUS PROPERTY INFORMATION REPORT

SUBJECT PROPERTY:

46 - 50 Magee Street, Stamford, CT 06902

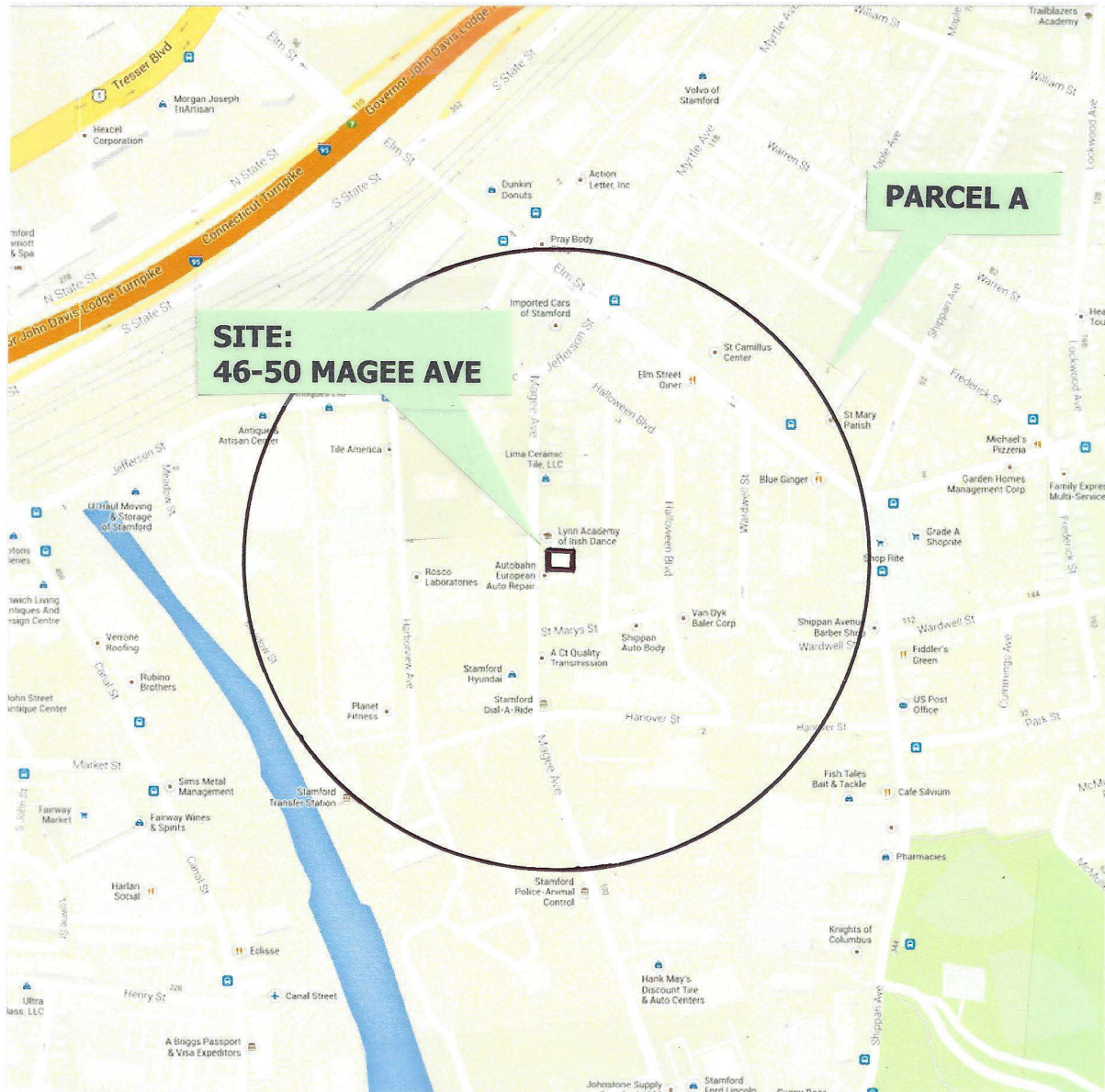
SENSITIVE AREAS WITHIN 1000 FEET:

Parcel A: St. Mary Parish
566 Elm Street, Stamford, CT 06902
Use: Place of Religious Worship
Building to Building Distance: 995 feet

I hereby declare that, to my knowledge and belief, the information presented in this Report is substantially correct. This information was prepared from Record Research and Maps, limited Field Observations, and other Sources.



Richard M. Walton, Connecticut Licensed Land Surveyor No. 16103
Dubiel Associates - 34 Connecticut Boulevard, East Hartford, CT 06108



1000 Foot Radius Proximity Map
46 – 50 Magee Street, Stamford, CT 06902
Scale: 1 inch = 600+/- feet
Prepared by Dubiel Associates



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Appendix H8

Floor Plan

In Re: RFA Section B Question 8, parts a-k

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

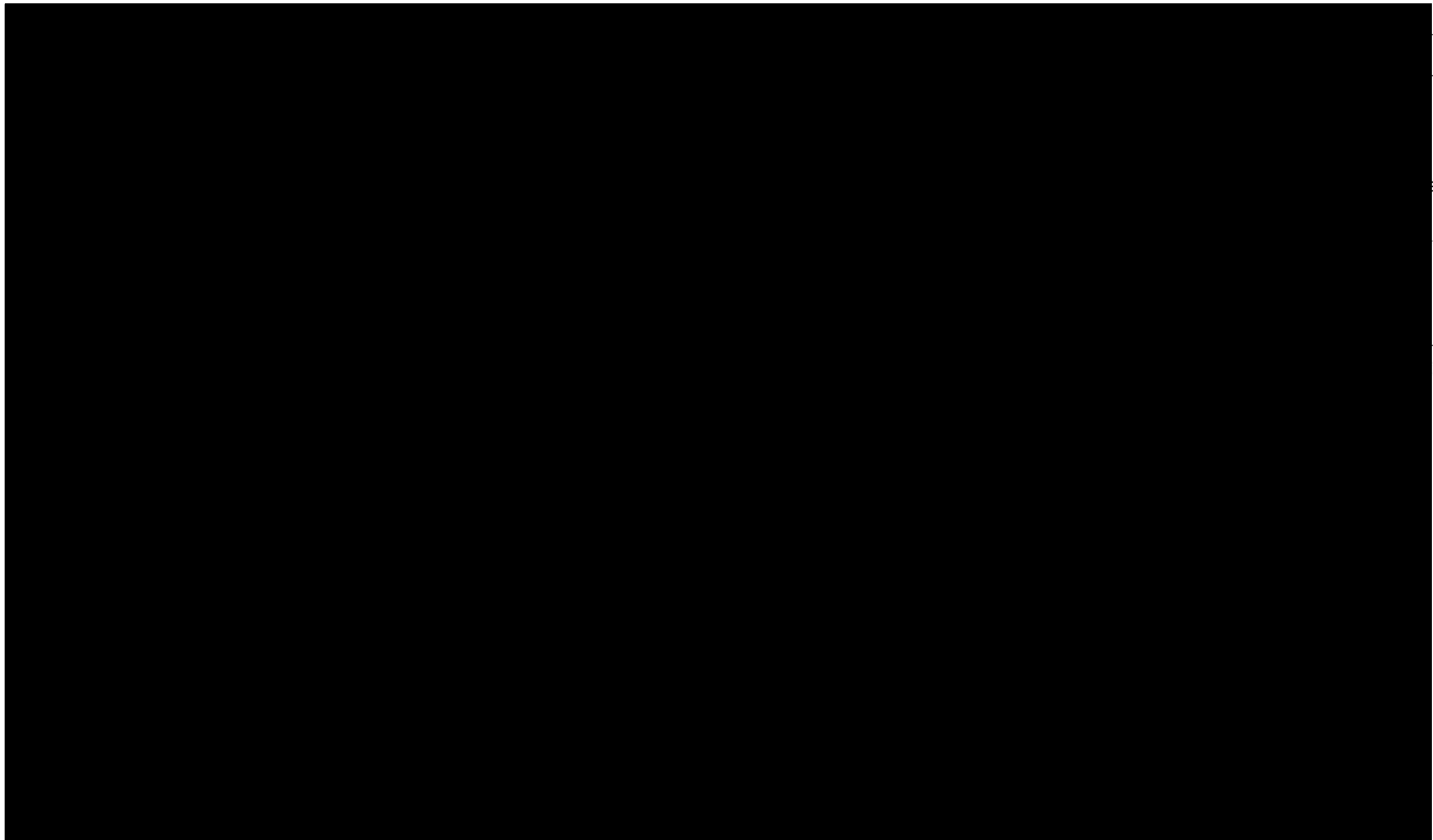
FLOOR PLAN

1.0 FLOOR PLAN OVERVIEW

Constitution Care LLC has retained Elton + Hampton Architects to create a floor plan drawn to scale of the proposed dispensary facility which shows and identifies the following:

- a. The location and square footage of the area which will constitute the dispensary department from which Medical Marijuana and Medical Marijuana products will be sold;
- b. The square footage of the overall dispensary facility;
- c. The square footage and location of the areas used as storerooms or stockrooms within the dispensary department;
- d. The size of the counter that will be used for selling Medical Marijuana and Medical Marijuana products within the dispensary department;
- e. The location of the dispensary facility sink and refrigerator;
- f. The location of the approved vault that will be used to store Medical Marijuana and Medical 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 (i.e. the Alternative Services area or other designated counseling area);
- j. The locations where any other products or services, in addition to Medical Marijuana and Medical Marijuana products, will be offered (i.e. the Alternative Services area); and
- k. The locations of all areas that may contain Medical Marijuana and Medical Marijuana products showing the location of walls, partitions, counters and all areas of ingress and egress.

The compliant Floor Plan be found on the following pages:




and

SF

n

① First Floor Plan
3/32" = 1'-0"

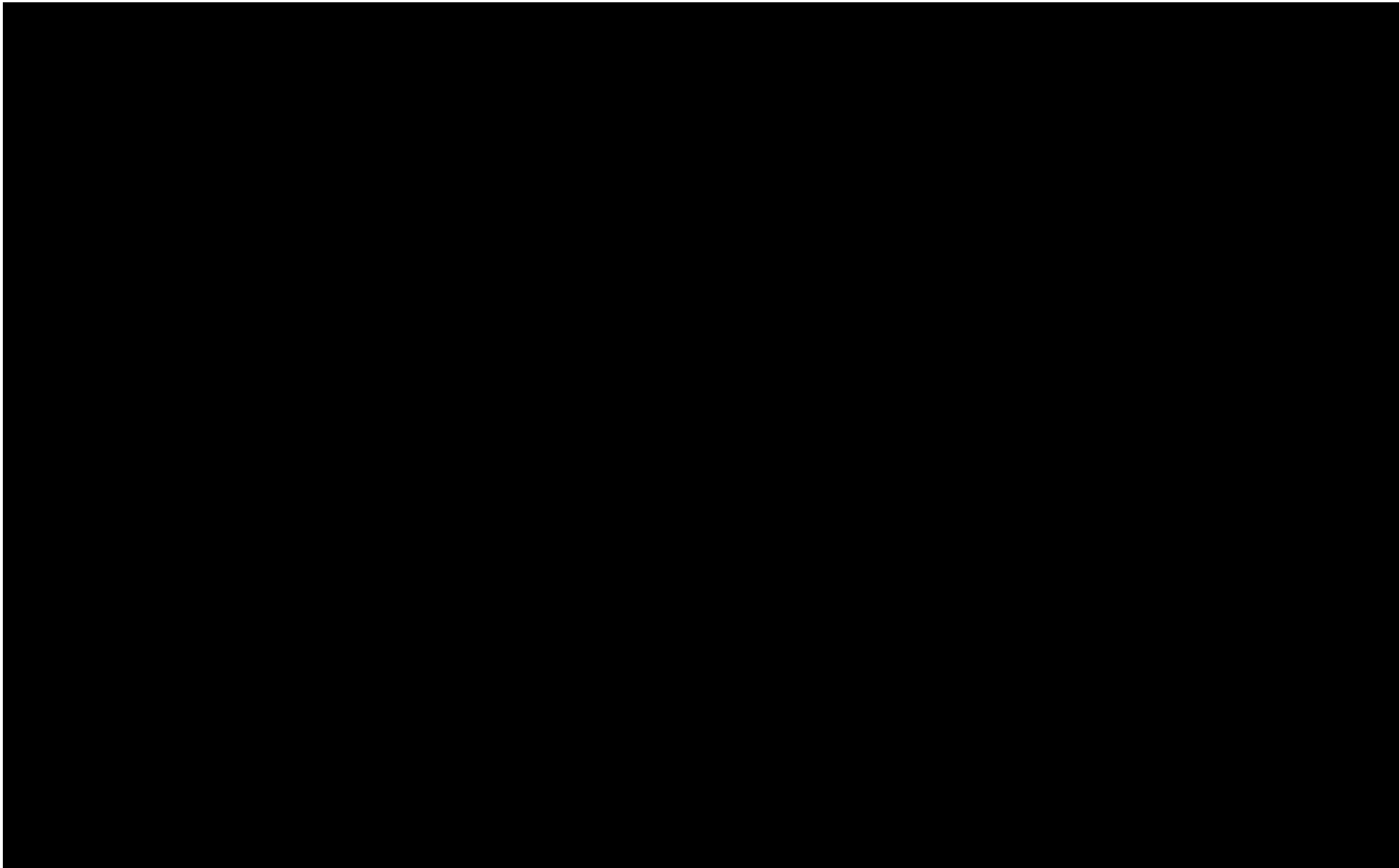
 **Elton + Hampton Architects**
 103 Terrace Street,
 Roxbury, MA 02120
 (617) 708-1071

Constitution Care
 46-50 Magee Avenue
 Stamford, CT 06902

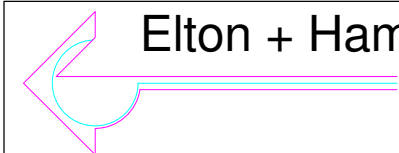
No.	Description	Date

Proposed First Floor Plan

Project number	STAMFORD	ST-04
Date	10.28.13	
Drawn by	Melissa Piper	
Checked by	Bruce Hampton	
Scale		3/32" = 1'-0"



① Second Floor Plan
3/32" = 1'-0"



Elton + Hampton Architects

103 Terrace Street,
Roxbury, MA 02120

(617) 708-1071

Constitution Care

**46-50 Magee Avenue
Stamford, CT 06902**

No.	Description	Date

Proposed Second Floor Plan

Project number STAMFORD

Date 10.28.13

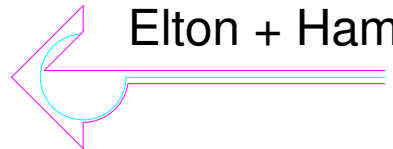
Drawn by Melissa Piper

Checked by Bruce Hampton

ST-05

Scale 3/32" = 1'-0"



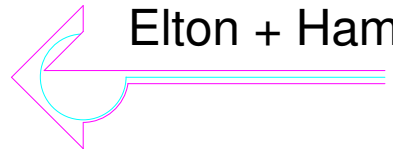

Elton + Hampton Architects
 103 Terrace Street,
 Roxbury, MA 02120
 (617) 708-1071

Constitution Care
 46-50 Magee Avenue
 Stamford, CT 06902

No.	Description	Date

Proposed Waiting Area		
Project number	STAMFORD	ST-06
Date	10.28.13	
Drawn by	Melissa Piper	
Checked by	Bruce Hampton	
		Scale




Elton + Hampton Architects
 103 Terrace Street,
 Roxbury, MA 02120
 (617) 708-1071

Constitution Care
 46-50 Magee Avenue
 Stamford, CT 06902

No.	Description	Date

Proposed Dispensary Department		
Project number	STAMFORD	ST-07
Date	10.28.13	
Drawn by	Melissa Piper	Scale
Checked by	Bruce Hampton	



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Appendix I1

Products Offered during First Year

In Re: RFA Section C Question 1

PRODUCTS OFFERED

1.0 PRODUCTS OVERVIEW

Constitution Care LLC's product line is broken down between products offered through the dispensary department, i.e. Medical Marijuana related products, and products offered through the alternative services area, i.e. non-Medical Marijuana related products. In many ways, the Medical Marijuana products we offer are dictated by the products produced by Connecticut's registered production facilities. Notwithstanding, as we have done in every market where we rely upon producers for products and inventory, we are committed to working in partnership with all licensees to communicate and share information provided by patients to ensure patients' needs are met to their satisfaction. We have tried and tested protocols designed to facilitate communications among the market operators. This infrastructure will mitigate any disconnect between the demands of the marketplace and the Medical Marijuana products being provided by the licensed producers. The remainder of the facility's products are mainly focused on facilitating patient administration of the medicine sold on site, educational tools, and other health-oriented products found in many pharmacies across the State.

Upon the successful award of a dispensary facility license and after consulting with and receiving approval from State program regulators, through its team of licensed pharmacists and technicians, Constitution Care LLC intends to apply for a Connecticut Pharmacy license so that it may provide further traditional, yet complementary pharmacist services and medications through its alternative services area. The concept would be to incorporate traditional and non-traditional medications in the dispensary facility as a means to track data and enhance the level of interaction and access to patients and healthcare providers. Accordingly, if the company obtains a Pharmacy license, the products available through the alternative services department may change to reflect additional product that work as a complement to other products and services provided by the dispensary facility.

For example, as a public service, Constitution Care LLC would like to be able to offer patients free influenza vaccinations before the beginning of the flu season. In addition, having established relationships with specialist pharmacies in other jurisdictions, we have found that there is a significant synergy to co-locating certain products and services for the benefit of patients. Among AIDS patients, we are designing a pilot program with a pharmacy partner in Washington, DC that provides enhanced discounts to AIDS patients who remain in complete compliance with their therapeutic medication program. The Medical Marijuana is used as an incentive for patients to remain adherent to their pharmaceutical regime. If proven successful, we would immediately bring our results and proposal to the State of Connecticut to seek their approval to initiating a similar program.

There are numerous incremental services that pharmacists can provide, such as counseling services which will also be incorporated into our dispensary facility operation. For us to maximize the benefit of having licensed pharmacists on our team, we plan on utilizing their entire skill set, rather than to simply serve as a dispenser of Medical Marijuana.



2.0 MEDICAL MARIJUANA RELATED PRODUCT LINE

The Medical Marijuana program in Connecticut is being implemented to provide relief to patients who suffer from a handful of qualifying conditions. Each condition has several debilitating symptoms, many of which may be alleviated by using Medical Marijuana or derivative products. Aside from the chronic nature of these conditions, there is a broad array of related illnesses and symptoms that require unique delivery systems and pathways based on the conditions and impairments endured by patients.

For example, lung cancer patients may benefit from the pain relief, anti-tumor/anti-inflammatory attributes and reduction in nausea caused by chemotherapy as well as an increase in appetite to address Cachexia, but cannot vaporize or smoke due to limitations of their respiratory system. Instead, these patients generally prefer ingesting Medical Cannabis extracts or eating Medical Marijuana infused edibles. By the same token, PTSD patients may suffer from sleeplessness and acute anxiety and find that vaporizing is the most effective way to relieve their symptoms, whereas MS or ALS patients may require the use of topical balms with high doses of CBDs to reduce muscle spasticity, pain and inflammation because their central nervous system and muscular systems are so weakened that they cannot ingest or inhale Medical Marijuana products.

Constitution Care LLC is committed to offering the diversity of products required to address the breadth of the symptoms associated with the qualifying conditions. The overview below provides the basis for our product and delivery selections to ensure all qualified patients, regardless of their physical condition, have access to this therapy.

Product Delivery Overview
GRG product line vs. qualifying conditions/symptoms

Qualifying Condition	Example Symptoms	Primary Systems Affected (1)	Likely Delivery Preferences	Example GRG Products
Cancer	Pain, Nausea, Tumors, Depression	All	Inhaled, Ingested, Topical	All
Glaucoma	Inflammation, Pain	CNS	Inhaled, Ingested	Flower, Pre-rolls, Concentrates, Edibles, Tinctures
HIV/AIDS	Wasting, Pain, Depression	I, L, MS, RE	Inhaled, Ingested, Topical	All
Parkinson's Disease	Pain, Muscle Spasticity	CNS	Inhaled, Ingested, Topical	All
Multiple Sclerosis	Pain, Muscle Spasticity	CNS	Inhaled, Ingested, Topical	All
Spinal Chord Nervous Tissue Damage	Pain, Muscle Spasticity	CNS	Inhaled, Ingested, Topical	All
Epilepsy	Pain, Muscle Spasticity	CNS	Inhaled, Ingested, Topical	All
Cachexia (3)	Wasting, Depression	MS, GI, CNS	Inhaled	Flower, Pre-rolls, Concentrates
Wasting Syndrome	Wasting, Depression	GI, I, CNS	Inhaled	Flower, Pre-rolls, Concentrates
Crohn's Disease	Pain, Muscle Spasticity, Inflammation	I, GI	Inhaled	Flower, Pre-rolls, Concentrates
Post Traumatic Stress Disorder	Sleeplessness, Anxiety, Depression	CNS	Inhaled, Ingested	Flower, Pre-rolls, Concentrates, Edibles, Tinctures

Notes:

Primary Systems in the Body:	(1) System Abbreviation
Circulatory	C
Digestive	GI
Endocrine	E
Immune	I
Lymphatic	L
Muscular/Skeletal	MS
Nervous	CNS
Reproductive	R
Respiratory	RE
Urinary	U

(2) Intractable spasticity

(3) Generally associated with cancer, AIDS, chronic obstructive lung disease, multiple sclerosis, congestive heart failure, tuberculosis, familial amyloid polyneuropathy, mercury poisoning (acrodyndia) and hormonal deficiency

Constitution Care LLC’s Medical Marijuana product line is dependent on the Medical Marijuana products produced by Connecticut’s registered production facilities, but will likely include the following general product types:

Table: Product Line

PRODUCT LINE	COMMENTS
Medical Marijuana Flower	Raw Medical Marijuana Flower (i.e. dried Marijuana “buds”) that can be rolled into papers, smoked in a standard pipe or a water pipe, or even vaporized with vaporizer products (believed to be the safest and healthiest means of inhalation). We plan on having at least 12 strains of Medical Marijuana available with a mix of Sativa, Indica and hybrid variants targeting specific symptoms of the qualifying conditions. Medical Marijuana flower will be sold in pre-packaged amounts, including pre-rolled forms.
Extracts	Extracts are manufactured by separating the trichomes (glands of the plant that contain high concentrations of cannabinoids) from the Medical Marijuana flowers to create a concentrated dose of Medical Cannabis. These product lines include bubble hash, tinctures and concentrates.
Preparations	Pre-rolls, sprays, oils, tinctures, topical ointments, pre-packed vaporizer cartridges and capsules.
Baked Goods & Edibles	Edibles (i.e. baked goods and the like) cooked with butter or oil that have been infused with Medical Marijuana. Edible Marijuana usually takes longer to take effect (20 minutes to over an hour), and the effects generally last longer than smoking or vaporizing. Products include Medical Cannabis-infused olive oil, cookies, brownies and popcorn,
Non-Medical Marijuana Products Offered	Non-Medical Marijuana products offered such as vaporizers, educational and research literature, grinders and rolling papers to assist in the administration and understanding of the medicine.

All Medical Marijuana based products will be packaged in light-resistant, child-resistant packaging in compliance with section 21a-408-56 of the Regulations of Connecticut State Agencies. Specifically, products will be packaged in unit sizes such that no single unit contains more than a one-month supply of Medical Marijuana. Also, packaging will satisfy the standard for “special packaging” as set forth in the Poison Prevention Packaging Act of 1970 Regulations, 16 CFR 1700.1(b)(4).

As Constitution Care LLC's patients establish their product preferences and purchasing trends, our dispensary facility will in turn request a focus on such products from the State's registered producers to maximize the efficiency of all producers. Since Constitution Care LLC does not have direct control over the assortment of products produced and manufactured at the production facilities, any special requests or issues with the Medical Marijuana related product line will be dealt with on a case-by-case basis. The facility's goal is to be able to offer a variety of products to accommodate and address each of the qualifying conditions under State law.

2.1 MEDICAL MARIJUANA FLOWER PRODUCTS OFFERED

We intend to offer at least 12 strains of Medical Marijuana consisting of at least 2 Indica strains, 2 Sativa strains, and 2 hybrid strains in order to target the most commonly experienced the range of qualifying conditions and patient preferences. The intended strains to be offered (depending on licensed producer product lines of course) are as follows:

- Harlequin (Indica, high CBD strain)
- True Blueberry OG (Indican-dominant hybrid, high CBD strain)
- Master Kush (Indica)
- Granddaddy Purple (Indica)
- Lavender (Indica)
- Jack Frost (Sativa)
- Super Silver Haze (Sativa)
- Sour Diesel (Sativa)
- Blue Dream (Sativa-dominant hybrid)
- Orange Crush (Sativa-dominant hybrid)
- OG Kush (Indica-dominant hybrid)
- Skywalker (Indica-dominant hybrid)

Products will be in unit sizes of 1.0 grams, 3.5 grams, and 7.0 grams only. Constitution Care LLC concentrated extract vials will only be accepted by licensed producers if their packaging includes the following features:

- Light-resistant (100% UV light protection)
- Child-resistant ("push and turn" style vials)
- Shatter-resistant
- Recyclable
- Clearly indicated opening instructions
- FDA-approved materials

2.2 EXTRACTS

We intend to sell at least 12 strains of “bubble hash” during the initial year of operation consisting of various Sativa, Indica and hybrid strains in order to accommodate the range of qualifying conditions and patient preferences. The intended strains of “bubble hash” (dependent on licensed producer product lines of course) are as follows:

- Harlequin (Indica, high CBD strain)
- True Blueberry OG (Indican-dominant hybrid, high CBD strain)
- Master Kush (Indica)
- Granddaddy Purple (Indica)
- Lavender (Indica)
- Jack Frost (Sativa)
- Super Silver Haze (Sativa)
- Sour Diesel (Sativa)
- Blue Dream (Sativa-dominant hybrid)
- Orange Crush (Sativa-dominant hybrid)
- OG Kush (Indica-dominant hybrid)
- Skywalker (Indica-dominant hybrid)

All concentrated extracts will be packaged in light-resistant, child-resistant packaging in compliance with section 21a-408-56 of the Regulations of Connecticut State Agencies. Products will be in unit sizes of 0.5 grams, 1.0 grams, and 2.0 grams only. Constitution Care LLC concentrated extract vials will only be accepted by licensed producers if their packaging includes the following features:

- Light-resistant (100% UV light protection)
- Child-resistant (“push and turn” style vials)
- Shatter-resistant
- Recyclable
- Clearly indicated opening instructions
- FDA-approved materials

We intend to offer at least two types of tinctures and concentrates in order to accommodate the range of qualifying conditions and patient preferences. The intended types of tinctures and concentrates that will be offered are:

- THC/CBD extract tincture
- CBD only extract tincture (non-THC)

All tinctures and concentrates will be packaged in light-resistant, child-resistant packaging in compliance with section 21a-408-56 of the Regulations of Connecticut State Agencies. Products will be in unit sizes of half ounce and 1 ounce only. Constitution Care LLC will only accept Medical Cannabis tincture and concentrate containers (i.e. pharmacy-grade liquid oval bottles) that have the following features:

- Light-resistant (100% UV light protection)
- Child-resistant (“push and turn” style vials)
- Shatter-resistant
- Recyclable
- Clearly indicated opening instructions
- FDA-approved materials

2.3 PREPARATIONS

Constitution Care LLC intends to offer several forms of prepared Medical Marijuana derivative products including sprays, oils, tinctures, topical ointments, pre-packed vaporizer cartridges and capsules. Such products will consist of extracted Medical Marijuana in concentrated or chemically separated forms (such as high CBD topical ointments that contain no THC and infused Olive Oil).

Ingestible products will be sold in packaging will include simple-to-follow use and dosing instructions so that patients may ingest their medicine in a number of ways that are suitable to their specific needs.

All Medical Cannabis preparations will be packaged in light-resistant, child-resistant packaging in compliance with section 21a-408-56 of the Regulations of Connecticut State Agencies. Products will be in unit sizes will range from 0.5 ounces to 16 ounces, depending upon the product. Constitution Care LLC will only accept products that are packaged in containers (i.e. pharmacy-grade liquid oval bottles) will have the following features:

- Light-resistant (100% UV light protection)
- Child-resistant (“push and turn” style vials)
- Shatter-resistant
- Recyclable
- Clearly indicated opening instructions
- FDA-approved materials

Additionally, Constitution Care LLC intends to offer at least 6 strains to be pre-packaged into pre-rolls (i.e. grounded raw Medical Cannabis flowers prepared in ready-to-consume unbleached rolling papers) during the initial year of operation consisting of at least two Indica strains, two Sativa strains, and two hybrid strains in order to accommodate the range of qualifying conditions and patient preferences. The pre-rolls themselves will likely contain 0.5 grams of grounded raw flowers and must be prepared in natural, unbleached cone rolling papers or a similar product. Such rolling papers must be chlorine free and are preferred to be 100% vegan.

All pre-rolls will be packaged in light-resistant, child-resistant packaging in compliance with section 21a-408-56 of the Regulations of Connecticut State Agencies. We will endeavor to offer pre-roll products in unit sizes of 1 pre-roll, 3 pre-rolls, and 7 pre-rolls only. Constitution Care LLC will only accept pre-rolls in packaging that have the following features:

- Light-resistant (100% UV light protection)
- Child-resistant (“push and turn” style vials)
- Shatter-resistant
- Recyclable
- Clearly indicated opening instructions
- FDA-approved materials

2.4 BAKED GOODS AND EDIBLES

Constitution Care LLC expects to offer patients at least four brands of single-dose, single-use baked goods and edibles (i.e. mini chocolate chip cookies, bite-sized brownies, popcorn and kettle corn) during the initial year of operation in order to accommodate the range of qualifying conditions and patient preferences. Each product will only contain the basic ingredients of the edible foods itself and 60 mg of extracted Medical Cannabis-infused butter or oil, depending on the particular product.

In order to accept Baked Goods and Edibles from state license producers, Constitution Care LLC will confirm that all goods have been manufactured in facilities that are compliant with all relevant State health, commercial food preparation and handling codes. To the extent a licensed producer is non-compliant with State producer requirements, testing results, dosing equivalency information AND State food handling and preparation requirements, we cannot accept their products.

All baked goods and edibles will be packaged in light-resistant, child-resistant packaging in compliance with section 21a-408-56 of the Regulations of Connecticut State Agencies. Products will be packaged in single-dose, single-use unit sizes only so that there will be no need to reseal packaging once opened (i.e. patients will consume the entire contents of the

package which will be the equivalent of one dosage of Medical Marijuana)-otherwise packaging must be resealable in a manner retaining the light-resistant, child-resistant features required by law. This approach prevents the potential exposure of the products to degradation from exposure to light and air, and it prevents any unintended use by children. Constitution Care LLC will only accept baked goods and edibles that are packaged with the following features:

- Light-resistant (100% UV light protection)
- Child-resistant
- Shatter-resistant
- Recyclable
- Clearly indicated opening instructions
- FDA-approved materials

3.0 NON-MEDICAL MARIJUANA PRODUCTS OFFERED

Constitution Care LLC intends to offer a wide array of non-Medical Marijuana products through its alternative services area. In particular, it will offer educational materials, including books, group counseling services, self-help/cooking classes (with specific focus on dosing, different ingesting methods and alternative delivery techniques), pamphlets and DVDs, on topics such as Medical Marijuana history and medicinally beneficial uses, the Medical Marijuana program in Connecticut and other states, general health and lifestyle, and other information regarding the qualifying conditions under State law. Such educational materials are likely to include the following:

- *The Benefits of Marijuana: Physical, Psychological and Spiritual* by Joan Bello
- *Marijuana Medical Handbook: Practical Guide to Therapeutic Uses of Marijuana* by Dale H. Gieringer
- *Cannabis: A History* by Martin Booth
- *Marijuana Myths Marijuana Facts: A Review of the Scientific Evidence* by Lynn Zimmer
- *The Emperor Wears No Clothes: The Authoritative Historical Record of Cannabis and the Conspiracy Against Marijuana* by Jack Herer
- *Marihuana: The Forbidden Medicine* by Lester Grinspoon
- *Understanding Marijuana: A New Look at the Scientific Evidence* by Mitchell Earleywine
- *Eat, Move and Be Healthy!* By Paul Chek
- *Concepts of Fitness and Wellness: A Comprehensive Lifestyle Approach* by Charles Corbin

- *The Cancer Survivor's Bible* by Jonathan Chamberlain
- *AIDS: Science and Society* by Hung Y. Fan, Ross F. Conner and Luis P. Villarreal
- *Cachexia and Wasting: A Modern Approach* by Stefan D. Anker, Giovanni Mantovani, Akio Inui, John E. Morely, Filippo Rossi Fanelli, Daniele Scevola, Michael W. Schuster, and Shing-Shing Yeh
- *What If Cannabis Cured Cancer* - an independent documentary
- *Clearing the Smoke: The Science of Cannabis* - a PBS documentary

Among the many proprietary resources we bring to our patients is free access to our four volume library of clinical study data that has been compiled over many years from European and Israeli research. Despite its characterization in the United States, active research programs have been ongoing overseas for over a decade. We have invested considerable resources in following these activities and as a result, have compiled a proprietary library of completed research studies that have been published and/or presented at conferences and withstood peer review. This may be one of the only such libraries in the United States. From a patient care and research perspective, this encyclopedic resource is among the most valuable assets we maintain at Constitution Care.

The dispensary facility also intends to offer a limited number of products used to facilitate the administration of the medicinal products offered in the dispensary facility for the convenience of our patients. One such product, vaporizers, is explained in further detail below to better explain patients' need for access to such administration equipment, particularly when many patients are limited to inhalation as a means of Medical Marijuana ingestion due to the circumstances of their respective qualifying conditions (e.g. HIV/AIDS patients with suppressed appetites and the need for quick and effective pain relief may find vaporizing Medical Marijuana a more practical option than edibles).

Metabolizing Medical Marijuana through inhalation (the lungs) is currently accepted by the Medical Marijuana community as the quickest and most effective means of obtaining the medicinal benefits of the product, though if smoked in a traditional manner it can cause unnecessary irritation to a patient's respiratory system. Using a vaporizer is the healthiest known means of inhaling Medical Marijuana through the lungs. Using a flame to heat the raw flower buds (i.e. smoking) lends to the contemporaneous inhalation of combusted plant matter (and butane if using a butane lighter) causing respiratory irritation along with the medicinally beneficial cannabinoids found in Medical Marijuana. Alternatively, a vaporizer electronically heats raw flower buds with hot air to the exact temperature necessary to release the essential, active cannabinoids without any burning, leaving the remaining plant matter in the product virtually intact. The numerous benefits of using a vaporizer are vast, with the most prominent being the safety and protection of patients' lungs.

Constitution Care LLC's goal is not to appear as a "head shop" or similar natured store, but as a professional, secure, and private retail area where patients can obtain all the ancillary equipment

and tools necessary for the safe and effective use of Medical Marijuana in a clean and open environment that respects patient confidentiality. Such products are likely to include, but not limited to, the following:

- T-Sac Tea Filters: This product is an easy-to-use loose tea filter for patients to make a simple Medical Marijuana tea recipe at home. The bags are biodegradable, chlorine free, and unbleached. Drinking Medical Marijuana tea is a relatively subtle method of ingestion which, if used properly, can mask the taste of the medicine and directly impact symptoms associated with Cachexia, Crohn's disease and Wasting Syndrome.



- ONA PRO Spray: This product safely and effectively neutralizes strong odors, particularly odors from smoking or vaporizing Medical Marijuana products. This is a plant based odor-neutralizer that is safe for humans and pets that can be used by patients to prevent odor nuisances from affecting loved ones and neighbors.



- Ripple Textured Aluminum Herb Grinder: This 4-part grinder has diamond-shaped teeth to effectively grind Medical Marijuana raw flower buds to a consistency suitable for ingestion by vaporizer, standard pipe or water pipe, or rolled joint. The grinder is equipped with a pollen screen and kief catching compartment so patients can get the most out of their medicine.



- Volcano Digit Vaporizer: This brand vaporizer is an easy-to-use “balloon” style vaporizer, meaning the vapor of raw flower buds are collected and temporarily stored in a balloon for more regulated ingestion through the lungs. Patients are able to vaporize their medicine and ingest at a comfortable pace that best suits their unique conditions.



- Vapor Brothers Vaporizer: This brand vaporizer uses a "whip", which is a glass piece with plastic tubing and mouthpiece, instead of a balloon to inhale the vapor of Medical Marijuana products. This type of vaporizer is more economical than the Volcano and allows patients to use only a minimal amount of product at a time to achieve desired results.



- AtmosRx Vaporizer: This brand vaporizer, which uses a lithium ion battery instead of cords or wires, is hand-held, portable and discreet- a great product for patients who wish to keep their medicinal administration equipment secure and out of the reach of small children.



- RAW Organic Hemp Rolling Papers: This product is an organic, all-natural, unbleached, chlorine-free, vegan rolling paper used to smoke Medical Marijuana. Whereas Constitution Care LLC would prefer its patients to inhale vapor as opposed to smoke for health reasons, some patients simply have preferences for particular medicinal administration equipment. In addition, each delivery device has a different price point - so in the spirit of increased access, the dispensary facility intends to offer patients an economical administration option that is one of the safest rolling papers on the market.





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Appendix I2

Services Offered during First Year

In Re: RFA Section C Question 2

SERVICES OFFERED

1.0 SERVICES PROVIDED OVERVIEW

Constitution Care LLC places a high emphasis on counseling and education in addition to the safe and responsible provision of Medical Marijuana. As such, the dispensary facility plans to offer additional patient services focused on overall patient health such as the Integrated Medical Marijuana and Counseling (“IMMAC”) program, concierge patient services, concierge provider services, support groups, workshops and other patient-oriented programs. Many of these programs are available at no charge to patients. Upon the successful award of a dispensary facility license, Constitution Care LLC intends to apply for a Connecticut Pharmacy license so that it may provide further traditional pharmacist services and medications through its alternative services area. The concept would be to incorporate traditional and non-traditional medications in the dispensary facility as a means to track data and enhance the level of interaction and access to patients and healthcare providers.

Upon the successful award of a dispensary facility license, Constitution Care LLC intends to apply for a Connecticut Pharmacy license so that it may provide further traditional pharmacist services and medications through its alternative services area. The concept would be to incorporate traditional and non-traditional medications in the dispensary facility as a means to track data and enhance the level of interaction and access to patients and healthcare providers. Accordingly, if the company obtains a Pharmacy license, the services available through the alternative services department may change to reflect additional services that work as a complement to other products and services provided by the dispensary facility.

2.0 IMMAC Program

Patient and primary caregiver education and counseling at Constitution Care LLC is a living, constantly improving process, and involves much more than distributing informative literature on Medical Marijuana. Patient education at Constitution Care LLC is highly individualized, allowing each patient to realize the most benefits for their particular condition and life situation.

In addition to comprehensive literature, including the Constitution Care LLC Patient Handbook, patient-members, at their option, will partake in comprehensive workshops and individual or group counseling sessions designed to address the needs of their Individual Treatment Plans (“ITPs”).

The process starts with the Integrated Medical Marijuana and Counseling program (IMMAC) developed by medical professionals specifically for Medical Marijuana dispensary facility operations.

Under IMMAC, Constitution Care LLC patients initially partake in a comprehensive screening, intake, psychosocial assessment, and psychological testing/evaluation, including completion of a

HIPAA-compliant release to identify problems which pose risks or challenges to patient adherence to his or her primary medical and/or medication treatment regimens, and to develop appropriate and active intervention protocols/ITPs.

Once an ITP is developed for a qualifying patient, that patient is provided with individual educational, treatment, and/or psychosocial support services, including:

- General Medical Marijuana education groups led by a qualified registered dispensary focusing on the appropriate use of Medical Marijuana as a critical component to a primary medical and medication treatment plan.
- Specific disease management psychosocial education groups led by a qualified professional focused on maintaining adherence to the primary medical and/or medication treatment plan.
- Motivational interview, harm-reduction counseling groups and/or individual counseling led by a qualified professional for patients who need and want assistance to eliminate or reduce their dependence on legal or illegal substances, and will refer clients in need of abstinence-based substance abuse treatment to APRA-certified programs, at our sister agencies, such as Whitman-Walker Health, with whom we have a long-standing relationship.
- Psychotherapy groups and/or individual psychotherapy led by a qualified professional for patients diagnosed with a psychiatric disorder or suffering from mental health problems which would benefit from clinical intervention.
- “Vincero” (“I will prevail”) psychotherapy/support groups led by a qualified professional for those patients whose medication and treatment options have been exhausted and who now need to successfully negotiate death and dying issues in a positive and empowering treatment milieu.
- Case management/legal counseling groups and/or individual sessions led by a qualified professional for patients with major life challenges to assist them in obtaining and/or maintaining entitlements, financial benefits, legal services, etc., which will significantly reduce barriers to care and treatment adherence
- Crisis management groups and/or individual sessions led by a qualified professional will be available to patients identified by dispensary facility employees and/or referred by their health care providers when they see evidence of significant negative changes in physical and mental health, and/or psychosocial status.

3.0 CONCIERGE PATIENT SERVICES PROGRAM

Constitution Care LLC believes strongly in empowering patients through its education and concierge patient services program. Such program includes the following:

- *Medication Counseling:* This service will provide patients with a one-on-one counseling session to review the many facets and proper techniques of Medical Marijuana ingestion, including but not limited to smoke inhalation, vapor inhalation, taking pills, eating edibles, applying topicals and lotions, and so on. Counseling will also include topics such as potential side effects and signs or symptoms of Medical Marijuana interactions with other drugs. Dispensaries will set manageable goals during initial consultation that are both patient and qualifying condition specific. Follow-up consultations will ensure goals are attained and patient satisfaction is maintained.

Medication Counseling will also focus on the recommendation of specific strains of Medical Marijuana and specific product types most suitable for particular qualifying conditions and individualized patient needs. Dispensaries will examine the chemical components of each patient's supply history juxtaposed with patient feedback to determine the necessity of alternative strains or products for better treatment and enhanced relief of patient symptoms.

- *Medication Therapy Management Program:* This service includes Drug Safety Reviews of the nature and type typically found in a pharmacy setting. It also includes personal and wellness counseling focusing on lifestyle modifications in areas such as nutrition, smoking cessation and weight loss which could affect patients' relief of symptoms.
- *Influenza Vaccination Program:* This service is akin to that typically found in a pharmacy setting. Since most patients are recommended to receive the influenza vaccine, Constitution Care LLC will offer this service during the appropriate months of the year.
- *Medication Discount Locator:* This service will be provided to assist patients in finding non-Medical Marijuana medications at the lowest price within Connecticut.

4.0 CONCIERGE PROVIDER SERVICES PROGRAM

Constitution Care LLC will work collaboratively with providers to meet their patient's medical and prescription needs by offering innovative solutions through the concierge provider program, which entails improving understanding, adherence, and outcomes related to patient use of Medical Marijuana as an effective medication. The dispensary facility will offer informative documents to providers to reinforce the information taught to patients during their counseling. Constitution Care LLC's goal is to assist providers in helping patients manage their medications and conditions through means such as the following:

- *Medical Marijuana Detailing:* This service assists providers in the selection of proper Medical Marijuana strains used to treat targeted disease states. Discussions will be based upon patient feedback, which will further assist in future Medical Marijuana recommendations.
- *Medication Consultations:* This service will be available to providers 24 hours a day and entails one-on-one consultations tailored to the provider in need's particular issues, questions or concerns.

5.0 SUPPORT GROUPS, WORKSHOPS AND OTHER PATIENT PROGRAMS

Constitution Care LLC plans to provide additional supplemental services, such as support groups, educational workshops and other patient-oriented programs, to improve overall patient health, increase patient knowledge of Medical Marijuana and its benefits, and enhance patients' understanding of the Connecticut Medical Marijuana program. Such services are intended to be offered upon the commencement of dispensary facility operations, if practical based upon patient demand.

Upon each patient's first visit to the dispensary facility, and from time to time thereafter, patients will be informed of available substance abuse resource counseling offered by Constitution Care LLC directly and by trusted off-site third-party sources (such as Celebrate Recovery-Hartford, and the Connecticut Community for Addiction Recovery-Bridgeport). Information will also be made available at those times regarding various patient support groups related to the emotional, psychological and physical effects of qualifying conditions on the health and lifestyle of patients offered by Constitution Care LLC directly and by trusted off-site third-party sources (such as the Hospital of Central Connecticut's Living With Cancer support group, and the AIDS Alliance of Greenwich support group).

Constitution Care LLC intends to offer patients regularly scheduled in-house Connecticut Medical Marijuana program informational classes which will provide a question-answer forum in a classroom setting regarding questions, concerns and general information pertaining to State laws, rules, regulations, and guidelines governing the Connecticut program. These classes will prove to be an excellent resource for patients to become more educated in a private setting which respects patient confidentiality. The dispensary facility also intends to offer Medical Marijuana workshops and educational classes focused on

Medical Marijuana history, science, beneficial uses, current events, and other interesting topics that may pique the interests of our patients.

Additional patient services available through the alternative services department that are intended to be phased in at Constitution Care LLC as the market develops include the following:

- Chiropractic services
- Yoga
- Natural healing
- Nutrition classes
- Art and music therapy
- Additional substance abuse and mental health counseling
- Additional resource services including referrals for a wide variety of essential life, social and economic services



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Appendix I3

Facility Access Plan

In Re: RFA Section C Question 3

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

FACILITY ACCESS

1.0 FACILITY ACCESS OVERVIEW

Aside from registered dispensary facility employees, qualifying patients, and primary caregivers, no person will be permitted on the premises of Constitution Care LLC's dispensary facility. Exceptions will be made for local law enforcement, for the Commissioner of the Department of Consumer Protection or the Commissioner's authorized representative, and for federal, state of Connecticut and local government officials acting in a manner necessary for the performance of their respective governmental duties. Temporary access will be permitted (1) for production facility employees for the sole purpose of delivering Medical Marijuana products, and (2) for other persons upon prior written request to and approval from the Commissioner or the Commissioner's authorized representative (collectively, "Visitors").

All Visitors permitted on Constitution Care LLC's facility premises are required to first obtain and display at all times while on the premises a visitor identification badge from security personnel. A security staff member or another authorized production facility staff member will escort and monitor Visitors at all times while on the premises. Upon exiting the dispensary facility, all Visitors must return the visitor identification badge to security personnel.

Upon each instance that a Visitor enters or exits the production facility, a designated security staff member will record the date, time and purpose of the visit on the facility's Visitor Log-In Form, which will be maintained and made available in accordance with section 21a-408-70 of the Regulations.

If it is impractical to obtain prior approval from the Commissioner or the Commissioner's authorized representative for a Visitor's permission to be on the facility premises due to an emergency situation, Constitution Care LLC will provide written notice to the Commissioner as soon as practical after the onset of the emergency. Such written notice will include the name and company affiliation of the Visitor, the purpose of the visit, and the date and time of the visit. During emergency visits, all company access and Visitor policies will be strictly observed, including but not limited to the log-in procedure and the escort/monitor procedure.

2.0 PROCEDURE FOR PREVENTING ENTRY TO PRODUCTION FACILITY

Constitution Care LLC plans to secure the perimeters of the dispensary facility such that access to the facility is only possible through the secured front door, which is within the view of professionally installed and maintained surveillance camera system and protected by locks and alarms. Dispensary facility staff, qualifying patients, primary caregivers, and/or Visitors will only be permitted into the building by security personnel once it has been determined that it is safe to do so (i.e. after confirmation through the surveillance system that no security threats have been observed). Once in the building, employees and Visitors must wait in the secured reception area while security personnel verify employment or Visitor status; patients and primary caregivers must wait while the facility patient services associate verifies registered patient or caregiver status.

For more information on the surveillance system and the alarm system, please refer to the Confidential Security Plan (Appendix A, Section L, Question 71 of this application).

Constitution Care LLC dispensary facility staff will carefully screen each new patient and primary caregiver to ensure that he or she is a registered in accordance with Connecticut law. The screening process will include the following:

- Inspection and verification of the qualifying patient or primary caregiver registration certificate.
- Inspection of a Connecticut driver's license or Department of Motor Vehicles ID card establishing residency in the state that includes photo identification, name that matches the name on the registration certificate, age, and expiration date.

All returning patients or primary caregivers will be required to show their registration certificate as well as their Connecticut driver's license or Department of Motor Vehicles ID card to gain admittance to the dispensary facility.

Upon verification, each entrant must fill out the facility's Log-In Form identifying their name, date, time of entry, and purpose for internal record purposes. At that time, either (1) a security staff member or another authorized production facility staff member will escort and monitor Visitors' entry in the interior of the dispensary facility, (2) the production facility employee will use his or her access card or thumbprint to enter the interior of the facility and the restricted-access areas within the facility, or (3) qualifying patients and primary caregivers will be granted access to the alternative services area and the dispensary department of the dispensary facility.

The access control system that Constitution Care LLC intends to use has been designed to provide accountability and limit access both to the registered dispensary facility and within the facility – particularly those areas that house critical assets such as the vault, the dispensary department, and surveillance room. Using state-of-the-art technology, the access system intended to be utilized will grant entry through the use of card readers and biometric locks that require thumbprint recognition for access. The access system will allow the security department to maintain a full audit trail of everyone who enters or leaves the facility and any secure area within the dispensary facility.

As an additional measure to prevent unauthorized entry to the dispensary facility, including the limited-access areas within the facility, security personnel will ensure that all locks and security equipment in the facility are in good working order at all times, particularly the locks to the building entrance, the lobby area, the dispensary department, surveillance room, and the vault room (entry to such areas will be locked at all times). Security personnel will monitor the premises to make sure no keys or access cards are left unattended or stored in a location accessible to persons other than specifically authorized employees.

Constitution Care LLC will also post a sign, which will be twelve inches by twelve inches, at all entry ways into any area of the dispensary facility containing Medical Marijuana that states: “DO NOT ENTER – LIMITED ACCESS AREA – ACCESS LIMITED TO AUTHORIZED EMPLOYEES ONLY.”

Furthermore, security personnel will visually monitor employee, patient, primary caregiver, and Visitor entry to the dispensary facility, including the limited-access areas within the facility. All employees will be required to possess their registration certificates at all times while in the facility. Only those employees possessing a valid registration certificate who have been authorized by security to enter the facility and by management to enter restricted-access areas within the facility will be able to enter through the use of biometric fingerprint readers as Section 3.0 below.

3.0 EQUIPMENT PREVENTING ACCESS

Constitution Care LLC intends to use the XR500 Series Access/Burglary/Fire 574-Zone Command Processor Panel. The XR500 is an integrated burglary, fire and access control system that can be configured for users to gain access and disarm the area using a single card reader. The XR500 system can restrict access by schedule, arming level, or other criteria.

The specific reason for access denial can be displayed on the keypad, stored in events, logged on a local printer, sent to the central station, and to DMP Advanced Reporting software. An anti-passback feature is also available. Any access control reader with a Wiegand output can be connected to the XR500 series panel. Card reader inputs can be attached to up to 16 different locations.

Constitution Care LLC intends to install at least four (4) alarm control keypads (LCD touchpad terminals) at the following locations:

- One (1) - Secured reception area (Armed Area 1)
- One (1) – Dispensary department area (Armed Area 2)
- One (1) – Alternative services department area (Armed Area 3)
- One (1) – Vault room area (Armed Area 4)

In addition, Constitution Care LLC intends to install at least seven (7) full-featured Biometric Fingerprint Reader Access Control Devices with HID Proximity and Integrated Pin Pad at the following locations to control access to areas of the facility:

- One (1) – Secured reception area (Armed Area 1)
- One (1) - Dispensary department entrance (Armed Area 2)
- One (1) – Alternative services department entrance (Armed Area 3)
- One (1) – Break room entrance (Armed Area 4)

APPENDIX I-3: Response to RFA Section C, Question 3



- One (1) - Vault room entrance (Armed Area 5)
- One (1) - Office entrance (Armed Area 6)
- One (1) - Surveillance room entrance (Armed Area 7)



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Appendix I4

Americans with Disabilities Act (ADA) Features

In Re: RFA Section C Question 4

AMERICANS WITH DISABILITIES ACT FEATURES

1.0 AMERICANS WITH DISABILITIES ACT FEATURES OVERVIEW

Constitution Care LLC has retained Elton + Hampton Architects to design and incorporate features of the dispensary facility that will provide accessibility to patients and primary caregivers in compliance with or beyond what is required by the Americans with Disabilities Act (the “ADA”).

Elton + Hampton Architects produced a memo addressing the features in compliance with or beyond the ADA requirements, a copy of which can be found on the following page.

Memorandum

To: Nicholas Vita

Date: November 8, 2013

CC: Bob Mayerson, Michael Abbot

RE: **ADA requirements for Constitution Care LLC**

Our proposed designs will meet or exceed the stricter of the requirements of the ADA or the Connecticut Office of Protection and Advocacy for Persons with Disabilities (OPA).

Retail and Manufacturing Establishments:

- Counter heights at the reception area and at retail sales areas shall be set to accommodate the reach requirements of both able and disabled workers and clients.
- Approach areas to counters shall meet or exceed dimensional requirements of the ADA, MAAB or OPA and shall be along an accessible route.
- Entries, parking, and approaches shall provide either sloped walks (less than 1:20 slopes) or ramps (less than 1:12 slope) with railings meeting ADA requirements. Cross pitches on all walks or ramps will not exceed 2%. All approaches shall be along accessible routes.
- Public toilets shall be on an accessible route and shall be designed to be fully compliant with accessibility requirements including appropriate turning space, fixture clearances, grab bars, dimensional requirements for mirrors and dispensers.
- Any public use spaces and employee spaces shall be designed to provide doorways and routes that are accessible to the extent possible in existing construction.
- Displays and signage shall include provisions for vision impaired both to prevent injury and provide directional information. Parking spaces designated as reserved for individuals with disabilities will be indicated with the appropriate signage. Signage will use appropriate pictorial images and Braille.
- Fire alarms shall meet requirements for both the hearing and visual impaired.
- Primary egress shall be along accessible routes and secondary means of egress shall either be accessible or provide an accessible means of rescue assistance.
- Floor surfaces shall be hard surfaces with no transition strips or thresholds exceeding 1/2" in height.
- Carpets, if used in offices or conference rooms shall be wheelchair compliant (adhered directly to the floor or stretched taut with max. 1/2" pile).



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Appendix I5

Odor Control Plan

In Re: RFA Section C Question 5

ODOR CONTROL PLAN

1.0 AIR TREATMENT OVERVIEW

Constitution Care LLC considers the treatment of air within the dispensary facility as one of the most important and sensitive features of the company's operations, particularly with regards to the control of odor nuisances that could negatively affect our neighbors. The organization intends to implement a plan to offset, neutralize, mask, and otherwise reduce the odors emanating from Medical Marijuana products through the use of commercial grade activated carbon filters and other proven odor-neutralizing products.

2.0 ODOR CONTROL PLAN IN AREAS CONTAINING MEDICAL MARIJUANA

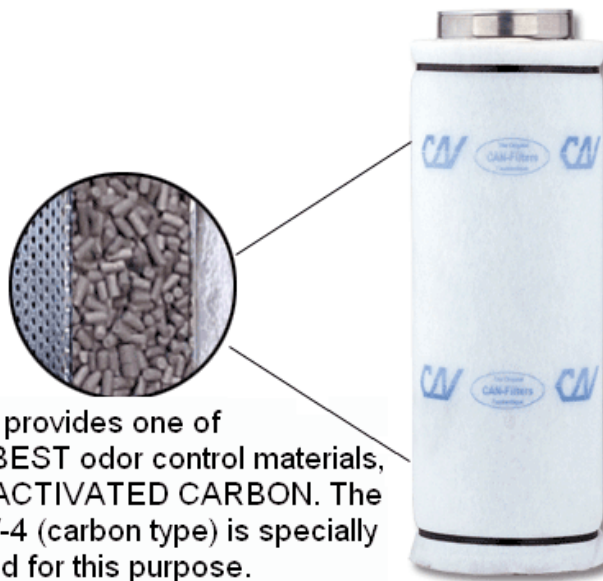
Constitution Care will use an extensive air filtration system throughout all areas of the facility which contain Medical Marijuana in any form. Such system consists of a collection of activated carbon filters, such as the Can-Filter 150, with correlating powerful exhaust fans to move the air, such as the 12 inch Max-Fan.

Activated carbon filters use a bed of activated carbon to remove contaminants and impurities through chemical adsorption. Adsorption is a process whereby pollutant molecules passing through the filter are trapped inside the pore structure of the carbon substrate. By using activated carbon, which is a processed form of carbon characterized by small, low-volume pores, effectively increased the surface area available for adsorption thereby increasing the efficiency of the adsorption process.

The Can-Filter series of activated carbon filters were specifically designed for air treatment and odor control in odor-sensitive areas such as hospitals and gymnasiums. Using a combination of the Can-Filter 150 with the powerful 12 inch Max-Fan, Constitution Care LLC will be able to filter and replace 1 cubic foot of air per minute, thereby effectively scrubbing unwanted odors emanating within and from the facility. Of course, the exact number of filters and fans in each area of the dispensary facility will be dictated by the respective volume of each room.

For more information on the Can-Filter 150 and the 12 inch Max-Fan, visit www.canfilters.com

Below is are images of the Can-Filter product line followed by product specifications for the Can-Filter 150:



Can-filter provides one of nature's BEST odor control materials, VIRGIN ACTIVATED CARBON. The Can CKV-4 (carbon type) is specially developed for this purpose.

Specifications

Max **Recirculating (Scrubbing)** CFM: 2520 cfm / 4200 m³h
 Max **Exhaust** CFM: 1260 cfm / 2100 m³h
 @ 0.1 sec contact time
 Recommended Min Airflow: 630 cfm / 1056 m³/h
 Prefilter: Yes
 Flange: 10", 12", 14"
 Dimensions: (with pre-filter)
 ·Outside Diameter: **42cm / 16.5"**
 ·Height: **150cm / 60"**
 ·Total Weight: **71kg / 156lbs**
 ·Carbon Weight: **56kg / 123lbs**
 ·Carbon Bed Depth: **6.5cm / 2.56"**
 Max Operating Temp: 80°C
 Pressure drop at max cfm: 180pa / .75"wg

Below is an image of the 12 inch Max-Fan followed by such product’s technical specifications:



FAN MODEL	CFM	RPM	MAX WATTS	MAX AMPS.	DUCT DIA.	LENGTH	BLADE DESIGN.	HOUSING	INLET/OUTLET
12"	1708	3374	489	4.1	12"	12 1/8"	Mixed Flow	Galvanized	12"

3.0 ODOR CONTROL PLAN IN ALL OTHER AREAS

In all areas of the dispensary facility where there are no Medical Marijuana products, particularly the areas of ingress and egress to the building (i.e. the lobby/reception area), Constitution Care plans to utilize ONA brand odor neutralizing agents to prevent odor nuisances that may escape the facility. ONA is manufactured by Odorchem Manufacturing Corp., whose business model focusses on industrial and commercial strength odor control for sewage treatment plants, rendering plants, chemical plants, and hydroponic gardens. The ONA product line neutralizes virtually every organic and non-organic odor, leaving only a clean, fresh scent. The active ingredients are plant based and completely safe around people, plants and pets.

Constitution Care LLC plans to use the ONA Gel in conjunction with the ONA Storm to prevent unwanted odors from emanating from the production facility. The ONA Gel is a blend of the ONA Liquid and various suspension elements resulting in an odor neutralizing product that has excellent dispersion qualities and can be released in a controlled manner through the use of a dispenser. The ONA Storm dispenser is an ideal tool for neutralizing airborne odors in larger areas such as schools, gymnasiums and office buildings. This product, specifically designed for use with 20 liter ONA Gel pails, has adjustable airflow control and can evenly distribute ONA for areas up to 10,000 square feet, using less power than most light bulbs (90 watts).

For more information on ONA products, visit www.onaonline.com

Below are images of the Ona Gel product line:



Below is an image of the ONA Storm followed by such product's technical specifications:



Specifications

- Weight: 7.7 kgs (17 lbs)
- Ship weight: 8.2 kgs (18 lbs)
- Capacity of pail: 20 liters (5 US gallons)
- Output: up to 225 cubic feet per minute
- Power consumption: up to 90 watts
- Power: 115 Volts/0.7 amps
- Cycle: 60 Hertz
- Dimensions: 16"L x 16"W x 21"H



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Appendix I6

Medical Marijuana Delivery Procedure

In Re: RFA Section C Question 6

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

MEDICAL MARIJUANA DELIVERY PROCEDURE

1.0 MEDICAL MARIJUANA DELIVERY OVERVIEW

Constitution Care LLC will take every precaution to ensure the safe and secure delivery of Medical Marijuana products from registered production facilities. Company protocols, identified below, have been established to avoid any diversion, theft or loss of Medical Marijuana during the delivery process. Constitution Care LLC will update its delivery protocol from time to time as it becomes necessary due to unforeseen business circumstances or changes to relevant Connecticut law.

2.0 REGISTERED PRODUCER FACILITY RELATIONSHIPS

Constitution Care LLC's Dispensary Facility Manager and Inventory Manager will conduct an in-person meeting with a representative from the registered production facility prior to purchasing medicine. This policy will help Constitution Care LLC staff to build one-on-one relationships with the registered producers in order to ensure understanding of their unique and customized strains and products.

The in-person meeting also serves a security purpose in that personnel from both companies have an opportunity to evaluate the level of security under which each is operating.

3.0 CONSTITUTION CARE LLC RECEIVING POLICIES

Company policies regarding receiving Medical Marijuana products are as follows:

- Times for delivery are not set up on a weekly timed schedule. For security reasons, the days of the week and times are changed regularly to thwart any possibility of robbery.
- Deliveries of product are not announced on any company calendar, nor are they put into any online calendar for view by the general public.
- Staffing at Constitution Care LLC must be adequate and security must be in place at the dispensary facility during delivery in order to ensure the safety of all parties.
- All receiving of deliveries must take place within a secure locked area of the facility to ensure safety for Constitution Care LLC employees. A member of Constitution Care LLC's security team must be unarmed and present when production facility delivery staff arrives. This security guard will assist the production facility employee in entering the building expeditiously so as to prevent theft or cause suspicion by the general public.

- Unpacking of all deliveries must take place in a secure locked area of the facility; there is no unpacking in view of the general public, patients or primary caregivers.

4.0 RECEIVING PROCESS

Constitution Care LLC will require notification from the registered production facility via telephone that the producer delivery team is approximately five minutes from arrival. This will allow the dispensary facility to alert the security team of the pending arrival. Upon arrival in the dispensary facility parking lot, the production delivery team will be instructed by security personnel to move the delivery vehicle to a secured parking area. The delivery team will be instructed by security personnel to exit the delivery vehicle and display their registration certificates and any additional identification cards provided by the production facility for verification authority. Identification and verification of delivery personnel must take place prior to accepting any delivery.

After identification and verification of delivery employees, authorized Constitution Care LLC staff, including security personnel, and the production delivery team will move into a secured and locked area of the dispensary facility where the delivery will be reviewed for accuracy. The delivery team will provide Constitution Care LLC staff with an invoice (and any additional product information) that details the order in accordance with the Act and Regulations.

The delivery team and either the Dispensary Facility Manager or the Inventory Manager will check each line of the invoice to confirm each individual line-item has been delivered. Once verification is complete, the dispensary facility representative will sign the packaging invoice; Constitution Care LLC and the production facility will each retain a copy of the signed invoice. All invoices will be stored and maintained by Constitution Care LLC in accordance with section 21a-408-70 of the Regulations.



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Appendix 17

Training and Continuing Education Plan

In Re: RFA Section C Question 7

TRAINING & CONTINUING EDUCATION PLAN

1.0 TRAINING & CONTINUING EDUCATION OVERVIEW

All qualified candidates for positions with Constitution Care LLC will be hired on a three month probationary status, no matter the position within the organization. During this period, employees will participate in a rigorous training process and will be evaluated for long-term suitability in the restricted-access medical environment. Training will include the comprehensive Employee Handbook and other relevant reading materials, lectures by qualified professionals, one-on-one and group hands-on training sessions, a mentoring program and taking quizzes to assure the proper information is being retained.

Constitution Care LLC's training and continuing education program is an investment that provides an incredible return on the company's training dollars and resources. Well-trained dispensary facility employees can build our reputation, improve morale and cohesiveness, provide better customer service, save resources and generate returns for the company, while poorly trained employees can cost the company in countless ways. When employees are well-trained, they are:

- Better equipped to provide exceptional service to patients;
- Better prepared to protect against diversion, theft or loss of Medical Marijuana products;
- Better able to prevent dispensing errors and other operational mistakes;
- More capable of preventing the misuse of confidential information;
- More enjoyable to work with, which can positively impact employee retention;
- More confident on the job. Confident employees are able to work smarter and faster, increasing efficiency and productivity levels; and
- Greater assets to the company. Competent employees breed higher productivity levels than untrained, low-performing employees. The dispensary facility will require a fewer number of overall staff members if such staff members are high-performance employees, which means lower labor costs.
- More likely to stay at the company and view this as a career opportunity for team members and their families – building this corporate culture is critical to our long-term success.

Orientation training will be given to each new dispensary facility employee and must be completed before any staff member is permitted to begin work in the facility. A certificate of completion will be given upon the successful conclusion of the orientation program.

Training and education will include issuing the Employee Handbook and other reading materials to all dispensary facility employees during orientation training, on-going lectures and seminars by qualified professionals, hands-on training from management, and quizzes to assure the lessons take hold and can be implemented without doubt or confusion. Customized programs provide ample training and education opportunities within each department of the facility (i.e. dispensary department, alternative services department, patient services, security department, and inventory). The general training and education program will consist of the following modules:

- Operational training is led by the Dispensary Facility Manager, or an experienced dispensary if the Dispensary Facility Manager is unavailable. The module includes policies and procedures preventing dispensing errors, guidelines for interacting with patients with varying qualifying conditions, conflict-resolution practices, and the handling of confidential patient information. Operational training will include at least one two-hour session during orientation training.
- Legal training is led by Chief Legal Advisor, Troy F. Kaplan, Esq. MBA – a leading Medical Cannabis attorney with nationwide industry experience, or his trained representative. Mr. Kaplan has developed a comprehensive legal training program covering Federal laws related to Marijuana, sentencing guidelines, relevant case law, proper guidelines regarding patient confidentiality, and best-practices in dispensary facility operations. Other topics will include the rules and regulations of the dispensary facility, sexual harassment training, effective interaction with law enforcement personnel and the rights and responsibilities of Medical Marijuana patients. Legal training will include at least one two-hour session during orientation training.
- Supplemental legal training specific to Connecticut law, in particular statutes, regulations, and case law as it relates to Medical Marijuana in the State, will be led by a locally licensed attorney. The legal obligations of licensed dispensary facility and production facilities will be emphasized. Supplemental legal training will include at least one two-hour session during orientation training. As the law develops further, continuing education sessions will be offered to staff from time to time.
- Safety and security training is led by the Bernie Sullivan, Chief Security Advisor, or his trained representative. Topics include acceptable currency identification and counterfeit detection, lock and alarm procedures, perimeter and entrance control, robbery response techniques, raid preparedness, conflict resolution techniques and diversion, theft and loss detection techniques. Safety and security training will include at least one three-session

during orientation training. As needed, we will invite members of our security team who are retired law enforcement to provide continuing education and situational awareness modules relating to diversion and best practices.

- Alarm system and restricted access system training is led by the Security Manager. Topics include the location of the alarm system components, particularly the panic alarms and holdup alarms, the operation of the duress alarm, and the proper practices with regards to the biometric locks. Diversion, theft and loss detection techniques will be emphasized during this module again. Alarm system and restricted access system training will include at least one one-hour session during orientation training.
- Basics of Marijuana training is led by the company QA/QC and Inventory Procurement personnel. Topics include the history of Cannabis, hemp, Medical Marijuana, and the various forms of Medical Marijuana products currently available. Cannabis genetics and the specific effects of medicinal strains, particularly those dispensed by the dispensary facility will be emphasized. Basics of Medical Marijuana will include at least one one-hour session during orientation training.
- Crises Preparation & Prevention training is led by the Security Manger. Topics include the preparation for the handling of any crises that affects the security or operation of the facility in the event of a strike, fire, flood, or other natural disaster, or other situations involving local, state, or national emergency. The lesson will focus on crises prevention techniques as well. Crises Preparation & Prevention will include at least one one-hour session during orientation training.

A professional human resources management firm will provide assistance with the performance review process for all employees, staff recruitment efforts for each department, and proper file management. Local legal counsel will be retained to regularly provide on-site compliance checks and training seminars for all staff members.

Security Training Details

Constitution Care LLC will train security personnel in industry standards and crime prevention prior to deployment. All security personnel will be required to complete a nationally developed safety training program, a formal evaluation, and an orientation and annual training seminar as a condition of employment within Constitution Care LLC's dispensary facility.

All dispensary facility personnel in every department will be trained in conflict resolution and the handling of emergency situations, including procedures for communicating with local law enforcement.

Furthermore, all dispensary facility employees, including security personnel, will receive a copy of Constitution Care LLC's Safety Handbook during their orientation training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of patients, dispensary facility staff, and the surrounding area.

In addition, dispensary facility employees will be trained on the operation of the alarm and camera systems, if appropriate given the staff member's responsibilities within the organization. A certificate of completion for all training will be provided to trained participants.

Protection Against Diversion, Theft or Loss Training

Constitution Care LLC's training for the protection against diversion, theft or loss will include the following:

- Personalized training led by the Chief Security Advisor (or a trained representative) and the Security Manager for all dispensary facility staff during orientation training focusing on detection, prevention, and reporting techniques and procedures;
- Personalized training led by the Security Manager for all authorized dispensary facility staff during orientation training focusing on the proper use and maintenance of security equipment, proper protocol when an incident occurs, and other best-practices techniques for detection and prevention;
- Continuing education courses for all security personnel, including any trained guards affiliated with the Fraternal Order of Police, to ensure that even the experienced experts on staff maintain an on-going commitment to always be up to date on new technologies, policies, and procedures;
- A review course covering Constitution Care LLC's Safety Handbook during orientation training;
- Customized training based on the layout of the dispensary facility to ensure all staff members are familiar with the premises and can better assist security personnel and/or local law enforcement upon the happening of any incident;
- Authorized dispensary facility employees will be trained one-on-one by the Dispensary Facility Manager, or a properly trained and authorized dispensary, in internal loss-prevention methods, standard retail cash-handling procedures, tracking of daily

reimbursements and expenses, and tracking inventory using GramTracker and Adilas Software (a seed-to-sale inventory tracking systems intended to be utilized by the dispensary facility); and

- Appropriate authorized staff members will be trained one-on-one by the Security Manager to carefully screen each patient and primary caregiver to ensure that they are properly registered in accordance with Connecticut law and do not exceed the one-month supply limit determined by law.

Prevention of Dispensing Errors Training

Constitution Care LLC's training for the prevention of dispensing errors will include the following:

- All dispensaries and dispensary technicians will be trained one-on-one by the Dispensary Facility Manager to detect, prevent, and report any act or omission relating to the dispensing of Medical Marijuana products that result in, or may be reasonably expected to result in, injury to or death of a qualifying patient or results in any detrimental change to the medical treatment for the patient;
- All dispensaries and dispensary technicians will be trained one-on-one by the Dispensary Facility Manager on all facility policies and procedures that ensure strict compliance with section 21a-408-48 of the Regulations of Connecticut State Agencies;
- All dispensaries and dispensary technicians will be trained one-on-one by the Dispensary Facility Manager in the proper protocol for contacting the local law enforcement agency, the Department of Consumer Protection, and the Drug Control Division of the Department of Consumer Protection when appropriate given a dispensing error;
- All dispensaries and dispensary technicians will be trained one-on-one by the Dispensary Facility Manager to perform a quality assurance review for each dispensing error; and
- All dispensaries and dispensary technicians will be trained one-on-one by the Dispensary Facility Manager in the proper creation and storage of all records relating to a dispensing error.

In an effort to prevent dispensing errors, Constitution Care LLC will do the following:

- Establish and communicate a dispensary facility standard work

flow;

- Report and record all events that affect the quality of service to patients and primary caregivers;
- Mandate programs staffed by personnel from other jurisdictions to discuss pitfalls, common errors and issue response;
- Provide on-site highly supervised training for key personnel in operational facilities
- Address and remediate any service breakdowns; and
- Utilize on-going training and continuing education.

The above listed procedures will help mitigate some of the most common causes of errors cited by pharmacists. Such common causes, according to the Massachusetts Board of Registration in Pharmacy's *Medication Error Study* commissioned by the Massachusetts Office of Health and Human Services, are as follows:

- 62% - excess phone calls
- 59% - unusually busy day
- 53% - increased customer volume
- 41% - no double-check
- 32% - staff shortage
- 29% - no time to counsel
- 29% - similar drug names
- 26% - illegible prescription
- 24% - misinterpreted prescription

Prevention of Misuse of Confidential Information Training

Constitution Care LLC's training for the prevention of the misuse of confidential information will include the following:

- Dispensary facility employees will be trained by the Dispensary Facility Manager, or a trained and authorized dispensary, the proper protocol for the handling of confidential patient information during orientation training;
- Appropriate authorized staff members will be trained one-on-one by the Dispensary Facility Manager and company counsel how patient information relates to HIPAA, techniques to prevent the disclosure of patient-specific information, the proper procedures for keeping patient records, the proper procedures for any electronic data entry, and methods to strictly adhere to all

Connecticut law, particularly section 21a-408-33 of the Regulations of Connecticut State Agencies; and

- All staff will be trained on, review and sign a Code of Conduct during orientation training, which states Constitution Care LLC's policies and procedures as they pertain to confidentiality and other sensitive facility matters.

2.0 TRAINING & EDUCATION PROGRAM DESIGN

Constitution Care LLC's training and education consists of leader-led, on-the-job training programs. Such programs are designed to guide skilled trainers (usually departmental management) a step-by-step guide through delivering proper and effective training while accommodating the on-going needs of the dispensary facility.

- The program consists mainly of demonstrations by and discussions with the trainers, as well as on-the-job shadowing and practice. There is some study time where the trainee is left alone to learn the necessary information and procedures.
- Basic knowledge is tested using "quizzes," and more comprehensive knowledge and skills are tested with a "Final Performance Test" upon the completion of training. Performance testing is conducted so that trainers and upper management can ensure that the trainee is ready to be a fully functioning employee once training has wrapped.
- Each training module or program is detailed in that program's *Leader's Guide*. Every program has a *Leader's Guide* and a companion *Trainee Workbook*.

Leader's Guides

Definition of "Leader's Guide." Each training module in the overall curriculum has a corresponding *Leader's Guide* to help train associates to become high-performing members of their department team. The *Leader's Guide* contains instructions on how to train (in general) and how specifically to train in the designated subject area. It contains important tools to be used in the training process. It is not meant to be an operational reference; it is solely meant to guide training procedures.

Intended User. Every trainer should have their own copy of a *Leader's Guide* to mark up, highlight, and make their own. They will use this same copy indefinitely for all trainees unless an updated version is released. If an updated version is produced, the old version would be replaced with the newer version.

Human Resources Copy. One master copy of each *Leader's Guide* should reside with the Human Resources personnel for reference.

Tab Organization. Tabbed dividers within the *Leader's Guide* make it easy to find the information that trainers need. The tabs include the following:

- How to Train Effectively
- Learning Objectives & Facilitator Scripts
- Quizzes
- Final Performance Test

Trainee Workbook

Every dispensary facility employee will be issued their own individual *Trainee Workbook* during orientation training. The workbook contains pertinent operational guidelines and has ample space for handwritten notes so that each trainee has the opportunity to learn in the most effective means possible. Highlights of the *Trainee Workbook* include the following:

- Each trainee has their own *Trainee Workbook* that allows them to jot down notes and reminders, write down specific information discussed in each day's recap, and record answers to questions, etc.
- The *Trainee Workbook* acts as an accompaniment to the *Leader's Guide*, used as a tool for the trainee.
- A copy of the Final Performance Test is included in the *Trainee Workbook* as a reference. Each Trainee is responsible to know all aspects of the business for which they will be held accountable.

Operations Tools

Each department at Constitution Care LLC has its own *Operations Manual* that is intended to be a one-stop collection for all policies and procedures related to that department. *Operations Manuals* are considered confidential company property and may not be taken off the premises. Some highlights of the *Operations Manuals* include the following:

- The *Operations Manuals* and all supplemental operational references are the most critical tools in the training process. The *Leader's Guide* instructs the trainer to utilize specific sections of these materials throughout the training.
- The *Operations Manual* and supplemental operational references are given to employees as a readily accessible source for them to

retain for the future and references as needed in their various roles.

- An “Updates” appendix is included in the manual for staff to collect new policies and procedures as they are released. Once a new version of the manual is published, staff may discard the old version and reference the new one. In addition, instructions for how to update the manual are provided as the first page in each department’s *Operations Manual*.
- Each department’s manager is responsible for keeping a copy of the most up-to-date manual available to employees for on-going reference.

Job Aids

There are a number of operational “Job Aids” that are stored in each dispensary facility department. Job Aids include items such as daily checklists, packaging charts, weight charts, etc. Such documents are available for reference and utilization during the training and education of employees but are also for daily use during normal operations.

3.0 TRAINING AND EDUCATION CURRICULUM

Below are sample overviews of several mandatory training modules for the training and education of all Constitution Care LLC employees. More advanced courses will be offered after the facility is operational for three months and will be offered at regular intervals over time from that point forward.

Medical Marijuana and the Law

Overview of Medical Marijuana Law & History in U.S.		✱
Description:	Brief outline of the history of Medical Marijuana law in the United States, starting with Prop 215 in California and leading up to a brief synopsis of the current wave of Medical Marijuana laws sweeping the country.	
Objectives:	Educate the dispensary facility staff members about the politics of Medical Marijuana and the differences and similarities between the Connecticut program and those of other states, including how regulations work in different areas.	
Length:	2 hours	
Method:	Lecture & Handout	
Overview of Connecticut Medical Marijuana Law		✱

APPENDIX I-7: Response to RFA Section C, Question 7



Description:	Overview of the Medical Marijuana laws in Connecticut, covering key points of legislation and rules that dispensary facilities and production facilities must follow to be compliant.
Objectives:	Dispensary facility staff will learn about the history of Medical Marijuana law in Connecticut and how it relates to business processes and procedures for a dispensary facility. The module will focus on policies for the facility to be compliant with the law. The course will also identify key aspects of operations that require special attention in order to function with strict adherence to the law, such as the handling of confidential patient information.
Length:	2 hours
Method:	Lecture & Handout
Connecticut Legislation and Relationship to US Federal Law	
Description:	This course breaks down the legality of Medical Marijuana use based on the sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies and the relationship of these laws to federal legislation. Compliance issues regarding both Federal and state law will be addressed.
Objectives:	This course will highlight the Connecticut laws as they compare to federal regulations where Marijuana is classified as a Schedule I drug. The course will highlight how the federal government does not recognize any medicinal use of Marijuana, actions taken by the federal government in past years, the roles of the DOJ, DEA and FDA, and current federal policies as set forth by the Obama Administration.
Length:	1.5 hours
Method:	Lecture & Handout

Operational Policies & Procedures

Key Dispensary Facility Operational Standards	
Description:	This course details key points of the Connecticut legislation regarding proper handling procedures, dispensing procedures, verification of patients and primary caregivers, techniques to prevent dispensing errors, the proper handling of confidential patient information, laws regarding marketing (advertising/incentives), security requirements, and the prevention of diversion, theft or loss.

<p>Objectives:</p>	<p>Employees will learn the proper procedures according to the Connecticut law for the handling and dispensing of Medical Marijuana to qualified patients and primary caregivers, including the process for a patient or primary caregiver to become registered in the state.</p> <p>Employees will be educated in key methods of recognizing misrepresentations by qualifying patients and caregivers, including fraudulent methods used to obtain Medical Marijuana illegally or in excess of the one-month supply, and communication methods to circumvent situations such as this. Employees will learn diversion prevention techniques involving effective identification and carding procedures, how to verify registration certificates, and how to spot forged driver’s licenses.</p> <p>Employees will learn the proper procedures for dispensing so as to remain strictly compliant with the law at all times and to prevent dispensing errors. All employees will be educated in the proper handling of confidential patient information and how to prevent misuse of the same.</p> <p>This course will teach the employee specific Connecticut regulations regarding advertising, promotion, and marketing of Medical Marijuana under the law, allowable signage including marketing incentives that are prohibited to ensure compliance with the law.</p> <p>Employees are educated in techniques for the prevention of diversion, theft or loss, and company procedures for operational compliance with the law. Additional topics include the company security plan and procedures for safety of the facility, including a review of security compliance, limited access areas, daily security procedures and transportation (delivery) safety and procedures.</p> <p>The course educates employees about the medicinal effects of Marijuana on the human body, including a review of the different effects by strain genotype. The lesson will highlight the effects of Marijuana while driving or operating heavy machine and the relationship between medical studies and Connecticut law, which prohibits use of Medical Marijuana while driving. Employees will learn the Connecticut laws pertaining to product labeling and packaging, including the specific requirements for labels and receipts.</p>
<p>Length:</p>	<p>4 hours</p>
<p>Method:</p>	<p>Lecture & Handout</p>
<p>Business Structure & the Relationship of Dispensary Facilities and Production Facilities</p>	
<p>Description:</p>	<p>This course details Connecticut law pertaining to cultivation, production, manufacturing, transportation, and sales of Medical Marijuana from both a dispensary facility and production facility viewpoint including Constitution Care LLC-specific processes.</p>
<p>Objectives:</p>	<p>Employees will learn the actual Connecticut statutes regarding sales and how the business structure of Constitution Care LLC has been designed to operate in strict compliance with all rules, laws, guidelines and regulations. Employees also learn the processes and procedures of dispensary sales, transportation/delivery and state compliant disposal procedures.</p>
<p>Length:</p>	<p>1.75 hours</p>
<p>Method:</p>	<p>Lecture & Handout</p>

4.0 CONTINUING EDUCATION OPPORTUNITIES

All Constitution Care LLC employees will be given ample opportunities for continuing education during their careers with the company. We feel it is vital to the health of the organization to keep our staff well-informed of new studies, best-practices, legal updates, and other areas where increased knowledge can translate into increased operational improvement. We strive to be the most well-informed dispensary facility in the nation – a goal which begins with first-rate performance management.

Introduction to Coaching

Constitution Care LLC will focus time and energy in developing its managers and supervisors into coaches through a customized training program. Managers and supervisors become coaches when they use feedback on an on-going basis to reinforce positive behavior or counsel employees to correct actions that do not correlate with the organization's vision or mission. Management is often a one-way line of communication, but coaching must be work in both directions with the coach and the team constantly giving and receiving feedback to each other. Such methods strengthen organizations and builds trust, confidence, and open lines of communication within the company.

In virtually every organization, the level of performance-output provided by the staff will form the familiar bell shaped curve. At one end of the curve there will be a small number of people whose performance is outstanding or distinguished. At the other end will be another small number whose performance-output and attitude is unacceptable. In the middle will be the great majority of employees who will fall between the two extremes of distinguished and unacceptable. This group is comprised of the emblematic, solid performers of the business. Such employees whose performance-output lies somewhere in the middle form the backbone of the company, yet the great majority of these employees are often ignored and unseen in many organizations because management's attention is primarily spent on those who do not perform competently, consistently and at a fully acceptable level (i.e. the small number of employees whose performance-output is unacceptable).

A skilled supervisor makes sure that solid performers discover there are positive consequences for maintaining good attendance records, handling job responsibilities well, and committing themselves to tending to all of the other routine tasks that often go unnoticed. This is vital because the greatest opportunity for increasing overall organizational performance lies with the solid, consistent performers. It follows that the best way to spur overall company performance-output improvement is to make sure that supervisors provide positive acknowledgment and recognition whenever employee behavior calls for such credit.

Conversely, a skilled supervisor should also give recognition for poor performance or attitude and confront the offending employees in a professional manner in the spirit of change and resolution.

A coach achieves this by communicating timely, effectively and honestly to all employees despite where they fall on the above-described bell curve. Such communication will take place as soon as practical and will not be unduly delayed. The following are examples of how such communications will be handled by our coaches:

- **Good Performers:** Be specific, direct and honest. Saying, "You're a great person" isn't as powerful as, "You helped that upset staff member by staying calm yourself."
- **Poor Performers:** Be specific, direct and honest. "You're not meeting your processing quota" isn't as specific and direct as, "The last time we talked I went over exactly what expectations we have for you and everybody else in regard to processing. It's ___ projects an hour, ___ projects a day. You're still a long way away from these numbers. Can you help me understand the problem?"

Introduction to Counseling

Counseling is a skill used to correct or prevent performance deficiencies and behavioral problems. It is designed to help an employee examine conditions, attitudes, feelings, perceptions and behavior patterns that may be a deficiency hindering effective on-the-job performance and/or causing problems for the employee. Constitution Care LLC will train and develop managers and supervisors to become effective counselors.

Verbal Counseling & Final Warnings. There's an old saying in employee/company relations: "If it isn't in writing, it didn't happen."

Even verbal counseling should be documented. The documentation, which should include the date and time of the session, serves to memorialize the session so that it can be referred to if necessary.

Generally speaking, an employee should only be counseled once. Sitting down and talking to an employee over and over about an issue typically intimidates the employee, frustrates the supervisor and negates the legitimacy of the progressive disciplinary process as opposed to correcting the behavior and mitigating the liability of the organization. Similarly, when preparing to deliver a "probation warning" to an employee, managers and supervisors should be prepared to follow through with the warning and or established repercussions for continued violations. The manager or supervisor and the employee should both be aware that a probationary warning is the step directly preceding termination and that if the behavior is not corrected the next step is termination without an extended period for remediation.

Warning Notices. The procedure for written warning notices, necessary for the documentation of disciplinary action, will be in accordance with following guidelines:

- The specific date, time and location of the infraction and the specific nature of the infraction should be detailed on the notice.
- The present disciplinary process utilized (i.e.: verbal counseling, written warning, probation/final warning, etc.).
- Review employee history by looking at prior performance evaluations. Warning notices will be sequentially numbered so that managers or supervisors can easily review records to determine if the employee is a repeat offender.
- Identify the type of problem: Attendance, Performance or Behavior/Conduct. These three categories describe the infinite scale of possible problems a manager or supervisor will face with an employee.

Attendance: Attendance problems arise when an employee fails to meet Constitution Care LLC's expectation that he/she will be to work on time every day.

Performance: This category involves issues with the quality and quantity of an employee's work. These include issues such as failure to meet deadlines, failure to attain performance or training goals, provoking customer complaints or wasting time.

Behavior/Conduct: This category involves issues that deal with violating Constitution Care LLC's rules or standards. Sample issues include inappropriate use of company property, failure to comply with expense reimbursement procedures, safety violations, and theft of company property/resources.

Sample Forms

Counseling Report (Sample Form)

Counseling Report

Employee Name _____ Job Title _____

Date of counseling session _____

State reason for counseling _____

Actions for Improvement

1. _____

2. _____

3. _____

4. _____

Date to follow-up effect of counseling and actions for improvement _____

Employee comments:

Employee Signature*

Date

Manager Signature

Date

HR Representative

Date

**Employee's signature indicates receipt, not agreement with actions taken.*

Disciplinary Warning Notice (Sample Form)

This memo template may be used for a written reprimand – generally if there is a serious violation of policy, repeated minor violations of policies, and so forth. A written reprimand can alternatively take a warning notice format, provided on the prior page.

Memo

To: Employee
From: Manager
CC: Personnel file & HR
Date: 9/29/15
Re: Written Reprimand

The purpose of this memorandum is to discuss the issues discussed at our meeting of **date**, attended by _____, to discuss your performance issues. On January 8, 2015, you missed a key company deadline by failing to turn in your portion of Project X. Your supervisor met with you at that time and informed you that your performance was unacceptable and that you needed to meet all future deadlines. You agreed. Last week, you failed to timely complete your portion of the new software rollout, which resulted in your department not meeting another key company deadline.

You are required to meet all company deadlines. If you will have a problem meeting a deadline, you need to inform your supervisor well in advance so that your supervisor can assist you in meeting the deadline or provide additional resources.

If you miss any further deadlines, this will be grounds for further disciplinary action, up to and including termination from employment.

_____ Employee Signature*	_____ Date
_____ Manager Signature	_____ Date
_____ HR Representative	_____ Date

**Employee's signature indicates receipt, not agreement with actions taken.*

5.0 HIPAA TRAINING

HIPAA requires that every pharmacy, and likely the dispensary facility as well, appoint a Privacy Officer who must develop and regularly update the organization's privacy policies and procedures. At Constitution Care LLC, the Dispensary Facility Manager will serve as the Privacy Officer and will also be responsible for all information security requirements, including the requirement that patient information remain confidential. The Privacy Officer will draft and implement the appropriate policies and procedures, keep such documents on file, and collaborate with other personnel to ensure strict compliance. They will also be responsible for employee HIPAA training and Protected Health Information ("PHI") training. The Privacy Officer will also train employees on the Notice of Privacy Practices which explicitly describe how PHI will be used and disclosed within and outside the dispensary facility setting.

All dispensary facility employees are required to participate in a basic HIPAA pharmacy and PHI training program during orientation training. Constitution Care LLC will use a power point presentation and handout for staff to utilize. Upon completion of the training program, staff will be required to pass a test before being permitted to commence work within the dispensary facility. Staff will also be required to sign a Confidentiality and Responsibility Agreement outlining Connecticut's confidentiality requirements as well as company policies regarding the handling of private patient information.

The essential goal of the HIPAA and PHI training program is to minimize the risk of disclosure of private patient data and PHI. It will become clear to all dispensary facility employees exactly who is authorized to access PHI and for what purposes. A hierarchy will be established and respected that clearly identifies the levels of access correlating to each job function within the facility. Employees will be taught to follow reasonable safeguards to protect information as required by law. Constitution Care LLC will maintain a record of all employee training.

The following is a sample/illustrative HIPAA training assessment test given to dispensary facility employees after completion of the HIPAA pharmacy training program that will be modified given the unique aspects of our dispensary facility and the products it handles:

HIPAA Training Assessment

Employee name _____

1. HIPAA is a federal law that regulates how patient health information and records are handled. True or False?
2. Pharmacists/dispensaries are the only health care providers at our facility who are affected by HIPAA? True or False?
3. The Privacy Officer must be the owner or manager of the pharmacy? True or False?
4. Is a dispensary technician allowed to tell the patient if a prescription has been called in for her?
 - A. No, a technician should tell the patient that she cannot provide confidential information over the phone.
 - B. N/A, patients with qualifying conditions cannot call in orders.
 - C. Yes, the technician can tell the patient but only if the patient has already signed the acknowledgement that she has received the pharmacy's notice of privacy practices.
 - D. Yes, the technician can tell the patient.
5. Two technicians at the Dispensary Facility are chatting in line at the deli, waiting to order sandwiches for lunch. William overhears their conversation about the 97 year old man who buys two grams of Medical Marijuana every month. William knows his father is 97 and a customer of the Dispensary Facility.

Which of the following is protected health information that should not have been discussed at the deli:

- A. The patient's age
 - B. The product purchase
 - C. The amount purchased
 - D. A and B and C
 - E. None of the above since the patient name was not spoken.
6. True or False – HIPAA prohibits sending a fax to the doctor's office with a refill request since the request contains the patient's name and the name, strength, quantity and last fill date of the drug?
 7. True or False -HIPAA security rules require health care workers to shred all waste paper that contains PHI?

8. The clerk at the Dispensary Facility is often the staff member who asks patients to sign the electronic signature pad or paper log acknowledging they have been provided with Family Pharmacy's Notice of Privacy Practices. Henry is a patient at the Dispensary Facility who has come in to pick up a prescription. He asks Allison why he should sign the acknowledgement document. She correctly and politely explains why but he refuses to sign the document. What should the clerk do now?
- A. Sign his name for him after he leaves the Dispensary Facility.
 - B. Refuse to give him his prescription until he signs.
 - C. Give him his prescription and do nothing else
 - D. Allow him to pick up his prescription but make a note to the dispensary or Privacy Officer that he refused to acknowledge receipt of the privacy notice.
9. Dave, the staff dispensary, was recently designated the Privacy Officer, prompting a revision of the Notice. Mr. Henry is back for another refill but wants to know why Allison wants a signature for HIPAA. What should she say?
- A. I think we lost track of who already signed – we just started making everyone redo it.
 - B. Protecting your private health information has always been a priority at Constitution Care LLC. We named a new HIPAA Privacy Officer after Jake, the technician, and his family moved away. If you have questions or complaints about the privacy of your health information talk to Dave, his contact information is on the back of this notice.
 - C. So we can start selling our patient lists.
 - D. Just sign it!
10. One of our technicians, Marie, faxes a prescription refill request for patient Tom Smith's prescription. Later that day, the prescription is approved by the physician's office. Marie calls Mr. Smith's home to let him know that his prescription is ready, but his daughter answers the phone and tells Marie that Mr. Thatcher is not home. Marie has heard about the HIPAA requirement to protect an individual patient's health information and is unsure what she should do.
- Can Marie tell Mr. Smith's daughter that his prescription is ready?
- A. Yes, Marie should tell the daughter that Mr. Thatcher's prescription is ready
 - B. No, Marie should hang up the phone as soon as she finds out Mr. Thatcher is not home.
 - C. No, Marie should ask when Mr. Thatcher will be home and call back then.
 - D. Marie should not have called in the first place. She should wait until Mr. Thatcher calls the Dispensary Facility to ask about the status of his prescription.
11. Our dispensary Allison is unsure whether or not HIPAA allows someone other than the Mrs. Smith, here Mr. Thatcher, to pick up her prescription. What should Allison do?

- A. Tell Mrs. Smith that she will need to bring in a letter granting Mr. Thatcher's permission for her to pick up his prescription.
 - B. If Mrs. Smith has not already signed the acknowledgement of receiving the Dispensary Facility's Notice of Privacy Practices, she should include it in the prescription bag and ask Mrs. Smith to sign the document used to collect written acknowledgements of receipt of the Notice.
 - C. Allow Mr. Thatcher to pick up Mrs. Smith's prescription if he is Mrs. Smith's registered primary caregiver.
 - D. Both B and C.
12. The Dispensary Facility Manager receives a phone call from a company requesting to purchase a list of all of the facility's HIV patients. The company plans to contact all of the patients to tell them about their new medication and to send them a \$5 coupon for use in purchasing the new medication.
- Does HIPAA address this situation? Yes or No.
- What should the Dispensary Facility Manager do?
- A. Ask the company representative if he wants a list of all patients from this year or from previous years.
 - B. Ask the representative, "How much per patient record?"
 - C. Advise the representative that the information is protected health information under HIPAA and cannot be used in this way unless the dispensary has acquired the patient's written authorization for this use and disclosure.
 - D. Let the representative have the information as long as the patient has received the Dispensary Facility's Notice of Privacy Practices.
13. Judy has had a busy month of billing at Constitution Care LLC. In order to get caught up, she saves her work in and spreadsheet on a USB storage device to bring home with her. After finishing her work on her home computer, she emails a number of documents to be mailed in the morning to her work email. Which of the following is true?
- A. The PHI on the USB storage device is unsecured PHI.
 - B. The PHI attached to the email message is unsecured PHI.
 - C. Jeanie is only working with secure PHI since she is not transporting unshredded paper records.
 - D. Both A and B are true.
14. Judy walks to the coffee shop on her way to the Dispensary Facility the morning after bringing the spreadsheet with billing information home on a USB drive. She accidentally leaves the USB drive attached to her keychain at the coffee shop and there is no sign of her keys or the USB drive when she returns. Which of the following is true?

APPENDIX I-7: Response to RFA Section C, Question 7



- A. The Dispensary Facility must immediately call each of the 24 patients who had protected health information on the lost USB drive.
- B. The Dispensary Facility must notify each of the 24 patients who had protected health information on the lost USB drive in writing within 60 days
- C. The Dispensary Facility must place a notice in the local newspaper since protected health information of more than 10 patients was affected.
- D. The Dispensary Facility must immediately notify the Secretary of the U.S. Department of Health and Human Services.



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Appendix 18

Diversion, Theft and Loss Prevention Plan

In Re: RFA Section C Question 8

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

DIVERSION, THEFT AND LOSS PREVENTION PLAN

1.0 DIVERSION, THEFT, AND LOSS PREVENTION OVERVIEW

Constitution Care LLC's ability to prevent diversion, theft and loss of Medical Marijuana to the black market stems from three areas in which the organization excels: our people, our investment in next-generation security equipment and protocols, and our best-practices Policies & Procedures. Furthermore, our secure vault room (and TL-30 rated safe), and our security alarm and surveillance plan will provide additional measures against diversion, theft, and loss.

For more information regarding our security procedures, please refer to the Confidential Security Plan (Appendix A, Section L, Question 71).

2.0 OUR PEOPLE

Constitution Care LLC's ability to prevent diversion, theft or loss begins with its people. Constitution Care LLC is comprised of dedicated professionals guided by the highest standards of integrity. Leading the team's security efforts is Chief Security Advisor Bernard Sullivan. Bernard Sullivan, a Connecticut native, has dedicated over 25 years of service to the City of Hartford Police Department, including positions as Sergeant, Lieutenant, Captain, and Chief of Police, and has over 45 years of collective experience in law enforcement, security, and public safety. He has been the recipient of a plethora of awards, honors and recognitions for his services, including the Hartford Police Department Merit Award for Valor and the Chief's Medal of Valor. Mr. Sullivan has also served in roles as Director of Corporate Security for ITT Hartford Insurance Group, Commissioner of Public Safety for the State of Connecticut, Acting Police Chief for Central Connecticut State University, Chief of Staff to Speaker of the House of Representatives for the state of Connecticut, and Vice Chair of the Sandy Hook Advisory Commission. Mr. Sullivan is a life member and past President of the Connecticut Police Chiefs Association, and also serves as President of the 100 Club of Connecticut, an organization that supports surviving family members of public safety personnel who were killed in the line of duty.

Constitution Care LLC also intends to contract with the Fraternal Order of Police ("FOP"), the world's largest organization of sworn law enforcement officers, to supply the facility with well-trained guards to be on duty during all business hours. The company intends to hire retired expert law enforcement officers, specifically with drug enforcement and larceny prevention backgrounds. In general, security personnel will prevent nuisance activity and crime, including looking for any signs of diversion, theft or loss of Medical Marijuana products. Members of FOP have dedicated their lives to protecting and serving our communities. Constitution Care LLC welcomes their expertise and believes that the years of experience they bring to the table is a perfect match for registered dispensary facility needs.

The greatest threat of diversion, theft, and loss necessarily stems from the controlling organization itself. (Given our next-generation security equipment and procedures, outside access to the heavily monitored Medical Marijuana at the dispensary facility is unlikely.)

Bernard Sullivan and the facility's Security Manager will assist Constitution Care LLC in vetting potential staff members to ensure only professional, like-minded and trustworthy employees are hired.

In addition to the background check required by the Department of Consumer Protection (the "Department") for the dispensary facility employee, employee candidates must also complete personality tests, undergo comprehensive dispensary facility training, and fulfill performance testing requirements.

Additionally, all employees of Constitution Care LLC, including security personnel, will receive a copy of our Safety Handbook during their orientation training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of patients, dispensary facility staff and the surrounding area.

In addition, Constitution Care LLC intends to retain Sonitrol New England to install our state-of-the-art security alarm and surveillance system. Sonitrol New England is an experienced, reliable and well-qualified Connecticut security firm servicing commercial enterprises in the state since 1972. The contractor's goal is to ensure absolute safety and security measures for the dispensary facility. The contractor is deeply experienced, with demonstrated reliability over many years of service to demanding clients. Sonitrol New England will provide training to all necessary personnel on the operation of the security system. A certificate of completion of all training will be provided to trained participants.

Staffing the dispensary facility with the right people provides Constitution Care LLC the greatest opportunity to prevent diversion, theft and loss.

3.0 OUR SECURITY EQUIPMENT AND PROTOCOLS

Based on the layout of the dispensary facility, Connecticut law, particularly sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes (the "Act") and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies (the "Regulations"), Constitution Care LLC Policies & Procedures, decades of crime prevention experience, and all applicable rules, regulations and guidelines, a comprehensive security system has been designed to monitor and protect the dispensary facility with increased attention to the most vulnerable areas. The system includes high-resolution, internet-protocol cameras, biometric locks, and live-streaming, encrypted video feeds to the internet (recorded digitally and remotely accessible), and various motion sensors and alarms.

The Constitution Care LLC security system features:

- Indoor, high-resolution, 360°, internet-protocol video cameras
- Outdoor, high-resolution, 90°, internet-protocol video cameras

- Outdoor, high-resolution, 180°, internet-protocol video cameras
- Live-streaming, encrypted video feeds via internet, remotely accessible
- Glass break detectors
- Biometric locks (thumbprint access)
- Motion sensors that instantaneously alert staff by remote device (cell phone) in the event of a potential unauthorized intrusion
- Panic buttons
- Cellular backup
- Closed-circuit television, digital storage

In addition to the security system consisting of a comprehensive surveillance system and alarm system, Constitution Care LLC will hire security personnel to routinely patrol the facility and neighborhood. Constitution Care LLC will employ internal loss-prevention methods, standard retail cash-handling procedures, and tracking of daily reimbursements and expenses as described in detail in the Constitution Care LLC Policies & Procedures Manual.

Constitution Care LLC also intends to install Adilas Software. This software and POS system is a unique seed-to-sale tracking of every gram of Marijuana to the .01 gram level. Processes unique to this software include tracking weight loss caused by evaporation. For example, every package of inventory is checked out and signed off on by two team members, and any difference in weight between the package time and the check-out time is recorded. All gross and net weights are tracked.

As demonstrated below, Constitution Care LLC will comply with all security requirements set forth by Connecticut's Act and Regulations.

4.0 BEST-PRACTICE POLICIES & PROCEDURES

Constitution Care LLC has gone to great lengths to ensure its written policies are comprehensive, practical and suited for the industry. We have worked with leading experts to develop comprehensive guides. All employees of Constitution Care LLC, including security personnel, will receive a copy of our Safety Handbook during their orientation training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff and the surrounding area.

Constitution Care LLC is committed to employing and abiding by all of its Policies & Procedures.

5.0 SECURITY PROCEDURES TO PREVENT DIVERSION, THEFT AND LOSS

Screening Process

Constitution Care LLC dispensary facility staff will carefully screen each new patient and primary caregiver to ensure that he or she is a registered in accordance with Connecticut's Act and Regulations. The screening process will include the following:

- Inspection and verification of the qualifying patient or primary caregiver registration certificate.
- Inspection of a Connecticut driver's license or Department of Motor Vehicles or other State-issued ID card establishing residency in the state that includes photo identification, name that matches the name on the registration certificate, age, and expiration date.

All returning patients or primary caregivers will be required to show their registration certificate as well as their Connecticut driver's license or Department of Motor Vehicles ID card to gain admittance to the dispensary facility.

Once inside the dispensary facility, all patients and/or primary caregivers are first required to present their registration certificate and Connecticut driver's license or Department of Motor Vehicles ID card to reception personnel before accessing facility services. Reception personnel will verify each patient's registration status using Constitution Care LLC's point-of-sale system. The point-of-sales system will not only verify that the qualified patient or primary caregiver is registered, it will also track the quantity and date of each Medical Marijuana sale to ensure strict compliance with the Act and Regulations regarding per-patient quantity limits.

When patients and/or primary caregivers enter the dispensary department, they will then present their registration certificate one more time to the dispensary so that the dispensary can verify that the patient has properly checked in at reception and therefore can have Medical Marijuana products dispensed to them.

Furthermore, Constitution Care LLC will post, in a location that is visible from the point of entry to the dispensary department, signage that indicates the following:

- The obligation of the qualified patient or primary caregiver to produce a valid registration certificate issued by the Department of Consumer Protection;
- The obligation of the qualified patient or primary caregiver to produce a valid, government-issued, photo identification document displaying proof of age that matches the name on the registration certificate; and

- The sale and use of Medical Marijuana and the diversion of Medical Marijuana for non-medical purposes, including to a third party, is a crime in violation of Connecticut law.

Quantity Limits

Patients will be permitted to visit the dispensary facility no more than two times per day. Pursuant to Connecticut law, Constitution Care LLC will limit patients' access to Medical Marijuana to no more than a one-month's supply, as determined by the Department of Consumer Protection, of Medical Marijuana products either at one (1) time or within a thirty (30)-day period.

Constitution Care LLC will utilize point-of-sale ("POS") software and bar-coding technology to help manage its transactions and track inventory. The patient database and POS software that Constitution Care LLC intends to use allows the tracking of individual patient purchases. All purchases will be tracked to alert staff when purchasing limits have been met. If a staff member attempts to authorize a sale over of the purchasing limit, the POS system will not allow the transaction to take place. Constitution Care LLC will maintain strict inventory controls to ensure stocking levels at the dispensary facility are commensurate with patients' needs and within the limits established by the Act and Regulations.

Site Patrol

Constitution Care LLC will ensure that a licensed guard is on duty at all times during business hours. Security personnel will routinely patrol the neighborhood to prevent nuisance activity or crime, looking for signs of diversion, preparation for illicit consumption of medicine, and illicit consumption of medicine.

Constitution Care LLC will train security personnel in industry standards and crime prevention prior to deployment. All security personnel will be required to complete a nationally developed safety training program, a formal evaluation, and an orientation and annual training seminar as a condition of employment at Constitution Care LLC.

Constitution Care LLC security personnel will also be trained in conflict resolution and the handling of emergency situations, including procedures for communicating with local law enforcement agencies.

Moreover, Constitution Care LLC intends to provide patients and neighbors with the name, phone number, and e-mail address of an on-site community relations staff person who will be responsible for addressing any concerns posed by our neighbors. Constitution Care LLC will encourage all neighboring residences and businesses to call this person to try to solve operating problems, if any, prior to them making any calls or complaints to the city.

6.0 PLAN TO ASSIST LOCAL LAW ENFORCEMENT AND THE DEPARTMENT OF CONSUMER PROTECTION WITH ENFORCEMENT

After over 25 years of service, our Chief Security Advisor, Bernard Sullivan, still maintains strong ties with Connecticut law enforcement agencies and personnel. Constitution Care LLC aims to have an open dialogue with the local Police Department—however, the Chief Security Advisor will facilitate communications to the extent necessary. Furthermore, the Security Manager will help ensure that Constitution Care LLC security protocols mesh seamlessly with law enforcement agency points of contact.

Additionally, Constitution Care LLC has incorporated strategically placed, internet-protocol security cameras which will stream encrypted feeds to the Web. If necessary or required by law, law enforcement agencies will be able to view our dispensary facility at any time through a wireless 3G or 4F Internet connection. Moreover, the feeds are digitally recorded and securely stored.

Finally, Constitution Care LLC looks forward to a strong partnership with the Department of Consumer Protection. In addition to complying with all enforcement rules and regulations, Constitution Care LLC will request meetings at the outset with the Commissioner of the Department of Consumer Protection (the “Commissioner”) and Department personnel who will have a role in the Medical Marijuana program. As with our organization internally, we believe the key to productive, meaningful relationships begins with open communication. Constitution Care LLC believes early meetings are integral to getting the program off on the right foot. Once the communication channels are open, we are confident that our responsive style will aid the Department with enforcement issues.

7.0 VAULT ROOM AND STORAGE OF PRODUCTS

Constitution Care LLC intends to store all Medical Marijuana in a private, secured vault that is climate-controlled and monitored by an external service, 24-hours a day, for both security and changes in environment (temperature and humidity). In addition to utilizing a TL-30 rated safe, Constitution Care LLC will convert the storage space into a walk-in safe (“vault”) and place the safe within the vault for added security. Constitution Care LLC will need to store processed product in the safe which will be secured within the vault, along with a secured/locked freezer and refrigerator to store alternative Medical Marijuana products (such as baked goods), requiring the conversion of the storage space into a vault room rather than only having a single a stand-alone safe. Constitution Care LLC will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of the XR500 access control system that Constitution Care LLC intends to install. For example, only employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials stored in the access control system. Additionally, only a limited number of authorized employees possessing a valid registration certificate will be granted access to the secured storage and staging areas. The vault room will

also be protected by a volumetric alarm and motion sensors. All limited access rooms will be monitored for security, temperature and humidity controls 24-hours a day by Sonitrol New England. Should alarms go off for security or changes in the environment, staff will be alerted promptly.

Constitution Care LLC will use sophisticated product-tracking software to monitor inventory and sales transactions. Should any Medical Marijuana be identified as lost or stolen, Constitution Care LLC will report this to local law enforcement by filing a police report within 24 hours of becoming aware of the theft or loss.

8.0 SECURITY ALARM AND SURVEILLANCE PLAN

The Security Department will ensure that the dispensary facility meets or exceeds the minimum security alarm system requirements set forth in Connecticut law.

Commercial Grade Equipment

The dispensary facility will utilize a comprehensive, commercial-grade, state-of-the-art security system to prevent and detect diversion, theft or loss of Medical Marijuana. Such security system will include door sensors, perimeter alarms, motion detectors, video cameras, twenty-four hour recordings, duress alarms, panic alarms, holdup alarms, automatic voice dialers, failure notification systems, the ability to immediately produce a clear color still photo with a minimum dpi of 9600, date and time stamps embedded on all recordings, and the ability to remain operational during a power outage.

Video Cameras

Prior to opening, Constitution Care LLC will install and maintain a closed-circuit video surveillance system (CCTV) that will operate 24 hours per day, 7 days per week. The video surveillance system will effectively cover the interior and exterior of the dispensary facility, including parking areas, rear alley areas, all entrances and exits to the building, limited-access areas, and all areas where Medical Marijuana is stored, handled or dispensed.

Constitution Care LLC intends to install at least five (5) cameras in the interior of the facility, each high resolution with 360 degree view capability and internet-protocol with encrypted video feed. The proposed cameras will be tamper-proof, ultra-compact, and equipped to offer high-resolution video recording (2048 x 1536 IP 3 Megapixel). Each camera comes equipped with a built-in 4GB Micro SD Card for digital recording at the camera with two-way audio. The 360 degree all-around view can capture an entire room; the panorama function and a quad view will show images from four different angles simultaneously.

When ceiling-mounted, the hemispheric camera displays the image area of the entire room. The 360 degree image in the hemisphere cameras is convex, particularly near the image borders.

These image sections are corrected for the viewer by the integrated distortion correction software, allowing a view of the scene from the usual perspective. The virtual PTZ/Zoom feature allows users to enlarge or move image sections within the hemisphere, just like a PTZ/Zoom camera. This is achieved without moving parts and allows one to view any area in the room (when ceiling-mounted; 180 degrees when wall-mounted). While a traditional analog system would require four cameras, one hemispheric camera allows users to see four directions simultaneously on the monitor in a quad view. The preset North position can be moved to any direction in the image; the camera generates the other three directions (East, South, West) automatically and stores them as separate views.

The indoor, high-resolution, IP video cameras will be installed at critical locations within the facility. More cameras may be utilized after further consultation with Sonitrol New England upon Constitution Care LLC's award of a dispensary facility license. All points of entry and exit will have video cameras angled so as to allow for the capture of clear and certain identification of any person entering or exiting the dispensary facility and all areas within the facility.

Additionally, Constitution Care LLC intends to install at least four (4) cameras on the exterior of the facility. The proposed cameras are ultra-rugged, tamper-proof, and equipped to offer two separate high-resolution image sensors for day/night video recording (2048 x 1536 IP 3 Megapixel). Each camera comes equipped with a built-in 4GB Micro SD Card for digital recording at the camera with two-way audio. The cameras offer a 180 degree view and are weatherproof from -30° to +60° C (-22° to +140° F) without the need for heating. The dual lens IP camera offers digital continuous zoom, pan and tilt and is integrated with a two-way audio microphone, speaker and PIR motion detector. Like the interior cameras, the exterior cameras will have an encrypted video feed.

The surveillance system will be pre-installed with battery packs which allows the system and all its components to remain fully operational during a power outage. If the system shuts down for any reason, the battery packs immediately supply the necessary power to allow uninterrupted protection and alarm monitoring. Sonitrol New England will check battery status during routine system inspections and after each incidence of use to ensure batteries are adequately charged. Moreover, Constitution Care LLC intend to connect the alarm system to an industrial grade or commercial grade uninterruptible power supply ("UPS"), which can provide up to 72 hours of uninterrupted power to the system in case of an extended power outage. The digital video recorder and the cameras, as well as the surveillance room's modem, router, wireless receiver, and monitors will connect to the UPS to ensure uninterrupted remote access to the system.

A failure notification system will be installed providing an alert to Sonitrol New England as well as to the dispensary facility, within five minutes of a triggering event causing the surveillance system's failure by phone, email, and text message.

Video Recording Capabilities

Every video camera utilized by the dispensary facility will record for 24 hours a day, 7 days a week. A synchronized and correctly set date and time stamp will be embedded on all recordings,

which will appear in a manner so as not to significantly obscure the picture. All video recording will allow for the production and exporting of clear color still images with a minimum of 9600 dpi from any camera image (live or recorded) in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will be able to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system.

The video surveillance system will have the capability to record, archive and playback video feed for a minimum of six (6) months. The decentralized IP concept (discussed in the Video Storage section below) incorporates a digital memory (SD card) for long-term recording in every camera. The PC is now used only for viewing, not for analysis or recording.

As a result, the cameras can record events even without PC/DVR and digitally record videos with sound for archiving purposes. Additionally, the system will allow for the production of a videodisc directly from the DVR unit; the video on the disc will be viewable on a Windows PC and will include any required software needed to view the video.

The Security Manager will personally oversee the erasure of all recordings prior to disposal or sale of the dispensary facility.

Video Storage

Usually cameras only supply the images, while the processing and recording are done later on a central PC or Digital Video Recorder that uses video management software. This traditional, centralized structure is unsuitable for high-resolution video systems, since it requires not only high network bandwidth, but also needs enormous PC processing power to support several cameras. These PC/DVR systems typically have high failure rates because the PC's are consistently running, overheating and recording. They put considerable strain on the PC/DVR, because they are expected to process dozens of high-resolution live cameras 24/7. As such, Constitution Care LLC will utilize a decentralized IP system.

Unlike other systems, the decentralized IP concept incorporates a digital memory (SD card) for long-term recording in every camera. The PC is now used only for viewing, not for analysis or recording. As a result, the cameras can record events even without PC/DVR and digitally record videos with sound for archiving purposes.

The system will be monitored by security personnel on multiple screens (at least one 19-inch or greater call-up monitor), within the secured surveillance room. In addition, the surveillance room will include a video printer capable of immediately producing a clear color still image with a minimum of 9600 dpi from any camera image (live or recorded) in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will be able to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. The

video surveillance system will use pan, tilt and zoom cameras located both inside and outside the facility. On-site security personnel will monitor all video feed from before opening until all persons have left the premises. Secured remote viewing will be available for security and safety personnel as well as senior management at any time through an Internet login system. In addition, Sonitrol New England will monitor the video feed 24 hours a day.

All recordings will be retained for at least six (6) months and made available for immediate viewing by the Commissioner or the Commissioner's authorized representative upon request. If Constitution Care LLC is aware of a pending criminal, civil or administrative investigation or legal proceeding for which a recording may contain relevant information, the Security Manager will ensure that the dispensary facility retains an unaltered copy of the recording until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the dispensary facility manager that it is not necessary to retain the recording.

Alarm System

Constitution Care LLC will install, maintain and use a professionally monitored trespass, robbery and burglary alarm system. Sonitrol New England, a recognized commercial security firm, will install the alarm/intrusion detection system. This system will be in-use and monitored 24 hours each day and consists of a door sensors, perimeter alarms, motion detectors, duress alarms, panic alarms, and holdup alarms. The alarm system will have an automatic voice dialer capable of sending a prerecorded voice message to law enforcement, public safety and/or emergency services agency requesting dispatch. A failure notification system will be installed providing an alert to the dispensary facility, particularly the Security Manager and Dispensary Facility Manager, within five minutes of the alarm system's failure by phone, email, and text message.

The alarm system will be designed to provide protection to the building perimeter and interior of the dispensary facility. The system will include the following components, at minimum:

- Seven (7) - Single Door Sensor Locations
- Nine (9) - Motion Detector Locations
- Seven (7) – Panic Alarm Locations
- Seven (7) – Holdup Alarm Locations

Constitution Care LLC's alarm system will also utilize a duress alarm, generated by the entry of a designated code into an arming station in order to signal that the alarm user is being forced to turn off the system. Constitution Care LLC intends to use a UL commercial encrypted DMP XR 500 Security Control Device.

More alarms may be added to the system after further consultation with Sonitrol New England upon Constitution Care LLC's award of a dispensary facility license. In particular, Constitution Care LLC will install audio glass break frequency detectors near all glass windows within the

dispensary facility to further secure the perimeter of the dispensary facility. Intrusion detection devices will be placed at all exterior doors and windows, roof entry points, and reception desks. All dispensary facility employees will be trained on the procedures for triggering the panic, holdup, and duress alarms.

The alarm system will monitor all sensors on a 24/7 basis as designated by a pre-determined time schedule that will be established. Security personnel and Sonitrol New England will receive notification when an alarm is triggered.

The alarm system will be pre-installed with battery packs which allows the system and all its components to remain fully operational during a power outage. If the system shuts down for any reason, the battery packs immediately supply the necessary power to allow uninterrupted protection and alarm monitoring. Sonitrol New England will check battery status during routine system inspections and after each incidence of use to ensure batteries are adequately charged. Moreover, Constitution Care LLC intend to connect the alarm system to an industrial grade or commercial grade uninterruptible power supply (“UPS”), which can provide up to 72 hours of uninterrupted power to the system in case of an extended power outage. The control panel and alarms will connect to the UPS to ensure uninterrupted power to the system.

A failure notification system will be installed providing an alert to Sonitrol New England as well as to the dispensary facility, within five minutes of a triggering event causing of the surveillance system’s failure by phone, email, and text message.

The alarm system will be inspected and all devices tested by Sonitrol New England to ensure proper functioning at least twice per year.

Maintenance and Access to the Security System Equipment

In order to ensure that the dispensary facility is secured and effectively monitored, Constitution Care LLC is committed to maintaining an electronic recording system that is in good working order at all times so as to prevent any theft, loss, destruction or alterations. Each dispensary facility employee or security system service employee who has been authorized to oversee the functioning of the security system will be required to report any malfunctioning of the system to the Dispensary Facility Manager and Security Manager immediately.

In addition, Sonitrol New England will inspect the security system at least two times a year to ensure that all components function correctly. The inspection consists of a system/communications test, system reset, check of all devices and equipment for proper operations, adjustment or replacement, including cleaning of all lenses, equipment or devices, replacement of any system batteries, if needed, and verification and updating of all subscriber information.

In order to attain the utmost safety and protection for the dispensary facility, security staff will limit access to the surveillance area to only those persons essential to surveillance operations.

Biometric locks will be used to secure the surveillance room, requiring all authorized employees to verify their fingerprint in order to gain access. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the surveillance room. Such surveillance area will always be locked and will not be used for any other function.

When appropriate, security staff will permit access to law enforcement agencies, security system service employees, the Commissioner or the Commissioner's authorized representative, and others when specifically approved by the Commissioner. The Security Department will maintain and make available upon request to the Commissioner or the Commissioner's authorized representative a current list of authorized dispensary facility employees and security system service employees that have access to the surveillance area.

Lighting

Constitution Care LLC will ensure sufficient lighting on the outside perimeter of the registered premises to be used each day between sunrise and sunset. Such lighting will adequately illuminate the registered dispensary facility and its immediate surrounding area, including parking and entry areas. Specifically, Constitution Care LLC intends to install 400-watt HID metal halide security lights.

Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates within 40 feet of the building. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.



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Appendix I9

Proposed Business Plan

In Re: RFA Section C

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

BUSINESS PLAN

1.0 EXECUTIVE SUMMARY

1.1 Overview

Constitution Care LLC is a State of Connecticut Limited Liability Company.

At Constitution Care LLC, our mission is to be the premier provider of Medical Marijuana services and products for qualifying patients in Connecticut (the “State”) by offering a better, natural way to manage their suffering and improve their lives. We are committed to leading the industry in patient care, innovation, social responsibility, education, and most especially compliance - consistently exceeding our patients’, partners’ and regulators’ expectations. In every jurisdiction in which we operate, working in close partnership with local leaders, law enforcement, medical/healthcare providers and patient and community advocacy groups, we offer financial and philanthropic support to ensure our neighbors benefit directly from our involvement in their communities. As demonstrated by our partnerships with the University of Connecticut-School of Pharmacy and the Connecticut Pharmacists Association, we will continue to work directly with the local scientific, healthcare and research communities to provide meaningful support to proprietary, Constitution Care LLC-funded research and development programs that ensure responsible and effective use of Medical Marijuana.

Our team is comprised of experts from every related discipline including pharmacy, clinical research, medicine, security, community engagement, technology, finance, legal/compliance, government, retail and education. As the first approved dispensary facility operator and only integrated ‘seed to sale’ platform in our nation’s Capitol- and as one of the largest providers of Medical Cannabis products and services in the highly regulated, medically-focused Arizona program, our team, our substantial capital base and our national platform offers the State of Connecticut proven execution and resources to ensure successful and compliant implementation of the State’s program.

Our company pledges: Quality, Experience, Security, Responsibility and Compliance.

Quality

At Constitution Care LLC, our primary goal is to provide the best care and products in a compliant and therapeutic environment. We believe in treatment one patient at a time, and every aspect of our business is focused on and driven by a combination of patient needs, our experience, and regulatory compliance. We have built our company around the principle that our internal standards should always exceed the requirements of the State. Our business model begins with training passionate personnel and ends when we offer patients the highest quality products and services. We rigorously test for safety, efficacy, purity, organic

methods and the absence of pesticides not only because we believe in quality and safety first, but because we know that quality and safety are the only guarantees of patient wellbeing. We willingly offer an accessible and transparent platform to healthcare providers precisely to encourage them to access and utilize our facilities and our technologies to maximize data collection and increase provider access points to patients so that together we can measure effectiveness and maximize outcomes.

The time we take to qualify our personnel is extensive and goes well beyond scientific and product knowledge. We leverage our “on the ground” experience in other regulated/medical jurisdictions to insure that our dispensaries and dispensary technicians are familiar with the unique handling requirements and compliance risks associated with Medical Marijuana in addition to the unique demands and expectations of a medically-driven, qualifying patient population. Our policies and procedures have been developed with both the regulatory environment and real world practice in mind, always seeking to instill good habits in our team members and to maintain disciplined operations that result in satisfied patients and regulators.

Experience

People. Our foundation is a comprehensive team of established professionals with 250 years of relevant experience, who believe in the merits of a highly-regulated, medically-focused, state-licensed program. We share a common vision that serves as the basis for all of our existing and future operations, and have established an organization that will serve our patients’ needs with the highest set of standards based on the principles of compliance, safety, security and quality of products and services.

- **Corporate Leadership** is comprised of proven executive officers drawn from some of the most successful global companies, including Staples, Amgen, Eastern Mountain Sports and the Goldman Sachs.

- **Healthcare/Research Team** is comprised of leading physicians, researchers and pharmacists whose previous experience originates from many of the world’s finest research, medical and healthcare policy institutions, such as the Yale-New Haven Medical System, the University of Connecticut School of Pharmacy, Harvard Medical School, the Dana Farber Cancer Institute, Cornell-Weil Medical Center and the University of Pennsylvania Medical School.

- **Compliance Team** is comprised of retired public servants, legal and policy experts with domain expertise in Medical Marijuana, related Connecticut

State and Federal laws, and includes several team members and advisors, one of whom served with distinction as the Speaker of the House in the Connecticut House of Representatives for six years.

- **Security Team** is comprised of retired members of the Connecticut law enforcement community (former Chief of Police of Hartford, current President of the 100 Club, Member of the Sandy Hook Advisory Commission, and former commissioner at the Connecticut Department of Public Safety), retired MARSOC (Marines Special Operations Command) personnel charged with embassy protection and extensive expertise in combat theatres, and retired members of narcotics interdiction teams from local municipal, state and Federal departments and agencies.

Over the past two years, CC has built the most unique and diversified team of professionals specifically selected to operate patient-focused Medical Marijuana dispensary facilities in highly regulated markets such as Connecticut.

Capital. Constitution Care LLC brings substantial financial and operational resources to ensure it will be a successful, sustainable, and reliable partner for the State of Connecticut. Our access to financial and human capital will serve as the foundation for the infrastructure needed to build state-of-the-art facilities, develop and employ fully-integrated, compliant proprietary security systems and protocols and to train personnel to ensure the absolute best patient experience and compliance. Furthermore, because Connecticut's program is relatively young and has not yet fully launched, Constitution Care LLC brings the additional and unique experience of having built a marketplace for a new Medical Marijuana program as its sister company continues to do in Washington, D.C. Constitution Care LLC will employ the lessons it has learned elsewhere to build not only the best team and infrastructure to support Connecticut's program, but also to lead the market creation process through education, outreach, supporting regulators and public service initiatives. We have learned that without patients and the support of healthcare providers and politicians – there is no program. With fewer than 1500 registered patients in the State of Connecticut, the lead-time, discipline and capital required to build a self-sustaining market will be substantial. To ensure the success of Connecticut's program, all stakeholders must collaborate and bring to bear substantial resources and domain expertise. Constitution Care LLC is committed to this long-term investment

Proven Execution. Through our affiliates, Constitution Care LLC operates best-in-class dispensary facilities with leading market shares in Arizona and Washington, DC. After a highly competitive application and selection process, our company was licensed to operate Medical Marijuana facilities in our nation's Capitol. Washington DC currently has the most restrictive Medical Marijuana

program in the United States and the only program with Federal and local involvement. With greater than 55.0% of the market share among registered patients, we are the only fully-integrated, licensee in the District of Columbia, and were the first approved operate a dispensary facility. This recognition of our facility is a testament to our unique combination of superior/organic products, professional staff, comforting/clean/safe environment, innovative service, and working, partnerships with charitable organizations, specialty pharmacies, healthcare providers and voluntary charitable care subsidies. From a regulatory and compliance perspective, the lengths we take to ensure inventory oversight, chain of custody management and security enable us to operate within stricter tolerances than those required by any statute or law. Our culture of transparency has served us well in other markets, and we intend to continue this practice so that every law enforcement and regulatory authority is aware of our stellar performance, and more importantly, our capacity to hold ourselves to a higher standard of care.

In Washington DC, our operations, policies and procedures are continually reviewed by the Department of Health, Metropolitan Police Department, Department of Protective Services and Department of Environmental Protection with positive reviews and zero deficiencies or citations (we have inspections every other week). We have never had a material breach of compliance in any operation, nationally, and maintain among the best compliance records in any of the jurisdictions where we operate. In the unfortunate event a breach does occur, we react immediately and consistently. We deal with the problem regardless of cost or consequence, and we follow up to ensure it does not occur again. We run training exercises that rewards self-reporting and require any deficiency be accompanied with a response plan in hand that details immediate remedial action (if necessary) to resolve any structural or procedural weaknesses. We have been asked to serve as an advisor for the District's revised law enforcement policies and we partner with and enjoy the support of the Fraternal Order of Police based on the quality of our proprietary safety and compliance measures.

In Arizona, our affiliates operate dispensary facilities in the nation's second most stringently regulated Medical Marijuana program and currently the most highly regulated not-for profit Medical Marijuana market in the United States. Again, we are market leaders and after a competitive selection process we were licensed to operate two-fully integrated Medical Marijuana platforms (up to four facilities – two dispensaries and two cultivation facilities). We remain one of the only organizations certified with perfect scores during compliance reviews with the Department of Health, Prescott and Tempe Police Departments, Tempe Department of Protective Services and Department of Environmental Protection. Furthermore, we are one of the only groups in the United States to have been selected in a competitive process to serve as a Medical Marijuana Licensee Manager for a Court Appointed Trustee during a receivership. We successfully, completed an organizational workout on behalf of the court and not only built the licensee's entire facility and team, but secured the State issued license with no deficiencies, launched the dispensary facility's operations and initiated its business development program prior to transitioning the asset back to the Trustee upon

completion of our assignment. In Connecticut, Constitution Care LLC will continue to leverage its expertise and proven methods to ensure that we bring not only leading business experience and financial capital, but proven operating systems and domain expertise in providing safe and quality Medical Marijuana products and services.

Security

At Constitution Care LLC, security is paramount. We establish and maintain security protocols and infrastructure that exceed all legal requirements. We utilize advanced systems complete with high-resolution PTZ cameras, magnetically-sealed doors, biometric access technology, motion detectors, window breaks, TL-30 safes, reinforced vault rooms, proprietary protocols, remote camera access for law enforcement and wireless emergency notification. We have developed proprietary cash management, inventory control systems, HIPAA compliant IT systems and patient POS/CRM/EMR systems that exceed the requirements of a traditional pharmacy or the program regulations to ensure real-time access and redundant oversight of products and corporate assets. Furthermore, Constitution Care LLC utilizes only systems and procedures that have been vetted in a Federal jurisdiction and approved by the relevant law enforcement agencies. Our approach should resonate with patients, healthcare providers and regulators. By combining best-in-class systems and pharmacy policies and procedures with these security protocols, our goal is to operate seamlessly and without incident as a contributing member of the local community healthcare/pharmacy spectrum, while decreasing the potential for regulatory anxiety that could result from a controversial program.

Compliance

Our policy is to exceed the standards for compliance set by both the State's Medical Marijuana program and its pharmacy regulations. As we have always done in other jurisdictions, we are committed to working in partnership with local and state law enforcement, government authorities and environmental organizations to ensure every aspect of our operation exceeds all standards and expectations. For example, we expect to utilize Pioneer Rx as our primary pharmacy IT/EMR platform in conjunction with several other integrated POS, CRM and inventory tracking systems to maintain redundant layers of oversight, patient support, company records and data collection. We have also developed proprietary record-keeping processes for financial and compliance purposes. Training modules and the company's policies and procedures were developed and implemented over several years and have undergone countless variations to insure their effectiveness. They incorporate and reinforce duplicative checks and balances drawn from the experience of operating in stringent, medically-focused regulatory environments and have been adjusted to exemplify the unique aspects of Connecticut's program.

Responsibility

We are a team comprised of Connecticut residents who intend to operate facilities in their own communities. We love our homes, families and neighbors. Our

corporate mission is to improve the lives of our patients and communities- but we seek to do more. We believe that our mission is our personal commitment. We have already begun several outreach initiatives to support local leaders and organizations including law enforcement, medical experts, universities, non-profits and advocacy groups. By supporting their efforts, we will never stop working to enhance the quality of life for our neighbors and for the communities where we also live and work.

Environment. We are committed to minimizing our ecological footprint and have developed proprietary energy and water conservation processes for both cultivation and dispensary facilities. In addition, we utilize design plans to incorporate repurposed and salvaged materials and ecologically sustainable materials. The green technologies we employ in other jurisdictions and build into our design plans will be adopted to suit Connecticut's climate. In some cases, our facilities actually contribute back into the power grid to benefit the entire community. Our facility and logo designs are distinctly clean and clinical to avoid unnecessary attention and enhance patient privacy.

Community and Compassionate Care. Our corporate policy is to allocate up to 15% of operating profit to local charitable organizations and programs including food banks, veteran groups, law enforcement/first responders, education, rehabilitation and low-income housing. With the assistance and guidance of local leadership, we have selected organizations representing each category mentioned above that directly supports the immediate communities in which we operate. Two immediate consequences of this local involvement were our recognition that (1) we needed to provide more low income subsidy to some of our patients in Washington, DC, and (2) we needed to provide a company-wide senior veteran discount. Both policies are core to our values and contribute to our mission by improving access for our patients and their communities. Through our affiliates, we have been the first in Arizona and Washington, DC to voluntarily institute subsidy/charity care programs for patients who qualify; including low-income, veterans and senior citizens. Our commitment is to continue this practice in Connecticut to ensure access to all patients, regardless of economic circumstances.

Scientific Community and Research. As we have done in other jurisdictions, by leveraging our Scientific Advisory Board, we will continue to engage with leading physicians, clinics and caseworkers using our proprietary HIPAA compliant IT systems to assist researchers in evaluating and researching the efficacy of Medical Cannabis across appropriate disease categories. We have partnered with Health Outcomes, Policy and Economics ("HOPE") Collaborative Group at the University of Connecticut School of Pharmacy to create a patient registry (IMPACT or "Improvements in Patient Ability due to Cannabis Therapy") to scientifically assess the effectiveness and safety of Medical Marijuana through the collection of patient-reported outcomes ("PROMs"). This is in addition to the ongoing roll out of the IMMAC program that is focused on AIDS/HIV efficacy in Washington, DC that we hope to implement in Connecticut.

We expect the outcomes data we collect through HOPE and UConn using the IMPACT registry, under the direction of Constitution Care LLC's Scientific Advisory Board will be the first collected and published dataset on Medical Marijuana outcomes in the United States. This will lay the groundwork, and set the standard for all other dispensary facilities and instill confidence that Constitution Care LLC and the State of Connecticut are at the forefront of providing Medical Marijuana in a private, controlled and medical environment. Above all, we are an organization that truly believes in our medical mission to serve our patients, and we are dedicated to mitigating their conditions, providing a holistic form of symptom management, and most of all to help them live the best possible life. Our bottom line will always be our patients.

It is our mission at Constitution Care LLC to provide the registered qualifying patients of Connecticut safe access to scientifically screened, consistent, pharmaceutical-grade Medical Marijuana, and comprehensive, individualized patient counseling services (such as the proprietary IMMAC Program described below) - within strict compliance of sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes (the "Act") and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies (the "Regulations"). We are committed to ensuring that every patient who enters our dispensary facility will experience a feeling of community, belonging, and wellness. Our success in fulfilling our vision is gauged by quantitatively measured patient satisfaction, team member excellence and happiness, the safety of our surrounding neighborhood, return on capital investment, and community support.

IMMAC Overview

Constitution Care LLC aims to redefine and set the standard in Medical Marijuana patient services by focusing on patient care in a strict medical model. Our extensive clinical experience leads us to the conclusion that a responsible Medical Marijuana dispensary facility must simultaneously address and track: (1) the positive impact of Marijuana on medical conditions and/or medication side effects, and (2) the ability to provide appropriate education, care, and treatment services for the classes of patients with multiple diagnoses and/or life problems, whose prescription adherence could be negatively affected either by a pre-existing susceptibility/condition, or by access to Medical Marijuana. This work, through the Integrated Medical Marijuana and Counseling ("IMMAC") program, should result in a repeatable model in other dispensary facilities in the State.

For the purposes of the State's Medical Marijuana program, Constitution Care LLC shall utilize the IMMAC program based primarily on the advice of local physicians' extensive counseling experience. The IMMAC program will be available to all Constitution Care LLC patients regardless of whether they purchase Medical Marijuana.

The IMMAC program has three objectives: (1) to provide comprehensive and individualized counseling and treatment plans for each patient, (2) to track the progress of each patient, including the monitoring of each patient's adherence to their primary medical prescriptions and regimens, and (3) to collect program-wide data concerning the efficacy of matching specific strains and dosages to specific conditions and symptoms.

Best-Practices Facility

The Constitution Care LLC dispensary facility will be a highly functional, best-practices dispensary set apart by superior patient service. That service will result from industry-leading policies and procedures, a dedicated and knowledgeable staff, and an unwavering commitment to security and social responsibility.

When open, Constitution Care LLC will be a clean, secure, eco-conscious, modern facility that accentuates health and a sense of wellness. We will dispense safe, laboratory tested products that are professionally processed, packaged and presented to patients in a comfortable, secure environment. Dispensary facility employees will be well-trained and attentive, always striving to serve members respectfully and with compassion.

Our facility operations are governed by detailed administrative plans and processes that we have developed with the assistance of industry leaders in Medical Marijuana dispensary facility operations and management, including training and human resource systems, to ensure uniformly strict compliance by, and high performance from, our entire staff.

The security and safety of our staff and the surrounding community is a top priority. Accordingly, we have allocated sufficient capital for a next-generation security system, complete with biometric locks, and high-resolution Internet protocol cameras that will stream an encrypted video feed to the internet. We have partnered with a first-rate security vendor and consulting company to help meet our needs and remain in compliance with the standards and requirements set forth in the Act and Regulations.

Legal compliance is paramount, as one misstep could reduce safety or jeopardize the dispensary facility license. Additionally, we are mindful that we must remain financially sound and responsive to the community in which we operate. We will strive to be seen as a good neighbor to local residents and businesses. We accomplish that in part by engaging municipal and community leaders in constructive dialogue, and serving as an example of a responsible service provider.

Once licensed, we will continue to request additional meetings with the local law enforcement department to discuss security issues during the build-out, and to further develop open lines of communication with key law enforcement personnel and community stakeholders. We aim to approach potential security challenges as a team, increasing our ability to detect problems and solve them more quickly.

Products and services will be offered at a reduced rate or free to low-income individuals regardless of patients' ability to pay, so no one in need is ever turned away. Please refer to our Compassionate Need Plan for more information.

Additionally, our model includes a charitable giving program that increases in proportion to Constitution Care LLC's revenue, and we look forward to making additional contributions to programs in our neighborhood, and throughout the State as well. Please refer to our Community Benefits Plan for more information.

Constitution Care LLC's corporate management team is a capable, dedicated group of professionals with a track record of service and accomplishment. The team is committed to the letter and spirit of the State's Act and Regulations, and the State's safe and responsible implementation of such Act and Regulations.

This plan represents a realistic and achievable vision of what a model, sustainable Medical Marijuana dispensary facility can be.

1.2 Mission

It is our mission at Constitution Care LLC to provide the State's registered patients safe access to scientifically screened, laboratory tested, consistent, pharmaceutical-grade Medical Marijuana, *and* comprehensive, individualized patient counseling services - within strict compliance of the State's Act and Regulations. We are committed to ensuring that every patient who enters our center will experience a feeling of community, belonging and wellness. Our success in fulfilling our vision is measured by quantitatively assessed patient satisfaction, team member excellence and happiness, the safety of our surrounding neighborhood, return on capital investment, and community support.

1.3 Objectives

Business goals for Constitution Care LLC are to:

1. Cultivate an environment of wellness, happiness and care.
2. Develop and maintain a loyal patient following through a variety of superior quality Medical Cannabis preparations and individualized patient care.
3. Become a model platform for Medical Cannabis distribution and care, and an exemplary, charitable citizen and neighbor in the community.

1.4 Vision

Constitution Care LLC envisions a community-focused organization that provides patients-in-need with safe access to pharmaceutical-grade Medical Marijuana and individualized patient care, based on the IMMAC program, in addition to holistic wellness services, and educational resources. We foresee Constitution Care LLC serving as a leader in the Connecticut Medical Marijuana community by informing discussions with critical empirical data, and engaging local stakeholders and city officials in productive dialog. We strive to be seen as a good neighbor to local residents and businesses, serving as an example of a responsible service provider.

Upon the successful award of a dispensary facility license, Constitution Care LLC intends to apply for a Connecticut Pharmacy license so that it may provide further traditional pharmacist services and medications through its alternative services area. The concept would be to incorporate traditional and non-traditional medications in the dispensary facility as a means to track data and enhance the level of interaction and access to patients and healthcare providers.

Our Commitments:

- Operate in strict compliance with the Act, the Regulations, and all other applicable rules, regulations, guidelines, ordinances and laws. In doing so, we will maintain a strong working relationship with all government authorities, including law enforcement officials.
- Maintain a close, cooperative and professional partnership with the Connecticut Department of Consumer Protection (the “Department”).
- Maintain an open and ongoing relationship with municipal and community leadership. We are committed to being a responsible business, a good neighbor, and demonstrating this commitment to residents and businesses in our area.
- Provide the qualifying patient community with alternative health resources in a safe, professional environment where all are treated with dignity, compassion and care.
- Strive to ensure that everyone who enters Constitution Care LLC experiences a feeling of community, belonging and wellness.
- Serve our community, both patients and non-

patients, through charitable community events and services.

1.5 Core Values

Constitution Care LLC core principles are:

- *Highest-Quality Pharmaceutical-Grade Medical Cannabis Products* - We offer only safe, high-quality pharmaceutical-grade products subject to careful selection based on their effectiveness in addressing the symptoms for the qualifying conditions and processing and testing by an independent registered laboratory.
- *Compassion* - Serving our patients professionally with sensitivity to their needs in a clean environment where they feel safe and secure.
- *Responsiveness* - We are part of the community at large, and communication is paramount. We are available and responsive to all stakeholders including patients, residents, our team members, law enforcement, regulators and our neighbors.
- *Transparency* - Our financial and operational data is always available to regulators and regularly reviewed by a CPAs.
- *Community Service* - Conducting varied and ongoing outreach and research programs to serve the needs of patients and others in our community as well as providing direct support to charities and neighborhood advocacy groups are core to our business philosophy. Please see our Community Benefits Plan for more information.
- *Education* - Providing facts and information to help people understand the responsible and effective use of Medical Marijuana.
- *Being a “Good Neighbor”* - by working with the community, the municipality and local police department as a responsible service provider

1.6 Keys to Success

Important keys to our success include:

- Positioning the dispensary facility as a responsible business in the community and developing close working relationships with civic, business and government leaders, and their staffs.
- Highly detailed planning and execution with regards to the staffing, training, detailed operational procedures, and infrastructure required to operate a professional quality Medical Marijuana dispensary facility is critical to our success.
- Financials, particularly cash flow, must be well-planned and managed, and kept to high standards commensurate with our service-oriented business model and visibility in the industry.

2.0 ORGANIZATION SUMMARY

2.1 Legal Entity

Constitution Care LLC is a State of Connecticut Limited Liability Company. It is governed by its management team with direction and guidance from its Board of Advisors.

2.2 Startup Summary

Following are some of the notable milestones and accomplishments achieved thus far:

- Retained a team of qualified leaders, managers, team members and advisors including architects, designers, financial planners, engineers, researchers, physicians, pharmacists, attorneys, consulting firms, and the nation's leading consultants to the Medical Marijuana industry, to advise management on best practices in operations.
- Activated agreement to license Adilas software and inventory tracking systems – Medical Marijuana dispensary facility-specific management and operations software with more unique and effective features than any other comparable product on the

market. This specialized software features seed-to-sale tracking, and can track pre-packaged Medical Marijuana down to the .01 gram, accounting even for weight lost due to evaporation in a transport vehicle.

- Prepared a comprehensive set of operational plans and commitments that address all areas required to fund and operate a legally compliant, sustainable dispensary facility that can fully deliver on its mission.
- Developed one of the most comprehensive sets of operating and training manuals in the Medical Marijuana dispensary facility industry.

3.0 PRODUCTS AND SERVICES

3.1 Product and Service Philosophy

Consistent with Constitution Care LLC’s core values, our distribution is firmly grounded in a service, patient-care model. Constitution Care LLC will work diligently to deliver on its core value that calls for “highest-quality products” and individualized patient care. Upon the successful award of a dispensary facility license, Constitution Care LLC intends to apply for a Connecticut Pharmacy license so that it may provide further traditional pharmacist services and medications through its alternative services area. The concept would be to incorporate traditional and non-traditional medications in the dispensary facility as a means to track data and enhance the level of interaction and access to patients and healthcare providers.

The following is a general outline of how Constitution Care LLC approaches product quality and service.

Strict Quality Control Guidelines

Only scientifically screened, laboratory tested Medical Marijuana emanating from superior genetics and processing will be available at Constitution Care LLC. Such requirements will be demanded of all registered producers from which the company will obtain its pharmaceutical-grade Medical Marijuana products.

Zero Tolerance on Medical Marijuana Performance Issues

Any product thought to have a potential problem is removed from the shelf until it is reviewed at multiple levels and passes further inspection. Any medicine that does not meet our strict quality standards will be disposed of in accordance with State law, particularly section 21a-408-64 of the Regulations.

Individualized Treatment Plans

Upon becoming a registered member at Constitution Care LLC, each qualifying patient is issued a Patient Handbook, and also screened by trained and qualified employees to begin the IMMAC process. Patients are screened for conditions and essential life issues. The data is recorded and the patients are then offered individual or groups counseling sessions and treatment plans based on their needs. All data is recorded throughout the member’s tenure with Constitution Care LLC, allowing for effective health management including adherence to all prescription regimens outside of Medical Marijuana, and for a more effective IMMAC program moving forward. The IMMAC program is discussed more thoroughly, below.

3.2 Product Line

Constitution Care LLC’s product line is dependent on the Medical Marijuana products produced by Connecticut’s registered production facilities, but will likely include the following general product types:

Table: Product Line

PRODUCT LINE	COMMENTS
Flowers	Raw Medical Marijuana Flower (i.e. dried Marijuana “buds”) that can be rolled into papers, smoked in a standard pipe or a water pipe, or even vaporized with vaporizer products (believed to be the safest and healthiest means of inhalation). We plan on having at least 12 strains with a mix of sativa, indica and hybrid variants targeting symptoms of the qualifying conditions). Medical Marijuana flower will be sold in pre-packaged amounts, including pre-rolled forms. Raw Medical Marijuana Flower (i.e. dried Marijuana “buds”) that can be rolled into papers, smoked in a standard pipe

Extracts	Extracts are manufactured by separating the trichomes (glands of the plant that contain high concentrations of cannabinoids) from the Marijuana flowers to create a concentrated dose of Medical Cannabis. These product lines include bubble hash, tinctures and concentrates.
Preparations	Pre-rolls, sprays, oils, tinctures, topical ointments, , pre-packed vaporizer cartridges and capsules.
Baked Goods & Edibles	Edibles (i.e. baked goods and the like) cooked with butter or oil that have been infused with Medical Marijuana. Edible Marijuana usually takes longer to take effect (20 minutes to over an hour), and the effects generally last longer than smoking or vaporizing. . Products include Medical Cannabis-infused olive oil, cookies, brownies and popcorn,
Non-Medical Marijuana Products Offered	Non-Medical Marijuana products offered such as vaporizers to assist in the administration of the medicine (available in the dispensary department), and educational materials related to Medical Marijuana such as books and DVDs (available in the alternative services department).

All Medical Marijuana based products will be packaged by the licensed producer on their premises in light-proof, child-resistant packaging in compliance with section 21a-408-56 of the Regulations of Connecticut State Agencies. Specifically, products will be packaged in unit sizes such that no single unit contains more than a one-month supply of Medical Marijuana. Also, packaging will satisfy the standard for “special packaging” as set forth in the Poison Prevention Packaging Act of 1970 Regulations, 16 CFR 1700.1(b)(4).

For more information on non-Medical Marijuana related products anticipated to be sold in Constitution Care LLC’s alternative services area, see Products Offered in Appendix I.

3.3 Services

Constitution Care LLC places a high emphasis on counseling and education in addition to safe and responsible provision of Medical Marijuana. Constitution Care LLC has prepared ample information found in the **Patient Handbook** to help

patients understand their rights, the industry, and how to choose Medical Marijuana products appropriately and understand how to use them effectively.

In accordance with the Act and Regulations, particularly section 21a-408-34(f) of the Regulations, only registered dispensaries and/or registered dispensary technicians under the direct supervision of a dispensary may dispense or sell Medical Marijuana products to registered qualifying patients or their primary caregivers.

Other than services directly related to the provision of Medical Marijuana products and paraphernalia, Constitution Care LLC also provides a wide range of products (such as educational books and DVDs) and alternative services designed to help patients succeed in facing their potentially debilitating conditions available in the alternative services department of the dispensary facility. Many programs and services are available at no charge. The list includes workshops, support groups, classes and other programs as part of the Integrated Medical Marijuana and Counseling (IMMAC) program.

Upon the successful award of a dispensary facility license, Constitution Care LLC intends to apply for a Connecticut Pharmacy license so that it may provide further traditional pharmacist services and medications through its alternative services area. The concept would be to incorporate traditional and non-traditional medications in the dispensary facility as a means to track data and enhance the level of interaction and access to patients and healthcare providers.

IMMAC Program

Patient and primary caregiver education and counseling at Constitution Care LLC is a living, constantly improving process, and involves much more than distributing informative literature on Medical Marijuana. Patient education at Constitution Care LLC is highly individualized, allowing each patient to realize the most benefits for their particular condition and life situation.

In addition to comprehensive literature, including the Constitution Care LLC Patient Handbook, patient-members, at their option, will partake in comprehensive workshops and individual or group counseling sessions designed to address the needs of their Individual Treatment Plans (“ITPs”).

The process starts with the Integrated Medical Marijuana and Counseling program (IMMAC) developed by medical professionals specifically for Medical Marijuana dispensary facility operations.

Under IMMAC, Constitution Care LLC patients initially partake in a comprehensive screening, intake, psychosocial assessment, and psychological testing/evaluation, including completion of a HIPAA-compliant release to identify

problems which pose risks or challenges to patient adherence to his or her primary medical and/or medication treatment regimens, and to develop appropriate and active intervention protocols/ITPs.

Once an ITP is developed for a qualifying patient, that patient is provided with individual educational, treatment, and/or psychosocial support services, including:

- General Medical Marijuana education groups led by a qualified registered dispensary focusing on the appropriate use of Medical Marijuana as a critical component to a primary medical and medication treatment plan.
- Specific disease management psychosocial education groups led by a qualified professional focused on maintaining adherence to the primary medical and/or medication treatment plan.
- Motivational interview, harm-reduction counseling groups and/or individual counseling led by a qualified professional for patients who need and want assistance to eliminate or reduce their dependence on legal or illegal substances, and will refer clients in need of abstinence-based substance abuse treatment to APRA-certified programs, at our sister agencies, such as Whitman-Walker Health, with whom we have a long-standing relationship.
- Psychotherapy groups and/or individual psychotherapy led by a qualified professional for patients diagnosed with a psychiatric disorder or suffering from mental health problems which would benefit from clinical intervention.
- “Vincero” (“I will prevail”) psychotherapy/support groups led by a qualified professional for those patients whose medication and treatment options have been exhausted and who now need to successfully negotiate death and dying issues in a positive and empowering treatment milieu.
- Case management/legal counseling groups and/or individual sessions led by a qualified professional for patients with major life challenges to assist them in obtaining and/or maintaining entitlements, financial benefits, legal services, etc., which will significantly reduce barriers to care and treatment adherence

- Crisis management groups and/or individual sessions led by a qualified professional will be available to patients identified by dispensary facility employees and/or referred by their health care providers when they see evidence of significant negative changes in physical and mental health, and/or psychosocial status.

Additional patient services to be phased in (and available in the alternative services department of the dispensary facility) include:

- Chiropractic
- Yoga
- Natural Healing
- Nutrition Classes
- Art and Music Therapy
- Additional Substance Abuse and Mental Health Counseling
- Resource Services (referrals for a wide variety of essential life, social and economic services)

For more information on the dispensary facility services anticipated to be offered, see Services Offered in Appendix I.

3.4 Compassionate Need Program

We believe strongly in an individual's right to personal health empowerment through access and knowledge. To support this mission, Constitution Care LLC will provide subsidized access to medicine and alternative healing services at considerable discounts for veterans, disabled, terminally ill, senior citizens and fixed/low-income patients, regardless of financial status. Dispensaries will also provide educational materials designed to help patients better understand how to meet their needs to support their quest for optimal health.

Our clientele suffer from a wide range of conditions, including (but not limited to) cancer, AIDS, glaucoma, and multiple sclerosis, yet all share a common desire to be proactive in their healing process, health, and pain management through alternative means. We wish to help them however we can.

In order to be considered for the program, patients must be a registered patient in good standing and complete a Compassion Program registration form. This form will help Constitution Care LLC staff determine whether the patient qualifies for the program and to what extent they require assistance. Patients will be required to show documentation of their financial status before being approved.

All Compassion Program members will be required to adhere to the Constitution Care LLC's Membership Agreement and Code of Conduct. Membership in the

program will be renewed every six months. Please refer to our Compassionate Need Plan for more information.

For more information, see the Compassionate Need Plan in Appendix M.

4.0 MARKET ANALYSIS

4.1 Industry Analysis

History of the Medical Marijuana Industry

The legal Medical Marijuana industry began in California in 1996 when a referendum known as Proposition 215 was approved by 56% of California voters. Subsequently, the Compassionate Use Act of 1996 codified the rights of authorized patients to possess and cultivate the medicine under the California Health & Safety Code Sect. 11362.5.

Since 1996, additional states have followed California's lead, with Medical Marijuana use now legal in Alaska, Arizona, Colorado, Connecticut, Delaware, Hawaii, Illinois, Maine, Massachusetts, Michigan, Montana, Nevada, New Hampshire, New Jersey, New Mexico, Oregon, Rhode Island, Vermont, Washington and the District of Columbia (DC).

Medical Marijuana in Connecticut

Connecticut Governor Dan Malloy signed into law Public Act 12-55, "An Act Concerning the Palliative Use of Marijuana", on June 1, 2012. The law took effect on October 1, 2012, at which point Connecticut officially became the 17th state since 1996 to allow for the physician-authorized use of Cannabis as a therapeutic option for qualified patients. A 14-member legislative panel approved regulations for the sale of Medical Marijuana on August 27, 2013 and such regulations subsequently took effect on September 6, 2013.

The State Legislature first legalized the limited use of medical marijuana in May 2012, authorizing the State's Consumer Protection Bureau to generate more specific guidelines and mandating that Medical Marijuana grown and sold in the State be held to the same high standard as all other pharmaceuticals.

The table below provides a basic overview of the qualifying conditions, commonly experienced symptoms, the systems affected and likely medicine delivery preferences for patients.

Qualifying Condition	Example Symptoms	Primary Systems Affected (1)	Likely Delivery Preferences
Cancer	Pain, Nausea, Tumors, Depression	All	Inhaled, Ingested, Topical
Glaucoma	Inflammation, Pain	CNS	Inhaled, Ingested
HIV/AIDS	Wasting, Pain, Depression	I, L, MS, RE	Inhaled, Ingested, Topical
Parkinson's Disease	Pain, Muscle Spasticity	CNS	Inhaled, Ingested, Topical
Multiple Sclerosis	Pain, Muscle Spasticity	CNS	Inhaled, Ingested, Topical
Spinal Chord Nervous Tissue Damage	Pain, Muscle Spasticity	CNS	Inhaled, Ingested, Topical
Epilepsy	Pain, Muscle Spasticity	CNS	Inhaled, Ingested, Topical
Cachexia (3)	Wasting, Depression	MS, GI, CNS	Inhaled
Wasting Syndrome	Wasting, Depression	GI, I, CNS	Inhaled
Crohn's Disease	Pain, Muscle Spasticity, Inflammation	I, GI	Inhaled
Post Traumatic Stress Disorder	Sleeplessness, Anxiety, Depression	CNS	Inhaled, Ingested

Notes:

Primary Systems in the Body:	(1) System Abbreviation
Circulatory	C
Digestive	GI
Endocrine	E
Immune	I
Lymphatic	L
Muscular/Skeletal	MS
Nervous	CNS
Reproductive	R
Respiratory	RE
Urinary	U

(2) Intractable spasticity

(3) Generally associated with cancer, AIDS, chronic obstructive lung disease, multiple sclerosis, congestive heart failure, tuberculosis, familial amyloid polyneuropathy, mercury poisoning (acrodynia) and hormonal deficiency

Although there are currently fewer than 1500 patients registered state-wide, based on the qualifying conditions listed above, the nature of their chronic afflictions, available Connecticut demographic information and precedent market data from outside of Connecticut, we believe that the market could eventually develop to range anywhere in size from 60,000 to 250,000 patients¹. As we have experienced in other markets, the market size in medically focused, highly regulated markets, depends heavily upon physician support, patient initiative, dispensary outreach and regulatory support and typically requires a substantially longer lead time to achieve market size projections.,

An Industry Marked by Controversy

Despite its legal status, Medical Marijuana is not without significant opposition. Perhaps the biggest obstacle to industry growth is the federal government, where the Department of Health and Human Services has continued to maintain that “Marijuana has no currently accepted medical use in treatment in the United States.” This, along with the prior administration’s generally conservative stance on drugs and social issues, helps explain why the Drug Enforcement Administration (DEA) conducted frequent raids on Medical Marijuana dispensaries through most of the 2000’s—even in states where the operations are expressly legal.

¹ In Colorado, California, Arizona and other markets – the registered patient penetration rates range from 1.0%-3.5%, depending upon the maturity and restrictiveness of the State/municipal laws.

There is still suspicion by a significant portion of the population that views Medical Marijuana as a thinly veiled excuse for people to acquire a recreational drug under the guise of medical need.

Combined, these factors have dampened the normal process of growth and cohesion that typically occurs in emerging industries. Until the formation of the National Cannabis Industry Association in 2010, there were no trade associations for licensed Medical Marijuana dispensary facilities or production facilities.

This leaves the industry void of a force for self-regulation, promotion of best practices and unified voice for political action. The National Organization for the Reform of Marijuana Laws (NORML), the Marijuana Policy Project (MPP), and Americans for Safe Access (ASA) all address general issues related to Marijuana and Medical Marijuana use. However, no organization has focused specifically on the business of running a dispensary. The formation of the NCIA is a step in the right direction, but the organization is still new and lacks significant funding.

Policy Changes Continue to Support Medical Programs

Despite opposition and the challenges that the industry faces, Medical Marijuana use appears to be here to stay. Growth factors include support among the general population and gradual acceptance in the medical and law enforcement communities.

Support for Medical Marijuana has grown among the general population since the passage of the first ballot initiatives in 1996, with a January 2010 ABC News/Washington Post poll finding 81% of Americans support legalizing Marijuana for medical use.

The medical community has been slow to embrace Marijuana as a medicine, but it appears to be just a matter of time. There is a considerable body of evidence that Medical Marijuana is as good—if not better—for treating certain conditions than many chemically produced medications.

NORML statistics show that Marijuana is used to treat a range of conditions from chronic to acute and terminal.

- 40% chronic pain
- 22% AIDS-related
- 15% mood disorders
- 23% all other categories

Specific conditions for which Medical Marijuana is currently used as a treatment include (only some of which are considered qualifying conditions by the State of Connecticut):

- AIDS (HIV) & AIDS Wasting

- Alzheimer’s Disease
- Appetite / Nausea
- Arthritis
- Asthma / Breathing Disorders
- Chemotherapy
- Crohn’s / Gastrointestinal Disorders
- Epilepsy / Seizures
- Glaucoma
- Hepatitis C
- Migraines
- Multiple Sclerosis / Muscle Spasms
- Pain/Analgesia
- Psychological Conditions
- Tourette’s Syndrome
- Terminally Ill

According to ASA, more than 6,500 reports and journal articles from around the world support the medical value of Marijuana. Hundreds of scholarly studies have demonstrated Medical Marijuana’s ability to reduce pain, fight nausea, improve appetite and ease other symptoms—with virtually no harmful side effects. In contrast, many of the standard pharmaceuticals currently used to treat these conditions pose unpleasant or potentially harmful side effects.

After careful scrutiny and substantial consideration of the evidence over decades, dozens of public health organizations have endorsed Medical Marijuana use. The list is impressive. Supporters include the National Association of People Living With AIDS, AIDS Action Council, American Public Health Association, American Academy of Family Physicians, American Nurses Association, Federation of American Scientists, Kaiser Permanente, New England Journal of Medicine, National Association for Public Health Policy, California Medical Association, Whitman-Walker Clinic, Lymphoma Foundation of America, and many more.

The Industry’s Economic Impact is Increasing

Another reason the Medical Marijuana industry shows continued promise is its current and future impact as a source of tax revenue. ASA estimates that, in California, there are now more than 200,000 physician-sanctioned Medical Marijuana users. NORML claims that more than 1,500 of the state’s 62,000 physicians now write letters approving Medical Marijuana use for their patients.

A first ever market research report released by the business strategy firm See Change in March 2011, estimated that \$1.7 billion of Medical Marijuana will be sold through dispensaries in 2011. This figure does not take into account Medical Marijuana that is being grown and exchanged between individual patients and caregivers, only retail and wholesale sales. The retail market rivals national sales of Viagra, which grosses \$1.9 billion annually. This study also did not take into

account the ancillary businesses that have sprung up around the legal Medical Marijuana industry, including cultivation suppliers, point of sale system providers, credit card processing companies, and consulting firms.

The resulting contribution to tax rolls is significant. According to NORML, California's Medical Marijuana patients alone are currently consuming somewhere between \$870 million and \$2 billion worth of medicinal product each year. That translates to somewhere between \$70 million and \$120 million in state sales tax revenues. At the local level, meanwhile, municipalities are enjoying the boost in tax revenues from Medical Marijuana.

Friendlier Federal Policies Will Further Industry Growth

DEA raids on Medical Marijuana dispensary facilities have mostly waned since President Barack Obama took office. Obama repeatedly stated during his campaign that he would take steps to end the practice, effectively eliminating the competing position between federal and state laws.

In October 2009, Attorney General Eric Holder reinforced that commitment as he directed federal prosecutors to stop pursuing cases against Medical Marijuana patients who were otherwise lawful under state law. Those guidelines were contained in a memo from Deputy Attorney General David Ogden that was sent to United States attorneys. In July 2011, Deputy US Attorney General James Cole issued a new Justice Department memo to United States attorneys stating that while state law is no defense for a violation of federal law, the administration's position on the use of scarce federal prosecutorial resources has not changed. In August 2013, Cole issued a subsequent memo offering guidance regarding Marijuana enforcement and identifying eight priorities for which Department of Justice attorneys and law enforcement should focus their resources and efforts. The memo goes on to state that "in jurisdictions that have enacted laws legalizing Marijuana in some form and that have also implemented strong and effective regulatory and enforcement systems to control the cultivation, distribution, sale, and possession of marijuana, conduct in compliance with those laws and regulations is less likely to threaten the federal priorities."

With a more relaxed legal climate in place, it is likely that the Medical Marijuana industry will experience a surge in growth. Some or all of the following trends are expected to occur:

- The climate of fear that the DEA raids has caused will abate, increasing patients' comfort level in participating in Medical Marijuana programs.
- More patients will feel comfortable seeking physicians' recommendations for Medical Marijuana use, and physicians will feel more comfortable

giving them.

- New businesses will open as demand increases due to the more tolerant climate.
- Existing establishments will see an increase in business.
- Additional municipalities and state governments will address Medical Marijuana as federal tolerance improves and pressure increases to find new sources of tax revenues in a challenging economy.
- Some businesses will become industry leaders and seek industry dominance as they improve operating efficiency and open additional centers.

4.2 Connecticut Market

As noted earlier in the Industry Analysis, the Medical Marijuana industry is still in its infancy and is relatively undeveloped compared to most industries. The market is characterized by local culture, with dispensary facilities taking form based on the social climate of the communities in which they are located.

Medical Marijuana Market Difficult to Assess

Quantifying the market (the number of patients and/or potential revenue) is difficult to quantify because:

- There is no source of comprehensive information about dispensary facility operations and data.
- The stigma associated with Medical Marijuana use, along with the threat of possible legal difficulties, has forced many patients to “fly under the radar.” Therefore, user data that might be openly published and accessible in other types of markets is not available.
- Data gathering is further impacted by HIPAA laws that specify strict handling of patient information for privacy reasons.
- Connecticut’s rules and regulations have yet to be fully implemented, making accurate predictions of patient numbers nearly impossible.

According to the Department, as of November 12, 2013, the number of patients certified by physicians for the use of Medical Marijuana for each county in the State are:

County	No. of Patients
Fairfield	326
Hartford	252
Litchfield	87
Middlesex	75
New Haven	400
New London	87
Tolland	32
Windham	50
Total	1309

Although the then current patient population is under 1400 people, we anticipate the patient market to grow significantly over time, particularly as the State’s Medical Marijuana program continues to develop and as awareness of the medicinal benefits of Cannabis steadily increases.

The Market Poses Barriers to Patients

Even when a patient is open to using Marijuana medically, he or she faces additional obstacles compared to patients who use more traditional pharmaceuticals. For example, a patient must seek a recommendation from his or her physician approving them for Medical Marijuana use.

Patients whose physician does not understand the benefits of Medical Marijuana must jump through additional hoops. In California and Colorado, this has typically involved visiting a special Medical Marijuana certification clinic to obtain a physician’s recommendation and, only then, after a special evaluation and visitation fee. Such Medical Marijuana evaluation centers are not anticipated in Connecticut under the current regulations.

4.3 Market Segmentation / Customer Profile

Looking at the patient population in Colorado, we can extrapolate the approximate makeup of Connecticut’s patient base. While Colorado has a more expansive set of approved medical conditions (Connecticut does not include chronic pain as a qualifying condition), it is likely that Constitution Care LLC’s patients will be similar in makeup to the customer statistics for qualified conditions available from Colorado’s Medical Marijuana Registry.

The most common conditions in jurisdictions outside Connecticut cited are severe pain (94%) and muscle spasms (21%). Other significant conditions include severe nausea (12%) and Cancer (2%). The reported patients are primarily male (69%), and the overall average age of all patients is 40 years old.

5.0 STRATEGY AND IMPLEMENTATION SUMMARY

5.1 SWOT Analysis

The SWOT analysis provides us with an opportunity to examine the internal strengths and weaknesses Constitution Care LLC must address. It also allows us to examine the opportunities presented to Constitution Care LLC as well as potential threats that lie beyond the center's control.

Strengths

The following strengths are internal to Constitution Care LLC:

- Advised by a team of lawyers, doctors, policy experts, community organizers, and experienced operators, Constitution Care LLC is positioned to become a dispensary facility market leader. The advisory team includes some of the most knowledgeable and seasoned figures in the Medical Marijuana industry, each intensely dedicated to incorporating Medical Marijuana into the mainstream in a responsible fashion.
- Heavy reliance on financial and operations data and systems (e.g., QuickBooks, inventory control, POS system).
- Clean, professional environment with healing and patient support programs.
- Competitive salary for dispensary facility employees that exceeds the area's living wage requirements.
- Strong support team, including dispensary facility consultants, compliance consultants, and security consultants.
- Strong board of directors who are focused on

fulfilling the company's mission and meeting community needs.

- Modern, easily accessible dispensary facility location that is relatively easy to secure.
- High-quality dispensary facility staff and staff training.

Weaknesses

The following weaknesses are internal to Constitution Care LLC:

- Lack of comprehensive market data.
- Unclear protocols for marketing to potential qualifying patients and potential business alliances.
- Lack of clarity about Connecticut market in practice.
- The Department of Consumer Protection has the ability to shut down the company's operations with unknown precedents.

Opportunities

The following are opportunities Constitution Care LLC can leverage that lie outside of its organization or control:

- Support for Medical Marijuana in Connecticut is exceptionally high.
- General public acceptance of Marijuana use as a medicine is growing.
- New federal administration policies toward state-compliant operators are more tolerant.
- The dispensary facility can continue to build and strengthen alliances with medical providers, counselors and others in the wellness industry.

Threats

The following factors represent potential threats that lie outside Constitution Care LLC's organization and control:

- There are still significant preconceived negatives by society at large about Medical Marijuana use. Constitution Care LLC will monitor trends and work to effect change through high operational standards, good community relations and by playing an active role in changing public attitudes about Medical Marijuana.
- The dynamic tension between federal and state government regarding legalities of Medical Marijuana is not fully resolved. While raids are unlikely, particularly in view of the company’s transparency and legal operation under State and local law, issues with the legality of Medical Marijuana could re-surface as an issue. Constitution Care LLC will remain compliant with the Act, the Regulations, and all applicable State and local ordinances.
- If approved by voters, any proposed initiative to legalize recreational-use Marijuana in the future could lead to a greater volume of legal product available for purchase. However, “street”-sourced Marijuana cannot match the quality and safety (free of contamination, reputable source of medicine, and privacy of transaction) of that provided by Constitution Care LLC. That, along with the services and assortment of pharmaceutical-grade products the dispensary facility provides, would help to offset competition should the legalization of recreational-use Marijuana occur.

5.2 Marketing and Sales

Branding and Positioning

Many Medical Marijuana dispensary facilities operate with the assumption that, since patients are pursuing Marijuana as a medicine, they must also resonate with most or all of the other aspects of the drug counterculture. This leads to many developing an image more closely associated with the stereotypical drug culture than with service-oriented professionals who regard themselves as part of a healing, healthy lifestyle.

Constitution Care LLC’s approach is clearly the latter. Our focus is on healing,

good health and a balanced lifestyle. We also believe the overwhelming portion of those seeking Medical Marijuana will be responsive to this wellness-based approach, so our dispensary facility brand will reflect this. Our staff is professional in appearance, and sees themselves as a positive, integral part of the community—rather than as an isolated subculture standing in opposition to the mainstream.

Constitution Care LLC’s approach is designed to better meet the needs of patients who seek a modern, clean, safe and professionally managed facility. General differentiators that appeal to our patients include the following:

- *Focus on Healing* – Constitution Care LLC emphasizes health and healing—not the drug culture. We are a patient-focused operation whose mission is to help our members heal and achieve the highest possible quality of life.
- *Service Orientation* – Constitution Care LLC’s employees will be comprised of dispensaries, dispensary technicians, and alternative services staff consisting of patients and caregivers, many of whom have survived an illness. We are truly committed to service quality and providing a high degree of information to patients in a consultative format.
- *Higher Quality Medicine* – Constitution Care LLC will focus on developing long-term relationships with State-registered production facilities.
- *Reliance on Merchandising* – Constitution Care LLC adopt certain pharmacy-type approaches to dispensing medicine. This includes dispensary consultations with patients, discussing the administration of the medicine, assisting in the selection of the appropriate Medical Marijuana product from stock, and the provision of any supplemental instructions regarding the use of Medical Marijuana.
- *Use of Current Technology* – Constitution Care LLC will utilize point-of-sale software and bar-coding technology to help manage its transactions and track inventory. This technology provides more information and control to help us make better decisions about how to better serve patients.

Competition

The State intends to approve three to five dispensary facilities under its Medical Marijuana program. We feel that our service-oriented model gives us a significant competitive advantage in this market. While all approved dispensary facilities in Connecticut pose at least indirect competition for the company, none are expected to offer direct competition to the Constitution Care LLC's model approach to patient care and our full range of alternative health care services.

Pricing Strategy

Constitution Care LLC's pricing will be set by a combination of local and national factors. As is the case with all market driven products, we expect to provide value to our patients as well as compassion and care.

Notwithstanding, it is likely that pricing for Medical Marijuana will also approximate the local market rate for non-medicinal (illegal) Marijuana to discourage black market diversion. Diversion refers to the phenomenon that occurs when dispensaries price their products too far below prevailing rates for Marijuana purchases. When this occurs, it creates an incentive for patients to purchase Medical Marijuana and resell it for a profit at the higher market rate. Through its pricing practices, Constitution Care LLC will support State law by discouraging diversion.

Constitution Care LLC will offer discounted medicine, either as incentives or as assistance for those with lesser ability to pay, such as seniors, veterans and patients on disability. Please see our Compassionate Need Plan for more information.

Marketing Objectives

Constitution Care LLC and all dispensary facilities must be judicious in how much attention they attract to the program and its facilities. When prudent, and in view of the data and opportunities presented within this plan, the following summarizes general objectives for Constitution Care LLC in the next one to two years of operation:

- **Increase Education** – Prevailing attitudes about Medical Marijuana are continuing to relax. However, prior issues with legality and social stigma have constrained the market. Constitution Care LLC can attract new patients by continuing to educate the local public about Cannabis as a viable, safe, alternative medicine.
- **Heighten Standards and Recruit Patient Members** – Constitution Care LLC plans to increase

membership and revenue growth as it improves operations and expands services.

- **Increase Brand Awareness** – Many dispensary facilities do not appear to be earning high brand loyalty and/or generating awareness. Constitution Care LLC can increase market share by advertising to attract more patients from areas served by competitors. Our design and service-based programs, based on best practices of leading successful dispensary facilities, will make us a destination for patients throughout Connecticut.
- **Maintain Outreach Efforts** – A strong outreach program poses various benefits for Constitution Care LLC. By working with community groups and participating in community events, the center better serves its community. It also builds awareness, relationships and cooperation that will lead to increased referrals and member growth. Please see our Community Benefits Plan for more information.

Marketing / Promotional Strategy

Leading dispensary facilities elsewhere have found that word of mouth and a media campaign are two of the most important ways to attract patients and build awareness. While maintain strict compliance with sections 21a-408-66 to 21a-408-68, inclusive, of the Regulations, Constitution Care LLC will leverage these and other proven methods as it undertakes the following initiatives to accomplish its marketing objectives.

Advertising – Constitution Care LLC expects to spend a considerable amount of resources for advertising and marketing costs in its first 12 months of operation. Limited public advertising will be primarily educational and focus on the fact that Medical Marijuana is safe and available.

Ads will closely mirror the Constitution Care LLC brand, which promotes health and healing (vs. the stereotypical drug culture). Ads will not attempt to influence patients with regards to the selection of a physician, dispensary or Medical Marijuana product.

Constitution Care LLC will leverage social media websites in order to build brand awareness, and to spread the word to patients that relief is available. Any ads will direct prospective patients to Constitution Care LLC's website. The site will be utilized to more fully educate prospective patients about Medical Marijuana, the conditions it can help treat and what to do next—particularly for people who are

not sure.

Search engine optimization will be used in combination with pay-per-click advertising to present the center's website to searchers in Connecticut.

Sponsorships – Paid sponsorships and exhibitor opportunities offer Constitution Care LLC visibility and can often present significant exposure well beyond the paid cost of the opportunity. Sponsorships should be specifically targeted at venues where Medical Marijuana use is already widely accepted and/or where the need for Medical Marijuana is great. Examples of the latter would be programs related to cancer, AIDS and other significant health-based issues.

Community Participation – Additional, non-paid forms of participating in the community will also help Constitution Care LLC gain visibility.

Industry Activism – Additional participation includes formal activism, which helps promote Constitution Care LLC in industry circles as well as forwards Medical Marijuana as a legal, safe, alternative form of treatment. Examples of this include:

- ASA – Americans for Safe Access, a patients' rights advocacy group
- MPP – Marijuana Policy Project, a political lobbying group
- SSDP – Students for Sensible Drug Policy

Public Relations – Managed coverage in local media is another way Constitution Care LLC will work to increase awareness and positive information about its services. Periodic press releases will be furnished to local press where it will not bring unwanted attention to the program, including local newspapers, community newsletters, hospice and patient bulletin boards to highlight the dispensary facility's progress and work in the community.

Member Marketing – Constitution Care LLC will actively work to increase membership as well as encourage member loyalty and purchasing behavior by marketing to our member base. Because of the relationship between the Constitution Care LLC and patients, marketing must be permission-based and low-key. However, tasteful communications to members that educate and gently promote are not inappropriate, providing they respect privacy and do not violate any State laws. Messaging will include on-site promotional material, such as signage, flyers, newsletters and bulletins, as well as occasional emailed communications to members who have specifically opted in.

Word of Mouth Marketing – Satisfied members can be the most effective means to promote Constitution Care LLC, particularly with its strong brand. Therefore,

significant effort will be directed at leveraging its patient population to evangelize on the dispensary facility's behalf. Constitution Care LLC will develop a formal referral program that encourages current members to bring a friend or pass on information to a friend. This is particularly important, given that "friend" is the most common answer reported on new patient intake forms when patients are asked to indicate how they heard about a dispensary facility.

Alliances – Alliances represent a substantial opportunity for Constitution Care LLC to increase awareness and enjoy a stream of referrals. Not only is there little cost associated with alliances, but a strong alliance-building program will continue to produce over time. Constitution Care LLC plans to establish strong alliances with various hospices and patient service groups that receive free Medical Marijuana from its founders.

In addition to expanding these alliance networks, Constitution Care LLC will reach out to a variety of organizations and health providers who are in contact with prospective patients. Examples include physicians, chiropractors, cancer support groups, AIDS organizations and senior centers. A key part of this initiative will be educating alliance partners on the benefits, legalities and processes involved with referring people for Medical Marijuana use. The time is particularly ideal now that Federal pressure on the industry is easing.

Sales Strategy

As a service-based organization focused on patient wellness, Constitution Care LLC's approach to sales must be consultative and focused more on the patient's needs than on selling product. A high emphasis will be placed on customer service and product knowledge to ensure that patients are provided with accurate, useful information.

At the same time, the dispensary facility must also operate efficiently in order to remain financially viable and deliver on its long-term mission. Therefore, Constitution Care LLC will provide ongoing training to its dispensary facility employees to ensure that they are properly prepared to provide excellent service and do so with expediency.

Individual feedback, coupled with regular department meetings, will be used as training opportunities to continually improve staff capabilities.

For more information on marketing, see Marketing Plan in Appendix J.

5.3 Operations

Constitution Care LLC has adopted a comprehensive set of operations manuals to guide virtually every aspect of daily operations for each department (full version is

available for review upon request). These operating manuals are the most comprehensive set of training and operational procedures in the dispensary facility industry, developed over the course of several years by leading experts in the industry. The manuals, which feature more than 370 pages of detailed information, provide an excellent basis for training and address a wide variety of topics, including:

- *Purchasing* – Guidelines for acquiring safe, high-quality, pharmaceutical-grade Medical Marijuana products.
- *Processing and Storage* – How medicine will be handled and stored safely, and by whom.
- *Information Technology* – Documents the dispensary facility’s main data system and electronic information systems, access, security and back-up procedures.
- *Dispensing Procedures* – Step-by-step guidance for dispensaries (and dispensary technicians under the direct supervision of a dispensary) to provide quality service and dispense medicine to patients.
- *Bookkeeping and Banking* – Procedures for cash handling, accounting and banking.
- *Security* – How the dispensary facility will maintain a safe environment to protect its patients and employees, both inside the facility and in adjacent areas (e.g., parking).
- *Emergency Procedures* – Specific protocols in case of medical, police or other emergencies to ensure rapid response involving the appropriate personnel and/or outside authorities.

Labeling

All Medical Marijuana products dispensed and sold to patients or primary caregivers will bear a compliant producer label and a dispensary facility label in accordance with section 21a-408-40(b) of the Regulations. The expiration date on such dispensary facility label will not be a date later than the expiration date determined by the producer.

In addition to the labels, the dispensary facility will include the following statement on all receipts: “If you have a concern that an error may have occurred in the dispensing of your Medical Marijuana, you may contact the Department of Consumer Protection, Drug Control Division, by calling (Department telephone number authorized pursuant to section 21a-2 of the Connecticut General Statutes).”

Closures

During times when the dispensary facility is closed, the premises will be securely locked and equipped with an alarm system. Such alarm system will be able to immediately detect entrance to the dispensary facility as set forth in our confidential Security Plan. Only dispensaries will have the authority to deactivate the alarm system. Keys and access codes to the alarm system will be controlled by the Security Manager who will restrict access to the dispensary facility to authorized dispensary facility employees. At any time the dispensary facility is closed and not in operation, the facility will be properly secured in accordance with sections 21a-408-51 and 21a-408-62 of the Regulations.

If the dispensary facility must close during its normal hours of operations due to unforeseen circumstances, dispensary facility employees will notify patients and primary caregivers of such closure and when the facility intends to reopen for business. Notice will be given by means of conspicuously posted signs, auto-reply emails, and a clear message on the facility’s telephone system.

Restricted Access

The dispensary facility shall not permit any person to enter the dispensary department unless (1) such person is licensed or registered by the Department of Consumer Protections (the “Department”) pursuant to section 21a-408-1 to 21a-408-70, inclusive, of the Regulations, (2) such person’s responsibilities necessitate access to the dispensary department and then for only as long as necessary to perform the person’s job duties, or (3) such person has a patient or caregiver registration certificate, in which case such person shall not be permitted behind the service counter or in other areas where Medical Marijuana is stored.

All persons permitted on the premises pursuant to section 21a-408-35(g) of the Regulations, shall obtain and display at all times a visitor identification badge from a dispensary facility employee. Such persons shall be escorted by a dispensary or dispensary technician at all times while in the dispensary department. All visitors shall log in and out upon entry and exit from the facility.

Pursuant to section 21a-408035(j) of the Regulations, members of the Department, local law enforcement or other federal, State or local government officials may

enter any area of the dispensary facility if necessary to perform their governmental duties.

Deliveries

All deliveries will be coordinated with the registered producers before the actual delivery takes place. All such deliveries will be carried out under the direct supervision of the Dispensary Manager or the Inventory Manager (which such position will be held by a registered dispensary), who will be present to accept the delivery. Upon delivery, the Medical Marijuana products will be placed immediately in the facility's approved safe.

In accordance with section 21a-408-35(i), Constitution Care LLC will not sell, dispense, or distribute Medical Marijuana via a delivery service nor via any other manner outside of the dispensary facility.

Records

Dispensaries will document each qualifying patient's self-assessment of the effects of Medical Marijuana in treating their respective debilitating medical condition or the symptoms thereof. Constitution Care LLC will maintain such confidential documentation electronically for at least three years following the date each patient ceases to designate the dispensary facility as his or her primary facility.

The Inventory Manager (which such position will be held by a dispensary) will assign and record a sequential serial number to each Medical Marijuana product dispensed to a patient and will keep all dispensing records in numerical order in a suitable file, electronic file or ledger. The records will indicate the following:

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 Medical Marijuana; and
5. Whether a full or partial one-month supply of Medical Marijuana was dispensed.

The dispensary facility will maintain a training record for all dispensary facility employees, which will include documentation of all required training, such as the dates of training, the general description of the topics covered, the name of the person supervising the training, and the signatures of both the person receiving the

training and the dispensary facility manager.

The dispensary facility manager will create a record of every quality assurance review for each dispensing error discovered pursuant to section 21a-408-48 of the Regulations. The record will include the date of the quality assurance review, the name and title of the person(s) performing the review, the pertinent data and other information relating to the dispensing error reviewed, any documentation of contact with the qualifying patient, primary caregiver if applicable, and the certifying physician, the findings and determinations of the review, and the recommended changes if any to dispensary facility policy, procedure, systems, or processes.

Constitution Care LLC will conduct a weekly inventory of the Medical Marijuana stock, which will include the date of inventory, a summary of the findings, the name, signature and title of the persons who conducted the inventory, the date of receipt of the Medical Marijuana, the name and address of the registered producer from whom the Medical Marijuana was received, and the kind and quantity of Medical Marijuana received. The record of all Medical Marijuana sold, dispensed, or otherwise disposed of will show the sale, the name of the dispensary facility, the name of the patient or primary caregiver to whom the Medical Marijuana was sold, the address of such recipient, and the brand and quantity of product sold.

All of Constitution Care LLC's record keeping systems will provide the utmost protection with regards to patient confidentiality. Safeguards will be in place to secure all records from erasures and unauthorized changes in data.

All such documentation and records identified in this section will be maintained and made available in accordance with sections 21a-408-69 to 21a-408-70, inclusive, of the Regulations.

5.4 Location / Facility

Locating and designing an advantageous location is essential to the success of any retail facility. However, there are additional considerations that apply to a Medical Marijuana dispensary given the nature of its products.

Site Selection

Management has identified a proposed location for the Constitution Care LLC's dispensary facility. The facility's location is ideal because of its easy access to public transit and major thoroughfares, meaning it is a convenient drive for patients from multiple areas throughout Connecticut. It is also appropriately located because of the property's zoning and its distance from sensitive uses (places primarily used for religious worship, public or private schools, convents, charitable institutions, hospitals, veterans' homes, military establishments, etc.).

For more information on the location and site plan, see the Photographs of Surrounding Neighborhood, the Site Plan, and the Proximity Map in Appendix H.

Site Design

In consultation with talented designers, Constitution Care LLC has created a design with patient service and care, and operational functionality as the top priorities.

With ample rentable square feet, Constitution Care LLC's design will feature:

- Bright, wide-open dispensary department area
- Easy patient flow throughout the facility
- Safe, secure storage area
- Large alternative patient services area
- Ample safety features, including a metal detector for added security

For more information on the site design, see the Floor Plan in Appendix H.

6.0 MANAGEMENT AND ORGANIZATION

6.1 Executive Team

Constitution Care LLC has been formed to address the needs of the Connecticut's qualifying Medical Marijuana patients in a professional, secure, and safe manner. The Executive Team comprises the organization's Board of Directors who are charged with the responsibility to oversee the efficient and compliant corporate governance of the dispensary facility. Below are brief bios of each Board Member.

Chairman: **Michael Abbott**

Michael Abbott is an impassioned leader and has considerable experience managing and motivating new organizations from infancy to latter stages. His experience extends to business, finance, and law enforcement.

Mr. Abbott is currently Chairman of the Columbia Care LLC, a Washington DC based company that operates one of the first registered Medical Marijuana dispensary facilities in the District. He also serves on the Board of Directors and has been a Managing Director at Raptor Group Holdings LP since 2012. At Raptor, Mr. Abbott works closely with the various heads of Raptor's industry groups on the management, oversight and development of the firm's different portfolio companies, co-investments and co-mingled funds.

Mr. Abbott started his career at Swiss Bank Corporation/SBC O'Connor in 1999, first in the Capital Markets Group in London, and then in Chicago as a Director responsible for both Capital Markets and Corporate Derivatives. From 1996-2002, he worked at Goldman Sachs & Co. in New York, initially in the convertible bond department, where he helped develop the first on-line convertible bond trading system for retail investors. Mr. Abbott was appointed US head of structured product trading and origination for Goldman Sachs in 2001. In 2002, he co-founded Elysium Capital, a macro FX hedge fund for which he served as the Chief Operating Officer and member of the investment committee.

Additionally, Mr. Abbott sits on the Trustee Board and Audit Committee of the Registered Investment Company of European Advisors, a New York-based multi-billion dollar public securities real estate firm. He is also a Managing Partner of Terroir Capital, a private equity firm based in Santa Barbara, CA, that acquires wineries and distributes their wines.

Prior to his career in finance, Mr. Abbott was a London Police and Narcotics Officer from 1983-1987. He was the British Police long range rifle champion in 1983, and represented the United Kingdom as a member of the under-25 British Rifle Team in 1982. He was part of the world record breaking senior British Rifle Team that toured the West Indies in 1986. Mr. Abbott also gained his law degree from King's College in London in 1990.

Mr. Abbott now lives in the Northeast with his wife and three children.

Chief Executive Officer: Nicholas Vita

Mr. Vita currently serves as the Vice Chairman and Chief Executive Officer of Columbia Care, LLC, the holder of cultivation center and dispensary registrations in the District of Columbia, and operator of several licensed businesses registered with the Arizona Medical Marijuana program, all of which have operated without a

single violation since commencement of operations. In addition, Mr. Vita serves as the Chief Executive Officer and Vice Chairman of VentureForth Holdings, LLC, the operator of the first licensed Medical Cannabis dispensary facility and the first two licensed cultivation facilities in Washington, DC. Mr. Vita is also a member of the Board of Managers of AP-III, a military infrastructure investment fund where he is responsible for sourcing, structuring and overseeing investments in and deploying resources for public private partnerships with the U.S. Department of Defense overseas and throughout the United States.

Mr. Vita has over 20 years of experience with investing capital, structuring public and private investments, providing strategic advisory services to Fortune 500 companies and negotiating joint ventures and partnerships ranging in size and scope. He is also a Founding Partner and Chairman of the Investment Committee at Apelles Investment Management, LLC (“Apelles”). Apelles is a private holding company for several New York-based funds that specialize in cross-capital structure, credit and stressed/distress investing within the healthcare sector. Prior to founding Apelles, Mr. Vita was a General Partner, member of the investment committee, and Portfolio Manager for the Healthcare Sector at ARX Investment Management, a multi-billion dollar global credit hedge fund. Previously, he worked for over six years in the Investment Banking Division at Goldman Sachs & Co., first as an analyst in Mergers & Acquisitions focusing healthcare, then as an Associate and Vice President in the Healthcare Department. He began his career in investment banking at S.G. Warburg & Co., Inc., a United Kingdom based Merchant Bank.

Mr. Vita currently sits on a number of corporate and academic Boards and received his A.B. from Columbia University where he was a member of the Men’s Varsity Heavyweight Crew Team and President of St. Anthony Hall.

*President, Chief Financial Officer: **Robert K. Mayerson***

Robert K. Mayerson is a seasoned growth-oriented executive with over 30 years of domestic and international experience. He has demonstrated experience in Operations, Strategic Planning, Treasury, Controller, Real Estate and Investor Relations functions. In every role since he graduated Hampshire College in 1979 with a Bachelor of Arts and the University of Massachusetts in 1982 with an MBA in Finance, Mr. Mayerson has achieved and has been recognized for consistently superior results. His skill set includes strong leadership abilities, creative problem-solving, and effective interpersonal communication.

Mr. Mayerson has worked for several high profile retail and consumer branded companies, including PepsiCo, Staples, and Eastern Mountain Sports, of which he has served as President, Chief Operating Officer and Chief Financial Officer. As Treasurer of Staples, he played a key role in developing the company's rapid growth.

As a member of the Board of Advisors, Mr. Mayerson brings a wealth of business knowledge and experience that gives the company an unprecedented advantage with regards to strategic management, particularly pertaining to retail operations, sound financial decision making, and growth.

6.2 Advisory Board

The Constitution Care advisory and consulting team is comprised of experienced managers, lawyers, doctors, policy experts, community organizers, and security professionals. The team includes some of the most knowledgeable and seasoned figures in the Medical Marijuana industry, each intensely dedicated to making Medical Marijuana available to those who need it most and in compliance with the law, particularly the State's Act and Regulations. While many positions have been contracted for, roles must still be filled. Constitution Care LLC is currently conducting an intense round of interviews of candidates to participate in management and advising roles in anticipation of being awarded a dispensary facility license. Upon success, Constitution Care LLC will formally engage the most highly qualified candidates for each position. Below is a list of the current Advisory Board which has been assembled to provide support to Constitution Care LLC's Board of Directors.

Chief Security Advisor: **Bernard R. Sullivan**

Chief Security Advisor Bernard R. Sullivan is an integral part of Constitution Care LLC's Board of Advisors. Mr. Sullivan brings more than 45 years of law enforcement, security, and public safety experience in the State of Connecticut. He has an impressive track record in gathering intelligence, investigating crimes, responding to emergencies, and directing the professional and business aspects of major public and private organizations. As a law enforcement officer, Mr. Sullivan served many roles with the Hartford Police Department, including positions as Sergeant, Lieutenant, Captain, and Police Chief. His relevant experience was further developed in roles as Commissioner of Public Safety for the State of Connecticut where he reported directly to Governor O'Neil, as Acting

Chief of Police for Central Connecticut State University, and as Chief of Staff to Speaker of the House of Representatives for the State of Connecticut.

Due to his vast law enforcement, security, and public safety experience, Mr. Sullivan has gained extensive knowledge of human behavior and performance. He has in-depth knowledge of Connecticut law, legal codes, court procedures, and local government. In his role on the company's Chief Security Advisor, Mr. Sullivan will guide the dispensary facility employees and security staff in the necessary security policies and procedures to ensure a safe working environment. Mr. Sullivan will also serve as head liaison with the local Police Department and Department of Consumer Protection for all safety and security related matters.

Mr. Sullivan is proud to currently serve as a Vice-Chair of the Sandy Hook Commission, which is appointed to review the mass shooting of children and adults at Sandy Hook Elementary School and provide recommendations concerning the prevention of future incidents. Members of the Commission were hand selected by Governor Malloy in the aftermath of the attack. Mr. Sullivan also currently serves as President of the 100 Club of Connecticut, an organization that supports surviving family members of public safety personnel who were killed in the line of duty which, among other benevolent gestures, guarantees a four year college education for surviving children.

Mr. Sullivan is a life member and past President of the Connecticut Police Chiefs Association, an association comprised of all active and some retired Police Chiefs who can only become life members by virtue of time served in office. This organization recommends training and professionalism measures for law enforcement agencies across Connecticut.

Chief Security Advisor Sullivan has been the recipient of a plethora of awards, honors and recognitions for his services, including the Hartford Police Department Merit Award for Valor and the Chief's Medal of Valor. He has received commendations from the Director of the Treasury Department, Special Agents in charge of the Secret Service, the Federal Bureau of Investigation, and the Drug Enforcement Administration, as well as from the U.S. Attorney, Strike Force Organized Crime, and the State's Attorney for Hartford County.

As a member of the Board of Advisors, Mr. Sullivan will provide a unique perspective on dispensary facility operations. He will provide guidance and advice

on all matters of security, compliance, prevention of diversion, theft or loss, conflict resolution, and delivery safety.

*Chief Legal Advisor/Compliance Officer: **Troy F. Kaplan, Esq., MBA***

Troy F. Kaplan, Esq. MBA has extensive experience in Medical Marijuana matters as a licensed attorney in California, New Jersey, and New York. He has served as a Medical Marijuana legal and business consultant in most of the Medical Marijuana states, including Arizona, Colorado, Connecticut, Delaware, Hawaii, Illinois, Massachusetts, Michigan, Nevada, New Hampshire, New Jersey, Oregon, Washington, and the District of Columbia. He has also given advice to advocates for new Medical Marijuana programs in Florida, New York, Pennsylvania, and Georgia. Mr. Kaplan has published articles and commentaries on Medical Marijuana, with topics including the flaws and necessary revisions in current legislation, in publications such as the prestigious *New Jersey Law Journal*.

Mr. Kaplan has sat on the Board of Directors as General Counsel for several California non-profit cooperatives working lawfully within the Medical Marijuana regulations in that state. He has also donated extensive time as a manager for one of California's premier Medical Marijuana dispensaries, *The Farmacy*, a high-concept resource for Medical Marijuana patients in Southern California featured on television shows, news stories, and educational documentaries, including *60 Minutes*, *Anderson Cooper*, and *The Cure For Cancer*, as the nation's model for future storefronts in the industry.

Before becoming an attorney, Mr. Kaplan graduated from Cornell University in Ithaca, New York, with a degree in Economics. He worked briefly with an investment bank in New York City before matriculating Rutgers University in its joint JD/MBA program. Mr. Kaplan graduated on the Dean's List from the law school and Magna Cum Laude from the business school. Upon graduation, he relocated to Los Angeles to pursue a solo law practice in Medical Marijuana law.

More recently, Mr. Kaplan moved to New York City to marry his wife and start a family. He now works for the law firm of GluckWalrath LLP in Trenton, New Jersey where he has expanded his practice beyond Medical Marijuana law and into litigation, municipal law, corporate law, insurance law, and real estate matters. He is licensed to practice in California, New Jersey, and New York.

As a Medical Marijuana attorney, Mr. Kaplan has represented an impressive assortment of Medical Marijuana industry participants, including but not limited to commercial cultivation facilities, dispensary facilities, delivery/transportation providers, commercial edible manufacturers, hydroponic gardening stores, breeders, brokers, appraisers, buyers, cultivators, concentrate manufacturers, doctors, patients, attorneys, glass manufacturers, and media companies.

As a direct result of his in depth experience with an array of Medical Marijuana industry insiders, Mr. Kaplan is highly qualified to serve as a company advisor. His business and legal background in conjunction with his hands-on work in the Medical Marijuana industry provide the basis of knowledge and expertise necessary in such a role.

*Chief Pharmacology Advisor: **Nicholas D. Tamborrino, Pharm. D., MBA***

Nicholas D. Tamborrino, Pharm. D. is a Connecticut licensed Clinical Pharmacist with over 11 years of experience related to multiple areas of pharmacy practice, including a focus in healthcare informatics, managed care, and hospital practice.

Mr. Tamborrino received his Bachelors of Science in Pharmacy Studies in 2000, his Doctor of Pharmacy in 2002, and his Master of Business Administration with a concentration in finance/marketing in 2011, each from the University of Connecticut.

Mr. Tamborrino began his professional career in clinical supply operations with the Bristol-Myers Squibb Pharmaceutical Research Institute where he label compliance matters. He then worked as a Retail Pharmacist for Walgreen's Corporation and as a per-diem Hospital Pharmacist for Bridgeport Hospital. Most recently, Mr. Tamborrino has served as a per-diem Clinical Pharmacist for St. Vincent's Medical Center in Bridgeport, CT., a Clinical Consultant for CVS/Caremark in the Connecticut/New York territory, and an Epic Project Systems Analyst/Pharmacy Training Coordinator for the Yale New Haven Health System in Stratford, CT.

As Chief Pharmacology Advisor, Mr. Tamborrino will provide invaluable insight into the strategic planning of the company, particularly with regards to the selection of the best medicinal products to accommodate qualifying patients, the range of additional services provided by the facility, and the best-practice policies and procedures for facility employees.

*Chief Inventory Advisor: **Nate Nienhuis***

The Chief Inventory Advisor, Nate Nienhuis, is an experienced indoor, commercial horticulturalist. He is currently registered with the District of Columbia's Medical Marijuana program for his work with several of the registered dispensaries and cultivation centers. His expertise expands beyond cultivation and into cultivation center design and engineering. As such, he is uniquely positioned to assess the qualities and characteristics of incoming inventory produced by the State's registered producers.

Before beginning his career in Medical Marijuana, Mr. Nienhuis attended Cal State Fullerton for mechanical engineering. He worked as Head Engineer for Growlite where he designed light bulbs and fixtures for the indoor gardening industry. He also performed engineering work for Carol Shelby and Goodyear racing. Additionally, Mr. Nienhuis has designed commercial agricultural equipment to enable the largest farms in the country to operate on alternative fuels. More recently, he was retained as Head Engineer for Holistic Remedies and Capital City Cultivation in Washington, DC to design and build their respective registered cultivation centers.

Interestingly, Mr. Nienhuis is a licensed operator for pest control, giving him unprecedented insight into pest control in an indoor horticulture environment. He also attended Rancho Santiago College for Fire Tech training and is well equipped to handle such unforeseen emergencies.

Mr. Nienhuis has donated extensive time to serve pro bono as President of the OC Kings Soccer Club, also known as SoCal Futbol Club. There, he managed a soccer program that has guided many amateur players into professional leagues. He is also a licensed professional soccer coach. Mr. Nienhuis is an avid hunter and fisherman and has a strong propensity for conservation and wildlife management.

As Chief Inventory Advisor, Mr. Nienhuis expects to utilize his expansive knowledge and unique skill set to create a comprehensive array of offerings to accommodate every sub-set of patients in the State based on the list of qualifying conditions set forth in the Act and Regulations.

Chief Medical Advisor, Chairwoman of the Scientific Advisory Board: Dr. Rosemary Mazanet, MD, PhD

Constitution Care LLC has retained Dr. Rosemary Mazanet, a Connecticut resident and medical physician licensed locally in Connecticut as well as in New York and Massachusetts, to serve the company on the Board of Advisors. Medical Marijuana is still in its infancy as an industry, so medical information pertaining to many genetic strains simply is not yet available. The advice and guidance from a professional in the medical sector is imperative to assure the State's patients are receiving the best medicine for their respective qualifying conditions. Of course, in accordance with section 21a-408-35(h) of the Regulations, the company has not and will not enter into any agreement with Dr. Mazanet concerning the provision of services or equipment that may adversely affect any person's freedom to choose the dispensary facility at which a qualifying patient or primary caregiver will purchase Medical Marijuana.

Dr. Mazanet is a Harvard trained internist, hematologist, and oncologist with extensive work experience focused on life sciences management, medical-related investment groups, and drug development executive management. She has served in an array of leadership roles, including but not limited to Chief Medical Officer for NKT Therapeutics and Galena Biopharma, CEO of Diabetes America, Inc., Breakthrough Therapeutics LLC, and Access Pharmaceuticals, General Partner and Director of Research for Oracle Partners LP, and Senior Director of Clinical Research for Amgen, Inc. Dr. Mazanet has also served as Director for over ten pharmaceutical related organizations and currently serves as Trustee for the University of Pennsylvania-School of Medicine. She is a published author and has written over 15 original papers on various medical topics and contributed to over 20 medical reviews, papers, and books.

Dr. Mazanet earned her BA from the University of Virginia where she was a member of Phi Beta Kappa, her PhD from the University of Pennsylvania-School of Medicine studying anatomy and cell biology, and her MD from the University of Pennsylvania-School of Medicine where she was a member of Alpha Omega Alpha. She served her residency in internal medicine at Brigham & Women's Hospital which is part of the Harvard Medical School in Boston, Massachusetts. Dr. Mazanet was further trained through her experience in the Clinical Oncology Fellowship at the Dana Farber cancer Institute, which is also part of the Harvard Medical School.

As Chief Medical Advisor, Dr. Mazanet will help create a strategic vision for the company with an eye towards the research and development of more effective

medicines for the qualifying patients of Connecticut. As a nationally respected figure in her field, she will be vital in establishing lasting relationships with research institutes, health organizations, and area hospitals.

*Scientific Advisory Board Member: **Dr. D. Barry Boyd, MD, MS***

With twenty-three years as a board-certified medical oncologist/hematologist and a Master's degree in nutritional biochemistry, Dr. Boyd has a recognized specialization in cancer treatment and recovery. Dr. Boyd is a pioneer in the field of integrative cancer care with a targeted focus on nutritional support for cancer patients. Incorporating emergent evidence-based medical oncology with cancer-specific nutritional counseling, he combines comprehensive support for the healing process.

Dr. Boyd enrolled in the Institute for Human Nutrition at Columbia University and received his medical degree from Cornell University Medical College. He completed his fellowship in Hematology-Oncology at New York Hospital-Cornell Medical Center in New York. Dr. Boyd is presently an attending physician at Greenwich Hospital – Yale Medical Center. Additionally, Dr. Boyd is an assistant clinical professor at the Yale University School of Medicine. Most recently, Dr. Boyd has been appointed Director of the Nutrition and Integrative Medicine Curriculum at Yale University School of Medicine.

Dr. Boyd is founding president of The Integrative Cancer Care Research Foundation and a board member of Environment and Human Health, Inc., a nonprofit organization made up of physicians and public health professionals dedicated to the purpose of protecting public health from environmental harms. Dr. Boyd has also recently published a book entitled, *The Cancer Recovery Plan*.

*Chief Information Technology Advisor: **Alexis Kopikis***

Chief Information Technology Advisor Alexis Kopikis has a strong history of rapidly designing and delivering new IT products to market, including but not limited to web, mobile and desktop products for a variety of companies and verticals from financial services to action sports. His specialties include social and digital media, internet and mobile applications, consumer products, software development, product strategy, product planning, product design, product marketing, product management, usability, UI design, human factors, marketing, sales, business development, fund raising, and general management.

Mr. Kopikis obtained his Bachelor of Arts in Political Science (in two years' time) and Masters of International Management both from the University of California-San Diego. He began his career with ING Baring Securities in institutional equity sales but left to found WorldStreet, a Client Relationship Management ("CRM") and peer-collaborative communication platform for the financial industry which was deemed InfoWorld Magazine's 21st most innovative company of 2001 and eventually acquired by Thomson Financial. Since then, Mr. Kopikis has served as Vice President of Product for Convog, Inc., founded Propel Consulting, and founded Krush, Inc.

As Chief Information Technology Advisor, Mr. Kopikis will ensure that the company's marketing and technology plans are well-developed, pragmatic, and attainable. He will also guide the facility in the design and maintenance of a fully functional IT department capable of preventing, identifying and immediately rectifying any technological issues.

Mr. Kopikis is a United States and Argentine citizen, is a native Spanish speaker, and is the proud father of twins.

*Board of Advisors: **Patient Outreach***

The Patient Outreach position requires strong communication skills coupled with a background in medicine, healthcare, or nursing. All candidates for this role must have demonstrated experience working with communities in outreach programs. Although experience in the Medical Marijuana field is preferred, it is not mandatory as Constitution Care LLC is seeking a candidate that has a positive attitude, outgoing personality, and acute relationship development skills more than cultivation related experience.

Strong personal skills are preferred for this position as it may require interactions with people who have severe health issues, thus necessitating a sensitive and understanding approach. Obviously, this position is that of a company representative to the public and requires a particular persona and ability to sensitively communicate with all walks of people.

Constitution Care LLC is currently interviewing candidates for this position, however will refrain from contracting with applicants until the successful award of a dispensary facility license. Constitution Care LLC would prefer to hire locally

for this position as we feel strongly that that our affiliate interacting with local patients should be a local resident.

Board of Advisors: Patient Care

The Patient Care position is an advisory role to the management team at the production facility. This position requires a professional demeanor, exemplary communication skills, and a keen ability to assess the needs of the local State qualified patient population.

Through in-person interactions with registered, qualified patients in the State Medical Marijuana program, the Patient Care specialist shall convey the needs of the patients to the cultivators so that

Constitution Care LLC operations truly reflect the needs of the end consumers. Essentially, the position calls for the Patient Care specialist to act as liaison between the patient community and the cultivation team.

Constitution Care LLC is currently interviewing candidates for this position, however will refrain from contracting with applicants until the successful award of a dispensary facility license. Constitution Care LLC would prefer to hire locally for this position as we feel strongly that that our affiliate interacting with local patients should be a local resident.

6.3 Personnel Plan

General Philosophy

Constitution Care LLC has a comprehensive staffing plan in place to guide recruitment, hiring, training and managing its dispensary facility employees. Highlights of the plan feature include the following:

- Precise definition of responsibilities
- Clearly understood chains of authority
- Well-paid, well-qualified, well-trained personnel
- High patient/staff ratio
- Professional recruiting practices
- Thorough training of new hires

Employee Handbook

A comprehensive employee handbook provides information to guide employees’ behavior and relationship with the dispensary facility (available for review upon request). The manual, which is furnished to all dispensary facility employees upon being hired, addresses the following:

Section 1: The Way We Work

Section 2: Your Pay and Progress

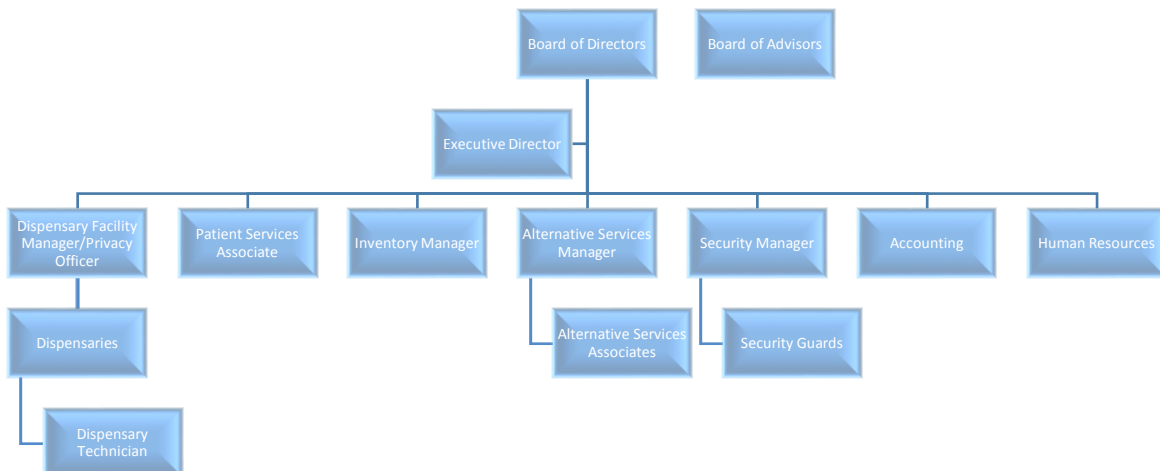
Section 3: Time Away From Work and Other Benefits

Section 4: On the Job (covers various aspects of conduct policy and procedures)

Section 5: Safety in the Workplace

Organization

The following chart describes the company’s current organizational structure:



Recruitment

Constitution Care LLC’s recruiting efforts for dispensary facility support staff (i.e. patient services associate, alternative services manager, and alternative services

staff) will be primarily directed at candidates with the following qualifications:

- Pharmacy or health-related educational/professional backgrounds
- Interest and aptitude for the healing arts
- Spotless criminal records
- Experience in restricted access retail venues
- Valid Medical Marijuana patient status

Recruiting efforts for dispensary technicians will be primarily directed at candidates with the following qualifications:

- Active pharmacy technician registration in Connecticut within the past five years
- Interest and aptitude for the healing arts
- Spotless criminal records
- Experience in restricted access retail venues
- Valid Dispensary Technician License in accordance with section 21a-408-24 of the Regulations

Recruiting efforts for dispensaries will be primarily directed at candidates with the following qualifications:

- Active pharmacist licensed under chapter 400j of the Connecticut General Statutes
- Experience in dealing with patients with qualifying conditions
- Spotless criminal records
- Experience in restricted access retail venues
- Valid Dispensary License in accordance with section 21a-408-24 of the Regulations

Training

Qualified dispensary facility candidates will be hired on a three-month probationary status. During this period, they will participate in a rigorous training process, and be evaluated for suitability in a restricted-access medical environment. Training materials will include the employee handbook and other reading materials, lectures by qualified professionals, hands-on training, and quizzes. Topics will include on-the-job and other related education, professional

conduct, ethics, State and federal laws regarding patient confidentiality, developments in the field of Medical Marijuana, security measures and controls to prevent the diversion, theft or loss of Medical Marijuana, emergency response procedures, and proper record keeping. The program will consist of the following modules:

Legal – Legal training will cover all State and federal laws relating to Marijuana, particularly those laws related to Medical Marijuana such as the Act and Regulations. Legal obligations of registered Medical Marijuana dispensary facilities and staff will be emphasized. Other topics will include the rules and regulations of the dispensary facility itself, sexual harassment training, effective interaction with law enforcement personnel, and the rights and responsibilities of Medical Marijuana patients including patient confidentiality. Legal training will include at least one two-hour session with an attorney who is a practicing member of the State Bar.

Medical – Medical training will include disabled rights and sensitivity, how to identify and interact with a patient having a medical emergency, the proper uses and benefits of Medical Marijuana, and an introduction to the other medical treatments offered by Constitution Care LLC.

Safety – In addition to its focus on safety, security training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques and diversion, theft and loss detection techniques.

For more information on training, see Training & Continuing Education Plan in Appendix I.

Personnel

Individual job descriptions have been developed for each position in Constitution Care LLC's organization. The purpose is to ensure that all personnel are clear about their role and responsibilities, and to understand how their position contributes to the safe, efficient operation of the center.

Positions addressed include the following:

- Dispensary Facility Manager/Privacy Officer –
Oversee the entire dispensary department operation and ensure that the facility successfully delivers on its mission and business objectives, oversee proper registration and training of all dispensary department

employees, oversee record management and retention, and maintain physical security of Medical Marijuana.

HIPAA requires that every pharmacy, and likely the dispensary facility as well, appoint a Privacy Officer who must develop and regularly update the organization's privacy policies and procedures. At Constitution Care LLC, the Dispensary Facility Manager will serve as the Privacy Officer and will also be responsible for all information security requirements, including the requirement that patient information remain confidential. The Privacy Officer will draft and implement the appropriate policies and procedures, keep such documents on file, and collaborate with other personnel to ensure strict compliance.

- Inventory Manager – Oversee procurement of quality medicine from registered producers and ensure that funds are properly obtained, secured and reported pursuant to the Act and Regulations. The position will be held by a registered dispensary.
- Dispensary – Assist patients by dispensing the Medical Marijuana, facilitating the selection of the appropriate Medical Marijuana products from the available inventory, affix compliant labels to containers, provide any instructions regarding the use of Medical Marijuana.
- Dispensary Technician – Generally assist dispensaries, assist in the dispensing of Medical Marijuana only when under the direct supervision of a dispensary.
- Security Manager – Oversee security guards and security operations of the facility. Monitor all areas of operations to ensure the safety of patients, staff and neighbors, and compliance with all laws and regulations.
- Patient Services Associate – Greet patients, conduct new patient orientation, verify patient information, input data, address and resolve complaints, and monitor dispensary facility's security status.

- Alternative Services Manager – Oversee non-Medical Marijuana products and services available to patients beyond the dispensary department area, and oversee the alternative services staff.

7.0 FINANCIAL PLAN

7.1 Important Assumptions

Because Constitution Care LLC does not yet have an operational history, corporate management has made its best estimate based on information available. Actual performance for the dispensary facility will vary. Constitution Care LLC's assumptions are also based on a careful analysis of data culled from existing Medical Marijuana states, and adjusted for the State's Act, Regulations and patient demographic. In sum, while the organization has gone to great lengths to provide accurate estimates, actual performance for Constitution Care LLC will necessarily vary.

For more information on the income statement, balance sheet, cash flow statement, and other pro forma documents, see Financial Statements in Appendix K.



CONSTITUTION
C A R E

Appendix J

Marketing Plan

In Re: RFA Section D Question 1

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

MARKETING PLAN

1.0 MARKETING OVERVIEW

Constitution Care LLC marketing and communications plans will position our dispensary facility as the leading provider of Medical Marijuana services and products in the State of Connecticut. We have an unwavering commitment to be the market leader in patient care, education, research and social responsibility:

- We will provide our patients with the highest quality care in a safe, compassionate and therapeutic environment.
- Constitution Care LLC will be the leading resource to patients for awareness and education around responsible use of Medical Marijuana. Our outreach and public service initiatives will encompass education for dispensary agents, healthcare providers, researchers and patients. We will support patient advocacy by facilitating patients' ability to share their experiences and educate other qualified patients and our staff.
- Constitution Care LLC will work directly with the scientific, healthcare and research communities of Connecticut to enable proprietary research and development programs that ensure responsible and effective use of medical marijuana and its ancillary products. Our patients will be offered the opportunity to participate in these studies.
- As we do in all our markets, we will be a responsible community member and contributing partner to relevant organizations including healthcare, law enforcement, and patient advocacy groups. We will support local philanthropies that have a meaningful impact in the communities in which we operate.

2.0 COMPETITIVE POSITIONING

Our mission is to be the premier provider of pharmaceutical-grade medical marijuana services and products for qualifying patients in the State of Connecticut. We are confident that our service model and proven experience will succeed in this market due to the following:

- Constitution Care LLC not only brings top quality management and financial capital – but an unrivaled expertise with affiliates operating dispensaries in highly regulated, state licensed, medical programs.

- Our foundation is a comprehensive team of established professionals with over 250 combined years of relevant business, retail, research, security, technology, scientific and compliance expertise from the United States and Europe.
- We offer a combination of expertise, proprietary security infrastructures, and established success in dispensing procedures and patient care services that positions Constitution Care LLC as a leader in the industry.
- We will provide a comprehensive patient experience leveraging technology to engage and educate patients at every phase of their care.
 - This will include a robust and integrated website, mobile applications and in-store kiosk for patient registration/research, on-ramp and product information.
 - Our comprehensive audit trail enables us to monitor patient use and abuse and allows us visibility into our patients overall condition and the efficacy of our products and services so we can continuously improve the quality of our care.
- Through its affiliates, Constitution Care LLC operates best-in-class dispensary facilities and has become the market share leader in both Arizona and Washington, DC by partnering with local leaders, neighboring communities, state regulators, law enforcement and healthcare professionals
- Constitution Care LLC expects to set the standards for others in the industry to protect the integrity of the products and services we all provide. We will ensure that qualified patients have access to the care they need and deserve.

3.0 MARKETING STRATEGY

Constitution Care LLC will take a 360° approach to marketing in an effort to empower qualified patients to conveniently and securely access the education, services, products and resources their treatment requires.

Create Awareness

Constitution Care LLC will create awareness around the products and services offered by sharing information through digital, print and outreach efforts. There will be no direct advertisement of products but rather education and information around Medical Marijuana as a solution for qualified patients' needs. Awareness will primarily be driven by our patients and proactive partnerships with members of the local healthcare community and advocacy groups.

Promote Patient Education

Constitution Care LLC will be a leading resource for education pertaining to Medical Marijuana and will leverage pharmacist (dispensary) interaction directly along with channels such as websites, forums, and community events to provide information for qualified patients to make informed decisions. The value of the product that will be offered at our dispensary facility will be apparent in our ability to provide education (including optimal dosing for reproducible medical effects) and appropriate warnings about the safe and effective usage of the product, regardless of formulation.

Maintain Flexible Pricing & Promotional Strategies

Based on our experience in other markets, we have found that it is important to offer patients a broad assortment of products with a range of pricing to select from. This is not dissimilar from the impact that generic drugs have for patients today in terms of lowering their cost versus name brand drugs. Given the qualifying conditions specified by the State, the most common symptoms amongst registered patients will likely be chronic pain, muscle spasticity and depression driven by central nervous system, HIV/AIDS, Cancer and auto immune disorders. Based on our experience treating patients with these symptoms in other markets we have tailored our product plan and offering accordingly for the appropriate range of inhaled, ingested and topical products. Based on the range of our product offering we will be able to consistently offer our patients a broad spectrum of pricing. Pricing will approximate the local market rate for non-medicinal (illegal) marijuana to discourage any incentive for black market diversion. We will offer our patients frequent promotions to help incentivize trial of new strains and product offerings. Constitution Care LLC will offer discounts to qualified patients in need including low income, senior citizens and veterans.

For more information on our discounted medicine, see Compassionate Need Plan in Appendix M.

Provide Un-Paralleled Service

Constitution Care LLC will hire and train the most qualified dispensary facility staff to ensure the most comprehensive and highest quality one-on-one patient care and follow up. Constitution Care LLC is proud to have a highly experienced, skilled and trained Pharmacist as our Dispensary Facility Manager and Privacy Officer.

For more information on our Dispensary Facility Manager, see background information in Appendix C, background information in Appendix D, and Organizational Chart in Appendix K.

Our dispensary department team is led by and comprised of trained Pharmacists and we have drawn from the best practices of the leading established pharmacies to develop our policies and procedures surrounding patient care, safety and privacy. All of our dispensaries will be Connecticut-licensed Pharmacists with years of experience relating to multiple areas of pharmacy expertise.

The initial patient consult will consist of a complete medication therapy management program looking to capture patient's medication history, problem history, allergies, primary care provider, etc. The follow-up consult will consist of documentation on past refill prescription strain and outcome. We will monitor for side effects from patient's medication list. We will also address concerns relating to costs of medications. Using RX software, we can price shop for patients to find cheapest prices on non-marijuana medications.

For more information on our services provided, see Services Offered in Appendix I.

Encourage On-going Engagement

Constitution Care LLC will foster a relationship with its patients in order to offer them continued education and resources around responsible use of Medical Marijuana throughout their treatment program. We will do this with tools such as email, direct mail, digital and ongoing outreach to ensure their patients have the most secure and accurate information and resources available. We will also provide patients with a mobile application to enable the most convenient access to dispensary facility services.

Proactively Support Advocacy and Research

Constitution Care LLC will support patient advocacy by facilitating patients' ability to share their experiences and educate other qualified patients. Constitution Care LLC will also give patients the ability to donate, anonymously, their usage/efficacy information so that research partners can use its patient database to screen for candidates to include in studies or trials. Constitution Care LLC will actively partner with leading doctors, clinics and case workers using a proprietary HIPAA compliant IT system.

Dedicated medical professional examination and counseling areas will be embedded in the dispensary facility design to facilitate the integration of Medical Marijuana into traditional healthcare standards of care. Constitution Care LLC will offer several proprietary research programs, including the Integrated Medical Marijuana and Counseling ("IMMAC") program designed and overseen by medical professionals and independent institutions to monitor patient compliance and track measured outcomes data for use in clinical study – with the goal of peer review and assessment.

For more information on the IMMAC program, see Services Offered in Appendix 1.

Our dispensary facilities see their role in the patient interaction as a crucial support for part of the integrated care plan. In addition to collecting patient reported outcomes data (PROMS) at each center, the centers will be a resource of information based on our multi-state database about appropriate and safe dosing of product for reproducible and reliable medical effectiveness. The education and support programs planned for the centers and through the website will provide a safe and responsible forum for patients to optimize their medical care.

We have partnered with Health Outcomes, Policy and Economics (“HOPE”) Collaborative Group at the University of Connecticut School of Pharmacy to create a patient registry to scientifically assess the effectiveness and safety of medical marijuana through the collection of patient reported outcomes (“PROMS”). This is in addition to the ongoing rollout of the IMMAC program that is focused on AIDS/HIV efficacy in Washington D.C. that we hope to implement in Connecticut. We expect the outcomes data we collect, under the direction of Constitution Care’s Scientific Advisory Board will be the first collected and published dataset on medical marijuana outcomes in the United States.

For more information on Constitution Care LLC’s planned studies, see Research Plan in Appendix N.

Respect & Responsibility

Constitution Care LLC will institute subsidy programs for patients (low income, veterans and senior citizens) and will allocate up to 15% of company’s profit to local, charitable organizations and programs including food banks, law enforcement, education/rehabilitation and low income housing.

For more information on Constitution Care LLC’s charitable giving programs, see Community Benefits Plan in Appendix O.

Constitution Care LLC will sponsor local artisans and vendors as we will continue to buy from and support local businesses. Based on patient demand, we may offer products from such artisans and vendors through our alternative services department.

4.0 MARKETING PLAN

For more details on Constitution Care LLC’s marketing plan, see the following power point presentation followed by a sample Brochure:



CONSTITUTION

C A R E

Marketing Plan

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Constitution Care LLC

Mission

At Constitution Care LLC we aim to be the premier Provider of responsible medical marijuana services and products for the State of Connecticut giving the citizens who suffer today a better, natural way to eliminate their suffering and improve their lives.

Goal

Continue to be an industry leader in expertise, compliance, innovation, social responsibility and education. Consistently deliver safe and quality products and services and exceed our patients' and partners' expectations.

Commitment

To offer financial and philanthropic support to and work in partnership with local leaders, law enforcement, medical/healthcare providers and patient advocacy groups to ensure our neighbors benefit from our involvement in their communities. To work with the scientific community to provide ongoing support to research and development around responsible use of medical marijuana.

Marketing Overview

Constitution Care LLC marketing and communications plans will position our dispensary facility as the leading provider of Medical Marijuana services and products in the State of Connecticut. We have an unwavering commitment to be the market leader in patient care, education, research and social responsibility.

Specifically, we are committed to:

- Providing our patients with the highest quality care in a safe, compassionate and therapeutic environment.
- Being the leading resource to patients for awareness and education around responsible use of Medical Marijuana.
- Working directly with the scientific, healthcare and research communities of Connecticut to enable proprietary research and development programs that ensure responsible and effective use of medical marijuana and its ancillary products .
- Being a responsible community member and contributing partner to relevant organizations including healthcare, law enforcement, and patient advocacy groups.



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Competitive Positioning

Our mission is to be the premier provider of pharmaceutical-grade medical marijuana services and products for qualifying patients in the State of Connecticut. We are confident that our service model and proven experience will succeed in this market due to the following:

- Top quality management and financial capital – along with an unrivaled expertise operating production facilities and dispensary facilities in highly regulated, state licensed, medical programs
- A comprehensive team of established professionals with over 250 combined years of relevant agricultural, scientific and compliance expertise from the United States and Europe
- We offer a combination of expertise, proprietary security infrastructures, and established success in dispensing procedures and patient care services that positions Constitution Care LLC as a leader in the industry
- We will provide a comprehensive patient experience leveraging technology to engage and educate patients at every phase of their care including a robust website, mobile applications and in-store kiosk for patient registration/ research and on-ramp and product information

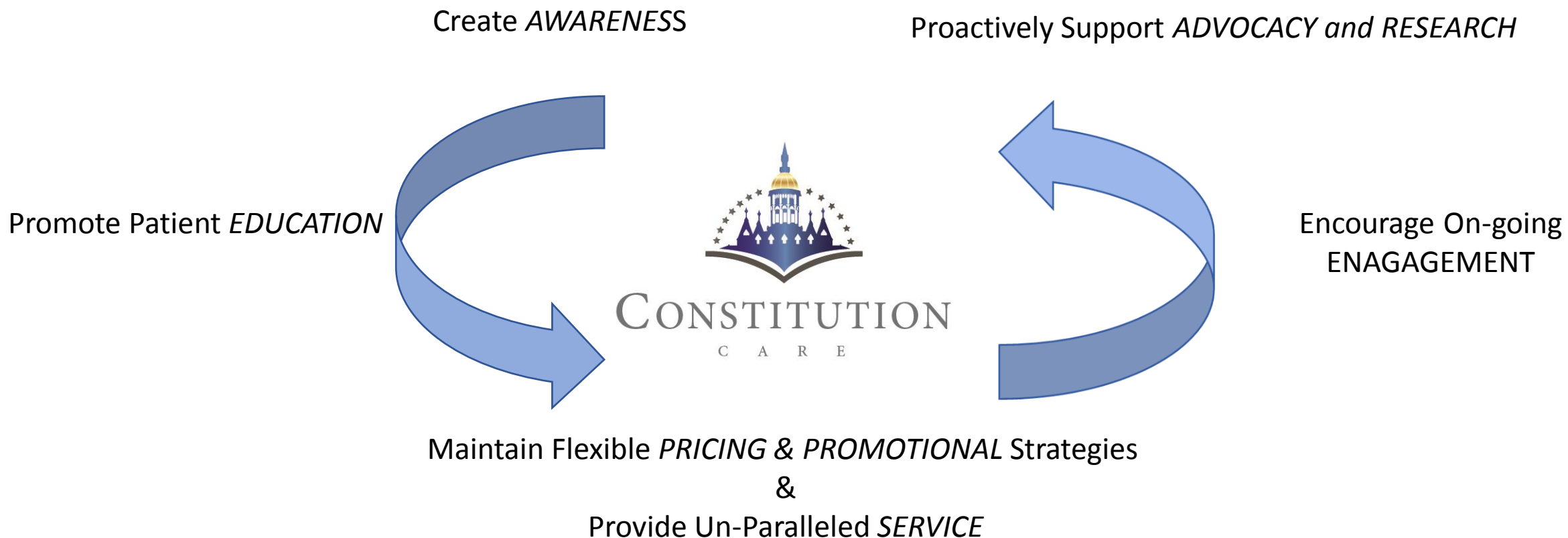
Competitive Positioning (cont'd)

Our mission is to be the premier provider of pharmaceutical-grade medical marijuana services and products for qualifying patients in the State of Connecticut. We are confident that our service model and proven experience will succeed in this market due to the following:

- Through its affiliates, Constitution Care LLC operates best-in-class dispensary facilities and has become the market share leader in both Arizona and Washington, DC by partnering with local leaders, neighboring communities, state regulators, law enforcement and healthcare professionals.
- Constitution Care LLC expects to set the standards for others in the industry to protect the integrity of the products and services we all provide. We will ensure that qualified patients have access to the care they need and deserve.

Marketing Strategy

Our 360° approach empowers qualified patients to conveniently and securely access the education, services, products and resources their treatment requires.



Create Awareness

Constitution Care LLC will create awareness around the products and services offered by sharing information through digital, print and outreach efforts. There will be no direct advertisement of products but rather education and information around Medical Marijuana as a solution for qualified patients' needs.

Patient mindsets

*I am suffering and I need a solution for my pain and I am unaware of medical marijuana or I do not think it is the right solution based on what I know. **I am unaware, skeptical or nervous.***

OR

*I am suffering and I need a solution to my pain and I am aware of medical marijuana and I want to learn more. **I am curious.***

Tactics

Website & Mobile

Qualified patients will have access to unlimited resources from education to patient stories to product information through a comprehensive desktop and mobile site.

Print

Print “advercation” while minimal will be strategically placed in relevant publications to increase awareness and educate qualified patients with positive information around medical marijuana treatment programs


PR

Periodic press releases to local papers, newsletters, doctor’s offices and community boards to increase awareness and positive information around medical marijuana treatment programs

Outreach/Events

Events will be facilitated and outreach coordinated with Doctors, Clinics, Universities, nursing homes etc. to increase awareness


Create Awareness



Think you Know
Medical Cannabis?
Think Again.

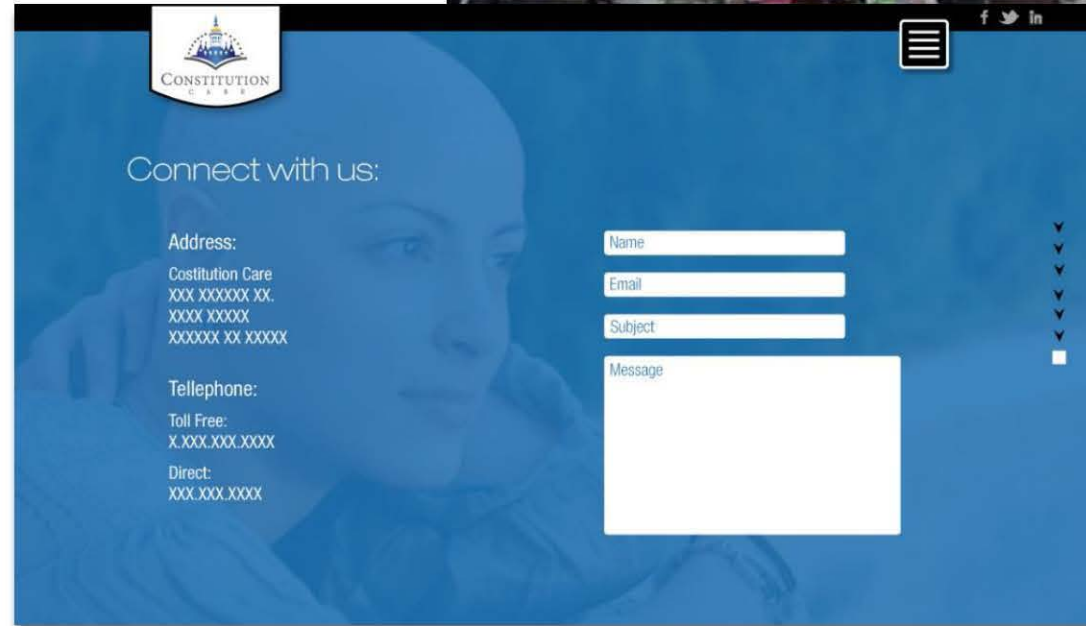
[Learn More >](#)

Our Mission
We are on a mission to eliminate suffering one patient at a time through the responsible use of Medical Cannabis. Join us.



At Constitution Care we aim to be the premier Provider of Medical Cannabis Services and Products for the State of Connecticut giving the citizens of the commonwealth who suffer today a better, natural way to eliminate their suffering and improve their lives.

[Learn more >>](#)

Connect with us:

Address:
Constitution Care
XXX XXXXXX XX.
XXXX XXXXX
XXXXXX XX XXXXX

Tellephone:
Toll Free:
X.XXX.XXX.XXXX
Direct:
XXX.XXX.XXXX

Name

Email

Subject

Message

Promote Patient Education

Constitution Care LLC will be a leading resource for education pertaining to Medical Marijuana and will leverage pharmacist (dispensary) interaction directly along with channels such as websites, forums, and community events to provide information for qualified patients to make informed decisions.

Patient mindset

*I know medical marijuana is right for me and I am looking for the right treatment center based on convenience, price, knowledge of staff, quality of product and price. **I need the right treatment partner.***

Tactics

Website & Mobile

Qualified patients will have access to unlimited resources from education to patient stories to resource networking through a comprehensive desktop and mobile site.

Outreach/Event

Events will be facilitated and outreach coordinated with Doctors, Clinics, Universities, nursing homes etc

Promote Patient Education



Find a Physician:

Search our network to find a physician right for you to help guide you through your treatment process



[Learn more >](#)



Our Community:



Our communities are important to us and we are committed to having a positive impact in the those that we operate. To that end, we have established strong partnerships with local leaders and organizations including law enforcement, medical experts, Universities, non-profits and advocacy groups.



[Learn more >>](#)



Promote Patient Education

- Constitution Care LLC will actively partner with leading doctors, clinics and case workers using proprietary HIPAA compliant IT system
- Dedicated medical professional examination and counseling room will be embedded in dispensary facility design to facilitate inclusion of MMJ into traditional healthcare standard of care
- Constitution Care LLC will offer several proprietary research programs, including IMMAC (Integrated Medical Marijuana and Counseling) designed and overseen by medical professionals and independent institutions to monitor patient compliance and track measured outcomes data for use in clinical study – with the goal of peer review and assessment

Dr. Rosemary Mazanet, MD PhD a Harvard trained internist, hematologist, and oncologist with extensive work experience focused on life sciences management, medical-related investment groups, and drug development executive management will help lead our medical outreach efforts and set the standards for our patient treatment programs.



Flexible Pricing, Product Assortment & Unparalleled Service



Patient mindset

*I have chosen Constitution Care LLC based on what I have learned now, I am headed there now and hoping to have a good experience so I can trust and keep coming back. **I want the best experience.***

Tactics

Pricing/promotion

Pricing and promotional programs will be available to those who qualify. See pricing and promotional details.

Product offering

Based on our experience treating patients' symptoms in other markets we have tailored our product plan and offering accordingly for the appropriate range of inhaled, ingested and topical products.

Staff

Patients will have access to highly qualified, compassionate, and trained staff who will meet their specific needs before, during and after visiting the center.

Flexible Pricing & Promotion

Pricing

- Based on our experience in other markets, we have found that it is important to offer patients a broad assortment of products with a range of pricing to select from. This is not dissimilar from the impact that generic drugs have for patients today in terms of lowering their cost versus name brand drugs.
- Based on the range of our product offering we will be able to consistently offer our patients a broad spectrum of pricing.
- Pricing will approximate the local market rate for non-medicinal (illegal) marijuana to discourage any incentive for black market diversion.

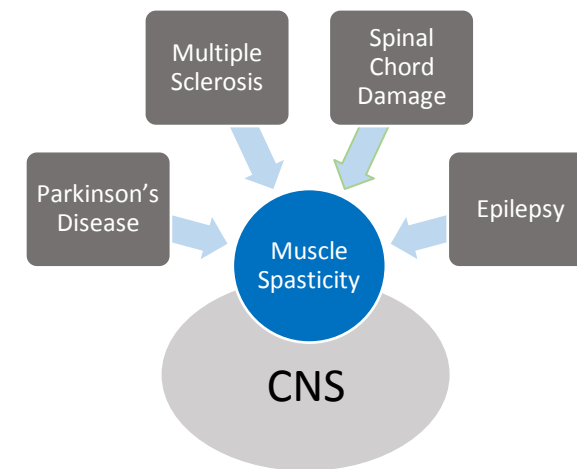
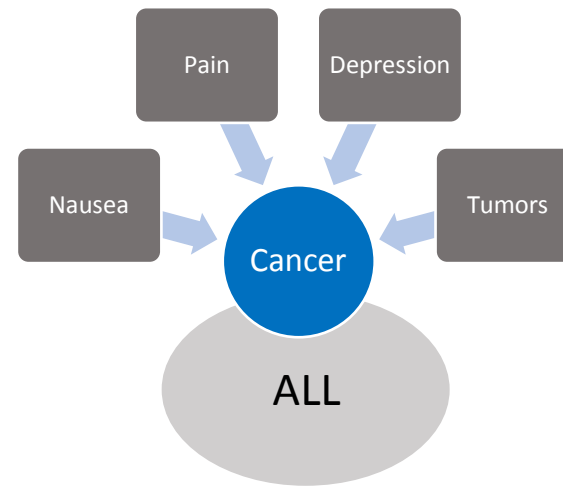
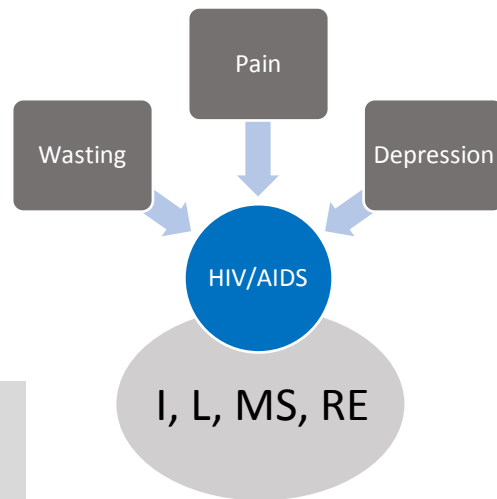
Promotion

- We will offer our patients frequent promotions to help incentivize trial of new strains and product offerings.
- We will offer discounts to qualified patients in need including low income, senior citizens and veterans.



Product Offering Driven by Qualifying Conditions

- Given the qualifying conditions specified by the State, the most common symptoms amongst registered patients will likely be chronic pain, muscle spasticity and depression driven by central nervous system, HIV/AIDS, Cancer and auto immune disorders.
- Based on our experience treating patients with these symptoms in other markets we have tailored our product plan and offering accordingly for the appropriate range of inhaled, ingested and topical products, all of which can help treat the symptoms caused and systems affected by these qualifying conditions.

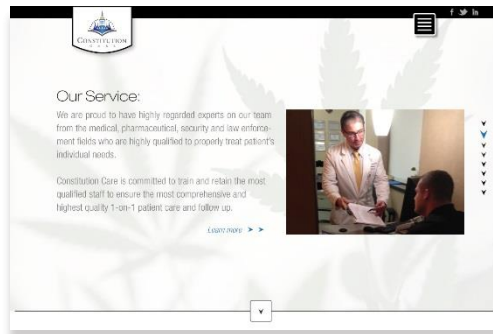


AFFECTED SYSTEMS

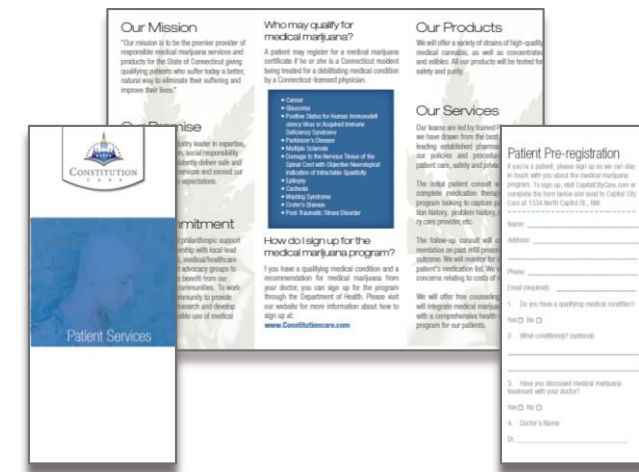
- CNS:** Nervous system
- E:** Endocrine
- GI:** Digestive
- I:** Immune
- L:** Lymphatic
- MS:** Muscular/skeletal
- R:** Reproductive
- RE:** Respiratory
- U:** Urinary

Unparalleled Service

- Constitution Care LLC will hire and train the most qualified dispensary facility staff to ensure the most comprehensive and highest quality one-on-one patient care and follow up.
- Our dispensary department team is led by and comprised of trained Pharmacists and we have drawn from the best practices of the leading established pharmacies to develop our policies and procedures surrounding patient care, safety and privacy. All of our dispensaries will be Connecticut-licensed Pharmacists with years of experience relating to multiple areas of pharmacy expertise.
- We will provide a variety of tools throughout the patient experience to assist in serving the patients including product brochures, kiosks to access digital content and mobile tools for on-the-go access to ongoing education and events.



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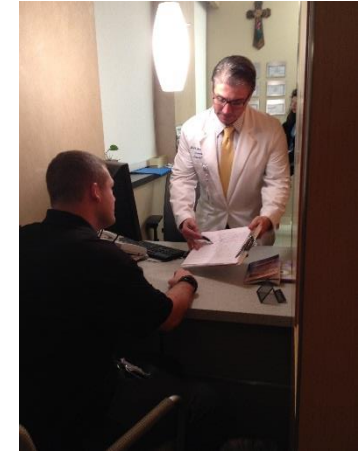
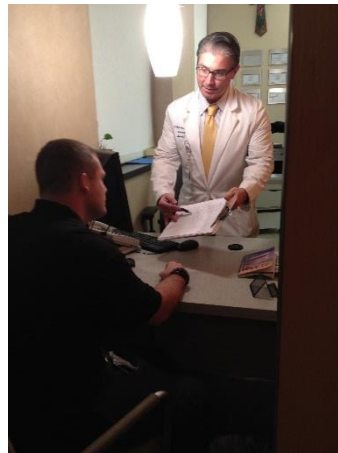


Unparalleled Service

Patient experience will consist of the following steps:

- A complete medication therapy management program looking to capture patient's medication history, problem history, allergies, primary care provider, etc upon initial consult.
- The follow-up consult will consist of documentation on past refill prescription strain and outcome.
- Monitoring for side effects from patient's medication list.
- Using RX software, we can price shop for patients to find cheapest prices on non-marijuana medications addressing concerns relating to costs of medications.

We are proud to have on our team, **Nicholas D. Tamborrino, Pharm.D**, a Dispensary Facility Manager and clinical Pharmacist with 11 years of experience relating to multiple areas of pharmacy practice with extensive focus in Healthcare Informatics, Managed Care and Hospital Practice.



Encourage Ongoing Engagement & Advocacy

Patient mindset

*Constitution Care LLC is my trusted partner and solution for my pain and I feel so strongly about the products and services they provide that I want to share my experience with others who are looking for similar solutions and are interested to hear from a fellow patient. **I want to share my story.***

“As a person living with HIV, the ability to use medical marijuana will go far in helping to alleviate the challenges I have both with the disease and side effects from my medication. This organization is a life-affirming resource, staffed with sensitive and compassionate providers. They are not only knowledgeable about the benefits of marijuana, but through their advocacy on our behalf have made this resource a reality. Visiting the dispensary for the first time was a dream come true.” – Alonzo, a patient at a Constitution Care LLC affiliate organization.

Tactics

Website

Referral programs, forums, testimonials

Focus groups/data collection

Patients who are willing and interested to share their Medical Marijuana experience will be able to do so anonymously and securely for the purposes of research and development

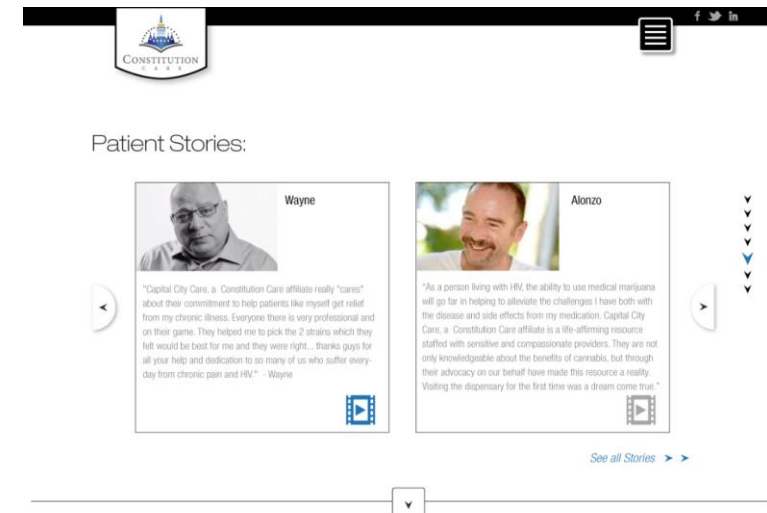
Sponsorships/donations

Sponsorship and donations will be made to local, relevant advocacy groups

Encourage Ongoing Engagement

Constitution Care LLC will foster a relationship with its patients in order to offer them continued education and resources around responsible use of Medical Marijuana throughout their treatment program. They will do this with tools such as email, direct mail, digital and ongoing outreach to ensure their patients have the most secure and accurate information and resources available. We will also provide patients with a mobile application to enable the most convenient access to dispensary facility services.

Constitution Care LLC will support patient advocacy by facilitating patients' ability to share their experiences and educate other qualified patients. Constitution Care LLC will also give patients the ability to donate, anonymously, their usage/efficacy information so that research partners can use its patient database to screen for candidates to include in studies or trials. Constitution Care LLC will actively partner with leading doctors, clinics and case workers using a proprietary HIPAA compliant IT system.



Respect & Responsibility

Constitution Care LLC will institute subsidy programs for patients (low income, veterans and senior citizens) and will allocate up to 15% of company's profit to local, charitable organizations and programs including food banks, law enforcement, education/rehabilitation and low income housing.

Constitution Care LLC will sponsor local artisans and manufacturing vendors as we will continue to buy from and support local businesses. Based on patient demand, we may offer products from such artisans and vendors through our alternative services department.





Patient Pre-registration

If you're a patient, please sign up so we can stay in touch with you about the medical marijuana program. To sign up, visit ConstitutionCare.com or complete the form below and send to Constitution Care at XXXXXX XXX XXXX., CT.

Name: _____

Address: _____

Phone: _____

Email (required): _____

1. Do you have a qualifying medical condition?

Yes No

2. What condition(s)? (optional)

3. Have you discussed medical marijuana treatment with your doctor?

Yes No

4. Doctor's Name:

Dr. _____

Connect with us:

 XXX.XXX.XXXX

 [Facebook.com/ConstitutionCare](https://www.facebook.com/ConstitutionCare)

 info@ConstitutionCare.com

 ConstitutionCare.com



Patient Services

Our Mission

“Our mission is to be the premier provider of responsible medical marijuana services and products for the State of Connecticut giving qualifying patients who suffer today a better, natural way to alleviate their suffering and improve their lives.”

Our Promise

Continue to be an industry leader in expertise, compliance, innovation, social responsibility and education. Consistently deliver safe and quality products and services and exceed our patients' and partners' expectations.

Our Commitment

To offer financial and philanthropic support to and work in partnership with local leaders, law enforcement, medical/healthcare providers and patient advocacy groups to ensure our neighbors benefit from our involvement in local communities. To work with the scientific community to provide ongoing support to research and development around responsible use of medical marijuana.

Who may qualify for medical marijuana?

A patient may register for a medical marijuana certificate if he or she is a Connecticut resident being treated for a debilitating medical condition by a Connecticut-licensed physician.

- 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

How do I sign up for the medical marijuana program?

If you have a qualifying medical condition and a recommendation for medical marijuana from your doctor, you can sign up. Please visit our website for more information about how to sign up at:

www.Constitutioncare.com

Our Products

We will offer a variety of strains of high-quality, pharmaceutical grade medical marijuana, as well as concentrates and edibles. All our products will be tested for safety and purity.

Our Services

Our teams are led by trained Pharmacists and we have drawn from the best practices of the leading established pharmacies to develop our policies and procedures surrounding patient care, safety and privacy.

The initial patient consultation will consist of a complete medication therapy management program looking to capture patient's medication history, problem history, allergies, primary care provider, etc.

The follow-up consult will consist of documentation on past refill prescription strain and outcome. We will monitor for side effects from patient's medication list. We will also address concerns relating to costs of medications.

We will offer free counseling programs that will integrate medical marijuana treatment with a comprehensive health and wellness program for our patients'.



CONSTITUTION
C A R E

Appendix K1

Incorporation Documents and Bylaws

In Re: RFA Section E Question 1

INCORPORATION DOCUMENTS AND BYLAWS

1.0 INCORPORATION DOCUMENTS AND BYLAWS OVERVIEW

Constitution Care LLC was incorporated in Connecticut and is currently in good standing with the State.

The following documents are attached hereto:

- Articles of Organization
- Certificate of Legal Existence
- Bylaws

Please find the above identified documents on the following pages:



SECRETARY OF THE STATE OF CONNECTICUT

MAILING ADDRESS: COMMERCIAL RECORDING DIVISION, CONNECTICUT SECRETARY OF THE STATE, P.O. BOX 150470, HARTFORD, CT 06115-0470
DELIVERY ADDRESS: COMMERCIAL RECORDING DIVISION, CONNECTICUT SECRETARY OF THE STATE, 30 TRINITY STREET, HARTFORD, CT 06108
PHONE: 860-509-6003 WEBSITE: www.concord-sots.ct.gov

ARTICLES OF ORGANIZATION
LIMITED LIABILITY COMPANY - DOMESTIC

C.G.S. §§34-120; 34-121

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

FILING PARTY (CONFIRMATION WILL BE SENT TO THIS ADDRESS): NAME: Robert K. Mayerson ADDRESS: 139 Stow Road CITY: Harvard, MA STATE: ZIP: 01451		FILING FEE: \$120 MAKE CHECKS PAYABLE TO "SECRETARY OF THE STATE"
1. NAME OF LIMITED LIABILITY COMPANY - REQUIRED: (MUST INCLUDE BUSINESS DESIGNATION I.E. LLC, L.L.C., ETC.) Constitution Care LLC		
2. DESCRIPTION OF BUSINESS TO BE TRANSACTED OR PURPOSE TO BE PROMOTED - REQUIRED: ATTACH 8 1/2 X 11 SHEETS IF NECESSARY. The purpose of the limited liability company is to engage in any lawful act or activity for which a limited liability company may be formed under the Connecticut Limited Liability Company Act		
3. LLC'S PRINCIPAL OFFICE ADDRESS - REQUIRED: (NO P.O. BOX) PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE. ADDRESS: 1131-0 Tolland Turnpike Suite 297 CITY: Manchester STATE: CT ZIP: 06042		
4. MAILING ADDRESS, IF DIFFERENT THAN #3: PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE. ADDRESS: CITY: STATE: ZIP:		
5. APPOINTMENT OF STATUTORY AGENT FOR SERVICE OF PROCESS - REQUIRED: (COMPLETE A OR B NOT BOTH) <input type="checkbox"/> A. IF AGENT IS AN INDIVIDUAL. PRINT OR TYPE FULL LEGAL NAME:		
BUSINESS ADDRESS (P.O. BOX NOT ACCEPTABLE) IF NONE, MUST STATE "NONE" ADDRESS: CITY: STATE: ZIP:		CONNECTICUT RESIDENCE ADDRESS (P.O. BOX NOT ACCEPTABLE) ADDRESS: CITY: STATE: ZIP:
SIGNATURE ACCEPTING APPOINTMENT:		

FILING [REDACTED] PG 02 OF 02 VOL B-01855
FILED 10/03/2013 09:00 AM PAGE 01252
SECRETARY OF THE STATE
CONNECTICUT SECRETARY OF THE STATE

B. IF AGENT IS A BUSINESS:

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

Corporation Service Company

CT BUSINESS ADDRESS (P.O. BOX UNACCEPTABLE)

ADDRESS: 50 Weston Street

CITY: Hartford

STATE: Connecticut

ZIP: 06120-1537

SIGNATURE ACCEPTING APPOINTMENT ON BEHALF OF AGENT:

Linda Snook

PRINT NAME & TITLE OF PERSON SIGNING:

Linda Snook
Assistant VP

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

NAME	TITLE	BUSINESS ADDRESS (No. P.O Box) IF NONE, MUST STATE "NONE"	RESIDENCE ADDRESS: (No. P.O Box)
Columbia Case CT, LLC	Member	1131-0 Tolland Turnpike, Suite 296 Manchester, CT 06042	1131-0 Tolland Turnpike Suite 296 Manchester, CT 06042

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

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

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

DATED THIS 30th DAY OF October, 2013

NAME OF ORGANIZER (PRINT OR TYPE)	SIGNATURE
ROBERT MAYERSON	<i>RM</i>

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

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

OCTOBER 4, 2013

ROBERT K. MAYERSEO
139 STOW ROAD
HARVARD, MA 01451

RE: Acceptance of Business Filing

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

Business Name:
CONSTITUTION CARE LLC

Work Order Number: 2013291388-003
Business Filing Number: [REDACTED]
Type of Request: ARTICLES OF ORGANIZATION
File Date/Time: OCT 03 2013 09:00 AM
Effective Date/Time:
Work Order Payment Received: 550.00
Payment Received: 170.00
Credit on Account: .00
Customer Id: [REDACTED]
Business Id: [REDACTED]

RUBY VEAL
Commercial Recording Division
860-509-6003
WWW.CONCORD.SOTS.CT.GOV

BUSINESS FILING REPORT

WORK ORDER NUMBER:2013291388-003

BUSINESS FILING NUMBER: [REDACTED]

BUSINESS NAME:

CONSTITUTION CARE LLC

BUSINESS LOCATION:

1131-0 TOLLAND TURNPIKE
SUITE 297
MANCHESTER,CT 06042

MEMBER INFORMATION FOR ONE MEMBER:

NAME:COLUMBIA CARE CT, LLC
TITLE:MEMBER

** END OF REPORT **

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

OCTOBER 4, 2013

ROBERT K. MAYERSEO
139 STOW ROAD
HARVARD, MA 01451

RE: Request for Information

Work Order Number: 2013291388-004
Type of Request: CERTIFIED COPY
Work Order Payment Received: 550.00
Payment Received: 105.00
Credit on Account: .00
Customer Id: [REDACTED]

Attached is the information you requested.

Copies of most filings may be requested from our office. Due to the implementation of CONCORD, you may receive more information than you requested. Please read your request for information carefully.

RUBY VEAL
Commercial Recording Division
860-509-6003

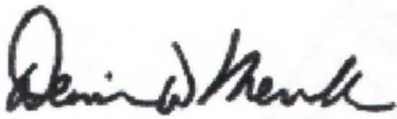
Office of the Secretary of the State of Connecticut

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

CONSTITUTION CARE LLC

a domestic limited liability company, were filed in this office on October 03, 2013.

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



Secretary of the State

Date Issued: October 07, 2013

**CONSTITUTION CARE LLC BY LAWS
(a Connecticut Limited Liability Company)**

RECITAL:

The party to this agreement, Columbia Care CT LLC, a Delaware limited liability company, (the "Member") is entering into this agreement for the purpose of forming a limited liability company that is to be managed by one or more managers (the "Managers") under the Limited Liability Company Act of the State of Connecticut (the "Act") on November 1, 2013.

AGREEMENTS:

1. FORMATION

- 1.1 Name.** The name of this limited liability company (the "Company") is Constitution Care LLC.
- 1.2 Articles of Organization.** Articles of Organization for the Company were filed with the Secretary of State for the state of Connecticut on October 3, 2013.
- 1.3 Duration.** The Company will exist until dissolved as provided in this agreement.
- 1.4 Principal Office.** The Company's principal office will initially be at 1131-0 Tolland Turnpike, Suite 296, Manchester, Connecticut, but it may be relocated by the Managers at any time.
- 1.5 Designated Office and Agent for Service of Process.** The Company's initial designated office will be at 50 Weston Street, Hartford, Connecticut 06120, and the name of its initial agent for service of process at that address will be Corporation Service Company. The Company's designated office and its agent for service of process may only be changed by filing notice of the change with the Secretary of State of the state in which the articles of organization of the Company were filed.
- 1.6 Purposes and Powers.** The Company is formed for the purpose of engaging in any lawful act or activity for which a limited liability company may be formed under the Connecticut Limited Liability Act. The Company has the power to do all things necessary, incident, or in furtherance of that business.
- 1.7 Title to Assets.** Title to all assets of the Company will be held in the name of the Company. No Member has any right to the assets of the Company or any ownership interest in those assets except indirectly as a result of the Member's

ownership of an interest in the Company. No Member has any right to partition any assets of the Company or any right to receive any specific assets upon liquidation of the Company or upon any other distribution from the Company.

2. MEMBERS, CONTRIBUTIONS AND INTERESTS

2.1 Initial Members. The names and addresses of the Members of the Company, the amounts of their initial capital contributions, and their initial Ownership Interests are:

<u>Name and address</u>	<u>Ownership Interest</u>
Columbia Care CT LLC 1131-0 Tolland Turnpike Suite 296 Manchester, CT 06042	100%

2.2 Initial Capital Contribution. The initial capital contributions of Columbia Care CT LLC must be paid to the Company in a manner consistent with the term of the Compensation Agreement- Obligation of Financial Support contract to be executed contemporaneously with these bylaws or within seven (7) days thereof.

2.3 Additional Members. Additional members of the Company may not be admitted except with the approval of the Members and in accordance with relevant Connecticut rules, law, regulations, particularly the Connecticut General Statutes sections 21a-408 *et seq.* and the Regulations of Connecticut State Agencies sections 21a-408-1 *et seq.*

2.4 Additional Contributions. Except as otherwise provided in the Act, no Member is required to contribute additional capital to the Company. Additional capital contributions to the Company may be made by the Members only with the approval of the Managers. If the Managers approve additional capital contributions, the Managers must set a maximum amount of such contributions that will be accepted from the Members. Each Member will then have the right, but not the obligation, to contribute a pro rata share of the maximum based upon the Member's Ownership Interest. If any Member elects to contribute less than the Member's pro rata share of the maximum, the other Members may contribute the difference on a pro rata basis in accordance with their Ownership Interests or on any other basis they may agree upon.

2.5 No Interest on Capital Contributions. No interest will be paid on capital contributions unless otherwise agreed upon.

2.6 Capital Accounts. An individual capital account will be maintained for each Member. A Member's capital account will be credited with all capital contributions made by the Member and with all income and gain (including any

income exempt from federal income tax) allocated to the Member. A Member's capital account will be charged with the amount of all distributions made to the Member and with all losses and deductions (including deductions attributable to tax-exempt income) allocated to the Member. Members' capital accounts must be maintained in accordance with the federal income tax accounting principles prescribed in Treasury Regulations §1.704-1(b)(2)(iv).

- 2.7 Outside Activities.** Members may engage in business and investment activities outside the Company, and neither the Company nor the other Members have any rights to the property, profits, or benefits of such activities. But no Member may enter into any business or investment activity that is competitive with the business of the Company unless the activity was approved in advance by action of the Members.

3. ALLOCATION OF PROFITS AND LOSSES

- 3.1 Determination.** The net profit or net loss of the Company for each fiscal year will be determined according to the accounting principles employed in the preparation of the Company's federal income tax information return for that fiscal year. In computing net profit or net loss for purposes of allocation between Members, no special provision will be made for tax-exempt or partially tax-exempt income of the Company, and all items of the Company's income, gain, loss, or deduction required to be separately stated under IRC §703(a)(1) will be included in the net profit or net loss of the Company.
- 3.2 Allocation of Net Profits and Net Losses.** The net profit or net loss of the Company for a fiscal year will be allocated among the Members in proportion to their Ownership Interests.
- 3.3 Allocations Solely for Tax Purposes.** In accordance with IRC §704(c) and the corresponding regulations, income, gain, loss, and deduction with respect to any property contributed to the capital of the Company will be allocated among the Members, solely for income tax purposes, so as to take into account any variation between the adjusted basis of such property for federal income tax purposes in the hands of the Company and the agreed value of such property as set forth in this agreement, or in any document entered into at the time an additional contribution is made to the Company. Any elections or other decisions relating to the allocations to be made under this section will be made by the Managers. The allocations to be made under this section are solely for purposes of federal, state, and local income taxes and will not affect, or in any way be taken into account in computing, any Member's capital account, allocable share of the net profits and net losses of the Company, or right to distributions.
- 3.4 Prorates.** If a Member has not been a Member during a full fiscal year of the Company, or if a Member's Ownership Interest in the Company changes during a fiscal year, the net profit or net loss for the year will be allocated to the Member

based only on the period of time during which the Member was a Member or held a particular Ownership Interest. In determining a Member's share of the net profit or net loss for a fiscal year, the Managers may allocate the net profit or net loss ratably on a daily basis using the Company's usual method of accounting. Alternatively, the Managers may separate the Company's fiscal year into two or more segments and allocate the net profits or net losses for each segment among the persons who were Members, or who held particular Ownership Interests, during each segment based upon their Ownership Interests during that segment.

4. DISTRIBUTIONS

- 4.1 Distributions to Pay Taxes.** To enable the Members to pay taxes on income of the Company that is taxable to the Members, the Company must make cash distributions to the Members, during each fiscal year, in an amount equal to the product of (a) the highest aggregate rate of federal, state, and local income and self-employment tax imposed on the Company's income for that fiscal year (taking into account the deductibility of state and local income taxes for federal income tax purposes) allocated to any Member who was a Member for the full fiscal year times (b) the amount of the taxable income of the Company allocated to all Members for that fiscal year. Distributions must be paid at least quarterly during each fiscal year at times that coincide with the Members' payment of estimated taxes, and the amount of each distribution will be based upon the anticipated taxable income of the Company for the fiscal year of the distribution and the anticipated tax rates of Members, as determined at the time the distribution is made. The Company's obligation to make distributions under this section is subject to the restrictions governing distributions under the Act.
- 4.2 Additional Distributions.** Subject to the restrictions governing distributions under the Act, additional distributions of cash or property may be made from time to time by the Company to the Members, at such times and in such amounts as the Managers determine.
- 4.3 Allocation of Distributions.** All distributions to pay taxes and additional distributions must be made to Members in proportion to their Ownership Interests.

5. MANAGERS

- 5.1 Number and Qualifications.** As provided in the Articles of Organization of the Company, the Company will be managed by Managers. The number of Managers serving at any given time will be the number elected by the Members, but the number may not be less than one nor more than five. Managers may be entities as well as individuals and need not be Members.
- 5.2 Initial Managers.** There will initially be three Managers of the Company, Nicholas Vita, Michael Abbott and Robert Mayerson.

- 5.3 Election and Term.** Managers will be elected at meetings of the Members called for the purpose of electing Managers. The notice of any meeting of the Members at which Managers are elected must state that the purpose, or one of the purposes, of the meeting is the election of Managers. Each Manager, including each of the initials Manager named in this agreement, will serve for a term ending at the next meeting of Members called for the purpose of electing Managers, or until the Manager's earlier death, resignation, or removal.
- 5.4 Resignation and Removal.** A Manager may resign at any time by delivering a written resignation to the Members. The resignation will be effective when received by all Members unless a later effective date is stated in the written resignation. The Members may remove any Manager at any time, with or without cause. But a Manager may be removed by the Members only at a meeting of the Members called for the purpose of removing the Manager, and the notice of the meeting must state that the purpose, or one of the purposes, of the meeting is the removal of a Manager. The resignation or removal of a Manager who is also a Member will not constitute a withdrawal or expulsion of the Manager as a Member of the Company or otherwise affect the Manager's rights as a Member.
- 5.5 Authority.** Subject to the limitations imposed by this agreement or by action of the Managers or the Members, each Manager is an agent of the Company and has authority to bind the Company in the ordinary course of the Company's business. But no Manager has authority to engage in any of the following acts unless the act was approved in advance by action of the Members:
- 5.5.1** To sell, lease, exchange, mortgage, pledge, or otherwise transfer or dispose of all or substantially all of the property or assets of the Company;
 - 5.5.2** To merge the Company with any other entity;
 - 5.5.3** To amend the Articles of Organization of the Company;
 - 5.5.4** To incur indebtedness by the Company other than in the ordinary course of business;
 - 5.5.5** To authorize a transaction involving an actual or potential conflict of interest between a Manager or a Member and the Company;
 - 5.5.6** To change the nature of the business of the Company; or
 - 5.5.7** To commence a voluntary bankruptcy case for the Company.

The Managers may, but are not required to, refer any other matter to a vote of the Members.

- 5.6 Other Agents.** By action of the Managers, other agents may be authorized to act on behalf of the Company. The authority given such agents may be general or may be limited to specific matters.
- 5.7 Powers of Members.** No Member who is acting solely in his or her capacity as a Member is authorized to act on behalf of the Company.
- 5.8 Devotion of Time; Outside Activities.** Each of the Managers must devote so much time and attention to the business of the Company as the Managers agree is appropriate. Managers may engage in business and investment activities outside the Company, and neither the Company nor the Members have any rights to the property, profits, or benefits of such activities. But no Manager may enter into any business or investment activity that is competitive with the business of the Company unless the activity was approved in advance by action of the Members. No Manager may use any property or assets of the Company other than for the operation of the Company's business. For this purpose, the property and assets of the Company include, without limitation, information developed for the Company, opportunities offered to the Company, and other information or opportunities entrusted to a Manager as a result of being a Manager of the Company.
- 5.9 Compensation and Reimbursement.** The Managers will be paid such salaries and other compensation as may be fixed from time to time by action of the Members. The fact that a Manager is also a Member will not prevent the Manager from receiving a salary or other compensation from the Company. Managers are also entitled to reimbursement from the Company for reasonable expenses incurred on behalf of the Company, including expenses incurred in the formation, dissolution, and liquidation of the Company.
- 5.10 Meetings of Managers.** If there is more than one Manager serving, meetings of the Managers may be called by any Manager. Except as provided by section 7.1, meetings of the Managers will be held at the principal office of the Company, unless another place is fixed by action of the Managers. Notice of the date, time, and place of all meetings must be given to each Manager at least 24 hours prior to the meeting. The notice must be written. Written notice will be effective at the earliest of the following times: (a) when received by the Manager, (b) when sent by facsimile or other form of electronic communication reasonably expected to be received immediately at the Manager's place of business, or (c) three days after mailing. A majority of Managers constitutes a quorum for any meeting of the Managers. Each Manager is entitled to one vote, and a matter submitted to a vote at a meeting of the Managers will be approved if a majority of the Managers voting on the matter vote in favor of the matter.

6. MEMBER MEETINGS

- 6.1 Meetings.** A meeting of Members may be called by the Managers or by Members holding at least 10 percent of the Ownership Interests. If a meeting is called by Members, the Members must deliver a written demand for a meeting addressed to the Managers at the Company's principal office, and the written demand must state the purpose for which the meeting is to be held. Meetings of the Members will be held at the principal office of the Company, or at another place within 25 miles of the principal office that is fixed by action of the Managers and is set forth in the notice of the meeting, unless otherwise agreed upon.
- 6.2 Notice of Meetings.** Notice of the date, time, and place of all meetings must be given to each Member in writing not earlier than 60 days nor less than 10 days before the meeting date. The notice must be mailed to each Member at the Member's address as shown on the Company's records and must include a description of the purpose or purposes for which the meeting is called.
- 6.3 Record Date.** The Members who are entitled to notice of a meeting of Members and to vote at the meeting, and their respective Ownership Interests, will be determined as of the record date for the meeting. Except as provided in section 7.1, the record date may be selected by the Managers and may not be more than 70 days nor less than 3 days before the meeting. If the Managers do not select a record date for a meeting of Members, the record date will be the date on which the initial notice of the meeting was mailed to the Members.
- 6.4 Quorum and Voting.** A Member may be represented at a meeting of Members, and may vote, in person or by written proxy. The presence at a meeting of Members, in person or by proxy, holding more than 50 percent of the Ownership Interests constitutes a quorum. Each Member is entitled to vote the Member's Ownership Interest. Except as otherwise provided in the articles of organization, this agreement, or the Act, a matter submitted to a vote at a meeting of the Members will be approved if a majority of the Ownership Interests voted on the matter are voted in favor of the matter.
- 6.5 Self Interest.** A Member does not violate any duty or obligation to the Company merely as a result of engaging in conduct that furthers the interest of the Member. A Member may lend money or transact other business with the Company, and, in this case, the rights and obligations of the Member will be the same as those of a person who is not a Member, so long as the loan or other transaction has been approved or ratified by the Managers, or has been approved or ratified by the Members if the loan or other transaction involves a Manager. Unless otherwise provided by applicable law, a Member with a financial interest in the outcome of a particular action is nevertheless entitled to vote on such action.

7. ACTION BY MANAGERS OR MEMBERS

- 7.1 Meetings Without Notice.** Notwithstanding any other provision of this agreement, if all of the Managers or all of the Members hold a meeting at any time or place and no Manager or Member objects to the lack of notice, the meeting will be valid even if there was no notice or the notice given was insufficient, and any action taken at the meeting will be the action of the Managers or Members, as the case may be.
- 7.2 Actions Without Meeting.** Any action required or permitted to be taken by the Managers or by the Members at a meeting may be taken without a meeting if a written consent setting forth the action taken is signed by all of the Managers or Members, as the case may be. All written consents of the Managers and Members must be retained as part of the Company's records of meetings.
- 7.3 Meetings by Telephone.** Meetings of the Managers or Members may be held by conference telephone or by any other means of communication by which all participants can hear each other simultaneously during the meeting. If a Manager or Member participates in a meeting by conference telephone or by other means authorized by this section, the Manager or Member will be considered to be present at the meeting in person.

8. ACCOUNTING AND RECORDS

- 8.1 Books of Account.** The Managers must keep such books and records relating to the operation of the Company as are appropriate and adequate for the Company's business and for the carrying out of this agreement. At a minimum, the following must be maintained at the principal office of the Company: (a) financial statements for the three most recent fiscal years; (b) federal, state, and local income tax returns for the three most recent fiscal years; (c) a register showing the current names and addresses of the Members; (d) a copy of the Company's Articles of Organization and any amendments thereto; (e) this agreement and any amendments thereto; (f) minutes of any meetings of Managers or Members; and (g) consents to action by Managers or Members. Each Member will have access to all such books and records at all times.
- 8.2 Fiscal Year.** The fiscal year of the Company will be the calendar year.
- 8.3 Accounting Reports.** Within 90 days after the close of each fiscal year, Company must deliver to each Member an unaudited report of the activities of the Company for the preceding fiscal year, including a copy of a balance sheet of the Company as of the end of the year and a profit and loss statement for the year.
- 8.4 Tax Returns.** The Company must prepare and file all required federal, state, and local income tax and other tax returns on a timely basis. Within 90 days after the end of each fiscal year, the Company must deliver to each Member a Schedule K-1, showing the amounts of any distributions, contributions, income, gain, loss, deductions, or credits allocated to the Member during the fiscal year.

8.5 Tax Matters Partner. Anytime the Company has more than 10 Members, any Member is an entity other than an estate or a C corporation, or any Member is a nonresident alien individual, the Managers must designate one of the Members as the tax matters partner of the Company in accordance with IRC §6231(a)(7) and keep such designation in effect at all times. In making this designation, preference must be given to Members who are also Managers.

9. DISSOCIATION AND DISSOLUTION

9.1 Withdrawal. A Member may not withdraw from the Company.

9.2 Events of Dissolution. Except as otherwise provided in this agreement, the Company will dissolve upon the earliest of: (a) the death, incompetence, expulsion, bankruptcy, or dissolution of any Member; (b) approval of a dissolution of the Company by action of the Members; or (c) at such time as the Company has no Members.

9.3 Effect of Member's Dissociation. Within 120 days of the death, incompetence, expulsion, bankruptcy, or dissolution of a Member, the other Members (whether one or more) may elect to continue the Company by themselves or with others, and to cause the Company to purchase the interest of the dissociating Member pursuant to the provisions of the sections of this agreement relating to purchase price and payment for member's interest. Making the election is in the sole discretion of the other Members and requires the consent of other Members holding a majority of the Ownership Interests held by the other Members. Notice of the election must be given in writing to the dissociating Member or the dissociating Member's successor in interest promptly after the election is made. If the other Members do not so elect, the Company will be dissolved.

9.4 Purchase Price. If the other Members elect to cause the Company to purchase the interest of a dissociating Member under the section of this agreement relating to effect of Member's dissociation, the purchase price of the dissociating Member's interest in the Company will be determined by agreement between the Managers and the dissociating Member. If an agreement on the purchase price is not reached within 30 days following the election to purchase the interest of the dissociating Member, the interest must be valued by a third party appraiser selected by the Managers who is reasonably acceptable to the dissociating Member, and the purchase price will be the value determined in that appraisal. In appraising the interest to be purchased, the appraiser must determine the fair market value of the interest as of the date of the event of dissociation. In determining the value, the appraiser must consider the greater of the liquidation value of the Company or the value of the Company based upon sale of the entire Company as a going concern. The appraiser must also consider appropriate minority interest, lack of marketability, and other discounts. If the appraisal is not completed within 120 days following the election to purchase the interest of the

dissociating Member, either the Managers or the dissociating Member may apply to a court of competent jurisdiction for the appointment of another appraiser, in which case the court-appointed appraiser must appraise the interest of the dissociating Member in accordance with the standards set forth in this section, and the purchase price will be the value determined in that appraisal.

9.5 Payment for Member's Interest. The purchase price for the interest of a Member purchased under the section of this agreement relating to effect of member's dissociation will be paid as follows:

9.5.1 The purchase price will bear interest from the date of the election of the other Members to purchase the dissociating Member's interest at the prime rate of interest in effect on the date of the election as quoted in The Wall Street Journal or, if that publication is not available, another reputable national publication selected by the Managers that is reasonably acceptable to the dissociating Member.

9.5.2 The purchase price will be payable in accordance with the terms of a promissory note of the Company providing for the payment of the principal amount in 60 equal monthly installments, including interest on the unpaid balance, with the first installment to be due one month after the date of closing and an additional installment to be due on the same day of each month thereafter until the promissory note is paid in full. The promissory note will bear interest from the date of the closing at the rate specified above. The promissory note must provide that if any installment is not paid when due, the holder may declare the entire remaining balance, together with all accrued interest, immediately due and payable. Partial or complete prepayment of the remaining balance due under the promissory note will be permitted at any time without penalty, provided that any partial prepayment will not affect the amount or regularity of payments coming due thereafter.

9.5.3 The purchase must be closed within 30 days following the determination of the purchase price. At the closing, the dissociating Member must sign and deliver to the Company a written assignment transferring the entire interest of the dissociating Member in the Company to the Company free and clear of all encumbrances. Such assignment must contain warranties of title and good right to transfer. At the closing, the Company must pay the accrued interest on the purchase price then due to the dissociating Member, and the Company must also deliver its promissory note to the dissociating Member. Each of the other Members must sign and deliver to the dissociating Member a security agreement granting a security interest to the dissociating Member in that percentage of the interest of each of the other Members in the Company equal to the Ownership Interest of the dissociating Member being purchased by the Company. The security agreement must be in a form reasonably acceptable to the attorney for the

dissociating Member and will secure payment of the promissory note by the Company. The security agreement must provide that if there is a default in the payment of the promissory note by the Company and the security interest is foreclosed or the interest in the Company is retained by the secured party in satisfaction of the indebtedness, the interest may be transferred without the necessity of tendering the interest to the Company under the section of this agreement relating to tender of interest and the person acquiring the interest in the Company will be admitted as a member of the Company without further consent of the Members being required.

9.6 Effect of Purchase of Member's Interest. A dissociating Member will cease to be a Member upon the election of the other Members to cause the Company to purchase the dissociating Member's interest pursuant to the section of this agreement relating to effect of member's dissociation. Thereafter, the dissociating Member will have no rights as a Member in the Company, except the right to have the dissociating Member's interest purchased in accordance with the terms of this agreement.

9.7 Successor in Interest. For purposes of this section relating to dissociation and dissolution, the term "dissociating Member" includes the dissociating Member's successor in interest.

10. WINDING UP AND LIQUIDATION

10.1 Liquidation Upon Dissolution. Upon the dissolution of the Company, the Managers must wind up the affairs of the Company unless the dissolution results from the dissociation of a Member and the other Members elect to continue the Company under the provisions of this agreement relating to effect of member's dissociation. If the affairs of the Company are wound up, a full account must be taken of the assets and liabilities of the Company, and the assets of the Company must be promptly liquidated. Following liquidation of the assets of the Company, the proceeds thereof must be applied and distributed in the following order of priority:

10.1.1 To creditors of the Company in satisfaction of liabilities and obligations of the Company, including, to the extent permitted by law, liabilities and obligations owed to Members as creditors (except liabilities for unpaid distributions);

10.1.2 To any reserves set up for contingent or unliquidated liabilities or obligations of the Company deemed reasonably necessary by the Managers, which reserves may be paid over to an escrow agent by the Managers to be held by such escrow agent for disbursement in satisfaction of the liabilities and obligations of the Company, with any excess being distributed to the Members as provided below; and

10.1.3 To Members in proportion to the positive balances of their capital accounts, after taking into account all adjustments made to capital accounts for the fiscal year during which the distributions to Members are made.

10.2 Distribution of Property in Kind. With approval of the Members, property of the Company may be distributed in kind in the process of winding up and liquidation. Any property distributed in kind will be valued and treated for the Company's accounting purposes, in accordance with Treasury Regulations §1.704-1(b)(2)(iv)(e)(1), as though the property distributed had been sold at fair market value on the date of distribution. If property is distributed in kind, the difference between the fair market value of the property and its adjusted tax basis will, solely for the Company's accounting purposes and to adjust the Members' capital accounts, be treated as a gain or loss on the sale of the property and will be credited or charged to the Members' capital accounts in the manner specified in the section of this agreement relating to capital accounts.

10.3 Negative Capital Accounts. If any Member has a negative balance in the Member's capital account upon liquidation of the Company, the Member will have no obligation to make any contribution to the capital of the Company to make up the deficit, and the deficit will not be considered a debt owed to the Company or any other person for any purpose.

11. TRANSFER OF MEMBERS' INTERESTS

11.1 General Restrictions. No Member may transfer all or any part of such Member's interest as a member of the Company except as permitted in this agreement. Any purported transfer of an interest or a part of an interest in violation of the terms of this agreement will be null and void and of no effect. For purposes of this section a "transfer" includes a sale, exchange, pledge, or other disposition, voluntarily or by operation of law.

11.2 Securities Law Restriction. Each Member acknowledges that the interest of the Member in the Company has not been registered under the Securities Act of 1933 or applicable state securities laws in reliance upon exemptions from registration and that the resale or other transfer of the interests of Members is restricted by applicable provisions of the Securities Act of 1933 and applicable state securities laws. Each Member agrees that the Member's interest may not be offered for sale, sold, transferred, pledged, or otherwise disposed of unless the interests of the Members in the Company are registered under the Securities Act of 1933 and applicable state securities laws or unless an exemption from registration is otherwise available. NOTWITHSTANDING ANY OTHER PROVISION OF THIS AGREEMENT, THE INTEREST OF A MEMBER IN THE COMPANY MAY NOT BE OFFERED FOR SALE, SOLD, TRANSFERRED, PLEDGED, OR OTHERWISE DISPOSED OF BY A MEMBER IN THE ABSENCE OF AN

EFFECTIVE REGISTRATION STATEMENT UNDER THE SECURITIES ACT OF 1933 AND APPLICABLE STATE SECURITIES LAWS OR AN OPINION OF COUNSEL SATISFACTORY TO THE MANAGERS THAT REGISTRATION UNDER THE SECURITIES ACT OF 1933 AND APPLICABLE STATE SECURITIES LAWS IS NOT REQUIRED.

- 11.3 Permitted Transfers.** Subject to the restrictions contained in the section of this agreement relating to securities law restrictions, a Member may transfer all or a part of the Member's interest in the Company with the prior written consent of all other Members. If the other Members do not consent to a particular transfer and if the transfer does not violate the securities law restriction, the Member may transfer all or a part of the Member's interest if such interest or part has been tendered for sale to the Company in accordance with the section of this agreement relating to tender of interest, the tender has not been accepted within the time limit set forth in that section, the transfer is made to the transferee named in the notice of tender within 180 days after the notice of tender is effective, and the transfer is at a price and upon terms no more favorable to the transferee than those set forth in the notice of tender.
- 11.4 Tender of Interest.** If a Member wishes to transfer all or part of the Member's interest in the Company and the other Members do not consent, the interest or the part of an interest to be transferred must be tendered to the Company by giving written notice of such tender to the Company. Such notice must contain the name and address of the proposed transferee, the price to be paid by the proposed transferee for the interest, if any, and the terms of the proposed transfer. If a Member's interest is transferred by operation of law, the successor in interest to the transferring Member may give the required notice of tender to the other Members at any time following the transfer, and such successor in interest will be deemed to have given the notice of tender at the time any other Member gives notice to the successor in interest and to all other Members of the failure to give the notice of tender. Within 30 days after a notice of tender is given, the other Members may accept the tender on behalf of the Company and have the Company purchase the interest tendered for the lesser of the price set forth in the notice of tender (if the proposed transfer is to be by sale) or the price applicable to the purchase of a Member's interest pursuant to the section of this agreement relating to the effect of member's dissociation. The tender must be accepted on behalf of the Company by giving written notice of acceptance to the transferring Member or the transferring Member's successor in interest. The purchase may, at the option of the other Members, be on the terms set forth in the notice of tender, if any, or the terms set forth in the section of this agreement relating to payment for member's interest. For purposes of those provisions, the date of the acceptance of the tender will be deemed to be the date on which the other Members elected to purchase the interest of the dissociating Member.
- 11.5 Effect of Tender.** The Member tendering the interest will cease to be a Member with respect to the tendered interest upon an acceptance of the tender by the

Company. Thereafter, the Member tendering the interest will have no rights as a Member in the Company, except the right to have the tendered interest purchased in accordance with the terms of this agreement.

- 11.6 Substitution.** If the interest of a Member is transferred, with the consent of the other Members or after the interest has been tendered for sale to the Company in accordance with the section of this agreement relating to tender of interest, the transferee of the interest will be admitted as a Member of the Company effective upon the execution by the transferee and delivery to the Company of a written agreement to be bound by all of the terms and provisions of this agreement. If a Member who is the only member of the Company assigns the Member's entire interest, the transferee will be admitted as a Member of the Company effective upon the transfer. If the transferee is not admitted as a Member, the transferee will only have the right to receive, to the extent assigned, the distributions from the Company to which the transferor would be entitled. The transferee will not have the right to exercise the rights of a Member, including, without limitation, the right to vote or inspect or obtain records of the Company.

12. REPRESENTATIONS AND WARRANTIES OF MEMBERS

Each Member represents and warrants to the Company and the other Members that such Member has acquired an interest in the Company for such Member's own account for investment and not with a view to distribution of the interest.

13. INDEMNIFICATION AND LIABILITY LIMITATION

- 13.1 Indemnification.** Except as otherwise provided in this section, the Company must indemnify each of the Managers to the fullest extent permissible under the law of the state in which the Company is organized, as the same exists or may hereafter be amended, against all liability, loss, and costs (including, without limitation, attorneys' fees) incurred or suffered by the Manager by reason of or arising from the fact that the Manager is or was a manager of the Company, or is or was serving at the request of the Company as a manager, member, director, officer, partner, trustee, employee, or agent of another foreign or domestic limited liability company, corporation, partnership, joint venture, trust, benefit plan, or other enterprise. The Company may, by action of the Managers, provide indemnification to employees and agents of the Company who are not Managers. The indemnification provided in this section is not exclusive of any other rights to which any person may be entitled under any statute, agreement, resolution of Managers or Members, contract, or otherwise. But despite any other provision of this agreement, the Company has no obligation to indemnify a Manager for:

13.1.1 Any breach of the Manager's duty of loyalty to the Company;

13.1.2 Acts or omissions not in good faith that involve intentional misconduct or a knowing violation of law;

13.1.3 Any unlawful distribution under the Act; or

13.1.4 Any transaction in which the Manager derives improper personal benefit.

13.2 Limitation of Liability. No Manager of the Company is liable to the Company or to the Members for monetary damages resulting from the Manager's conduct as a Manager except to the extent that the Act, as it now exists or may be amended in the future, prohibits the elimination or limitation of liability of managers of limited liability companies. No repeal or amendment of this section or of the Act will adversely affect any right or protection of a Manager for actions or omissions prior to the repeal or amendment.

14. MISCELLANEOUS PROVISIONS

14.1 Amendment. The Members may amend or repeal all or part of this agreement by action of the Members, provided that such action is memorialized in writing. This agreement may not be amended or repealed by oral agreement of the Members or by oral or written agreement of the Managers.


14.2 Binding Effect. The provisions of this agreement will be binding upon and will inure to the benefit of the heirs, personal representatives, successors, and assigns of the Members. But this section may not be construed as a modification of any restriction on transfer set forth in this agreement.

14.3 Notice. Except as otherwise provided in other sections of this agreement, any notice or other communication required or permitted to be given under this agreement must be in writing and must be mailed by certified mail, return receipt requested, with postage prepaid. Notices addressed to a Member must be addressed to the Member's address listed in the section of this agreement relating to initial members, or if there is no such address listed for a Member, the address of the Member shown on the records of the Company. Notices addressed to the Company or a Manager must be addressed to the principal office of the Company. The address of a Member, the Company, or a Manager to which notices or other communications are to be mailed may be changed from time to time by the Member's, the Company's, or the Manager's giving written notice to the Members, the Company, and the Managers. All notices and other communications will be deemed to be given at the expiration of three days after the date of mailing.

14.4 Litigation Expense. If any legal proceeding is commenced for the purpose of interpreting or enforcing any provision of this agreement, including any proceeding in the United States Bankruptcy Court, the prevailing party in such proceeding will be entitled to recover a reasonable attorney's fee in such proceeding, or any appeal thereof, to be set by the court without the necessity of hearing testimony or receiving evidence, in addition to the costs and disbursements allowed by law.


- 14.5 Additional Documents.** Each Member must execute such additional documents and take such actions as are reasonably requested by the Managers in order to complete or confirm the transactions contemplated by this agreement.
- 14.6 Counterparts.** This agreement may be executed in two or more counterparts, which together will constitute one agreement.
- 14.7 Governing Law.** This agreement will be governed by the law of the state in which the Articles of Organization of the Company have been filed.
- 14.8 Severability.** If any provision of this agreement is invalid or unenforceable, this will not affect the remaining provisions.
- 14.9 Third-Party Beneficiaries.** The provisions of this agreement are intended solely for the benefit of the Members and Managers and create no rights or obligations enforceable by any third party, including creditors of the Company, except as otherwise provided by applicable law.
- 14.10 Authority.** Each individual executing this agreement on behalf of a corporation or other entity warrants that he or she is authorized to do so and that this agreement will constitute the legally binding obligation of the corporation or other entity that the individual represents.

By: COLUMBIA CARE CT LLC



Nicholas Vita,
Chief Executive Officer, President

Date: November 1, 2013



Robert Mayerson,
Chief Financial Officer, Treasurer

Date: November 1, 2013



Michael Abbott,
Chairman, Secretary

Date: November 1, 2013



CONSTITUTION
C A R E

Appendix K2

Organizational Chart & Resumes

In Re: RFA Section E Question 2

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

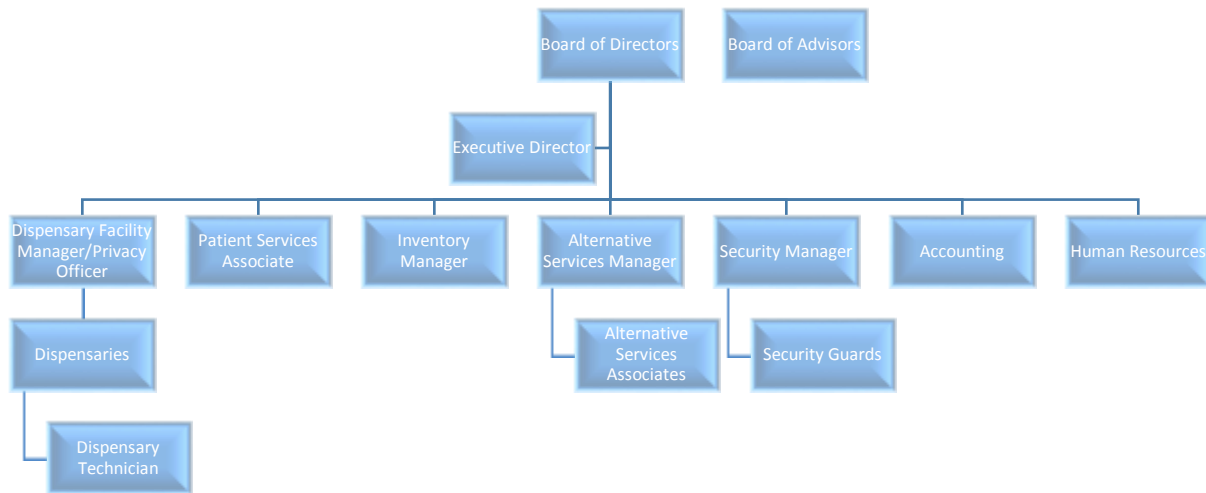
Please contact the applicant for any questions or comments regarding this request for exemption.



ORGANIZATIONAL CHART

1.0 ORGANIZATIONAL CHART

Below is Constitution Care LLC’s current organizational chart:



2.0 POSITION DESCRIPTIONS

Board of Directors

Formulates and oversees the implementation of the strategic goals, vision and mission of Constitution Care LLC. Board Members generally govern the organization, ensure compliance with the company’s bylaws, establish broad policies and objectives, ensure the availability of adequate financial resources, approve annual budgets, and set the compensation packages for the company’s management.

Board of Advisors

Provides advice and counsel to the Board of Directors with regards to the strategic goals, vision and mission of the organization. Board of Advisor Members, which includes the Scientific Advisory Board, offer opinions on the establishment of broad policies and objectives, and advise on the various transactions of the organization.

Executive Director



Oversees the operations of the entire dispensary facility, including the dispensary department and alternative services department. This position acts as a liaison between dispensary facility staff and the Board of Directors and acts as a liaison to local law enforcement and the local community at large.

Dispensary Facility Manager

Oversees the entire dispensary department operation and ensures that the dispensary facility successfully delivers on its mission and business objectives. This position also oversees proper registration and training of all dispensary department employees, oversees record management and retention, and maintains physical security of Medical Marijuana.

Privacy Officer

HIPAA requires that every pharmacy, and likely the dispensary facility as well, appoint a Privacy Officer who must develop and regularly update the organization's privacy policies and procedures. At Constitution Care LLC, the Dispensary Facility Manager will serve as the Privacy Officer who will also be responsible for all information security requirements, including the requirement that patient information remain confidential. The Privacy Officer will draft and implement the appropriate policies and procedures, keep such documents on file, and collaborate with other personnel to ensure strict compliance.

Head of Information Security

Connecticut law requires that every dispensary facility appoint a Head of Information Security responsible for all information security requirements, including the requirement that patient information remain confidential.

Dispensary

Assists patients by dispensing the Medical Marijuana, facilitating the selection of the appropriate Medical Marijuana products from the available inventory, affixes compliant labels to containers, and provides instructions regarding the use of Medical Marijuana.

Dispensary Technician

Generally assists dispensaries, and assists in the dispensing of Medical Marijuana only when under the direct supervision of a dispensary.



Patient Services Associate

Greets patients, conducts new patient orientation, verifies patient information, inputs data, addresses and resolves complaints, and monitors the dispensary facility's security status.

Inventory Manager

Oversees procurement of quality medicine from registered producers and ensure that funds are properly obtained, secured and reported pursuant to the Connecticut law. The position will be held by a registered dispensary.

Alternative Services Manager

Oversees non-Medical Marijuana products and services available to patients beyond the dispensary department area, and oversees the alternative services staff.

Alternative Services Associates

Generally assists the Alternative Services Manager in the provision of non-Medical Marijuana products to patients and the alternative services offered by the dispensary facility.

Security Manager

Oversees security guards and security operations of the facility. Monitors all areas of operations to ensure the safety of patients, staff and neighbors, and compliance with all Connecticut laws and regulations

Security Guards

Monitor all areas of operations to ensure the safety of patients, staff and neighbors, and compliance with all Connecticut laws and regulations. This position also ensures that only authorized patients, primary caregivers and staff members have access to the limited-access areas of the facility.

Accountant

Oversees payroll matters, tax matters, and all banking matters for the dispensary facility.

Human Resources



Oversees all hiring and training of dispensary facility employees, addresses any patient complaints or issues, and addresses any staff issues that are not resolved by management directly.

3.0 NAMES AND RESUMES

The following is a list of the names and positions held within Constituion Care LLC:

- Nicholas Vita – Chief Executive Officer-Board of Directors
- Michael Abbott – Chairman-Board of Directors
- Robert K. Mayerson – Chief Financial Officer-Board of Directors
- Nicholas Tamborrino, Pharm.D., MBA – Dispensary Facility Manager, Privacy Officer, Head of Information Security, Chief Pharmcaology Advisor-Board of Advisors
- Bernard R. Sullivan – Chief Security Advisor-Board of Advisors
- Troy F. Kaplan – Chief Legal Advisor/Compliance Officer-Board of Advisors
- Nate Nienhuis – Chief Inventory Advisor
- Dr. Rosemary Mazanet, MD, PhD – Chief Medical Advisor-Board of Advisors
- Dr. D. Barry Boyd – Scientific Advisory Board Member-Board of Advisors
- Alexis Kopikis – Chief Information Technology Advisor-Board of Advisors

The following is an assembly of the resumes of the above identified personnel:

NICHOLAS VITA

EXPERIENCE

- 06/06 – Present** **APELLES INVESTMENT MANAGEMENT, LLC. (“AIM”)** **New York, NY**
- Senior Partner* –. Responsible for sourcing, researching, analyzing and managing investments and operating companies with a focus on private equity; mezzanine financings; high yield, bank, distressed and structured debt, and late-stage venture investments in the healthcare sector. Responsible for Firm build-out and oversight of all operations (business, legal, infrastructure) and team of five investment and operations professionals. Member of the Management and Investment Committees.
- Board Memberships:* Various corporate and not-for-profit entities
- 11/02 – 06/06** **ARX INVESTMENT MANAGEMENT L.P.** **New York, NY**
- General Partner, Portfolio Manager – Healthcare Sector.* Portfolio Manager for multi-billion dollar global credit hedge fund. Responsible for sourcing and analyzing investment opportunities and maintaining industry (executive management, mid-level operators and consultants) and governmental (federal, state and local) contacts. Member of Investment Committee (for all industrial sectors). Provided coverage for all healthcare sub-sectors’ public and private investments (long/short) across all asset classes (revolvers, term loans, distressed, HY and IG debt, convertible securities, preferred and common equity). Strategy focused on exploiting cross-capital structure valuation based inefficiencies in highly levered, stressed and distressed credits. Experience with management negotiations/bondholder groups in covenant breach/consent solicitations. Core competencies in enterprise/asset valuation, industry knowledge, capital structure analysis.
- 01/97 – 11/02** **GOLDMAN, SACHS & CO. INC.** **New York, NY**
- 3/01 – 11/02** *Vice President, Investment Banking Division – Healthcare Department.* Team leader responsible for structuring, developing and executing transactions across all strategic advisory and financing product lines. Analyzed and implemented strategic alternatives for clients including mergers, acquisitions, leveraged buyouts, spin-offs, raid defenses and restructurings. Evaluated financing alternatives including hybrid, preferred and common equity offerings as well as high yield debt and bank financings. Assisted clients with ratings agency presentations. Developed strong personal relationships with senior management teams throughout healthcare sector in US, Europe and Asia. Provided industry expertise and contacts in support of financial sponsor client teams. Served on transaction teams in North America, Asia and Europe and completed over 35 transactions valued over US\$14bn.
- 08/98 – 03/01** *Associate, Investment Banking Division – Healthcare Department.* Direct Promote from Analyst to Associate Program. Exempted from graduate degree requirement. Selection rate of less than 10% for analyst program worldwide. Consistent top quartile peer reviews.
- 02/97 - 08/98** *Analyst, Investment Banking Division – Healthcare Department.* Lateral hire from S.G.Warburg, brought into program as 2nd year analyst, and subsequently offered position as 3rd year analyst (less than 30% selection rate in firm-wide analyst program, offer resultant from top 5% class rank).
- 07/95 - 02/97** **S.G. WARBURG & CO., INC.** **New York, NY**
- Analyst, Investment Banking – Mergers and Acquisitions.* Analyzed and executed acquisitions (cross-border and domestic), divestitures, mergers, leveraged buy-outs, joint ventures and related financings. Developed analytical models for corporate strategic and transaction valuations. Served on transaction teams in North America, Latin America and Europe.
- EDUCATION** **COLUMBIA COLLEGE, COLUMBIA UNIVERSITY** **New York, NY**
- A.B. in Political Science awarded May 1995. Earned Dean’s List for academic achievement. President, Saint Anthony Hall (2 years). Men’s Varsity Heavyweight Crew Team (1st boat, 1993 Columbia University “Crew of the Year”). Managed fund raising efforts for various charities.

EDUCATION

1987-1990 ▶ Kings College London, Bachelor of Laws, 2:1

WORK EXPERIENCE

2012-Present

RAPTOR GROUP

MANAGING DIRECTOR - MANAGEMENT COMMITTEE

▶ Private investment company backed by the family office of Jim Pallotta

2006-2012

HELIOS ADVISORS, NEW YORK

OWNER / GENERAL PARTNER

▶ Commodities Specialist Hedge Fund

2010-2011

CORNELL UNIVERSITY, ITHACA NEW YORK

CHIEF INVESTMENT OFFICER, ENDOWMENT*

2006-2010

ROBECO SAGE, NEW YORK

\$2bn+ multi-strategy Fund of Hedge Fund

CHIEF EXECUTIVE OFFICER AND HEAD OF INVESTMENT COMMITTEE

2002-2006

ELYSIUM CAPITAL GROUP, STAMFORD, CT

FOUNDING PARTNER, COO AND MEMBER OF INVESTMENT COMMITTEE

2001-2002

GOLDMAN SACHS, NEW YORK

EXECUTIVE DIRECTOR, HEAD OF US STRUCTURED PRODUCTS (TRADING & SALES)

1996-2001

GOLDMAN SACHS, NEW YORK

EXECUTIVE DIRECTOR, GLOBAL CONVERTIBLES

1994-1996

SWISS BANK / O'CONNOR PARTNERS, CHICAGO

DIRECTOR, CO-HEAD EQUITY-LINKED CAPITAL MARKETS, SYNDICATE AND CORPORATE DERIVATIVES

1990-1994

SWISS BANK CORPORATION, LONDON

MANAGER, EQUITY AND EQUITY-LINKED CAPITAL MARKETS

1983-1987

METROPOLITAN POLICE, LONDON

BOARDS

▶ European Investors, Registered Investment Corporation Fund Director, Head of Audit Committee
Affiliated Managers Group, Advisory Board, Wealth Management Division
Chairman, Board of Directors, Venture Forth (Washington DC-based medical company)

OTHER

▶ UK/Swiss Nationality, U.S. Green Card

ROBERT K. MAYERSON
139 Stow Road
Harvard, MA 01451
(978) 456-8190 (home)
(978) 771-1434 (cell)
bmayerson74@gmail.com

SUMMARY

Seasoned growth-oriented executive with over 30 years of domestic and international experience. Demonstrated expertise in Operations, Strategic Planning, Treasury, Contoller, Real Estate and Investor Relations functions. Achieved consistently superior results in all assignments. A high-impact leader, creative problem-solver and communicator with very effective interpersonal skills.

PROFESSIONAL EXPERIENCE

EASTERN MOUNTAIN SPORTS, INC., Peterborough, NH 2006-2013

President, Chief Operating Officer and Chief Financial Officer 5/06-1/13

Responsible for Store Operations, Real Estate & Construction, Logistics & Distribution, Finance, Information Technology and Non-Trade Procurement.

- Co-led successful process to sell the company to new private equity investors in Fall 2012.
- Helped engineer dramatic transformation of company. Between 2006 and 2010 we closed 29 stores, opened 20 newer format locations, revamped the product mix, sharpened focus on EMS brand products, improved the in-store customer experience and focused on cost reduction. We improved gross profit by 430 bp, and operating expenses by 510 bp. The years 2009 and 2010 were the company's two best in terms of profitability in nearly a decade.
- Completed three-part financing in July 2009 which included an infusion of \$10 mil. of new equity from existing private equity holders, restructuring of subordinated debt to reduce cash interest and implementation of \$40 mil. asset-based financing with new lenders.
- Negotiated complex transaction for relocation of store in Soho which netted company nearly \$4 mil. in cash after paying for cost of build-out of new prototype there.
- Improved store level standards and improved processes and communications between stores and headquarters to drive greater efficiency. Focused on ensuring the right people working in our stores to provide superior and differentiated customer service. Resulted in vastly improved store selling metrics and customer satisfaction.
- Proposed and implemented customer rewards program and database in 2012 to enable a more quantitative, customer centric business model
- Proposed and implemented EMS Brand Credit Card for customers in Spring 2007

STAPLES, INC., Framingham, MA 2002-2006

Senior Vice President, Treasurer 9/02-5/06

Returned to Staples in previous role. Responsible for Treasury, Tax and Risk Management. Administrative oversight of Internal Audit function. Treasury responsibilities included all financing, mergers and acquisitions and cash management.

- Led acquisition of delivery businesses in China and Argentina/Brazil. Responsible for ongoing operational interface between those entities and respective operating functions at headquarters. Led effort to pursue additional acquisition targets in China. Was appointed to Board of the China entity. Developed strategy for entry into India, which was subsequently executed.

- Recommended and implemented target capital structure and responsible for initiation of annual cash dividend. Led share repurchase efforts as well. Developed and implemented strategy for investment of \$1.5 bil. of excess cash.
- Member of Disclosure Committee. Co-led adoption of Sarbanes Oxley and developed framework to ensure global legal entity compliance.
- Established captive insurance subsidiary
- After a period of outsourcing, brought the Tax group back into company as internal resources. Established new legal entity structure for international operations.
- Implemented corporate-owned life insurance (COLI) for funding of deferred executive compensation plan.

TILION, INC., Maynard, MA

2000-2002

Chief Financial Officer 1/00-5/02

Responsible for all aspects of Finance, Human Resources, Legal and Operations for this software/service provider start-up. Joined the company at its founding. Company's principal investors included North Bridge Venture Partners and Venrock Associates.

- Led second fund-raising round in difficult macro environment (11/00). Raised \$36 mil. at pre-money valuation significantly in excess of first round valuation. Financing round included existing as well as new investors.
- Negotiated and implemented 2 separate financing lines totaling just under \$3 mil.

STAPLES, INC., Framingham, MA

1993-2000

Senior Vice President, Corporate Controller 11/97-11/99

Responsible for Financial Planning and Analysis, General Accounting, Margin & Inventory Control, Financial Services (e.g. Accounts Payable, Accounts Receivable and Payroll), Loss Prevention, Financial Systems Integration and Strategic Sourcing. Led staff of 250+ through 7 direct reports.

- Led successful corporate-wide program to identify and deliver \$100 mil. of savings from process improvements, centralized procurement and best practice adoption (1998).
- Led effort to reduce G&A spending primarily through process changes and centralization. Achieved \$17 mil. of \$22 mil. target prior to leaving company.
- Responsible for integrating finance and non-product procurement of two large acquired companies; efforts generated more than \$3 mil. in operating synergies.
- Created centralized procurement group and saved over \$10 mil. in first year.
- Implemented corporate EIS system.
- Wrote most major Investor Relations presentations for CEO and COO in 1998-1999 period.

Senior Vice President, Treasurer 8/93-11/97

Responsible for Treasury, Tax, Risk Management, Strategic Planning (and Investor Relations at various times). Treasury responsibilities included all financing, mergers and acquisitions and cash management. Strategic planning responsibilities included direction of annual strategy review with senior management and establishment of long-term sales and earnings targets. Led staff of 50.

- Completed 8 acquisitions (valuation, negotiation and documentation), including buy-out of joint venture partner in Europe. Evaluated 45 other target companies in the U.S. and abroad.
- Executed 2 separate public financings for \$500 mil. (convertible and straight debt) and 2 secondary equity offerings. Participated in road shows for each.
- Implemented \$350 mil. revolving credit facility on very favorable terms.
- Managed company from high-yield credit to investment grade during tenure.

- Implemented ideas in 12-month period that generated \$25 mil. in savings over 3 years.
- Developed cash flow forecasting which was critical during most rapid growth phase.
- Internal "champion" for focus on financial returns
- Part of small team dedicated to fight the FTC in court over potential merger with Office Depot

PEPSICO. INC. Purchase, NY

1982-1993

Director of Corporate Finance 1991-1993

Responsible for long term capital planning, capital structure analysis and financial risk management within Treasury group. In addition, responsibilities included rating agency and board presentations, acquisition analysis, dividend policy and PepsiCo's shareholder value framework.

- Conducted detailed analysis of foreign exchange exposures at the corporate, divisional and country levels. Developed exposure management policy to facilitate operating decisions at the division level and enhance performance measurement.
- Initiated corporate-wide review and risk assessment of international investment plans by division for next 5 years. Findings helped lead to more aggressive investment in Eastern Europe and Latin America.
- Prepared and presented strategic review of PepsiCo's business outlook and spending plans to rating agencies. Rating upheld despite aggressive investment spending plans.

Director of Planning, PepsiCo Food Service International 1989-1991

Responsible for the planning of PepsiCo's \$250 mil. international restaurant division (Pizza Hut and Taco Bell). Traveled extensively to review plans and operations of all international business units, including company-owned, joint venture and franchise operations. Managed a staff of five.

- Developed universal reporting format for submission of plan data which shortened the time required to roll-up field-based plans. Made financial reporting more insightful and descriptive and improved timeliness of reporting to senior management.
- Performed analysis of several potential acquisitions, franchise buy-outs and joint ventures. Completed \$10 mil. joint venture in South Korea.
- Provided financial framework to assist marketing programs and operations initiatives. Developed turn-around strategy for a developing European market. Member of 3-person team which developed strategy to aggressively build pizza delivery business in the UK.

Director of Investor Relations, PepsiCo, Inc. 1987-1989

Responsible for marketing PepsiCo as a long term investment to institutional investors. Developed and maintained communications with securities analysts and portfolio managers regarding PepsiCo's performance and outlook. Wrote speeches for Chairman/CEO and CFO.

- IR program recognized as one of top 10 in U.S. by Institutional Investor Magazine in 1989.
- Led successful targeting effort in the U.S.; Developed investor relations program in Europe.
- Developed highly successful multi-media presentation for international investors that was delivered by Chairman and senior managers in 18 cities.

Manager, Short-Term Financing, PepsiCo, Inc. 1985-1987

Developed and executed trading strategies with respect to PepsiCo's short-term financing needs, including commercial paper portfolios totaling \$2 billion, marketable securities portfolios totaling \$1 billion and all foreign exchange trades. Managed one professional trader.

- Negotiated and executed European commercial paper program and medium-term note programs; implemented and managed Australian dollar commercial paper program

- Hedged \$100 mil. bond issue through forward purchase of U.S. Treasury notes.
- Managed \$125 mil. arbitrage portfolio; generated pre-tax profits of \$200,000 in first year.

Senior Treasury Analyst, PepsiCo, Inc. 1984-1985

Responsible for analysis of long-term financing proposals, derivative products and preparation of presentations to rating agencies. Completed deals included the following:

- PepsiCo's first currency swap (in conjunction with a bond issue)
- Two bond issues (Swiss Franc and Australian Dollar) totaling \$200 mil.
- Structured off-shore purchase of \$200 mil. of receivables

Treasury Analyst, PepsiCo, Inc. 1982-1984

Initial responsibilities included determination of daily funding or investment requirements and execution of all wire transfers. Moved to cash management projects in 1983. Performed disbursement and collection studies and worked with outside consultants to design computerized cash management system.

SCHOOL OF BUSINESS, UNIVERSITY OF MASSACHUSETTS, Amherst, MA 1981-1982

Research Associate

Performed research on financial instruments, primarily futures and options. Co-authored paper on futures that was published by the Chicago Board of Trade.

J.C. PENNEY, New York, NY

1979-1980

Assistant Buyer

Responsible for evaluating and purchasing items for use in building new stores and refurbishing existing stores nationwide. Involved in contract negotiations, competitive bids and the sourcing of new suppliers.

EDUCATION

MBA - Finance, University of Massachusetts, Amherst, MA 1982

B.A. Hampshire College, Amherst, MA 1979

Nicholas D. Tamborrino, Pharm.D.

428 Old Mill Rd
Fairfield, CT 06824
(860) 508-5250

Email: nicholas.tamborrino@gmail.com

Summary

Clinical Pharmacist with 11 years of experience relating to multiple areas of pharmacy practice with extensive focus in Healthcare Informatics, Managed Care and Hospital Practice.

Education

University Of Connecticut
Master of Business Administration
Concentration in Finance/Marketing
Stamford, CT
12/11

University of Connecticut
Doctor of Pharmacy
Bachelors of Science in Pharmacy Studies
Storrs, CT
05/02
05/00

Professional Experience

Yale New Haven Health System
Epic Project Systems Analyst/ Pharmacy Training Coordinator
Responsible for the build and maintenance of pharmacy related products and workflows for Yale New Haven Health System Hospitals. Developed pharmacy curriculum for the staff at four major hospitals.
Stratford, CT
01/12-present
Epic Willow Inpatient Certified (version 2012)
Epic Beacon Certified (version 2012)
Epic Inpatient Orders/CPOE Credentialed
MST Build Experience
Golive Experience - Greenwich Hospital 4/2012, Yale-New Haven Hospital Main Campus 2/2013, Yale-New Haven Hospital St Raphael Campus 6/2013, Bridgeport Hospital 9/2013

CVS/Caremark
Clinical Consultant – Connecticut/ New York Territory
Work collaboratively with target physicians in specific therapeutic areas that decrease costs for Caremark plan participants. Partner with employers and health plans to create drug class initiatives that promote plan savings. In addition, provide clinical and basic pharmacy services to targeted physician offices improving patient care.
Connecticut
02/06-01/12

Accomplishments include:

- 2010 Caremark Gold impact Award
- 2009 Caremark Gold Impact Award
- 2009 Designed and implemented national training module
- 2007 Caremark Silver impact Award
- 2007 Accrediting Consulting Excellence (ACE) Level 1

Professional Experience

St. Vincent's Medical Center
Per-diem Clinical Pharmacist
 Bridgeport, CT
 01/09-present
 Provide clinical pharmacy services to ICU and telemetry floors. Additional responsibility includes interacting with medical staff to provide best therapeutic option for patient care. Accomplishments include:

- Implementation of a new chemotherapy pharmacy protocols measuring and assuring patient safety.
- An active member of the IV room implementation committee.

Bridgeport Hospital
Per-diem Hospital Pharmacist
 Bridgeport, CT
 08/04-present

- May 2012 Hospital Wide winner "Geat Catch Award".
- February 2006 Recognized Employee for "outstanding performance".
- Manage the storage and preparation of Clinical Study Drugs.
- Pharmacokinetic monitoring of Aminoglycosides and Vancomycin.
- Review medication profiles for appropriateness of therapy.
- Dose and preparation of Chemotherapy agents
- Act as drug resource for healthcare professionals.
- Ensure proper dosing on all medications
- Institutional Review Board (IRB) Member 2005-2006.

Walgreen's Corporation
Retail Pharmacist
 Norwalk, CT
 3/02-09/05

- Responsible for verification of medications while providing pharmaceutical care.
- Managed customer relationships including, patient counseling, complaint resolution, quality assurance, and adherence to practices promoting customer satisfaction.
- Developed and maintained good working collaborative practice with physicians and other - healthcare professionals maximizing patient care.

Bristol-Myers Squibb
 Pharmaceutical Research Institute
 Wallingford, CT
 06/00-08/01
Clinical Supply Operations

- Assisted in design and implementation of global labeling computer-based system.
- Ensured each study medication label was compliant with country regulations.
- Assisted in coordination of world wide global labeling simulation.

Licensure/Affiliations

- Pharmacist Connecticut #9771

BERNARD R. SULLIVAN

24 Adenas Walk

Glastonbury CT 06033

860-371-7434

SUMMARY

Senior manager with over 30 years' experience directing the professional and business aspects of major public and private organizations. Known for ability to identify problems and bring the necessary resources to correct solutions. Excellent team builder and communicator.

EXPERIENCE

2006 to Present Private consultant ,Public Safety

2013-Appointed by Governor D.Malloy as a Vice-Chair of the Sandy Hook Advisory Commission,charged with reviewing the murder of 20 children and four adults at the Sandy Hook School in Dec. of 2012 and making recommendations concerning prevention of incidents of this nature.

Provided consultant services to various clients such as those listed below;

Atty.Kristen Kenney,Kenny,Okeefe&Usseglio PC

Atty.James Szerakow,Halloran& Sage

Atty.Kathleen Nevins,Nevins and Nevins

Atty.Christine Lassen ,Kennedy,Johnson,Delia and Gillooly

Atty.Eric daigle,Daigle Law Group

Town of Southington Ct.Police Commission

2000-2006 Executive Vice president TBI Construction Co.

CEO of Construction Management Co .Overseeing Approximately \$40MM per year of building activity including the Downtown Waterbury Redevelopment Project Consisting of a Arts magnet School, two garages and the rehab of the Historical Palace Theater.

2 004 Appointed president of Tunxis Management Co., CEO of property management firm acting as third party manager of approximately 3 million square feet of low and high rise office buildings as well as retail plazas and a small commuter airport.

1992-2000 Chief of Staff to Speaker of the House of Representatives for the State of Connecticut

Managed support staff including legal, press, policy/research and constituent services. Served as the Speaker's liaison to the Governor and agency heads.

Developed first job descriptions and pay classification for staff.

Developed performance evaluation system.

Reviewed and evaluated non-partisan staff directors on Speaker's behalf and recommended appropriate changes.

Assisted in the organization of the first independent Capitol Police Department as well as the selection process for the Department's first police chief and worked with the Chief and the CT State Police through the transition.

1991-1992 Acting Chief of Police, Central Connecticut State University

Durational position. Developed department's first operations and administration manual. Developed process for and participated in selection of permanent Chief of Police.

1989-1991 Commissioner of Public Safety, State of Connecticut

Called upon by Governor William O'Neil to assume command of the CT Department of Public Safety after he requested resignation of incumbent Commissioner in midst of highly publicized series of illegal recording of Attorney client conversations.

Reported to the Governor and responsible for managing the State's public safety functions. Developed the operating budget, prepared rationale for funding, approved all operating policies and procedures relating to recruiting, training and professional operations. 1600 employees, \$85MM operating budget.

Reorganized the department into two distinct divisions; Police and Fire, and Building Safety, thus drawing clearer lines of authority and accountability.

Streamlined the agency thus reducing budgeted positions by 12% and simultaneously reducing overtime by 17% while maintaining 100% of agency effectiveness.

Established a wellness program utilizing external funding. Established exercise facilities at each (12) department location.

Revised and brought into conformance department policies such as; use of deadly force, AIDS and management reporting.

Established a departmental newsletter to enhance employee awareness.

Redefined physical training standards, thus settling an existing civil action and assuring future appropriateness of training.

Identified overall weakness in department automation and drafted a preliminary plan for upgrade utilizing consultants.

Reviewed and directed reconfiguration of agency tape recording systems to assure legal compliance.

1989-1989 Director of Corporate Security, ITT Hartford Insurance Group

Managed the security functions at the home office and branches nationwide.

1964-1989 City of Hartford Police Department Chief of Police (1982-1989)

Managed all business and professional elements of the City's Police Department. Operating budget \$24MM. 625 employees including civilian and sworn.

Increased strength of the Hartford Police Department from 360 to 500 sworn officers.

Surpassed Affirmative Action hiring goals.

Managed a budget that increased from \$14MM in FY 82-83 to \$24MM in FY87-88 without ever exceeding budget plan.

Oversaw the development of a full MIS unit within the department, which resulted in enhanced technology such as computer aided dispatch, on-line records and booking systems.

Created the position of police Psychologist to deal with stress and trauma related issues.

Added bi-lingual personnel to assure 24-hour communications ability.

Enhanced training and reduced the level of use of firearms in apprehensions by 75%.

Generated approximately one million dollars in monies or gifts to assist funding of the department through interaction with community and business leaders.

Formed Local/Federal Task Force in narcotics resulting in multiple convictions of major traffickers, seizures generated additional revenue of approximately One Million Dollars through Federal Seizures Act.

Invited participant in National Executive Session on Policing-Harvard University, JFK School of Govt.

Invited participant, through the International Association of Police Chiefs, for technical exchange with the national police of the People's Republic of China.

OTHER POSITIONS HARTFORD POLICE DEPT

1981-1982	Captain
1976-1981	Lieutenant
1971-1976	Sergeant
1969-1971	Detective
1964-1971	Patrolman

COMMENDATIONS

Numerous Hartford Police Department Commendations including the Department Merit Award for Valor, and the Chief's Medal of Valor. Commendations from the Director of the Treasury

Department, Special Agents in charge of the Secret Service, the Federal Bureau of Investigation and the Drug Enforcement Administration, as well as from the U.S. Attorney, Strike Force Organized Crime and the State's Attorney for Hartford County.

EDUCATION

Manchester Community College, 1974-1975

National Executive Institute of the Federal Bureau of Investigation, 1983

One-year fellowship with the American Leadership Forum, 1984-1985 Admitted to ALF as Senior Fellow, 1985

PROFESSIONAL AFFILIATIONS

Connecticut Police Chiefs Association - President 1987/88, presently life member. National Executive Institute Alumni Associate

CIVIC ASSOCIATIONS

President, Board of Directors, 100 Club of CT

Member, Board of Directors Justice Education Center of CT

Honorary Life member Ct. Police Chiefs Memorial

Past Member,

Board of Directors , The Urban League of Greater Hartford

Boys and Girls Club of Greater Hartford

YMCA of Greater Hartford

Corporator Institute of Living Hartford

Corporator Hartford Hospital

Corporator St. Francis Hospital

TROY F. KAPLAN, Esq. MBA

401 East 74th Street, Apartment 19F
New York, New York 10021

TroyFKaplan@gmail.com
(856) 261-4127

EDUCATION

Rutgers University School of Law - Camden, *Dean's List, Bloustein Scholar
Juris Doctor (J.D.)* May 2008

Rutgers University School of Business - Camden, *Magna Cum Laude
Master of Business Administration (M.B.A.)* May 2008

Cornell University - College of Arts & Sciences
Bachelor of Arts, Economics May 2004

BAR MEMBERSHIP

California State Bar June 2009
New Jersey State Bar December 2012
New York State Bar September 2013
American Bar Association

EXPERIENCE

GluckWalrath LLP, Trenton, NJ February 2013 – Present
Associate Attorney

- Lead Medical Marijuana Law department- licensing, business transactions, criminal
- Advise individuals, businesses and municipalities on municipal, corporate, real estate, business, insurance, litigation and transactional matters
- Conduct legal research, draft legal opinions, prepare memos, contracts, litigation documents concerning a plethora of legal and business matters

TechLaw Solutions and Compliance LP, New York October 2012 – February 2013
Document Reviewer

- Conducted first level, potentially privileged, and quality control reviews for:
 - Skadden Arps Department of Justice Second Request anti-trust matter
 - Paul Hastings employment discrimination matter for Fortune 100 client
 - Akin Gump patent infringement matter for Fortune 100 client

Law Offices of Troy F. Kaplan, Esq. MBA, Los Angeles June 2009 – February 2013
Attorney At Law

- Negotiated, drafted, and reviewed partnership agreements, employment contracts, commercial/residential leases, business plans, operations manuals, investment documents, bylaws, stock repurchase contracts, and nondisclosure agreements
- Advised on incorporation, compliance, licensing, entertainment transactions, film production, talent management, agency law, proposed legislation, business start-up, estate planning, unpaid wage claims, criminal law, and intellectual property rights matters in the small business, entertainment, media and Medical Marijuana industries
- Developed a book of business with a high client retention rate including repeat business and referrals while maintaining the utmost integrity, honesty and professionalism

Rosen, Feig & Golland LLP, Beverly Hills, CA October 2009 – March 2010
Law Clerk

- Drafted and reviewed intellectual property transactions, including deal memos, executive producer agreements, and literary rights for boutique entertainment law firm
- Researched and advised on relevant law, statutes, regulations and industry customs
- Counseled talent on diverse matters including estate planning, incorporation, licensing rights, career management decisions, and music, film and television production issues

*Chief Inventory Advisor: **Nate Nienhuis***

The Chief Inventory Advisor, Nate Nienhuis, is an experienced indoor, commercial horticulturalist. He is currently registered with the District of Columbia's Medical Marijuana program for his work with several of the registered dispensaries and cultivation centers. His expertise expands beyond cultivation and into cultivation center design and engineering. As such, he is uniquely positioned to assess the qualities and characteristics of incoming inventory produced by the State's registered producers.

Before beginning his career in Medical Marijuana, Mr. Nienhuis attended Cal State Fullerton for mechanical engineering. He worked as Head Engineer for Growlite where he designed light bulbs and fixtures for the indoor gardening industry. He also performed engineering work for Carol Shelby and Goodyear racing. Additionally, Mr. Nienhuis has designed commercial agricultural equipment to enable the largest farms in the country to operate on alternative fuels. More recently, he was retained as Head Engineer for Holistic Remedies and Capital City Cultivation in Washington, DC to design and build their respective registered cultivation centers.

Interestingly, Mr. Nienhuis is a licensed operator for pest control, giving him unprecedented insight into pest control in an indoor horticulture environment. He also attended Rancho Santiago College for Fire Tech training and is well equipped to handle such unforeseen emergencies.

Mr. Nienhuis has donated extensive time to serve pro bono as President of the OC Kings Soccer Club, also known as SoCal Futbol Club. There, he managed a soccer program that has guided many amateur players into professional leagues. He is also a licensed professional soccer coach. Mr. Nienhuis is an avid hunter and fisherman and has a strong propensity for conservation and wildlife management.

As Chief Inventory Advisor, Mr. Nienhuis expects to utilize his expansive knowledge and unique skill set to create a comprehensive array of offerings to accommodate every sub-set of patients in the State based on the list of qualifying conditions set forth in the Act and Regulations.

Rosemary Mazanet MDPHd
24 Daffodil Lane
Cos Cob, CT 06807
203-273-0572

EXPERIENCE:

Life sciences management and investment professional with executive drug development experience. Harvard trained internist/hematologist/oncologist. Association with all stages of drug development; IND submission through approval and launch. Able to conceive, articulate and execute strategic, development and financial vision in public and private company environments.

EMPLOYMENT HISTORY

2012-Present	NKT Therapeutics, Chief Medical Officer monoclonal antibodies to immune cells disease targets Sickle Cell Disease (phase 1) Asthma, Cancer
2011-Present	Galena Biopharma, Chief Medical Officer cancer vaccine NeuVax (phase 3) and pain Abstral (marketed)
2004-Present	President, Rosemary Mazanet L.L.C. Consulting Advisor to many public and private companies and equity investors in devising, reviewing and conducting drug development strategies.
2009-2012	Apelles Investment Mgt, LP General Partner and CSO Managed Biotechnology portfolio as well as Co-managed broader Healthcare portfolio.
2009-2010	Acting CEO Diabetes America, Inc. Houston, TX Private company, operates 18 Clinics for patients with diabetes in Texas and Arizona. Evaluated company for financing and acquisition potential, initiated a court ordered restructuring effort.
2004-2007	CEO and Co-Founder, Breakthrough Therapeutics LLC Angel funded virtual private company with therapeutic licensed from Memorial Sloan Kettering Cancer Center, NY, NY. Sole employee of company. Arranged all aspects of corporate operations, drug development, governance and clinical research. Filed corporate IND and in multicenter trial, treated 40 patients with drug candidate, presented and published results. After completion of phase II trial, returned compound to MSKCC

after success of Gleevec and follow-on compounds made drug candidate less attractive.

- 2005-2007 Acting CEO Access Pharmaceuticals (OTC: ACCP), Dallas TX
Charged with resurrecting a specialty pharma company that was a portfolio company of Oracle Partners, LP. Took the helm on an interim basis when company had no active clinical programs, no active significant partnerships, and significant debt and senior securities outstanding. Achieved a restructuring/repositioning over 18 month period. Raised \$21 million (\$13.4 in cash) on asset sale
Raised \$6 million in convertible debt.
Completed a reverse stock split.
Filed/Received 510K approval for MuGard
Hired CEO to take helm, with successful transition.
- 1998-2004 Oracle Partners, LP, General Partner, Director of Research, CSO
Originally hired as a Principal at the \$1B health care hedge fund, and made Partner in 1999. Co-managed the Biotechnology portfolio as well as oversight on all healthcare investments. During tenure, the fund posted annual gains of up to 77% net. Portfolio examples available on request.
- 1992-1997 Sr. Director of Clinical Research, Amgen, Inc.
Joined Amgen after Neupogen approval as the first US trained Hematologist/Oncologist. Eventually had oversight over all Oncology and Infectious Disease Clinical Development. Was involved not only in Clinical Development, but overlap functions in Medical Marketing, Business Development and Investor Relations.
Accomplishments/Responsibilities:
Global Clinical Development
Filed INDs (4), CE mark (1), IDE (1), sBLAs (4), BLAs (1)
Presentations at FDA Advisory Panel Meetings (2)
Medical Marketing, Oncology and Infectious Disease
Investor Relations Presentations with CEO/CFO
Evaluation Team-Licensing and Business Development
Joint Management Committees:
Roche-Amgen;
Kirin-Amgen;
Miltenyi Biotech-Amgen

DIRECTOR/LEADERSHIP POSITIONS

- 2002- **University of Pennsylvania**
Trustee, University of Pennsylvania School of Medicine/Hospital

- Member Executive Committee, PENN Medicine
 Chair, Campaign Cabinet PENN Medicine
 Lecturer, MDPHD Training program, School of Medicine
- 2010-2013 **Co-Chair “Making History” University Capital Campaign**
 Successfully raised \$3.5bn goal 14 months ahead of campaign end.
- 2010- Director (independent) Actinium Pharma, Inc., Private Company
 Technology licensed from Memorial Sloan Kettering Cancer Center, NY.
- 2011- Director (independent) Oncolyze Pharma, Inc. Private Company
 Technology licensed from State University of New York.
- 2012- Director, Wellcare Centers of America, LP
- 2002-2010 Director (independent), GTX, Inc. (NASDAQ: GTXI).
 Member, Audit and Finance Committee.
- 2006-2008 Vice Chairman, Access Pharma (OTC: ACCP), Dallas TX
- 2007-2008 Director (independent) Aksys, Inc (NASDAQ listed until 2008)
 Company asset sale.
- 2009-2011 Director, Diabetes America, Inc. (Private Company, see management
 experience)
- 2007-2010 Director (independent) Cellumen, Inc. (Private Company, acquired)
- 2005-2007 Director and Co-Founder Amorocyte (acquired by Neostem)

EMPLOYMENT HISTORY (Academic)

- 1993-1997 **Clinical Associate Physician, Department of Oncology**
 UCLA County---Oliveview Hospital, Sylmar, CA
 (while at Amgen)
- 1990-1992 **Clinical Physician, Harvard Medical Hospitals**
 Dana Farber Cancer Institute, Boston MA
 Brigham & Women’s Hospital, Boston, MA
 Beth Israel Hospital, Boston MA
 Mt. Auburn Hospital, Cambridge MA
- 1989-1992 **Instructor in Medicine, Harvard Medical School**
 American Cancer Society Career Development Awardee

EDUCATION AND TRAINING:

- 1989- 1991 **Clinical Oncology Fellowship, Dana Farber Cancer Institute**
Harvard Medical School, Boston MA
- 1986-1989 **Residency in Internal Medicine**
Brigham & Women's Hospital,
Harvard Medical School, Boston, MA
- 1986 **MD, University of Pennsylvania School of Medicine**
Philadelphia, PA
Alpha Omega Alpha
- 1981 **PhD. University of Pennsylvania School of Medicine**
Department of Anatomy and Cell Biology
Philadelphia PA
- 1977 **BA, University of Virginia**
Phi Beta Kappa

LICENSURE & CERTIFICATION:

- 2001 Licensed Physician, State of Connecticut #039910
- 1999 Licensed Physician, State of New York #213558
- 1993 Licensed Physician, State of California #G078040, expired
- 1991 Diplomat, American Board of Internal Medicine, Subspecialty
Medical Oncology #125095 (expired)
- 1989 Diplomat, American Board of Internal Medicine #125095
- 1988 Licensed Physician, Massachusetts Board of Medicine #59377

SOCIETY MEMBERSHIPS:

American Pain Society
American Heart Association
American Society of Hematology
American Society of Clinical Oncology
American Association for Cancer Research
American Medical Association
American College of Physicians

PERSONAL

Born October 28, 1955 Pittsburgh, PA
Married 1978 John G. Stoecker III; still married!
2 children: Sarah F. Stoecker born 3/21/89
 David S. Stoecker born 2/11/92

PUBLICATIONS:

Original papers:

1. Reduction of oral mucositis by filgrastim (r-metHuG-CSF) in patients receiving chemotherapy. Crawford J, Tomita DK, Mazanet R, Glaspy J, Ozer H. *Cytokines Cellular & Molecular Therapy*. 1999; 5:187-193.
2. Recktenwald DJ, Ewen C, Gibbons I, Kantor AB, Harding F, Mazanet R, McNiece I, Phil-Wilson J, Sheehan K, Yuen J, Miltenyi, S. High yield, high purity CD34 cell isolation with the Amgen/AmCell cell selection system. *Cancer Res Ther Contr*. 1997
3. Wheeler C, Elias A, Ibrahim J, Ayash L, McCauley M, Mauch P, Schwartz G, Eder JP, Mazanet R, Ferrara J, Rimm IJ, Guinan E, Bierer B, Gilliland G, Churchill WH, Ault K, Parsons S, Antman K, Schnipper L, Tepler I, Gaynes L, Frei E, Kadin M, Antin, J. High-dose cyclophosphamide, carmustine and etoposide with autologous transplantation in Hodgkin's disease: a prognostic model for treatment outcomes. *Biol Blood Marrow Transplant*. 1997; 3: 98-106.
4. Elias AD, Ayash L, Wheeler C, Schwartz G, Tepler I, Gonin R, McCauley M, Mazanet R, Schnipper I, Frei E, Antman KH. Phase I study of high-dose ifosfamide, carboplatin, and etoposide with autologous hematopoietic stem cell support. *Bone Marrow Transplant*. 1995; 15:373-379.
5. Elias AD, Ayash L, Wheeler C, Schwartz G, Tepler I, McCauley M, Mazanet R, Schnipper L, Frei E, Antman KH. High-dose ifosfamide, carboplatin, and etoposide (ICE) with autologous hematopoietic stem cell support: safety and future directions. *Semin. Oncol*. 1994; 21 :83-85.
6. Licht JD, Mazanet R, Loehrer PJ, Gonin R, Antman KH. Phase I trial of daily oral etoposide in the treatment of advanced soft-tissue sarcoma. *Cancer Chemother Pharmacol*. 1994;34:79-80.
7. Ayash LJ, Elias A, Wheeler C, Reich E, Schwartz G, Mazanet R, Tepler I, Warren D, Lynch C, Gonin R. Double dose-intensive chemotherapy with autologous marrow and peripheral blood progenitor cell support for metastatic cancer: a feasibility study. *J. Clin Oncol*. 1994; 12: 37-44.
8. Ayash L, Elias AD, Hunt M, Demetri G, Wheeler C, Tepler I, Schwartz G, Mazanet R, Reich E, McCauley M, Antman KH, Anderson K. Recombinant human erythropoietin for the treatment of the anemia associated with autologous bone marrow transplantation. *Br. J. Haematol*. 1994; 87:153-161.
9. Antman KH, Ayash L, Elias AD, Wheeler C, Schwartz G, Mazanet R, Tepler I, Schnipper LE, Frei E. High-dose cyclophosphamide, thiotepa, and carboplatin with autologous marrow support in women with measurable advanced breast cancer responding to standard dose therapy: analysis by age. *J. Natl. Cancer Inst*. 1994; 16:91-94
10. Elias AD, Ayash L, Tepler I, Wheeler C, Schwartz G, Mazanet R, Schnipper L, Frei E, Antman K. The use of G-CSF or GM-CSF mobilized peripheral blood progenitor cells (PBPC)

alone or to augment marrow as hematologic support of single or multiple cycle high-dose chemotherapy. *J Hematother.* 1993; 2:377-382.

11. Tepler I, Cannistra SA, Frei E, Gonin R, Anderson KC, Demetri G, Niloff J, Goodman H, Muntz H, Muto M, Sheets E, Elias AD, Mazanet R, Wheeler C, Ayash L, Schwartz G, McCauley M, Gaynes L, Harvey S, Schnipper LE, Antman KH. Use of peripheral blood progenitor cells abrogates the myelotoxicity of repetitive outpatient high-dose carboplatin and cyclophosphamide chemotherapy. *J Clin Oncol.* 1993; 11 (8) :1583-1591.

12. Wheeler C, Strawderman M, Ayash L, Churchill WH, Bierer BE, Elias E, Gilliland DG, Antman KH, Guinan EC, Eder JP, Weinstein H, Schwartz G, Ferrara J, Mazanet R, Rimm JJ, Tepler I, McCarthy P, Mauch P, Ault K, Gaynes L, McCauley M, Schnipper LE, Antin J. Prognostic factors for treatment outcome in autotransplantation of intermediate-grade and high-grade non-hodgkin's lymphoma with cyclophosphamide, carmustine, and etoposide. *J Clin Oncol.* 1993; 11 (6):1 085-1091.

13. Elias AD, Ayash L, Frei E III, Skarin AT, Hunt M, Wheeler C, Schwartz G, Mazanet R, Tepler I, Eder JP, McCauley M, Herman T, Schnipper L, Antman KH. Intensive combined modality therapy for limited stage small cell lung cancer. *J Natl Cancer Inst.* 1993; 85(7) :559-566.

14. Elias AD, Ayash L, Skarin AT, Wheeler C, Hunt M, Schwartz G, Mazanet R, Tepler I, Eder JP, Herman T, Schnipper L, Frei E III, Antman KH. High-dose combined alkylating agent therapy with autologous stem cell support and chest radiotherapy for limited small cell lung cancer. *Chest.* 1993; 103(4) :433S- 435S.

15. Elias AD, Ayash L, Anderson K, Hunt M, Wheeler C, Schwartz G, Tepler I, Mazanet R, Lynch C, Pap S, Pelaez J, Reich E, Critchlow J, Demetri G, Schnipper L, Griffin J, Frei E, Antman KH. Mobilization of peripheral blood progenitor cells by chemotherapy and GM-CSF for hematologic support after high dose intensification for breast cancer. *Blood.* 1992; 79:3036-3044.

16. Mazanet R, Reese BF, Franzini-Armstrong C, Reese TS. Variability in satellite cells in normal and injured muscle. *Dev Biol.* 1982; 93:22-27.

17. Mazanet R, Franzini-Armstrong C. SEM of pericytes in rat red muscle. *Microvascular Research.* 1982; 23:361-369.

18. Elias AD, Mazanet R, Wheeler C, Anderson K, Ayash L, Schwartz G, Tepler I, Pap S, Pelaez J, Gonin R, Schnipper L, Griffin J, Frei E, Antman KH. GM-CSF potentiated peripheral blood progenitor cell (PBPC) collection with or without bone marrow as hematologic support of high-dose chemotherapy: Two protocols. *Breast Cancer Res and Treat.* 1991; 20:S25-S29.

Book Chapters. Reviews and Invited Papers:

1. Mazanet, R, Molowa, D. The State of Biologics Manufacturing. In :Annual Reviews of Biotechnology, Vol 9. M Raafal El-Gewely, ed. Elsevier-Science B.V. Amsterdam, 2003: 285-302.

2. Mazanet R, Molineaux G. Development of Haematopoietic Growth Factors. In: Provan OJ Gribben J, eds. *Molecular Haematology*. Blackwell Press, Oxford, 2000; 198-207.
3. Foote MA, Gringeri A, Mazanet R. *Cell Therapy: Use of Hematopoietic Growth Factors and Cell Separation Techniques*; Oncology Nursing Press, Pittsburgh, PA; 2000; 9.3-9.16.
- 4.. Morstyn G, Foote MA, Crawford J, Trillet-Lenoir V, Maher D, Tomita D, Matcham J, Mazanet R. Granulocyte colony-stimulating factor: biology and clinical potential. In: *Principles of Cancer Biotherapy*; third edition; edited by RK Oldham; Kluwer Academic Publishers, Dordrecht, The Netherlands; 1998; 423-431.
5. Mazanet R, Morstyn G, Foote MA. Development of Biological Agents In: *Principles of Antineoplastic Drug Development and Pharmacology*; edited by RL Schilsky, GA Milano, MJ Ratain; Marcel Dekker, Inc; NY, NY; 1996; 55-73.
6. Mazanet R, Grier H. Sarcoma. In: Kirkwood JM, Lotze MT and Vasko JM, eds. *Current Cancer Therapeutics*; Second Edition. Current Medicine, Philadelphia, PA, publ. 1996.
7. Maakestad K, Mazanet R, Liles WS, Dale DC. Neutrophil transfusion for treating infections. In: Morstyn G, Sheridan WP, eds. *Cell Therapy*. Cambridge University Press, New York. 1996:510-526.
8. Morstyn G, Foote MA, Mazanet R. Haemopoietic growth factors in cancer chemotherapy. Section Review, *Oncologic, Endocrine and Metabolic*. *Exp Opin Invest Drugs* 1995; 4:515-523.
9. Mazanet R, Morstyn G, Foote MA. Development of Biological Agents IN: *Principles of Antineoplastic Drug Development and Pharmacology*; edited by RL Schilsky, GA Milano, MJ Ratain; Marcel Dekker, Inc; NY, NY; 1995; 55-73.
10. Morstyn G, Perkins D, Foote MA, Vincent M, Zwycewicz R, Mazanet R. Translation of clinical information about Filgrastim (r-metHuG-CSF) to post-approval usage. *Proc ASCO*. 1994; 1566a.
11. Mazanet R. Sarcoma. In: Kirkwood JM, Lotze MT and Vasko JM, eds. *Current Cancer Therapeutics*; First Edition. Current Medicine, Philadelphia, PA, publ.1994:137-145.
12. Mazanet R, Antman KH. Bone marrow transplantation. State of the art and the role of hematopoietic growth factors: solid tumors. In: Gorin NC, ed. *Behringwerke, Marburg, Germany*, publ. *Stem Cells Transplantation and Cytokines: State of the Art*. May 1993:45-54.
13. Mazanet R, Antman KH. The use of growth factors in cancer therapy. *Oncology Overview*. Mazanet R, Antman KH, eds. *CIDAC Information Ventures, Inc*. Philadelphia, PA, publ. 1993.
14. Elias AD, Ayash L, Frei E, Skarin A, Wheeler C, Schwartz G, Mazanet R, Tepler I, McCauley M, Schnipper L, Antman KH. Intensive combined modality therapy for responding

small cell lung cancer. In: Dicke KA, Armitage J, Dicke- Evinger MJ, eds. Autologous Bone Marrow Transplantation, Proc 6th International Symposium. 1993:161-169.

15. Antman KH, Mazanet R. Bone Marrow Transplantation. State of the art and role of hematopoietic growth factors: solid tumors. In: Gorin, NC, ed. Stem Cells Transplantation and Cytokines: State of the Art. Behringwerke AG Therapeutics. 1993:45-54.

16. Mazanet R. Clinical commentary on soft-tissue sarcomas. In: Bauer K, Duque A, Shankey TV, eds. Williams & Wilkins, publ. Clinical Flow Cytometry: Principals and Application. 1993:356-358.

17. Mazanet R, Griffin J. The use of hemopoietic growth factors for high dose chemotherapy. In: Armitage JO and Antman KH, eds. High Dose Cancer Therapy: Pharmacology, Hematopoietins and Stem Cells. Baltimore, MD Williams and Wilkins. 1992:289-313.

18. Elias AD, Mazanet R, Anderson K, Ayash L, Wheeler C, Schwartz G, Tepler I, Hunt M, Critchlow J, Schnipper L, Frei E, Antman KH. GM-CSF mobilized peripheral blood stem cell autografts: the DFCI/BIH experience. *Int J Cell Cloning*. 1992; 10 (suppl 1):149-151.

19. Mazanet R. Antman KH. Sarcomas of soft tissue and bone. *Cancer*. 1991; 68:463-473.

20. Mazanet R, Antman KH. Adjuvant therapy of soft tissue sarcomas *Seminars in Oncology*. 1991; 18:603-612.

21. Antman KH, Eder JP, Elias AD, Ayash L, Wheeler C, Hunt M, Schwartz G, Tepler I, Mazanet R, Pap S, Critchlow J, Shea TC, Teicher BA, Gonin R, Schnipper L, Frei E. Dose intensive regimens in breast cancer: the Dana Farber Cancer Institute and Beth Israel experience. In: Dicke KA and Armitage J, eds. Autologous Bone Marrow Transplantation, Proceedings of the Fifth International Symposium. 1991; 5:305-312.

22. Elias AD, Mazanet R, Wheeler C, Anderson K, Ayash L, Schwartz G, Tepler I, Pap S, Gonin A, Critchlow J, Schnipper L, Griffin J, Frei E, Antman KH. Peripheral blood progenitor cells (PBPC): Two protocols using GM-CSF potentiated progenitor cell collection. In: Dicke KA, Armitage J, eds. Autologous Bone Marrow Transplantation, Proceedings of the Fifth International Symposium. 1991; 5:875-880.

23. Mazanet R, Franzini-Armstrong C. The Satellite Cell. Chapter 7. In: Engel AG and Banker BQ, eds. *Myology*, New York, NY: McGraw Hill, Inc. 1986:285- 308.

MEETING PRESENTATIONS (abstracts):

1. Adkins DR, Goodnough L T, Brown RA, Rush C, Lockbaum P, Mazanet R, DiPersio JF. Alternate day prophylactic granulocyte infusions (PGI), obtained from HLA-matched sibling donors (D) receiving G-CSF may prevent absolute neutropenia and severe thrombocytopenia in allogeneic bone marrow transplant recipients. *Proc Am Soc Clin Oncol*.1996; 15: 1785a.

2. Webb IJ, Ayash LJ, Eickhoff CE, Wheeler C, Schwartz G, Mazanet R, Demetri G, Antman K, Schnipper L, Frei E, Elias A. Strategies for mobilization of peripheral blood stem cells for use in high dose chemotherapy. *Proc Am Soc Clin Oncol*. 1994

3. O'Day SJ, Mazanet R, Skarin AT, Salgia R, Gordon D, Elias AD. Dose escalation of liposome-encapsulated doxorubicin (D-99) with granulocyte colony stimulating factor (G-CSF) support in patients with advanced malignancies. *Proc Am Soc Clin Oncol.* 1994; 13:406a.
4. Morstyn G, Perkins DJ Foote MA, Vincent M, Zwycewicz R, Mazanet R Translation of clinical information about Filgrastim (r-metHuG-CSF) to post- approval usage. *Proc Am Soc Clin Oncol.* 1994; 13:1566a.
5. Crawford J, Glaspy J, Vincent M, Tomita P, Mazanet R. Effect of filgrastim (r-metHu G-CSF) on oral mucositis in patients with small cell lung cancer (SCLC) receiving chemotherapy (cyclophosphamide, doxorubicin, and etoposide, CAE. *Proc Am Soc Clin Oncol.* 1994; 13:1523a.
6. O'Day SJ, Mazanet R, Salgia A, Skarin A, Gordon D, Elias A. A phase I study of liposome-encapsulated doxorubicin (D-99) and granulocyte colony stimulating factor (G-CSF) in patients with advanced solid tumors. 7th World Conference on Lung Cancer.
7. Wheeler C, Shulman LN, Elias A, Axelrod J, Sieff C, Churchill WH, Ayash L, Gaynes L, McCauley M, Thompson L, Mazanet R, Antman K, Tepler I, Schnipper I, Wegner S, Schwartz G, Antin JH. Sequential ifosfamide (I), carboplatin (C), and etoposide (E) with steroids and cyclophosphamide/G-CSF mobilized peripheral blood progenitor cell (PBPC) support (SPICE) in relapsed lymphoma. *Blood* 1993; 81: a.
8. Ayash L, Elias AD, Reich E, Wheeler C, Schwartz G, Mazanet R, Tepler I, Warren D, Lynch C, Schnipper L, Frei E, Antman KH. Double dose-intensive chemotherapy with autologous marrow and peripheral blood progenitor cell (PBPC) support for metastatic breast cancer. 16th Annual San Antonio Breast Cancer Symposium.
9. Schwartz G, Elias AD, Wheeler C, Eder JP, Ayash L, Mazanet R, Tepler I, Gonin R, Antman KH, Schnipper L, Frei E. Carmustine (BCNU) dose and treatment era predict incidence (INC) of noninfectious pneumonitis (NP) in solid tumor patients undergoing high dose chemotherapy with autologous stem cell support. *Proc Am Soc Clin Oncol.* 1993; 12:414a.
10. Ayash L, Elias A, Reich E, Wheeler C, Schwartz G, Mazanet R, Tepler Schnipper L, Frei E, Antman K. Double dose-intensive chemotherapy with autologous marrow and peripheral blood progenitor cell (PBPC) support for metastatic breast cancer. *Breast Cancer Treat Res.* 1993;27:183.
11. Elias AD, Kantoff P, Ayash L, Schwartz G, Wheeler C, Tepler I, Mazanet R, McCauley M, Warren D, Frei E, Antman KH. High-dose ifosfamide, carboplatin, & etoposide (ICE) with autologous marrow support for germ cell carcinoma. *Proc Am Soc Clin Oncol.* 1993; 12:710a.
12. Ayash L, Lynch J, Cruz J, Reich E, Elias AD, Wheeler C, Schwartz G, Mazanet R, Tepler I, Warren D, Shapiro C, Schnipper L, Frei E, Hurd D, Weiner R, Antman KH. High-dose multimodality therapy for locally unresectable or inflammatory (stage IIIB) breast cancer. *Proc Am Soc Clin Oncol.* 1993; 12:158a

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17. Tepler I, Cannistra S, Anderson K, et al. Use of peripheral blood progenitor cells (PBPC) for support of repetitive high-dose carboplatin chemotherapy (X4) in previously untreated outpatients with cancer. *Blood* 1992;80:275a.
18. Wheeler C, Guinan E, Sieff C, et al. Interleukin 3 (IL-3) before marrow harvest and GM-CSF post-autotransplant (ABMT) in patients with relapsed lymphoma: no enhancement of hematopoietic recovery. *Blood*. 1992; 80:330a.
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22. Elias AD, Ayash L, Wheeler C, Hunt M, Schwartz G, Mazanet R, Tepler I, Herman T, Skarin AT, Frei E, Antman KH. High dose combination alkylating agents supported by autologous marrow (ABMT) with chest radiotherapy for responding limited stage (LD) small cell lung cancer (SCLC). *Proc Am Soc Clin Oncol*. 1992; 11:991a.
23. Mazanet R, Elias AD, Ayash L, Anderson K, Wheeler C, Schwartz G, Tepler I, Critchlow J, Schnipper L, Frei III E, Antman KH. Stimulated peripheral blood progenitor cells (PBPC)s added to bone marrow (BM) for hemopoietic rescue following high dose chemotherapy for small cell lung cancer (SCLC) reduces time of aplasia and length of hospitalization. *Proc Am Soc Clin Oncol*. 1992; 11:1336a.

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31. Mazanet R, Deck JD. Ultrastructural response of muscle to limb denervation and amputation in larval salamanders. *Anat. Rec*. 1976; 184:472a- 473a.

D. Barry Boyd, M.D., M.S.

203-869-2111
dboyd@boydcenter.com

With twenty-three years as a board-certified medical oncologist/hematologist and a Master's degree in nutritional biochemistry, Dr. Boyd has a recognized specialization in cancer treatment and recovery. Dr. Boyd is a pioneer in the field of integrative cancer care with a targeted focus on nutritional support for cancer patients. Incorporating emergent evidence-based medical oncology with cancer-specific nutritional counseling he combines comprehensive support for the healing process.

Dr. Boyd enrolled in the Institute for Human Nutrition at Columbia University and received his medical degree from Cornell University Medical College. He completed his fellowship in Hematology-Oncology at New York Hospital-Cornell Medical Center in New York. Dr. Boyd is presently an attending physician at Greenwich Hospital -- Yale Medical Center. Additionally, Dr. Boyd is an assistant clinical professor at the Yale University School of Medicine. Most recently, Dr. Boyd has been appointed Director of the Nutrition and Integrative Medicine Curriculum at Yale University School of Medicine.

Dr. Boyd is founding president of The Integrative Cancer Care Research Foundation and a board member of Environment and Human Health, Inc., a nonprofit organization made up of physicians and public health professionals dedicated to the purpose of protecting public health from environmental harms. Dr. Boyd has also recently published a book entitled, *The Cancer Recovery Plan*.

Licensure:

New York # 142453-1: Date of Issue: 07/80 (Current through 11/30/10)
Connecticut # 027275: Date of Issue: 07/86 (Current through 12/31/10)

DEA Number: AB1903322: Date of Last Renewal: 7/2/04 (Current through 7/31/10)

Board Certification:

Diplomate, National Board of Medical Examiners
Diplomate, American Board of Internal Medicine
American Board of Internal Medicine, Medical Oncology

Educational Background:

M.D.	1979	Cornell University Medical College	Medicine, New York, N.Y.
M.S.	1975	Institute of Human Nutrition Columbia University, New York, N.Y.	Nutritional Biochemistry
B.S.	1971	Cornell University Ithaca, N.Y.	Evolutionary Biology
A.A.S.	1969	State University of N.Y., Delhi, N.Y.	

Hospital Appointments:

- 1982-1983 Assistant Attending, St. Barnabas Hospital, New York, NY
- 1986-1992 Assistant Attending, Hematology-Oncology, Department of Internal Medicine, Greenwich Hospital, Greenwich, CT
- 1992-2000 Associate Attending, Hematology-Oncology, Greenwich Hospital, Greenwich, CT
- 2000-present Attending, Section of Hematology/Oncology, Greenwich Hospital, Greenwich, CT
- 1998 - 2005 Founder and Director, Integrative Medicine Program, Greenwich Hospital, Greenwich, CT

Employment Outside Hospitals:

- 1986-2000 Partner, Greenwich Medical Group
Greenwich Office Park #8, Greenwich,, CT
- 2000-2001 Associate Clinical Director
Center for Complementary and Integrative Medicine
Cornell-Weill Medical School, New York, N.Y.
- 1998-present Director, Program in Integrative Medicine
Greenwich Hospital-Yale Medical Center, Greenwich, CT
- 2001-2005 Sole Practitioner, Private Medical Practice, Greenwich, CT
- 2005-present Director, Boyd Center for Integrative Health, LLC
Greenwich, CT

Institutional Responsibilities:

- 2010-present Director, Cancer Nutrition, Yale-New Haven Health System
- 1986-present Hematology/Oncology Attending, Internal Medicine Residency Program
Greenwich Hospital-Yale Medical Center
Greenwich, CT
- 1990-1992 Member, Executive Committee, Greenwich Hospital, Greenwich, CT
- 1987-present Member, Tumor Committee, Greenwich Hospital, Greenwich, CT
- 1997-present Member, Medical Education Advisory Committee, Greenwich Hospital,
Greenwich, CT

D. Barry Boyd, M.D., M.S.
Managing Partner

Boyd Center for Integrative Health, LLC
15 Valley Drive, Greenwich, CT 06831

1997-2007 Chairman and Founder, Integrative Medicine Program, Greenwich Hospital, Greenwich, CT

2009-2012 Director of Nutrition Curriculum, Yale University School of Medicine, New Haven, CT

2009-2012 Director of Integrative Medicine Curriculum, Yale University School of Medicine, New Haven, CT.

2010-Present Director of Cancer Nutrition, Yale Health System, New Haven, CT.

Professional Memberships:

1990-present American College of Medicine

1990-present American Society of Preventive Oncology

1990-present Connecticut State Medical Society

Professional Memberships:

1990-present Fairfield County Medical Society

1990-present Connecticut State Medical Society

1990-present American Medical Association

1998-present American Society of Clinical Oncology

1998-present American Society for Preventive Oncology

2002-present American Psychosomatic Society

2002-present New York Academy of Sciences

2000-present Society for Integrative Oncology

Board Activities:

American Cancer Society, Weston, CT., Spokesperson

American Red Cross, Greenwich, CT., Past Board Member

Audubon of Greenwich, Greenwich, CT., Board Member

Cancer Communications, Inc., The Moss Scientific Advisory Board
Reports, Lamont, PA.,

Cancer Cure Coalition, Scarsdale, NY, Board Member

Collaboration on Health & the Partner

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Managing Partner

Boyd Center for Integrative Health, LLC
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Environment, San Francisco, CA.,	
Connecticut Challenge, Stamford, CT,	Medical Advisory Board Member
Environment & Human Health, Inc., North Haven, CT.,	Board Member
Gilda's Club, White Plains, N.Y.,	Medical Advisory Board Member
Integrative Cancer Care Research Foundation, Inc., Greenwich, CT.,	Founder & Chairman
Integrative Cancer Therapies, Sage Publications, Chicago, IL. ,	Editorial Board Member
Memorial Labyrinth Committee for Sept. 11, Greenwich, CT.,	Chairman

Bibliography:

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2. Coleman M, Boyd DB, Beshevkin M, et al: COPBLAM: Treatment of Large Cell Lymphoma: A Status Report, in Skarin AT (ed): Update on Treatment for Diffuse Large Cell Lymphoma. New York, Park Row, 1985, pp 63-69.
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10. Boyd DB. Insulin and Cancer. *Integrative Cancer Therapies*. 2003; 2(4):315-329.
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12. Henderson CC, Alderman N, Addiss S, Boyd DB et al. The State of Nutrition and Physical Activity in Our Schools. *Environment and Human Health*, North Haven,CT. 2004 p.117.
13. Boyd DB, Cullen M, Alderman N, Addiss, et al. Breast Cancer: What Science Knows, What Women Think. *Environment and Human Health*, North Haven, Ct. 2006 p.95
14. Boyd DB. Cancer and Insulin: Targeting the Insulin-IGF System for Risk Reduction and Survival. In: Kohlstadt, I ed. *Food and Nutrients in Disease Management*, CRC Press, Boca Raton, Fl.2012; 724-51.

Books

1. Boyd DB, *The Cancer Recovery Plan*, Penguin Press, New York, N.Y. 2005, p245.

Honorary Lectureships:

1. *Cancer Prevention and Survival. Positive Trends in Cancer Prevention and Better Outlook for Survival*. 11th Annual Kate Kuhn Woodbury, MD Memorial Lecturer, May 10, 2007, St. Francis Hospital, Hartford, CT.
2. *The Biology of Integrative Cancer Care*. 32nd Annual Meadow Brook Lecture in Medicine and Surgery¹, Southeastern Michigan Medical Society, May 21, 2008. Meadow Brook Hall, Rochester, MI.
3. *Nutrition in Cancer Care and Survival: A Practicing Oncologist's Evolving Perspective*. Fred Hutchinson Cancer Research Center, Cancer Control and Prevention Program, January, 2009, Seattle, Washington.
4. *Nutrition in Cancer Care and Survival: A Practicing Oncologist's Evolving Perspective*. New York Hospital, Weill-Cornell Medical Center, Cancer and Nutrition Program, January, 2009 New York, New York.

¹ The Meadow Brook Lecture Series was designed in 1977 to provide physicians with a unique opportunity to hear internationally prominent persons in the forefront of medicine and surgery. The lecture is held annually in conjunction with the SEMCME Research Forum. Previous speakers have included Michael DeBackey (Baylor Univeristy), Anthony Fauci (NIH) and Robert Gale (UCLA).

Alexis Kopikis

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Summary

My goal is to be a great dad. I am an entrepreneur, business and technical leader with a strong history of rapidly designing and delivering new products to market. I believe a group of individuals with focus, passion and humor can achieve anything and have spent my career enjoying the journey of doing so. I've had the privilege to assemble and work with amazing teams across a variety of companies and verticals from financial services to action sports. I have delivered web, mobile and desktop products and built and ran businesses from inception through growth and scale to acquisition. My passion is to invent, create, market and sell products that delight customers and succeed in the marketplace. As someone once said, "Some people dream of worthy accomplishments, others stay awake and do them."

Specialties: Social and digital media, internet and mobile applications, consumer products, software development, product strategy, product planning, product design, product marketing, product management, usability, UI design, human factors, marketing, sales, business development, fund raising, general management.

Experience

Founder, CEO Krush, Inc.

Mar 2010 – Present

Krush (www.krush.com) is the online destination for what's now, what's new and what's next in Action Sports and Lifestyle Fashion, posted by a society of tastemakers and influencers who live the lifestyle.

- Defined and implemented corporate and product strategy, establishing Krush as the leading crowd-curated product discovery site in the action sports and lifestyle vertical.
- Designed and delivered mobile and web products achieving 100K monthly uniques with a 22% weekly return rate and over 4 million unique consumer product ratings.
- Hired and led in-house and outsourced development teams through the design and delivery of mobile and web products using an OKR and metrics-driven agile development process.
- Developed predictive data offering for over 200 leading brands including Nike, adidas, Oakley, Nixon, Under Armour, Quiksilver, Hurley, O'Neill, Volcom, G-Shock and DC Shoes.

Founder and General Partner, Propel Consulting

Jan 2005 – Mar 2010

Propel provided strategy and product design services to venture backed companies helping to rapidly define and bring compelling software products to market faster while mitigating execution risk.

- Worked closely with entrepreneurs, executive teams, development organizations and investors in dozens of companies to jumpstart new, revamp existing or merge products.
- Clients included Awareness, Aptix, Gypsii, Knome, ProPlayer Connect, First Coverage, HaiVision, HP (Systinet), Impress, Thomson Reuters, Kadient, Mobicious, Microsoft, NetApp, Enpocket (Nokia), Ourstage, Pixable, Sermo, ScanScout, The Updown, Vivox and Wis.dm.

VP Product, Convoq, Inc.

May 2002 – Jan 2005

Convoq provided a first of its kind Flash-based web conference solution for SMBs leveraging instant messaging.

- Joined the company as employee number one, reported to the CEO as served as member of the executive committee.
- Helped conceptualize the company's product vision and business strategy through two major releases. Responsible for the collection, evaluation, prioritization, communication and execution of customer and partner goals, requirements, features and strategy decisions across functional groups.

- Responsible for the creation and communication of product positioning and messaging plans, roadmaps, release schedules, specifications, user interface designs, prototype demonstrations, and product documentation. Coordinated and managed resources across functional groups ensuring that partner schedules and milestones were met on time and with contractual alignment.

Founder and VP Product, WorldStreet

Feb 1996 – Jan 2002

Named by InfoWorld Magazine as the 21st most innovative company of 2001, WorldStreet delivered a Client Relationship Management (CRM) and peer-collaborative communication platform for the financial service industry. Acquired by Thomson Financial.

Institutional Equity Sales, Baring Securities (ING Barings)

Aug 1994 – Feb 1996

Responsible for institutional capital markets sales coverage of major client accounts, and the development of a CRM solution for the Latin America Equity Markets Group across sales, research, and trading organizations.

Education

Masters, Master of International Management, UC San Diego

Sep 1992 – Jun 1994

Graduate School of International Relations and Pacific Studies. Regional specializations in Latin America and Japan.

B.A. Political Science, UC San Diego

Sep 1989 – Jun 1991

Completed four-year degree in two years. Middle Eastern studies minor. Provost Honors for academic achievement.

Other

Mentor at Founders Mentors. Hold various patents. Life interests include FragileX, special education, Autism, tennis, ping-pong, soccer, history, nature, science, design, musical theater and dogs.

United States and Argentine citizen. Native Spanish speaker.

Married, father of twins.



CONSTITUTION
C A R E

Appendix K3

Information Security Personnel

In Re: RFA Section E Question 3

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.



INFORMATION SECURITY PERSONNEL

1.0 INFORMATION SECURITY OVERVIEW

Constitution Care LLC's Dispensary Facility Manager, **Nicholas Tamborinno, Pharm. D., MBA**, will also serve as the dispensary facility's Privacy Officer and Head of Information Security. This position is responsible for all information security requirements, including the requirement that patient information remain confidential. This position also must develop and regularly update the organization's privacy policies and procedures, draft and implement the appropriate privacy policies and procedures, keep such documents on file, and collaborate with other personnel to ensure strict compliance.

In order to support the Privacy Officer/Head of Information Security, Chief Technology Officer **Alexis Kopikis** will facilitate any technical aspects of the information security, and Chief Medical Advisor **Dr. Rosemary Mazanet, MD, PhD** will ensure strict compliance with HIPAA procedures and requirements.

The following is an assembly of the resumes of the Privacy Officer/Head of Information Security, the Chief Technology Officer and the Chief Medical Advisor:

Nicholas D. Tamborrino, Pharm.D.

428 Old Mill Rd
Fairfield, CT 06824
(860) 508-5250

Email: nicholas.tamborrino@gmail.com

Summary

Clinical Pharmacist with 11 years of experience relating to multiple areas of pharmacy practice with extensive focus in Healthcare Informatics, Managed Care and Hospital Practice.

Education

University Of Connecticut
Master of Business Administration
Concentration in Finance/Marketing
Stamford, CT
12/11

University of Connecticut
Doctor of Pharmacy
Bachelors of Science in Pharmacy Studies
Storrs, CT
05/02
05/00

Professional Experience

Yale New Haven Health System
Epic Project Systems Analyst/ Pharmacy Training Coordinator
Responsible for the build and maintenance of pharmacy related products and workflows for Yale New Haven Health System Hospitals. Developed pharmacy curriculum for the staff at four major hospitals.
Stratford, CT
01/12-present
Epic Willow Inpatient Certified (version 2012)
Epic Beacon Certified (version 2012)
Epic Inpatient Orders/CPOE Credentialed
MST Build Experience
Golive Experience - Greenwich Hospital 4/2012, Yale-New Haven Hospital Main Campus 2/2013, Yale-New Haven Hospital St Raphael Campus 6/2013, Bridgeport Hospital 9/2013

CVS/Caremark
Clinical Consultant – Connecticut/ New York Territory
Work collaboratively with target physicians in specific therapeutic areas that decrease costs for Caremark plan participants. Partner with employers and health plans to create drug class initiatives that promote plan savings. In addition, provide clinical and basic pharmacy services to targeted physician offices improving patient care.
Connecticut
02/06-01/12

Accomplishments include:

- 2010 Caremark Gold impact Award
- 2009 Caremark Gold Impact Award
- 2009 Designed and implemented national training module
- 2007 Caremark Silver impact Award
- 2007 Accrediting Consulting Excellence (ACE) Level 1

Professional Experience

St. Vincent's Medical Center
 Bridgeport, CT
Per-diem Clinical Pharmacist
 01/09-present
 Provide clinical pharmacy services to ICU and telemetry floors. Additional responsibility includes interacting with medical staff to provide best therapeutic option for patient care. Accomplishments include:

- Implementation of a new chemotherapy pharmacy protocols measuring and assuring patient safety.
- An active member of the IV room implementation committee.

Bridgeport Hospital
 Bridgeport, CT
Per-diem Hospital Pharmacist
 08/04-present

- May 2012 Hospital Wide winner "Geat Catch Award".
- February 2006 Recognized Employee for "outstanding performance".
- Manage the storage and preparation of Clinical Study Drugs.
- Pharmacokinetic monitoring of Aminoglycosides and Vancomycin.
- Review medication profiles for appropriateness of therapy.
- Dose and preparation of Chemotherapy agents
- Act as drug resource for healthcare professionals.
- Ensure proper dosing on all medications
- Institutional Review Board (IRB) Member 2005-2006.

Walgreen's Corporation
 Norwalk, CT
Retail Pharmacist
 3/02-09/05

- Responsible for verification of medications while providing pharmaceutical care.
- Managed customer relationships including, patient counseling, complaint resolution, quality assurance, and adherence to practices promoting customer satisfaction.
- Developed and maintained good working collaborative practice with physicians and other - healthcare professionals maximizing patient care.

Bristol-Myers Squibb
 Wallingford, CT
 Pharmaceutical Research Institute
 06/00-08/01
Clinical Supply Operations

- Assisted in design and implementation of global labeling computer-based system.
- Ensured each study medication label was compliant with country regulations.
- Assisted in coordination of world wide global labeling simulation.

Licensure/Affiliations

- Pharmacist Connecticut #9771

Rosemary Mazanet MDPHd
24 Daffodil Lane
Cos Cob, CT 06807
203-273-0572

EXPERIENCE:

Life sciences management and investment professional with executive drug development experience. Harvard trained internist/hematologist/oncologist. Association with all stages of drug development; IND submission through approval and launch. Able to conceive, articulate and execute strategic, development and financial vision in public and private company environments.

EMPLOYMENT HISTORY

2012-Present	NKT Therapeutics, Chief Medical Officer monoclonal antibodies to immune cells disease targets Sickle Cell Disease (phase 1) Asthma, Cancer
2011-Present	Galena Biopharma, Chief Medical Officer cancer vaccine NeuVax (phase 3) and pain Abstral (marketed)
2004-Present	President, Rosemary Mazanet L.L.C. Consulting Advisor to many public and private companies and equity investors in devising, reviewing and conducting drug development strategies.
2009-2012	Apelles Investment Mgt, LP General Partner and CSO Managed Biotechnology portfolio as well as Co-managed broader Healthcare portfolio.
2009-2010	Acting CEO Diabetes America, Inc. Houston, TX Private company, operates 18 Clinics for patients with diabetes in Texas and Arizona. Evaluated company for financing and acquisition potential, initiated a court ordered restructuring effort.
2004-2007	CEO and Co-Founder, Breakthrough Therapeutics LLC Angel funded virtual private company with therapeutic licensed from Memorial Sloan Kettering Cancer Center, NY, NY. Sole employee of company. Arranged all aspects of corporate operations, drug development, governance and clinical research. Filed corporate IND and in multicenter trial, treated 40 patients with drug candidate, presented and published results. After completion of phase II trial, returned compound to MSKCC

after success of Gleevec and follow-on compounds made drug candidate less attractive.

- 2005-2007 Acting CEO Access Pharmaceuticals (OTC: ACCP), Dallas TX
Charged with resurrecting a specialty pharma company that was a portfolio company of Oracle Partners, LP. Took the helm on an interim basis when company had no active clinical programs, no active significant partnerships, and significant debt and senior securities outstanding. Achieved a restructuring/repositioning over 18 month period. Raised \$21 million (\$13.4 in cash) on asset sale
Raised \$6 million in convertible debt.
Completed a reverse stock split.
Filed/Received 510K approval for MuGard
Hired CEO to take helm, with successful transition.
- 1998-2004 Oracle Partners, LP, General Partner, Director of Research, CSO
Originally hired as a Principal at the \$1B health care hedge fund, and made Partner in 1999. Co-managed the Biotechnology portfolio as well as oversight on all healthcare investments. During tenure, the fund posted annual gains of up to 77% net. Portfolio examples available on request.
- 1992-1997 Sr. Director of Clinical Research, Amgen, Inc.
Joined Amgen after Neupogen approval as the first US trained Hematologist/Oncologist. Eventually had oversight over all Oncology and Infectious Disease Clinical Development. Was involved not only in Clinical Development, but overlap functions in Medical Marketing, Business Development and Investor Relations.
Accomplishments/Responsibilities:
Global Clinical Development
Filed INDs (4), CE mark (1), IDE (1), sBLAs (4), BLAs (1)
Presentations at FDA Advisory Panel Meetings (2)
Medical Marketing, Oncology and Infectious Disease
Investor Relations Presentations with CEO/CFO
Evaluation Team-Licensing and Business Development
Joint Management Committees:
Roche-Amgen;
Kirin-Amgen;
Miltenyi Biotech-Amgen

DIRECTOR/LEADERSHIP POSITIONS

- 2002- **University of Pennsylvania**
Trustee, University of Pennsylvania School of Medicine/Hospital

- Member Executive Committee, PENN Medicine
 Chair, Campaign Cabinet PENN Medicine
 Lecturer, MDPHD Training program, School of Medicine
- 2010-2013 **Co-Chair “Making History” University Capital Campaign**
 Successfully raised \$3.5bn goal 14 months ahead of campaign end.
- 2010- Director (independent) Actinium Pharma, Inc., Private Company
 Technology licensed from Memorial Sloan Kettering Cancer Center, NY.
- 2011- Director (independent) Oncolyze Pharma, Inc. Private Company
 Technology licensed from State University of New York.
- 2012- Director, Wellcare Centers of America, LP
- 2002-2010 Director (independent), GTX, Inc. (NASDAQ: GTXI).
 Member, Audit and Finance Committee.
- 2006-2008 Vice Chairman, Access Pharma (OTC: ACCP), Dallas TX
- 2007-2008 Director (independent) Aksys, Inc (NASDAQ listed until 2008)
 Company asset sale.
- 2009-2011 Director, Diabetes America, Inc. (Private Company, see management
 experience)
- 2007-2010 Director (independent) Cellumen, Inc. (Private Company, acquired)
- 2005-2007 Director and Co-Founder Amorocyte (acquired by Neostem)

EMPLOYMENT HISTORY (Academic)

- 1993-1997 **Clinical Associate Physician, Department of Oncology**
 UCLA County---Oliveview Hospital, Sylmar, CA
 (while at Amgen)
- 1990-1992 **Clinical Physician, Harvard Medical Hospitals**
 Dana Farber Cancer Institute, Boston MA
 Brigham & Women’s Hospital, Boston, MA
 Beth Israel Hospital, Boston MA
 Mt. Auburn Hospital, Cambridge MA
- 1989-1992 **Instructor in Medicine, Harvard Medical School**
 American Cancer Society Career Development Awardee

EDUCATION AND TRAINING:

- 1989- 1991 **Clinical Oncology Fellowship, Dana Farber Cancer Institute**
Harvard Medical School, Boston MA
- 1986-1989 **Residency in Internal Medicine**
Brigham & Women's Hospital,
Harvard Medical School, Boston, MA
- 1986 **MD, University of Pennsylvania School of Medicine**
Philadelphia, PA
Alpha Omega Alpha
- 1981 **PhD. University of Pennsylvania School of Medicine**
Department of Anatomy and Cell Biology
Philadelphia PA
- 1977 **BA, University of Virginia**
Phi Beta Kappa

LICENSURE & CERTIFICATION:

- 2001 Licensed Physician, State of Connecticut #039910
- 1999 Licensed Physician, State of New York #213558
- 1993 Licensed Physician, State of California #G078040, expired
- 1991 Diplomat, American Board of Internal Medicine, Subspecialty
Medical Oncology #125095 (expired)
- 1989 Diplomat, American Board of Internal Medicine #125095
- 1988 Licensed Physician, Massachusetts Board of Medicine #59377

SOCIETY MEMBERSHIPS:

American Pain Society
American Heart Association
American Society of Hematology
American Society of Clinical Oncology
American Association for Cancer Research
American Medical Association
American College of Physicians

PERSONAL

Born October 28, 1955 Pittsburgh, PA
Married 1978 John G. Stoecker III; still married!
2 children: Sarah F. Stoecker born 3/21/89
 David S. Stoecker born 2/11/92

PUBLICATIONS:

Original papers:

1. Reduction of oral mucositis by filgrastim (r-metHuG-CSF) in patients receiving chemotherapy. Crawford J, Tomita DK, Mazanet R, Glaspy J, Ozer H. *Cytokines Cellular & Molecular Therapy*. 1999; 5:187-193.
2. Recktenwald DJ, Ewen C, Gibbons I, Kantor AB, Harding F, Mazanet R, McNiece I, Phil-Wilson J, Sheehan K, Yuen J, Miltenyi, S. High yield, high purity CD34 cell isolation with the Amgen/AmCell cell selection system. *Cancer Res Ther Contr*. 1997
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4. Elias AD, Ayash L, Wheeler C, Schwartz G, Tepler I, Gonin R, McCauley M, Mazanet R, Schnipper I, Frei E, Antman KH. Phase I study of high-dose ifosfamide, carboplatin, and etoposide with autologous hematopoietic stem cell support. *Bone Marrow Transplant*. 1995; 15:373-379.
5. Elias AD, Ayash L, Wheeler C, Schwartz G, Tepler I, McCauley M, Mazanet R, Schnipper L, Frei E, Antman KH. High-dose ifosfamide, carboplatin, and etoposide (ICE) with autologous hematopoietic stem cell support: safety and future directions. *Semin. Oncol*. 1994; 21 :83-85.
6. Licht JD, Mazanet R, Loehrer PJ, Gonin R, Antman KH. Phase I trial of daily oral etoposide in the treatment of advanced soft-tissue sarcoma. *Cancer Chemother Pharmacol*. 1994;34:79-80.
7. Ayash LJ, Elias A, Wheeler C, Reich E, Schwartz G, Mazanet R, Tepler I, Warren D, Lynch C, Gonin R. Double dose-intensive chemotherapy with autologous marrow and peripheral blood progenitor cell support for metastatic cancer: a feasibility study. *J. Clin Oncol*. 1994; 12: 37-44.
8. Ayash L, Elias AD, Hunt M, Demetri G, Wheeler C, Tepler I, Schwartz G, Mazanet R, Reich E, McCauley M, Antman KH, Anderson K. Recombinant human erythropoietin for the treatment of the anemia associated with autologous bone marrow transplantation. *Br. J. Haematol*. 1994; 87:153-161.
9. Antman KH, Ayash L, Elias AD, Wheeler C, Schwartz G, Mazanet R, Tepler I, Schnipper LE, Frei E. High-dose cyclophosphamide, thiotepa, and carboplatin with autologous marrow support in women with measurable advanced breast cancer responding to standard dose therapy: analysis by age. *J. Natl. Cancer Inst*. 1994; 16:91-94
10. Elias AD, Ayash L, Tepler I, Wheeler C, Schwartz G, Mazanet R, Schnipper L, Frei E, Antman K. The use of G-CSF or GM-CSF mobilized peripheral blood progenitor cells (PBPC)

alone or to augment marrow as hematologic support of single or multiple cycle high-dose chemotherapy. *J Hematother.* 1993; 2:377-382.

11. Tepler I, Cannistra SA, Frei E, Gonin R, Anderson KC, Demetri G, Niloff J, Goodman H, Muntz H, Muto M, Sheets E, Elias AD, Mazanet R, Wheeler C, Ayash L, Schwartz G, McCauley M, Gaynes L, Harvey S, Schnipper LE, Antman KH. Use of peripheral blood progenitor cells abrogates the myelotoxicity of repetitive outpatient high-dose carboplatin and cyclophosphamide chemotherapy. *J Clin Oncol.* 1993; 11 (8) :1583-1591.

12. Wheeler C, Strawderman M, Ayash L, Churchill WH, Bierer BE, Elias E, Gilliland DG, Antman KH, Guinan EC, Eder JP, Weinstein H, Schwartz G, Ferrara J, Mazanet R, Rimm JJ, Tepler I, McCarthy P, Mauch P, Ault K, Gaynes L, McCauley M, Schnipper LE, Antin J. Prognostic factors for treatment outcome in autotransplantation of intermediate-grade and high-grade non-hodgkin's lymphoma with cyclophosphamide, carmustine, and etoposide. *J Clin Oncol.* 1993; 11 (6):1 085-1091.

13. Elias AD, Ayash L, Frei E III, Skarin AT, Hunt M, Wheeler C, Schwartz G, Mazanet R, Tepler I, Eder JP, McCauley M, Herman T, Schnipper L, Antman KH. Intensive combined modality therapy for limited stage small cell lung cancer. *J Natl Cancer Inst.* 1993; 85(7) :559-566.

14. Elias AD, Ayash L, Skarin AT, Wheeler C, Hunt M, Schwartz G, Mazanet R, Tepler I, Eder JP, Herman T, Schnipper L, Frei E III, Antman KH. High-dose combined alkylating agent therapy with autologous stem cell support and chest radiotherapy for limited small cell lung cancer. *Chest.* 1993; 103(4) :433S- 435S.

15. Elias AD, Ayash L, Anderson K, Hunt M, Wheeler C, Schwartz G, Tepler I, Mazanet R, Lynch C, Pap S, Pelaez J, Reich E, Critchlow J, Demetri G, Schnipper L, Griffin J, Frei E, Antman KH. Mobilization of peripheral blood progenitor cells by chemotherapy and GM-CSF for hematologic support after high dose intensification for breast cancer. *Blood.* 1992; 79:3036-3044.

16. Mazanet R, Reese BF, Franzini-Armstrong C, Reese TS. Variability in satellite cells in normal and injured muscle. *Dev Biol.* 1982; 93:22-27.

17. Mazanet R, Franzini-Armstrong C. SEM of pericytes in rat red muscle. *Microvascular Research.* 1982; 23:361-369.

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Book Chapters. Reviews and Invited Papers:

1. Mazanet, R, Molowa, D. The State of Biologics Manufacturing. In :Annual Reviews of Biotechnology, Vol 9. M Raafal El-Gewely, ed. Elsevier-Science B.V. Amsterdam, 2003: 285-302.

2. Mazanet R, Molineaux G. Development of Haematopoietic Growth Factors. In: Provan OJ Gribben J, eds. *Molecular Haematology*. Blackwell Press, Oxford, 2000; 198-207.
3. Foote MA, Gringeri A, Mazanet R. *Cell Therapy: Use of Hematopoietic Growth Factors and Cell Separation Techniques*; Oncology Nursing Press, Pittsburgh, PA; 2000; 9.3-9.16.
- 4.. Morstyn G, Foote MA, Crawford J, Trillet-Lenoir V, Maher D, Tomita D, Matcham J, Mazanet R. Granulocyte colony-stimulating factor: biology and clinical potential. In: *Principles of Cancer Biotherapy*; third edition; edited by RK Oldham; Kluwer Academic Publishers, Dordrecht, The Netherlands; 1998; 423-431.
5. Mazanet R, Morstyn G, Foote MA. Development of Biological Agents In: *Principles of Antineoplastic Drug Development and Pharmacology*; edited by RL Schilsky, GA Milano, MJ Ratain; Marcel Dekker, Inc; NY, NY; 1996; 55-73.
6. Mazanet R, Grier H. Sarcoma. In: Kirkwood JM, Lotze MT and Vasko JM, eds. *Current Cancer Therapeutics*; Second Edition. Current Medicine, Philadelphia, PA, publ. 1996.
7. Maakestad K, Mazanet R, Liles WS, Dale DC. Neutrophil transfusion for treating infections. In: Morstyn G, Sheridan WP, eds. *Cell Therapy*. Cambridge University Press, New York. 1996:510-526.
8. Morstyn G, Foote MA, Mazanet R. Haemopoietic growth factors in cancer chemotherapy. Section Review, *Oncologic, Endocrine and Metabolic*. *Exp Opin Invest Drugs* 1995; 4:515-523.
9. Mazanet R, Morstyn G, Foote MA. Development of Biological Agents IN: *Principles of Antineoplastic Drug Development and Pharmacology*; edited by RL Schilsky, GA Milano, MJ Ratain; Marcel Dekker, Inc; NY, NY; 1995; 55-73.
10. Morstyn G, Perkins D, Foote MA, Vincent M, Zwycewicz R, Mazanet R. Translation of clinical information about Filgrastim (r-metHuG-CSF) to post-approval usage. *Proc ASCO*. 1994; 1566a.
11. Mazanet R. Sarcoma. In: Kirkwood JM, Lotze MT and Vasko JM, eds. *Current Cancer Therapeutics*; First Edition. Current Medicine, Philadelphia, PA, publ.1994:137-145.
12. Mazanet R, Antman KH. Bone marrow transplantation. State of the art and the role of hematopoietic growth factors: solid tumors. In: Gorin NC, ed. *Behringwerke, Marburg, Germany*, publ. *Stem Cells Transplantation and Cytokines: State of the Art*. May 1993:45-54.
13. Mazanet R, Antman KH. The use of growth factors in cancer therapy. *Oncology Overview*. Mazanet R, Antman KH, eds. *CIDAC Information Ventures, Inc*. Philadelphia, PA, publ. 1993.
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small cell lung cancer. In: Dicke KA, Armitage J, Dicke- Evinger MJ, eds. Autologous Bone Marrow Transplantation, Proc 6th International Symposium. 1993:161-169.

15. Antman KH, Mazanet R. Bone Marrow Transplantation. State of the art and role of hematopoietic growth factors: solid tumors. In: Gorin, NC, ed. Stem Cells Transplantation and Cytokines: State of the Art. Behringwerke AG Therapeutics. 1993:45-54.

16. Mazanet R. Clinical commentary on soft-tissue sarcomas. In: Bauer K, Duque A, Shankey TV, eds. Williams & Wilkins, publ. Clinical Flow Cytometry: Principals and Application. 1993:356-358.

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19. Mazanet R. Antman KH. Sarcomas of soft tissue and bone. *Cancer*. 1991; 68:463-473.

20. Mazanet R, Antman KH. Adjuvant therapy of soft tissue sarcomas *Seminars in Oncology*. 1991; 18:603-612.

21. Antman KH, Eder JP, Elias AD, Ayash L, Wheeler C, Hunt M, Schwartz G, Tepler I, Mazanet R, Pap S, Critchlow J, Shea TC, Teicher BA, Gonin R, Schnipper L, Frei E. Dose intensive regimens in breast cancer: the Dana Farber Cancer Institute and Beth Israel experience. In: Dicke KA and Armitage J, eds. Autologous Bone Marrow Transplantation, Proceedings of the Fifth International Symposium. 1991; 5:305-312.

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MEETING PRESENTATIONS (abstracts):

1. Adkins DR, Goodnough L T, Brown RA, Rush C, Lockbaum P, Mazanet R, DiPersio JF. Alternate day prophylactic granulocyte infusions (PGI), obtained from HLA-matched sibling donors (D) receiving G-CSF may prevent absolute neutropenia and severe thrombocytopenia in allogeneic bone marrow transplant recipients. *Proc Am Soc Clin Oncol*. 1996; 15: 1785a.

2. Webb IJ, Ayash LJ, Eickhoff CE, Wheeler C, Schwartz G, Mazanet R, Demetri G, Antman K, Schnipper L, Frei E, Elias A. Strategies for mobilization of peripheral blood stem cells for use in high dose chemotherapy. *Proc Am Soc Clin Oncol*. 1994

3. O'Day SJ, Mazanet R, Skarin AT, Salgia R, Gordon D, Elias AD. Dose escalation of liposome-encapsulated doxorubicin (D-99) with granulocyte colony stimulating factor (G-CSF) support in patients with advanced malignancies. *Proc Am Soc Clin Oncol.* 1994; 13:406a.
4. Morstyn G, Perkins DJ Foote MA, Vincent M, Zwycewicz R, Mazanet R Translation of clinical information about Filgrastim (r-metHuG-CSF) to post- approval usage. *Proc Am Soc Clin Oncol.* 1994; 13:1566a.
5. Crawford J, Glaspy J, Vincent M, Tomita P, Mazanet R. Effect of filgrastim (r-metHu G-CSF) on oral mucositis in patients with small cell lung cancer (SCLC) receiving chemotherapy (cyclophosphamide, doxorubicin, and etoposide, CAE. *Proc Am Soc Clin Oncol.* 1994; 13:1523a.
6. O'Day SJ, Mazanet R, Salgia A, Skarin A, Gordon D, Elias A. A phase I study of liposome-encapsulated doxorubicin (D-99) and granulocyte colony stimulating factor (G-CSF) in patients with advanced solid tumors. 7th World Conference on Lung Cancer.
7. Wheeler C, Shulman LN, Elias A, Axelrod J, Sieff C, Churchill WH, Ayash L, Gaynes L, McCauley M, Thompson L, Mazanet R, Antman K, Tepler I, Schnipper I, Wegner S, Schwartz G, Antin JH. Sequential ifosfamide (I), carboplatin (C), and etoposide (E) with steroids and cyclophosphamide/G-CSF mobilized peripheral blood progenitor cell (PBPC) support (SPICE) in relapsed lymphoma. *Blood* 1993; 81: a.
8. Ayash L, Elias AD, Reich E, Wheeler C, Schwartz G, Mazanet R, Tepler I, Warren D, Lynch C, Schnipper L, Frei E, Antman KH. Double dose-intensive chemotherapy with autologous marrow and peripheral blood progenitor cell (PBPC) support for metastatic breast cancer. 16th Annual San Antonio Breast Cancer Symposium.
9. Schwartz G, Elias AD, Wheeler C, Eder JP, Ayash L, Mazanet R, Tepler I, Gonin R, Antman KH, Schnipper L, Frei E. Carmustine (BCNU) dose and treatment era predict incidence (INC) of noninfectious pneumonitis (NP) in solid tumor patients undergoing high dose chemotherapy with autologous stem cell support. *Proc Am Soc Clin Oncol.* 1993; 12:414a.
10. Ayash L, Elias A, Reich E, Wheeler C, Schwartz G, Mazanet R, Tepler Schnipper L, Frei E, Antman K. Double dose-intensive chemotherapy with autologous marrow and peripheral blood progenitor cell (PBPC) support for metastatic breast cancer. *Breast Cancer Treat Res.* 1993;27:183.
11. Elias AD, Kantoff P, Ayash L, Schwartz G, Wheeler C, Tepler I, Mazanet R, McCauley M, Warren D, Frei E, Antman KH. High-dose ifosfamide, carboplatin, & etoposide (ICE) with autologous marrow support for germ cell carcinoma. *Proc Am Soc Clin Oncol.* 1993; 12:710a.
12. Ayash L, Lynch J, Cruz J, Reich E, Elias AD, Wheeler C, Schwartz G, Mazanet R, Tepler I, Warren D, Shapiro C, Schnipper L, Frei E, Hurd D, Weiner R, Antman KH. High-dose multimodality therapy for locally unresectable or inflammatory (stage IIIB) breast cancer. *Proc Am Soc Clin Oncol.* 1993; 12:158a

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14. Mazanet R, Seidenberg S, Bartel S, Elias AD, Saletan S. A phase I study of liposome encapsulated doxorubicin (TLC D-99) with G-CSF. *Proc Am Soc Clin Oncol*. 1993; 12:415a.
15. Matulonis U, Mazanet R, Niloff J, Goodman H, Muto M, Cannistra S. High-dose ifosfamide, etoposide, and GM-CSF for treatment of platinum- refractory ovarian cancer: preliminary results. *Proc Am Soc Clin Oncol*. 1993; 12:869a.
16. Bolcsak L, Youngster S, Swenson C, Saletan S, Elias A, Mazanet R Plasma levels of free and liposome-encapsulated doxorubicin after administration of TLC D-99 in humans. *ProcAACR* 1993; 34:2127a,
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18. Wheeler C, Guinan E, Sieff C, et al. Interleukin 3 (IL-3) before marrow harvest and GM-CSF post-autotransplant (ABMT) in patients with relapsed lymphoma: no enhancement of hematopoietic recovery. *Blood*. 1992; 80:330a.
19. Demetri GD, Samuels B, Gordon M, Merica A, Mazanet R. Recombinant human interleukin-6 (IL-6) increases circulating platelet counts and C-reactive protein levels in vivo: Initial results of a phase I trial in sarcoma patients with normal hemopoiesis. *Blood*. 1992; 80:334a.
20. Tepler I, Cannistra S, Anderson K, Niloff, J, Goodman H, Sheets E, Elias AD, Mazanet R, Ayash L, Wheeler G, Schwartz G, McCauley M, Gaynes L, Schnipper L, Frei E, Antman KH. Repetitive dose-intensive chemotherapy (X4) made possible by initial collection and repetitive rescue with peripheral blood progenitor cells (PBPC) in previously untreated outpatients with ovarian cancer *Proc Am Soc Clin Oncol*. 1992; 11:768a.
21. Wright, J, Tretyakov D, Ayash L, Elias AD, Wheeler C, Tepler I, Schwartz G, Mazanet R, Holden S, Asoowsky A, Antman KH, Frei E. Platinum rebound after dialysis for renal failure during high dose ifosfamide-carboplatin-etoposide treatment. *Proc AACR*. 1992; 530:3170a.
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23. Mazanet R, Elias AD, Ayash L, Anderson K, Wheeler C, Schwartz G, Tepler I, Critchlow J, Schnipper L, Frei III E, Antman KH. Stimulated peripheral blood progenitor cells (PBPC)s added to bone marrow (BM) for hemopoietic rescue following high dose chemotherapy for small cell lung cancer (SCLC) reduces time of aplasia and length of hospitalization. *Proc Am Soc Clin Oncol*. 1992; 11:1336a.

24. Elias AD, Ayash L, Mazanet R, Anderson K, Hunt M, Wheeler C, Schwartz G, Tepler I, Lynch C, Pap S, Palaez J, Critchlow J, Demetri G, Schnipper L, Griffin JD, Frei E, Antman KH. Peripheral blood progenitor cell mobilization by chemotherapy and GM-CSF for hematologic support of high dose intensification chemotherapy. *Cancer Investigation*. 1992; 10 (suppl 1):6-8a.
25. Wheeler C, Eder JP, Churchill WH, Ault K, Ayash L, McCarthy P, Elias AD, Schwartz G, Tepler I, Antman KH, Mazanet R, Schnipper L, Antin J. Cyclophosphamide, carmustine and etoposide with autologous stem cell support (ASCS) in Non Hodgkin's Lymphoma (NHL). *Blood*. 1991; 78:235a.

26. Elias AD, Ayash L, Anderson K, Wheeler C, Mazanet R, Schwartz G, Tepler I, Reich E, Hunt M, Pap S, Pelaez J, Lynch C, Schnipper L, Griffin H, Frei E, Antman KH. GM-CSF mobilized peripheral blood progenitor cells (PBPC) support after high dose chemotherapy for breast cancer: effect of GM-CSF post reinfusion. *Blood*. 1991; 78:400a.
27. Mazanet R, Elias AD, Hunt M, Ayash L, Anderson J, Wheeler C, Schwartz G, Tepler I, Critchlow J, Schnipper L, Demetri G, Griffin J, Frei E, Antman KH. Peripheral blood progenitor cells (PBPC)s added to bone marrow (BM) for hemopoietic rescue following high dose chemotherapy for solid tumors reduces morbidity and length of hospitalization. *Proc Am Soc Clin Oncol*. 1991; 10:1140a.
28. Antman KH, Elias AD, Hunt M, Ayash L, Anderson K, Wheeler C, Schwartz G, Tepler I, Mazanet R, Critchlow J, Schnipper L, Demetri G, Griffin J, Frei E. GM-CSF potentiated peripheral blood progenitor cell (PBPC) collection and use after high-dose chemotherapy. *Blood*. 1990; 76:526a.
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Alexis Kopikis

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Summary

My goal is to be a great dad. I am an entrepreneur, business and technical leader with a strong history of rapidly designing and delivering new products to market. I believe a group of individuals with focus, passion and humor can achieve anything and have spent my career enjoying the journey of doing so. I've had the privilege to assemble and work with amazing teams across a variety of companies and verticals from financial services to action sports. I have delivered web, mobile and desktop products and built and ran businesses from inception through growth and scale to acquisition. My passion is to invent, create, market and sell products that delight customers and succeed in the marketplace. As someone once said, "Some people dream of worthy accomplishments, others stay awake and do them."

Specialties: Social and digital media, internet and mobile applications, consumer products, software development, product strategy, product planning, product design, product marketing, product management, usability, UI design, human factors, marketing, sales, business development, fund raising, general management.

Experience

Founder, CEO Krush, Inc.

Mar 2010 – Present

Krush (www.krush.com) is the online destination for what's now, what's new and what's next in Action Sports and Lifestyle Fashion, posted by a society of tastemakers and influencers who live the lifestyle.

- Defined and implemented corporate and product strategy, establishing Krush as the leading crowd-curated product discovery site in the action sports and lifestyle vertical.
- Designed and delivered mobile and web products achieving 100K monthly uniques with a 22% weekly return rate and over 4 million unique consumer product ratings.
- Hired and led in-house and outsourced development teams through the design and delivery of mobile and web products using an OKR and metrics-driven agile development process.
- Developed predictive data offering for over 200 leading brands including Nike, adidas, Oakley, Nixon, Under Armour, Quiksilver, Hurley, O'Neill, Volcom, G-Shock and DC Shoes.

Founder and General Partner, Propel Consulting

Jan 2005 – Mar 2010

Propel provided strategy and product design services to venture backed companies helping to rapidly define and bring compelling software products to market faster while mitigating execution risk.

- Worked closely with entrepreneurs, executive teams, development organizations and investors in dozens of companies to jumpstart new, revamp existing or merge products.
- Clients included Awareness, Aptix, Gypsii, Knome, ProPlayer Connect, First Coverage, HaiVision, HP (Systinet), Impress, Thomson Reuters, Kadient, Mobicious, Microsoft, NetApp, Enpocket (Nokia), Ourstage, Pixable, Sermo, ScanScout, The Updown, Vivox and Wis.dm.

VP Product, Convoq, Inc.

May 2002 – Jan 2005

Convoq provided a first of its kind Flash-based web conference solution for SMBs leveraging instant messaging.

- Joined the company as employee number one, reported to the CEO as served as member of the executive committee.
- Helped conceptualize the company's product vision and business strategy through two major releases. Responsible for the collection, evaluation, prioritization, communication and execution of customer and partner goals, requirements, features and strategy decisions across functional groups.

- Responsible for the creation and communication of product positioning and messaging plans, roadmaps, release schedules, specifications, user interface designs, prototype demonstrations, and product documentation. Coordinated and managed resources across functional groups ensuring that partner schedules and milestones were met on time and with contractual alignment.

Founder and VP Product, WorldStreet

Feb 1996 – Jan 2002

Named by InfoWorld Magazine as the 21st most innovative company of 2001, WorldStreet delivered a Client Relationship Management (CRM) and peer-collaborative communication platform for the financial service industry. Acquired by Thomson Financial.

Institutional Equity Sales, Baring Securities (ING Barings)

Aug 1994 – Feb 1996

Responsible for institutional capital markets sales coverage of major client accounts, and the development of a CRM solution for the Latin America Equity Markets Group across sales, research, and trading organizations.

Education

Masters, Master of International Management, UC San Diego

Sep 1992 – Jun 1994

Graduate School of International Relations and Pacific Studies. Regional specializations in Latin America and Japan.

B.A. Political Science, UC San Diego

Sep 1989 – Jun 1991

Completed four-year degree in two years. Middle Eastern studies minor. Provost Honors for academic achievement.

Other

Mentor at Founders Mentors. Hold various patents. Life interests include FragileX, special education, Autism, tennis, ping-pong, soccer, history, nature, science, design, musical theater and dogs.

United States and Argentine citizen. Native Spanish speaker.

Married, father of twins.



CONSTITUTION
C A R E

Appendix K4

Compensation Agreements

In Re: RFA Section E Question 4

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

COMPENSATION AGREEMENTS

1.0 COMPENSATION AGREEMENTS OVERVIEW

Constitution Care LLC has executed Compensation Agreements with its dispensary backers and directors/officers required to complete Appendices B, C, and E. The company has also drafted a Compensation Agreement with the Dispensary Facility Manager to be executed upon the successful award of a dispensary facility license.

The following Compensation Agreements are attached hereto:

- Nicholas Vita
- Michael Abbott
- Robert K. Mayerson
- Columbia Care CT LLC (Backer)
- Columbia Care LLC (Backer Member)
- Dispensary Facility Manager (to be executed upon the successful award of a dispensary facility license).

Please find the above identified documents on the following pages:

CONSTITUTION CARE LLC COMPENSATION AGREEMENT

This Compensation Agreement is made by and between Constitution Care LLC (the "Company") and Nicholas Vita, the Chief Executive Officer (the "CEO"). For good consideration, the Company engages the CEO on the following terms and conditions:

1. **Term of Engagement.** The term of engagement shall begin upon the Company's award of a license by the Connecticut Department of Consumer Protection to operate a dispensary facility pursuant to sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies ("Licensure") and shall terminate pursuant to the terms of paragraph 9 below.
2. **Compensation Agreement:** In exchange for the services of CEO and upon the Company becoming cash flow positive, the Company shall pay CEO an initial base salary of \$50,000.00 per year, payable at regular payroll periods.
3. **Benefits.** The Company shall provide CEO with health care, dental, and vision benefits, the details of which shall be identified subsequent to Licensure.
4. **Cash Bonus Pool.** The Company shall establish a cash bonus pool for distribution to designated employees, including the CEO herein, of up to \$100,000 for each participating employee. Distribution shall be subject to benchmarks to be established by the Board of Directors subsequent to Licensure based on the following items:
 - a. Patient Satisfaction.
 - b. Achieving operational performance benchmarks.
 - c. Receiving zero sanctions from State of Connecticut regulators.
 - d. Meeting patient recruitment and retention goals.
 - e. Meeting philanthropic goals.
 - f. Corporate culture discretionary pool (based on teamwork and innovation).
5. **Corporate Equity Award Pool.** A corporate equity award pool is available for all full time employees. Participation and grants will be subject to the review and approval by the Board of Directors based on exceeding mandated performance benchmarks, the details of which shall be identified subsequent to Licensure.
6. **Duties and Position.** The Company hires the CEO in the capacity of CEO of the Board of Directors and general manager for its Connecticut dispensary facilities. The CEO's duties may be reasonably modified at the Company's discretion from time to time.

7. CEO to Devote Sufficient Time to Company. Unless otherwise agreed, the CEO will devote sufficient time, attention, and energies to the business of the Company, and, during this engagement, will not engage in any other business activity which substantially interferes with the CEO's duties to the Company, regardless of whether such activity is pursued for profit, gain, or other pecuniary advantage. CEO is not prohibited from making personal investments in any other businesses provided those investments do not require active involvement in the operation of said companies unless otherwise agreed.
8. Reimbursement of Expenses. The CEO may incur reasonable expenses for furthering the Company's business, including expenses for entertainment, travel, and similar items. The Company shall reimburse CEO for all business expenses after the CEO presents an itemized account of expenditures, pursuant to Company policy.
9. Termination of Agreement.
 - a. Notwithstanding anything to the contrary contained herein, this Agreement shall terminate if the Company is not awarded a license to operate a dispensary facility by the State of Connecticut upon the Company's application on November 15, 2013 and neither Company nor CEO shall be obligated to perform any of the terms or conditions contained herein.
 - b. Without cause, the Company may terminate this agreement at any time upon fourteen (14) days written notice to the CEO. If the Company requests, the CEO will continue to perform his/her duties and may be paid his/her regular salary up to the date of termination.
 - c. Without cause, the CEO may terminate engagement upon fourteen (14) days' written notice to the Company. CEO may be required to perform his or her duties and will be paid the regular salary to date of termination.
 - d. With cause, the Company may terminate this agreement immediately upon written notice to CEO and CEO will be paid the regular salary to date of termination, for any one of the following events:
 - i. an intentional act of fraud, embezzlement, theft or any other material violation of state law that occurs during or in the course of CEO's employment with Company;
 - ii. intentional disclosure of Company's confidential information contrary to companies policies;
 - iii. breach of CEO's obligations under this agreement;
 - iv. intentional breach of any of Company's policies;
 - v. the willful and continued failure to substantially perform CEO's duties for Company (other than as a result of incapacity due to physical or mental illness); or

- vi. willful conduct by CEO that is demonstrably and materially injurious to Company, monetarily or otherwise.
 - e. Notwithstanding anything to the contrary contained in this agreement, the Company may terminate the CEO's engagement upon one (1) day notice to the CEO should any of the following events occur:
 - i. The sale of substantially all of the Company's assets to a single purchaser or group of associated purchasers; or
 - ii. The sale, exchange, or other disposition, in one transaction of the majority of the Company's outstanding corporate shares; or
 - iii. The Company's decision to terminate its business and liquidate its assets;
 - iv. The merger or consolidation of the Company with another Company.
 - v. Bankruptcy or Chapter 11 reorganization.
10. Settlement by Binding Arbitration. Any claim or controversy that arises out of or relates to this agreement, or the breach of it, shall be settled by binding arbitration in accordance with the rules of the American Arbitration Association. Arbitration proceedings commenced pursuant to this paragraph shall only be commenced in the State of Connecticut. Judgment upon the award rendered may be entered in any court with jurisdiction.
11. Governing Law. This Agreement shall be construed in accordance with the laws of the State of Connecticut, and the parties agree that it is executed and delivered in the State of Connecticut.
12. Assumption of Agreement by Company's Successors and Assignees. The Company's rights and obligations under this agreement will inure to the benefit and be binding upon the Company's successors and assignees.
13. Oral Modifications Not Binding. This instrument is the entire agreement of the Company and the CEO. Oral changes have no effect. It may be altered only by a written agreement signed by the party against whom enforcement of any waiver, change, modification, extension, or discharge is sought.
14. Severability. Should any part of this Agreement be rendered or declared invalid by an arbitrator or court of competent jurisdiction, such invalidation of such part or portion of this Agreement will not invalidate the remaining portions thereof, and they shall remain in full force and effect.

Signed this 1st day of November 2013.

BY: COMPANY



Michael Abbot
Chairman, Constitution Care LLC

BY: CHIEF EXECUTIVE OFFICER



Nicholas Vita
Chief Financial Officer

CONSTITUTION CARE LLC COMPENSATION AGREEMENT

This Compensation Agreement is made by and between Constitution Care LLC (the "Company") and Michael Abbott (the "Chairman"). For good consideration, the Company engages the Chairman on the following terms and conditions:

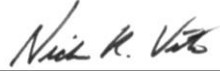
1. **Term of Engagement.** The term of engagement shall begin upon the Company's award of a license by the Connecticut Department of Consumer Protection to operate a dispensary facility pursuant to sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies ("Licensure") and shall terminate pursuant to the terms of paragraph 9 below.
2. **Compensation Agreement:** In exchange for the services of Chairman and upon the Company becoming cash flow positive, the Company shall pay Chairman a base salary of \$50,000.00 per year, payable at regular payroll periods.
3. **Benefits.** The Company shall provide Chairman with health care, dental, and vision benefits, the details of which shall be identified subsequent to Licensure.
4. **Cash Bonus Pool.** The Company shall establish a cash bonus pool for distribution to designated employees, including the Chairman herein, of up to \$100,000 for each participating employee. Distribution shall be subject to benchmarks to be established by the Board of Directors subsequent to Licensure based on the following items:
 - a. Patient Satisfaction.
 - b. Achieving operational performance benchmarks.
 - c. Receiving zero sanctions from State of Connecticut regulators.
 - d. Meeting patient recruitment and retention goals.
 - e. Meeting philanthropic goals.
 - f. Corporate culture discretionary pool (based on teamwork and innovation).
5. **Corporate Equity Award Pool.** A corporate equity award pool is available for all full time employees. Participation and grants will be subject to the review and approval by the Board of Directors based on exceeding mandated performance benchmarks, the details of which shall be identified subsequent to Licensure.
6. **Duties and Position.** The Company hires the Chairman in the capacity of Chairman of the Board of Directors and general manager for its Connecticut dispensary facilities. The Chairman's duties may be reasonably modified at the Company's discretion from time to time.

7. Chairman to Devote Sufficient Time to Company. Unless otherwise agreed, the Chairman will devote sufficient time, attention, and energies to the business of the Company, and, during this engagement, will not engage in any other business activity which substantially interferes with the Chairman's duties to the Company, regardless of whether such activity is pursued for profit, gain, or other pecuniary advantage. Chairman is not prohibited from making personal investments in any other businesses provided those investments do not require active involvement in the operation of said companies unless otherwise agreed.
8. Reimbursement of Expenses. The Chairman may incur reasonable expenses for furthering the Company's business, including expenses for entertainment, travel, and similar items. The Company shall reimburse Chairman for all business expenses after the Chairman presents an itemized account of expenditures, pursuant to Company policy.
9. Termination of Agreement.
 - a. Notwithstanding anything to the contrary contained herein, this Agreement shall terminate if the Company is not awarded a license to operate a dispensary facility by the State of Connecticut following the Company's application on November 15, 2013 and neither Company nor Chairman shall be obligated to perform any of the terms or conditions contained herein.
 - b. Without cause, the Company may terminate this agreement at any time upon fourteen (14) days written notice to the Chairman. If the Company requests, the Chairman will continue to perform his/her duties and may be paid his/her regular salary up to the date of termination.
 - c. Without cause, the Chairman may terminate engagement upon fourteen (14) days' written notice to the Company. Chairman may be required to perform his or her duties and will be paid the regular salary to date of termination.
 - d. With cause, the Company may terminate this agreement immediately upon written notice to Chairman and Chairman will be paid the regular salary to date of termination, for any one of the following events:
 - i. an intentional act of fraud, embezzlement, theft or any other material violation of state law that occurs during or in the course of Chairman's employment with Company;
 - ii. intentional disclosure of Company's confidential information contrary to companies policies;
 - iii. breach of Chairman's obligations under this agreement;
 - iv. intentional breach of any of Company's policies;
 - v. the willful and continued failure to substantially perform Chairman's duties for Company (other than as a result of incapacity due to physical or mental illness); or

- vi. willful conduct by Chairman that is demonstrably and materially injurious to company, monetarily or otherwise.
 - e. Notwithstanding anything to the contrary contained in this agreement, the Company may terminate the Chairman's engagement upon one (1) day notice to the Chairman should any of the following events occur:
 - i. The sale of substantially all of the Company's assets to a single purchaser or group of associated purchasers; or
 - ii. The sale, exchange, or other disposition, in one transaction of the majority of the Company's outstanding corporate shares; or
 - iii. The Company's decision to terminate its business and liquidate its assets;
 - iv. The merger or consolidation of the Company with another Company.
 - v. Bankruptcy or Chapter 11 reorganization.
10. Settlement by Binding Arbitration. Any claim or controversy that arises out of or relates to this agreement, or the breach of it, shall be settled by binding arbitration in accordance with the rules of the American Arbitration Association. Arbitration proceedings commenced pursuant to this paragraph shall only be commenced in the State of Connecticut. Judgment upon the award rendered may be entered in any court with jurisdiction.
11. Governing Law. This Agreement shall be construed in accordance with the laws of the State of Connecticut, and the parties agree that it is executed and delivered in the State of Connecticut.
12. Assumption of Agreement by Company's Successors and Assignees. The Company's rights and obligations under this agreement will inure to the benefit and be binding upon the Company's successors and assignees.
13. Oral Modifications Not Binding. This instrument is the entire agreement of the Company and the Chairman. Oral changes have no effect. It may be altered only by a written agreement signed by the party against whom enforcement of any waiver, change, modification, extension, or discharge is sought.
14. Severability. Should any part of this Agreement be rendered or declared invalid by an arbitrator or court of competent jurisdiction, such invalidation of such part or portion of this Agreement will not invalidate the remaining portions thereof, and they shall remain in full force and effect.

Signed this 1st day of November 2013.

BY: COMPANY



Nicholas Vita
Chief Executive Officer, Constitution Care LLC

BY: CHAIRMAN



Michael Abbott
Chairman

CONSTITUTION CARE LLC COMPENSATION AGREEMENT

This Compensation Agreement is made by and between Constitution Care LLC (the "Company") and Robert Mayerson, the Chief Financial Officer (the "CFO"). For good consideration, the Company engages the CFO on the following terms and conditions:

1. **Term of Engagement.** The term of engagement shall begin upon the Company's award of a license by the Connecticut Department of Consumer Protection to operate a dispensary facility pursuant to sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies ("Licensure") and shall terminate pursuant to the terms of paragraph 9 below.
2. **Compensation Agreement:** In exchange for the services of CFO and upon the Company becoming cash flow positive, The Company shall pay CFO an initial base salary of \$50,000.00 per year, payable at regular payroll periods.
3. **Benefits.** The Company shall provide CFO with health care, dental, and vision benefits, the details of which shall be identified subsequent to Licensure.
4. **Cash Bonus Pool.** The Company shall establish a cash bonus pool for distribution to designated employees, including the CFO herein, of up to \$100,000 for each participating employee. Distribution shall be subject to benchmarks to be established by the Board of Directors subsequent to Licensure based on the following items:
 - a. Patient Satisfaction.
 - b. Achieving operational performance benchmarks.
 - c. Receiving zero sanctions from State of Connecticut regulators.
 - d. Meeting patient recruitment and retention goals.
 - e. Meeting philanthropic goals.
 - f. Corporate culture discretionary pool (based on teamwork and innovation).
5. **Corporate Equity Award Pool.** A corporate equity award pool is available for all full time employees. Participation and grants will be subject to the review and approval by the Board of Directors based on exceeding mandated performance benchmarks, the details of which shall be identified subsequent to Licensure.
6. **Duties and Position.** The Company hires the CFO in the capacity of CFO of the Board of Directors and general manager for its Connecticut dispensary facilities. The CFO's duties may be reasonably modified at the Company's discretion from time to time.

7. CFO to Devote Sufficient Time to Company. Unless otherwise agreed, the CFO will devote sufficient time, attention, and energies to the business of the Company, and, during this engagement, will not engage in any other business activity which substantially interferes with the CFO's duties to the Company, regardless of whether such activity is pursued for profit, gain, or other pecuniary advantage. CFO is not prohibited from making personal investments in any other businesses provided those investments do not require active involvement in the operation of said companies unless otherwise agreed.
8. Reimbursement of Expenses. The CFO may incur reasonable expenses for furthering the Company's business, including expenses for entertainment, travel, and similar items. The Company shall reimburse CFO for all business expenses after the CFO presents an itemized account of expenditures, pursuant to Company policy.
9. Termination of Agreement.
 - a. Notwithstanding anything to the contrary contained herein, this Agreement shall terminate if the Company is not awarded a license to operate a dispensary facility by the State of Connecticut following the Company's application on November 15, 2013 and neither Company nor CFO shall be obligated to perform any of the terms or conditions contained herein.
 - b. Without cause, the Company may terminate this agreement at any time upon fourteen (14) days written notice to the CFO. If the Company requests, the CFO will continue to perform his/her duties and may be paid his/her regular salary up to the date of termination.
 - c. Without cause, the CFO may terminate engagement upon fourteen (14) days' written notice to the Company. CFO may be required to perform his or her duties and will be paid the regular salary to date of termination.
 - d. With cause, the Company may terminate this agreement immediately upon written notice to CFO and CFO will be paid the regular salary to date of termination, for any one of the following events:
 - i. an intentional act of fraud, embezzlement, theft or any other material violation of state law that occurs during or in the course of CFO's employment with Company;
 - ii. intentional disclosure of Company's confidential information contrary to companies policies;
 - iii. breach of CFO's obligations under this agreement;
 - iv. intentional breach of any of Company's policies;
 - v. the willful and continued failure to substantially perform CFO's duties for Company (other than as a result of incapacity due to physical or mental illness); or

- vi. willful conduct by CFO that is demonstrably and materially injurious to Company, monetarily or otherwise.
 - e. Notwithstanding anything to the contrary contained in this agreement, the Company may terminate the CFO's engagement upon one (1) day notice to the CFO should any of the following events occur:
 - i. The sale of substantially all of the Company's assets to a single purchaser or group of associated purchasers; or
 - ii. The sale, exchange, or other disposition, in one transaction of the majority of the Company's outstanding corporate shares; or
 - iii. The Company's decision to terminate its business and liquidate its assets;
 - iv. The merger or consolidation of the Company with another Company.
 - v. Bankruptcy or Chapter 11 reorganization.
10. Settlement by Binding Arbitration. Any claim or controversy that arises out of or relates to this agreement, or the breach of it, shall be settled by binding arbitration in accordance with the rules of the American Arbitration Association. Arbitration proceedings commenced pursuant to this paragraph shall only be commenced in the State of Connecticut. Judgment upon the award rendered may be entered in any court with jurisdiction.
11. Governing Law. This Agreement shall be construed in accordance with the laws of the State of Connecticut, and the parties agree that it is executed and delivered in the State of Connecticut.
12. Assumption of Agreement by Company's Successors and Assignees. The Company's rights and obligations under this agreement will inure to the benefit and be binding upon the Company's successors and assignees.
13. Oral Modifications Not Binding. This instrument is the entire agreement of the Company and the CFO. Oral changes have no effect. It may be altered only by a written agreement signed by the party against whom enforcement of any waiver, change, modification, extension, or discharge is sought.
14. Severability. Should any part of this Agreement be rendered or declared invalid by an arbitrator or court of competent jurisdiction, such invalidation of such part or portion of this Agreement will not invalidate the remaining portions thereof, and they shall remain in full force and effect.

Signed this 1st day of November 2013.

BY: COMPANY



Nicholas Vita
Chief Executive Officer, Constitution Care LLC

BY: CHIEF FINANCIAL OFFICER



Robert Mayerson
Chief Financial Officer

COLUMBIA CARE CT LLC

1131-O Tolland Turnpike, Suite 296

Manchester, CT 06042

T: 203.442.9000

Compensation Agreement- Obligation of Financial Support

This Compensation Agreement, dated **November 1, 2013**, memorializes the conditional financing agreement (“Agreement”) by and between **Columbia Care CT LLC**, whose address is 1131-O Tolland Turnpike, Suite 296, Manchester, CT, 06042, and **Constitution Care LLC**, whose address is 1131-O Tolland Turnpike, Suite 297, Manchester, CT 06042. Columbia Care CT LLC hereby agrees to commit a business loan to Constitution Care LLC of up to Three Million Five Hundred US Dollars (\$3,500,000.00) (the “Loan”) representing the required capital to commence operations for a licensed Connecticut Medical Marijuana dispensary facilities within a reasonable amount of time after the award of a license(s) from the Connecticut Department of Consumer Protection (the “DCP”).

This Agreement is contingent upon Constitution Care LLC obtaining at least one dispensary facility license from the DCP pursuant to the regulations contained in sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies. All disbursements of and draws from the Loan must be unconditionally approved in writing by Columbia Care CT LLC upon Constitution Care LLC’s prior written request. Such prior written request shall be made at least seventy two (72) hours prior to any disbursement or draw unless otherwise agreed. The full Loan amount plus interest in the amount of 15% shall be repaid to Columbia Care CT LLC over a term of five years. Upon written request to Columbia Care CT LLC, Constitution Care LLC may extend the term of such Loan repayment for an additional five (5) years, provided that interest shall accrue by an additional 2.5% in such extension term. The remaining terms of this Agreement shall be determined in a subsequent formal contract consistent with the terms of this Agreement and which specify all additional terms and conditions of the Loan. Such subsequent contract shall be executed within thirty (30) days of the DCP’s award of a dispensary facility license(s) to Constitution Care LLC. This Agreement and all related agreements shall be subject to and compliant with all local and state banking rules, regulations or statutes, including but not limited to the Connecticut General Statutes, the Regulations of Connecticut State Agencies and all restrictions and limitations contemplated by the licensure requirements of the DCP and the State of Connecticut with regards to a dispensary facility license.

Constitution Care LLC shall notify Columbia Care CT LLC within seventy two (72) hours of the DCP’s award or denial of a dispensary facility license(s).

The undersigned hereby agree to be bound by the terms of this Agreement.

By: Columbia Care CT LLC



Michael Abbott, Chairman
Columbia Care CT LLC

By: Constitution Care LLC



Nicholas Vita, Chief Executive Officer
Constitution Care LLC

COLUMBIA CARE LLC

130 West 57th Street, Suite 9B
New York, NY 10019

Compensation Agreement- Obligation of Financial Support

This Compensation Agreement, dated **November 1, 2013**, memorializes the conditional financing agreement (“Agreement”) by and between **Columbia Care LLC**, whose address is 130 West 57th Street, Suite 9B, New York, NY 10019, and **Columbia Care CT LLC**, whose address is 1131-O Tolland Turnpike, Suite 297, Manchester, CT 06042. Columbia Care LLC hereby agrees to commit a business loan to Columbia Care CT LLC of up to Three Million Five Hundred US Dollars (\$3,500,000.00) (the “Loan”) representing the required capital to commence operations for a licensed Connecticut Medical Marijuana dispensary facilities within a reasonable amount of time after the award of a license(s) from the Connecticut Department of Consumer Protection (the “DCP”).

This Agreement is contingent upon Constitution Care LLC obtaining at least one dispensary facility license from the DCP pursuant to the regulations contained in sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies. All disbursements of and draws from the Loan must be unconditionally approved in writing by Columbia Care LLC upon Columbia Care CT LLC’s prior written request. Such prior written request shall be made at least seventy two (72) hours prior to any disbursement or draw unless otherwise agreed. The full Loan amount plus interest in the amount of 15% shall be repaid to Columbia Care LLC over a term of five years. Upon written request to Columbia Care LLC, Columbia Care CT LLC may extend the term of such Loan repayment for an additional five (5) years, provided that interest shall accrue by an additional 2.5% in such extension term. The remaining terms of this Agreement shall be determined in a subsequent formal contract consistent with the terms of this Agreement and which specify all additional terms and conditions of the Loan. Such subsequent contract shall be executed within thirty (30) days of the DCP’s award of a dispensary facility license(s) to Constitution Care LLC. This Agreement and all related agreements shall be subject to and compliant with all local and state banking rules, regulations or statutes, including but not limited to the Connecticut General Statutes, the Regulations of Connecticut State Agencies and all restrictions and limitations contemplated by the licensure requirements of the DCP and the State of Connecticut with regards to a dispensary facility license.

Columbia Care CT LLC shall notify Columbia Care LLC within seventy two (72) hours of the DCP’s award or denial of a dispensary facility license(s).

The undersigned hereby agree to be bound by the terms of this Agreement.

By: Columbia Care LLC



Michael Abbott, Chairman
Columbia Care LLC

By: Columbia Care CT LLC



Nicholas Vita, Chief Executive Officer
Columbia Care CT LLC

CONSTITUTION CARE LLC COMPENSATION AGREEMENT

This Compensation Agreement is made between Constitution Care LLC (the "Company") and **Nicholas Tamborrino** (the "Dispensary Facility Manager"). For good consideration, the Company engages the Dispensary Facility Manager on the following terms and conditions:

1. **Term of Engagement.** The term of engagement shall begin upon the Company's award of a license to operate a dispensary facility pursuant to C.G.S. Sec. 21a-408-1 *et seq.* ("Licensure") and terminate pursuant to the terms of paragraph 12 below.
2. **Initial Base Salary.** The Company shall pay Dispensary Facility Manager a base salary of \$90,000.00 per year, in exchange for the services of the Dispensary Facility Manager, payable at regular payroll periods.
3. **Cash Bonus Pool.** The Company shall establish a cash bonus pool for distribution to designated employees, including the Dispensary Facility Manager herein. Participation shall be subject to benchmarks to be established by the Board of Directors subsequent to Licensure based on the following items:
 - a. Patient Satisfaction.
 - b. Achieving operational performance benchmarks.
 - c. Receiving zero sanctions from State of Connecticut Regulators.
 - d. Meeting patient recruitment and retention goals.
 - e. Meeting philanthropic goals.
 - f. Corporate culture discretionary pool (based on teamwork and innovation).
4. **Corporate Equity Award Pool.** A corporate equity award pool is available for all full time employees. Participation and grants will be subject to the review and approval by the Board of Directors based on exceeding mandated performance benchmarks, the details of which shall be identified subsequent to Licensure.
5. **Duties and Position.** The Company hires the Dispensary Facility Manager in the capacity of Lead Pharmacist for its Connecticut dispensary facilities and is further responsible for all team management for such dispensaries. The Dispensary Facility Manager's duties may be reasonably modified at the Company's discretion from time to time.
6. **Dispensary Facility Manager to Devote Sufficient Time to Company.** Unless otherwise agreed, the Dispensary Facility Manager will devote sufficient time, attention, and energies to the business of the Company, and, during this engagement, will not engage in any other business activity, regardless of whether such activity is pursued for profit, gain, or other pecuniary advantage. Dispensary Facility Manager is not prohibited from making personal investments in any other businesses provided those investments do not require active involvement in the operation of said companies.

7. Benefits. The Company shall provide Dispensary Facility Manager with health care, dental, and vision benefits, the details of which shall be identified subsequent to Licensure.
8. Reimbursement of Expenses. The Dispensary Facility Manager may incur reasonable expenses for furthering the Company's business, including expenses for entertainment, travel, and similar items. The Company shall reimburse Dispensary Facility Manager for all business expenses after the Dispensary Facility Manager presents an itemized account of expenditures, pursuant to Company policy, the details of which shall be identified subsequent to Licensure.
9. Vacation. The Dispensary Facility Manager shall be entitled to a yearly vacation of two weeks at full pay.
10. Termination of Agreement.
 - a. Notwithstanding anything to the contrary contained herein, this Agreement shall terminate if the Company is not awarded a license to operate a dispensary facility by the State of Connecticut upon the Company's application on November 15, 2013 and neither Company nor Dispensary Facility Manager shall be obligated to perform any of the terms or conditions contained herein.
 - b. Without cause, the Company may terminate this agreement at any time upon fourteen (14) days written notice to the Dispensary Facility Manager. If the Company requests, the Dispensary Facility Manager will continue to perform his/her duties and may be paid his/her regular salary up to the date of termination.
 - c. Without cause, the Dispensary Facility Manager may terminate engagement upon fourteen (14) days' written notice to the Company. Dispensary Facility Manager may be required to perform his or her duties and will be paid the regular salary to date of termination.
 - d. With cause, the Company may terminate this agreement immediately upon written notice to Dispensary Facility Manager and Dispensary Facility Manager will be paid the regular salary to date of termination, for any one of the following events:
 - i. an intentional act of fraud, embezzlement, theft or any other material violation of state law that occurs during or in the course of Dispensary Facility Manager's employment with Company;
 - ii. intentional disclosure of Company's confidential information contrary to companies policies;
 - iii. breach of Dispensary Facility Manager's obligations under this agreement;
 - iv. intentional breach of any of Company's policies;
 - v. the willful and continued failure to substantially perform Dispensary Facility Manager's duties for Company (other than as a result of incapacity due to physical or mental illness); or

- vi. willful conduct by Dispensary Facility Manager that is demonstrably and materially injurious to Company, monetarily or otherwise.
- e. Notwithstanding anything to the contrary contained in this agreement, the Company may terminate the Dispensary Facility Manager's engagement upon one (1) day's notice to the Dispensary Facility Manager should any of the following events occur:
 - i. The sale of substantially all of the Company's assets to a single purchaser or group of associated purchasers; or
 - ii. The sale, exchange, or other disposition, in one transaction of the majority of the Company's outstanding corporate shares; or
 - iii. The Company's decision to terminate its business and liquidate its assets;
 - iv. The merger or consolidation of the Company with another Company.
 - v. Bankruptcy or Chapter 11 reorganization.

11. Settlement by Binding Arbitration. Any claim or controversy that arises out of or relates to this agreement, or the breach of it, shall be settled by binding arbitration in accordance with the rules of the American Arbitration Association. Arbitration proceedings may only be commenced in the State of Connecticut. Judgment upon the award rendered may be entered in any court with jurisdiction.

12. Governing Law. This Agreement shall be construed in accordance with the laws of the State of Connecticut, and the parties agree that it is executed and delivered in the State of Connecticut.

13. Assumption of Agreement by Company's Successors and Assignees. The Company's rights and obligations under this agreement will inure to the benefit and be binding upon the Company's successors and assignees.

14. Oral Modifications Not Binding. This Agreement is the entire agreement of the Company and the Dispensary Facility Manager. Oral changes have no effect. It may be altered only by a written agreement signed by the party against whom enforcement of any waiver, change, modification, extension, or discharge is sought.

15. Severability. Should any part of this Agreement be rendered or declared invalid by an arbitrator or court of competent jurisdiction, such invalidation of such part or portion of this Agreement will not invalidate the remaining portions thereof, and they shall remain in full force and effect.

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Signed this _____ day of _____ 20____.

Constitution Care LLC, by:

Nicholas Vita
Chief Executive Officer

Nicholas Tamborrino
Dispensary Facility Manager



CONSTITUTION
C A R E

Appendix K5

Nature of Indebtedness to Open and Operate

In Re: RFA Section E Question 5

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

NATURE OF INDEBTEDNESS TO OPEN AND OPERATE

1.0 NATURE OF INDEBTEDNESS TO OPEN AND OPERATE OVERVIEW

Constitution Care LLC currently only has one form of indebtedness, namely a business loan from Columbia Care CT LLC, its sole backer. The business loan agreement has been executed and it is currently being drawn down to fund pursued/application costs. The total loan amount is for \$3,500,000, of which approximately \$150,000 has been drawn down.

Columbia Care CT LLC also only has one form of indebtedness, namely a business loan from Columbia Care LLC, its sole member. The financial relationship between Columbia Care CT LLC and Columbia Care LLC is that of a contractually obligated financial sponsor.

The business loan agreements (1) between Columbia Care CT LLC and Constitution Care LLC, and (2) between Columbia Care LLC and Columbia Care CT LLC, each identifying the nature, type, terms, covenants and priorities of the indebtedness in connection with the opening and operating of the proposed dispensary facility, are included on the following pages. A recent copy of Columbia Care LLC's bank statement (referred to therein as "Col Care Delaware") has also been included on the following pages as proof of the funding sources in order to exhibit the financial soundness of the company.

COLUMBIA CARE CT LLC

1131-O Tolland Turnpike, Suite 296
Manchester, CT 06042
T: 203.442.9000

Compensation Agreement- Obligation of Financial Support

This Compensation Agreement, dated **November 1, 2013**, memorializes the conditional financing agreement (“Agreement”) by and between **Columbia Care CT LLC**, whose address is 1131-O Tolland Turnpike, Suite 296, Manchester, CT, 06042, and **Constitution Care LLC**, whose address is 1131-O Tolland Turnpike, Suite 297, Manchester, CT 06042. Columbia Care CT LLC hereby agrees to commit a business loan to Constitution Care LLC of up to Three Million Five Hundred US Dollars (\$3,500,000.00) (the “Loan”) representing the required capital to commence operations for a licensed Connecticut Medical Marijuana dispensary facilities within a reasonable amount of time after the award of a license(s) from the Connecticut Department of Consumer Protection (the “DCP”).

This Agreement is contingent upon Constitution Care LLC obtaining at least one dispensary facility license from the DCP pursuant to the regulations contained in sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies. All disbursements of and draws from the Loan must be unconditionally approved in writing by Columbia Care CT LLC upon Constitution Care LLC’s prior written request. Such prior written request shall be made at least seventy two (72) hours prior to any disbursement or draw unless otherwise agreed. The full Loan amount plus interest in the amount of 15% shall be repaid to Columbia Care CT LLC over a term of five years. Upon written request to Columbia Care CT LLC, Constitution Care LLC may extend the term of such Loan repayment for an additional five (5) years, provided that interest shall accrue by an additional 2.5% in such extension term. The remaining terms of this Agreement shall be determined in a subsequent formal contract consistent with the terms of this Agreement and which specify all additional terms and conditions of the Loan. Such subsequent contract shall be executed within thirty (30) days of the DCP’s award of a dispensary facility license(s) to Constitution Care LLC. This Agreement and all related agreements shall be subject to and compliant with all local and state banking rules, regulations or statutes, including but not limited to the Connecticut General Statutes, the Regulations of Connecticut State Agencies and all restrictions and limitations contemplated by the licensure requirements of the DCP and the State of Connecticut with regards to a dispensary facility license.

Constitution Care LLC shall notify Columbia Care CT LLC within seventy two (72) hours of the DCP’s award or denial of a dispensary facility license(s).

The undersigned hereby agree to be bound by the terms of this Agreement.

By: Columbia Care CT LLC



Michael Abbott, Chairman
Columbia Care CT LLC

By: Constitution Care LLC



Nicholas Vita, Chief Executive Officer
Constitution Care LLC

COLUMBIA CARE LLC

130 West 57th Street, Suite 9B
New York, NY 10019

Compensation Agreement- Obligation of Financial Support

This Compensation Agreement, dated **November 1, 2013**, memorializes the conditional financing agreement (“Agreement”) by and between **Columbia Care LLC**, whose address is 130 West 57th Street, Suite 9B, New York, NY 10019, and **Columbia Care CT LLC**, whose address is 1131-O Tolland Turnpike, Suite 297, Manchester, CT 06042. Columbia Care LLC hereby agrees to commit a business loan to Columbia Care CT LLC of up to Three Million Five Hundred US Dollars (\$3,500,000.00) (the “Loan”) representing the required capital to commence operations for a licensed Connecticut Medical Marijuana dispensary facilities within a reasonable amount of time after the award of a license(s) from the Connecticut Department of Consumer Protection (the “DCP”).

This Agreement is contingent upon Constitution Care LLC obtaining at least one dispensary facility license from the DCP pursuant to the regulations contained in sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies. All disbursements of and draws from the Loan must be unconditionally approved in writing by Columbia Care LLC upon Columbia Care CT LLC’s prior written request. Such prior written request shall be made at least seventy two (72) hours prior to any disbursement or draw unless otherwise agreed. The full Loan amount plus interest in the amount of 15% shall be repaid to Columbia Care LLC over a term of five years. Upon written request to Columbia Care LLC, Columbia Care CT LLC may extend the term of such Loan repayment for an additional five (5) years, provided that interest shall accrue by an additional 2.5% in such extension term. The remaining terms of this Agreement shall be determined in a subsequent formal contract consistent with the terms of this Agreement and which specify all additional terms and conditions of the Loan. Such subsequent contract shall be executed within thirty (30) days of the DCP’s award of a dispensary facility license(s) to Constitution Care LLC. This Agreement and all related agreements shall be subject to and compliant with all local and state banking rules, regulations or statutes, including but not limited to the Connecticut General Statutes, the Regulations of Connecticut State Agencies and all restrictions and limitations contemplated by the licensure requirements of the DCP and the State of Connecticut with regards to a dispensary facility license.

Columbia Care CT LLC shall notify Columbia Care LLC within seventy two (72) hours of the DCP’s award or denial of a dispensary facility license(s).

The undersigned hereby agree to be bound by the terms of this Agreement.

By: Columbia Care LLC



Michael Abbott, Chairman
Columbia Care LLC

By: Columbia Care CT LLC



Nicholas Vita, Chief Executive Officer
Columbia Care CT LLC

BALANCES

As of 13:53 PM EST, 11/13/2013

MSB FBO COL. CARE (DELAWARE) LLC
C/O M ABBOTT & N VITA
677-018874-704 AAA
Limited Liability
\$2,942,528.32 (prev. close) / Reserved Select

MSB FBO COL. CARE (DELAWARE) LLC
C/O M ABBOTT & N VITA
130 WEST 57TH STREET SUITE 9B
NEW YORK NY 10019-3311
(917) 703-9208 (B) | abbotm@mac.com

Morgan Stanley

Product Category	CURRENT VALUE(\$)	PREV CLOSE(\$)	% OF LMV
PRODUCT CATEGORY			
MMF And BDP	2,942,528.32	2,942,528.32	100.00
SubTotal	\$2,942,528.32	\$2,942,528.32	
Accrued Interest ¹	20.11		0.00
Totals	\$2,942,548.43		100.00

** Monthly Accumulated Income: \$0.00

1. The accrued interest is based on prior day valuation. Please note that since this is not a real time calculation, it may be overstated on the Payable Date of a security, since the interest paid will also be reflected as a Change (\$) in 'Cash' for that day.

Spending Power

Investable Amount

Portfolio Loan Account (PLA)

Portfolio Loan Account Maintenance

Unless otherwise indicated, this information is not intended to be a substitute for the official account statements that you receive from us. This information is approximate and subject to adjustment, updating and correction and is for illustrative and general reference purposes only. We are not responsible for any clerical, computational or other inaccuracies, errors or omissions. We obtain market values and other data from various standard quotation services and other sources, which we believe to be reliable. However, we do not warrant or guarantee the accuracy or completeness of any such information. The values that you actually receive in the market for any investment may be higher or lower than the values reflected herein. To the extent there are any discrepancies between your official account statement and this information, you should rely on the official account statement. This information should not be considered as the sole basis for any investment decision. The Bank Deposit Program (BDP) is a cash sweep feature whereby clients can choose to have their available free credit balances automatically deposited into interest bearing, FDIC-insured deposit accounts at up to three banks ("Program Banks"): (1) Morgan Stanley Bank, N.A. and/or Morgan Stanley Private Bank, National Association (together, the "Morgan Stanley Banks"), or (2) Citibank, N.A. The Program Banks are FDIC members. Morgan Stanley Smith Barney LLC ("Morgan Stanley") is a registered broker-dealer, not a bank. Morgan Stanley and the Morgan Stanley Banks are affiliates. Unless specifically disclosed to you in writing, other investments and services offered to you through Morgan Stanley are not insured by the FDIC, are not deposits of or other obligations of, or guaranteed by, the Program Banks and involve investment risks, including possible loss of principal amount invested.



CONSTITUTION
C A R E

Appendix K6

Certified Financial Statements & Pro Forma Plan

In Re: RFA Section E Question 6

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

CERTIFIED FINANCIAL STATEMENTS AND PRO FORMA PLAN

1.0 CERTIFIED FINANCIAL STATEMENTS AND PRO FORMA PLAN OVERVIEW

Constitution Care LLC was formed in early October 2013 specifically to apply for the Connecticut dispensary facility license. On the following pages, we have included the complete financial model used for the planning, commencement and operations of the dispensary facility upon the successful award of a license. These inserts include our certified financial statements and a comprehensive three year pro forma financial plan.

The following financial statements are company certified financial statements for the period the company has been in existence. Since the company incorporated in October 2013, there has not been extensive business activities beyond matters directly related to the application process. The following certified financials are followed by the company's pro forma financials used for business planning purposes.

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11/13/13

Accrual Basis

Constitution Care LLC
Balance Sheet
As of November 13, 2013

	<u>Nov 13, 13</u>
ASSETS	
Other Assets	
Security Deposits Asset	42,053.34
Total Other Assets	42,053.34
TOTAL ASSETS	<u>42,053.34</u>
LIABILITIES & EQUITY	
Liabilities	
Long Term Liabilities	
Due to Columbia Care LLC	106,008.34
Total Long Term Liabilities	106,008.34
Total Liabilities	106,008.34
Equity	
Net Income	-63,955.00
Total Equity	-63,955.00
TOTAL LIABILITIES & EQUITY	<u>42,053.34</u>

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Accrual Basis

Constitution Care LLC
Profit & Loss
September 1 through November 13, 2013

	<u>Sep 1 - Nov 13, 13</u>
Ordinary Income/Expense	
Expense	
Contractor Wages	25,000.00
Legal Fees	23,015.00
Professional Fees	9,580.00
Rent Expense	6,360.00
Total Expense	<u>63,955.00</u>
Net Ordinary Income	<u>-63,955.00</u>
Net Income	<u><u>-63,955.00</u></u>

Constitution Care - Assumptions

Harvest Plan	Cultivation Facility
Est. Retail price / pound	\$ 6,000.00
Est. Wholesale price / pound	\$ 3,000.00
Initial Gross Margin %	50%
Wholesale as a % of Retail	50%
Est. Retail price / ounce	\$ 375.00
Est. Wholesale price / ounce	\$ 187.50

Note: Current retail market price per pound is \$7,852.00

Est. Patient/Market Dynamics	Population	% of pop	% of pop in Geographic Range	Potential Population in Geographic Range	Max Potential Patients	% CHAA pop.
Hartford	894,014	25.0%	100%	894,014	17,880	2%
Tolland	152,691	4.3%	50%	76,346	1,527	2%
Windham	118,428	3.3%	10%	11,843	237	2%
New London	274,055	7.7%	10%	27,406	548	2%
Middlesex	165,676	4.6%	50%	82,838	1,657	2%
New Haven	862,477	24.1%	30%	258,743	5,175	2%
Fairfield	916,829	25.7%	0%	-	-	2%
Litchfield	189,927	5.3%	50%	94,964	1,899	2%
Total State Population	3,574,097	100.0%		1,446,152	28,923	
Net Market Estimate (patients)	110,797	3.1%		110,797		

Est. Patient Population based on similar states

	% pop. w card	Implied mkt.
California (approx. 1.2MM)	3.20%	114,371
Colorado (approx. 158,000)	3.00%	107,223
Est. MA potential mkt. size (average):	3.1%	110,797
Est. Avg. purchase:		
	Monthly	Annually
California	\$ 312.00	\$ 3,744.00
Colorado	\$ 280.00	\$ 3,360.00
Est. Market Size in \$:	\$ 296.00	\$ 372,277,944

Constitution Care - Dispensary Sales Projections

	2014 May	2014 June	2014 Jul	2014 Aug	2014 Sep	2014 Oct	2014 Nov	2014 Dec	2015 Jan	2015 Feb	2015 Mar	2015 Apr	2015 May
Card Holders		550	660	792	950	1,140	1,312	1,508	1,735	1,995	2,194	2,414	2,655
Total Card Holders		550	660	792	950	1,140	1,312	1,508	1,735	1,995	2,194	2,414	2,655
Card Holder growth rate		20.0%	20.0%	20.0%	20.0%	20.0%	15.0%	15.0%	15.0%	15.0%	10.0%	10.0%	10.0%
% of the est. adressable population in region.		0.50%	0.60%	0.71%	0.86%	1.03%	1.18%	1.36%	1.57%	1.80%	1.98%	2.18%	2.40%
% of aggregate population		0.02%	0.02%	0.02%	0.03%	0.03%	0.04%	0.04%	0.05%	0.06%	0.06%	0.07%	0.07%
Average Patients Per Day (one trip per month)		18	22	26	32	38	44	50	58	66	73	80	88
Average Patients per Dispensary		18	22	26	32	38	44	50	58	66	73	80	88
Market Share % of patients													
Number of Dispensaries in County		1	1	1	1	1	1	1	1	1	1	1	1
Number of Registered patients - Customers 1		14	17	36	62	97	138	189	252	329	406	495	597
Market penetration rate in local market (CHAA)		2.5%	2.5%	4.5%	6.5%	8.5%	10.5%	12.5%	14.5%	16.5%	18.5%	20.5%	22.5%
Purchase Assumptions (Patients can purchase 2.5 Oz. / 2 weeks)													
Purchase per patient per month (Oz.)		0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Average \$ spent per month/patient	\$	187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50
Total Oz. demand per month		7	8	18	31	48	69	94	126	165	203	247	299
Total Oz. demand per month		7	8	18	31	48	69	94	126	165	203	247	299
Total Lbs. demand per month		0	1	1	2	3	4	6	8	10	13	15	19
Total Lbs. demand per month		0	1	1	2	3	4	6	8	10	13	15	19
Assumed price per Oz.	\$	375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375
Total Revenue	\$	2,578	\$ 3,094	\$ 6,683	\$ 11,583	\$ 18,176	\$ 25,821	\$ 35,350	\$ 47,157	\$ 61,711	\$ 76,111	\$ 92,773	\$ 112,006
Total Revenue		2,578	3,094	6,683	11,583	18,176	25,821	35,350	47,157	61,711	76,111	92,773	112,006
Revenue Growth %			20.0%	116.0%	73.3%	56.9%	42.1%	36.9%	33.4%	30.9%	23.3%	21.9%	20.7%

Constitution Care - Dispensary Sales Projections

	2015	2015	2015	2015	2015	2015	2015	2015	2016	2016	2016	2016	2016
	June	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	May
Card Holders	2,920	3,212	3,534	3,604	3,677	3,750	3,825	3,902	3,980	4,059	4,140	4,223	
Total Card Holders	2,920	3,212	3,534	3,604	3,677	3,750	3,825	3,902	3,980	4,059	4,140	4,223	
Card Holder growth rate	10.0%	10.0%	10.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%
% of the est. addressable population in region.	2.64%	2.90%	3.19%	3.25%	3.32%	3.38%	3.45%	3.52%	3.59%	3.66%	3.74%	3.81%	3.81%
% of aggregate population	0.08%	0.09%	0.10%	0.10%	0.10%	0.10%	0.11%	0.11%	0.11%	0.11%	0.12%	0.12%	0.12%
Average Patients Per Day (one trip per month)	97	107	118	120	123	125	128	130	133	135	138	141	141
Average Patients per Dispensary	97	107	118	120	123	125	128	130	133	135	138	141	141
Market Share % of patients													
Number of Dispensaries in County	1	1	1	1	1	1	1	1	1	1	1	1	1
Number of Registered patients - Customers 1	716	851	1,007	1,099	1,195	1,294	1,396	1,502	1,612	1,725	1,842	1,964	1,964
Market penetration rate in local market (CHAA)	24.5%	26.5%	28.5%	30.5%	32.5%	34.5%	36.5%	38.5%	40.5%	42.5%	44.5%	46.5%	46.5%
Purchase Assumptions (Patients can purchase 2.5 Oz. / 2 weeks)													
Purchase per patient per month (Oz.)	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Average \$ spent per month/patient	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50
Total Oz. demand per month	358	426	504	550	597	647	698	751	806	863	921	982	982
Total Oz. demand per month	358	426	504	550	597	647	698	751	806	863	921	982	982
Total Lbs. demand per month	22	27	31	34	37	40	44	47	50	54	58	61	61
Total Lbs. demand per month	22	27	31	34	37	40	44	47	50	54	58	61	61
Assumed price per Oz.	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375
Total Revenue	\$ 134,158	\$ 159,621	\$ 188,834	\$ 206,128	\$ 224,037	\$ 242,581	\$ 261,776	\$ 281,642	\$ 302,199	\$ 323,464	\$ 345,460	\$ 368,206	\$ 368,206
Total Revenue	134,158	159,621	188,834	206,128	224,037	242,581	261,776	281,642	302,199	323,464	345,460	368,206	368,206
Revenue Growth %	19.8%	19.0%	18.3%	9.2%	8.7%	8.3%	7.9%	7.6%	7.3%	7.0%	6.8%	6.6%	6.6%

Constitution Care - Dispensary Sales Projections

	2016	2016	2016	2016	2016	2016	2016	2017	2017	2017	2017	2017	2017	Goal
	June	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May		
Card Holders	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	
Total Card Holders	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	
Card Holder growth rate	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
% of the est. addressable population in region.	3.81%	3.81%	3.81%	3.81%	3.81%	3.81%	3.81%	3.81%	3.81%	3.81%	3.81%	3.81%	3.81%	100%
% of aggregate population	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	0.12%	3.10%
Average Patients Per Day (one trip per month)	141	141	141	141	141	141	141	141	141	141	141	141	141	
Average Patients per Dispensary	141	141	141	141	141	141	141	141	141	141	141	141	141	
Market Share % of patients														
Number of Dispensaries in County	1	1	1	1	1	1	1	1	1	1	1	1	1	
Number of Registered patients - Customers 1	2,048	2,133	2,217	2,302	2,386	2,471	2,555	2,639	2,724	2,808	2,893	2,977		
Market penetration rate in local market (CHAA)	48.5%	50.5%	52.5%	54.5%	56.5%	58.5%	60.5%	62.5%	64.5%	66.5%	68.5%	70.5%	70%	
Purchase Assumptions (Patients can purchase 2.5 Oz. / 2 weeks)														
Purchase per patient per month (Oz.)	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50	
Average \$ spent per month/patient	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	\$ 187.50	
Total Oz. demand per month	1,024	1,066	1,109	1,151	1,193	1,235	1,278	1,320	1,362	1,404	1,446	1,489		
Total Oz. demand per month	1,024	1,066	1,109	1,151	1,193	1,235	1,278	1,320	1,362	1,404	1,446	1,489		
Total Lbs. demand per month	64	67	69	72	75	77	80	82	85	88	90	93		
Total Lbs. demand per month	64	67	69	72	75	77	80	82	85	88	90	93		
Assumed price per Oz.	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	\$ 375	
Total Revenue	\$ 384,043	\$ 399,880	\$ 415,717	\$ 431,553	\$ 447,390	\$ 463,227	\$ 479,064	\$ 494,901	\$ 510,737	\$ 526,574	\$ 542,411	\$ 558,248		
Total Revenue	384,043	399,880	415,717	431,553	447,390	463,227	479,064	494,901	510,737	526,574	542,411	558,248		
Revenue Growth %	4.3%	4.1%	4.0%	3.8%	3.7%	3.5%	3.4%	3.3%	3.2%	3.1%	3.0%	2.9%		

Constitution Care - Dispensary Sales Projections

	June 2014 - May 2015	June 2015 - May 2016	June 2016 - May 2017
	Year 1	Year 2	Year 3
Card Holders			
Total Card Holders			
Card Holder growth rate			
<i>% of the est. addressable population in region.</i>			
<i>% of aggregate population</i>			
Average Patients Per Day (one trip per month)			
Average Patients per Dispensary			
Market Share % of patients			
<i>Number of Dispensaries in County</i>			
<i>Number of Registered patients - Customers 1</i>			
<i>Market penetration rate in local market (CHAA)</i>			
Purchase Assumptions (Patients can purchase 2.5 Oz. / 2 weeks)			
Purchase per patient per month (Oz.)			
Average \$ spent per month/patient			
Total Oz. demand per month	1,315	8,102	15,077
Total Oz. demand per month	1,315	8,102	15,077
Total Lbs. demand per month	82	506	942
Total Lbs. demand per month	82	506	942
Assumed price per Oz.			
Total Revenue	\$ 493,043	\$ 3,038,107	\$ 5,653,744
Total Revenue	493,043	3,038,107	5,653,744
Revenue Growth %			

Constitution Care Projected P&L

		June 2014 - May 2015	June 2015 - May 2016	June 2016 - May 2017
	CAP EX	Year 1	Year 2	Year 3
Qty Sold in Lbs.		82.2	506.4	942.3
Retail Sales		\$ 493,043	\$ 3,038,107	\$ 5,653,744
Total Sales		\$ 493,043	\$ 3,038,107	\$ 5,653,744
Cost of Goods Sold		\$ 246,522	\$ 1,519,053	\$ 2,826,872
Gross Profit		\$ 246,522	\$ 1,519,053	\$ 2,826,872
Operating Expenses				
4001 Dispensary General Manager (FT)		\$ 69,996	\$ 76,996	\$ 80,845
4002 Dispensary AGM (FT)		\$ 100,000	\$ 110,000	\$ 115,500
4003 Dispensary Staff (FT)		\$ 172,640	\$ 189,904	\$ 199,399
4004 Accountant		\$ 20,800	\$ 22,880	\$ 24,024
4005 Adt. Dispensary (PT) & Weekend		\$ 103,584	\$ 113,942	\$ 119,640
4009 Employer Payroll Taxes		\$ 67,381	\$ 67,381	\$ 67,381
4010 FT Employee Benefits		\$ 44,820	\$ 44,820	\$ 44,820
4015 CT DHS Licenses	\$ 12,500	\$ -	\$ -	\$ -
5001 Dispensary Rent	\$ 26,250	\$ 105,000	\$ 105,000	\$ 105,000
5002 Utilities		\$ 1,000	\$ 12,000	\$ 12,000
	Electric/Gas	\$ -	\$ -	\$ -
	Water	\$ 1,200	\$ 1,200	\$ 1,200
	Internet/Phone	\$ 3,500	\$ 4,200	\$ 4,200
	IT Support	\$ -	\$ 3,900	\$ 3,900
	Trash Removal	\$ 600	\$ 600	\$ 600
5003 Office Set-Up	Computer/Printer/Fax	\$ 6,000	\$ -	\$ -
5004 Office Supplies	Toner/Labels	\$ -	\$ 3,000	\$ 3,000
	Site Supplies	\$ 500	\$ 3,000	\$ 3,000
5007 Water/Coffee Service	Fridge	\$ 1,000	\$ -	\$ -
	Water Cooler/Coffee Machine/Microwave	\$ 350	\$ -	\$ -
	Bottled Water/Coffee	\$ -	\$ 3,000	\$ 3,000
5008 Compliance & POS Software	Adilas	\$ 200	\$ 2,400	\$ 2,400
	Label Writers	\$ 1,000	\$ -	\$ -
	Barcode Scanners	\$ 750	\$ -	\$ -
	(2) Integrated Scales	\$ 2,500	\$ -	\$ -
	(1) .1 High Weight Scales	\$ 1,300	\$ -	\$ -
	POS Equipment	\$ 5,000	\$ -	\$ -
	Cash Drawers`	\$ 500	\$ -	\$ -
	Debit Card Merchant Svcs Processing Terminals	\$ 1,500	\$ 144	\$ 144
	Packaging - 5000 Assorted Child Proof Medicine	\$ -	\$ -	\$ -
5009 Sales Supplies	Bottles	\$ 750	\$ 9,000	\$ 9,000
	Packaging Software Suite	\$ 250	\$ -	\$ -
	Packaging/Compliance	\$ -	\$ -	\$ -
	Labels & Toner	\$ 250	\$ 3,000	\$ 3,000
	LCD Displays	\$ 1,500	\$ -	\$ -
	Uniforms	\$ 750	\$ -	\$ -
5010 Dispensary Insurance	Facility Insurance	\$ 1,350	\$ 5,400	\$ 5,400
MMJ Testing		\$ -	\$ -	\$ -
6001 Testing & Research Lab		\$ -	\$ 14,400	\$ 14,400
CONTINGENCY		\$ 1,031	\$ 11,242	\$ 11,943
		\$ -	\$ -	\$ -
Dispensary Cap Ex		\$ 569,910	\$ -	\$ -
Sub Total - Dispensary Operating Costs		\$ 639,641	\$ 760,707	\$ 808,109
Operating Profit (before tax)		\$ (639,641)	\$ (514,185)	\$ 710,944

Notes:

- (1) Monthly Contingency Amt. (%):
(2) Monthly Contingency Amt. (%):

1.50%
1.50%

Constitution Care - Dispensary Labor Projections

P&L Account	Title	# of Staff	Hours/Week	Wage	\$/Week	\$/Month	\$/Year*
4001 Dispensary General Manager (FT)	Dispensary GM	1	40	\$5,833		\$5,833	\$69,996
4002 Dispensary AGM (FT)	AGM #1 (FT)	1	40	\$4,167		\$4,167	\$50,000
	AGM #2 (FT)	1	40	\$4,167		\$4,167	\$50,000
4003 Dispensary Staff (FT)	Sales Associate	1	40	\$14	\$540	\$2,340	\$28,080
	Sales Associate	1	40	\$14	\$540	\$2,340	\$28,080
	Security	1	40	\$16	\$640	\$2,773	\$33,280
	Security	1	40	\$16	\$640	\$2,773	\$33,280
	Receptionist	1	40	\$12	\$480	\$2,080	\$24,960
	Receptionist	1	40	\$12	\$480	\$2,080	\$24,960
4004 Accountant	Bookkeeper (PT)	1	20	\$20	\$400	\$1,733	\$20,800
4005 Adt. Dispensary (PT) & Weekend	Sales Associate	2	24	\$14	\$648	\$2,808	\$33,696
	Reception	2	24	\$12	\$576	\$2,496	\$29,952
	Security	2	24	\$16	\$768	\$3,328	\$39,936
Total		16				\$38,918	\$467,020

* Financial Projections assume 10% payroll growth in YR2 and 5% payroll growth in YR3

**Constitution Care
Dispensary Build Out**

COSTS AND EXPENSES:				CapEx
1000 CONSTRUCTION				
1001 Dispensary 1 Build Out (Materials)				
Office Construction	4	5000	20000	20,000
Bathroom Upgrade Employee	1	5000	5000	5,000
Kitchen/Breakroom Block Access to Non-Occupied areas	1	3500	3500	3,500
Sales Room	1	6500	6500	6,500
Flooring	1	12500	12500	12,500
Milwork	1	7500	7500	7,500
Reclaimed Wood Counters	1	3500	3500	3,500
HVAC	1	35000	35000	35,000
Roof Renovation	1	25000	25000	25,000
Architectural Drawings & Approvals			3500	3,500
General Contractor	1	35000	35000	35,000
1002 Dispensary 2 Build Out				
Office Construction	8	5000	40000	40,000
Bathroom Modification	1	10000	10000	10,000
ADA Compliance	1	10000	10000	10,000
Sales Room	1	12500	12500	12,500
Flooring	1	12500	12500	12,500
Milwork	1	7500	7500	7,500
Reclaimed Wood Counters	1	3500	3500	3,500
HVAC	1	35000	35000	35,000
Architectural Drawings & Approvals			3500	3,500
General Contractor	1	35000	35000	35,000
1002 Dispensary 3 Build Out				
Office Construction	6	5000	30000	30,000
Bathroom Modification	1	10000	10000	10,000
ADA Compliance	1	10000	10000	10,000
Sales Room	1	1000	1000	1,000
Flooring	1	12500	12500	12,500
Milwork	1	7500	7500	7,500
Reclaimed Wood Counters	1	3500	3500	3,500
HVAC	1	35000	35000	35,000
Architectural Drawings & Approvals			3500	3,500
General Contractor	1	35000	35000	35,000
for each dispensary				0
				0
				0
2000 SECURITY				
2003 Security Cameras				
Cameras	1	48000	48000	48,000
Rack & Video Storage Installation	1	2500	2500	2,500
Locks & Doors (Biometrics)	1	5000	5000	5,000
2005 Safe				
TL 30 Safe	1	3500	3500	3,500
				0

**Constitution Care
Dispensary Build Out**

	Barcode Scanners						750
	(2) Integrated Scales						2,500
	(1) .1 High Weight Scales						1,300
	POS Equipment						5,000
	Cash Drawers						500
	Debit Card Merchant Svcs Processing Terminals						1,500
5009 Sales Supplies	Packaging - 5000 Assorted Child Proof Medicine Bottles						750
	Packaging Software Suite						250
	Packaging/Compliance Labels & Toner						250
	LCD Displays						1,500
	Uniforms						750
5010 Dispensary Insurance	Facility Insurance						1,350
6000 MMJ Testing							
6001 Testing & Research Lab	Product Testing	1	24	50	1200		0
7000 CONTINGENCY							30,410
Total Ind. Manufacturing:							638,610



CONSTITUTION
C A R E

Appendix K7

Federal, State and Foreign Tax Returns

In Re: RFA Section E Question 7

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

FEDERAL, STATE AND FOREIGN TAX RETURNS

1.0 FEDERAL, STATE AND FOREIGN TAX RETURNS OVERVIEW

Constitution Care LLC was formed in October 2013 specifically to apply for the Connecticut dispensary facility license. On the following pages, please find the company's notice of its employer identification number from the Internal Revenue Service, which states that the company is not obligated to file Form 941 until April 30, 2014, Form 940 until January 31, 2015, and Form 1065 until April 15, 2014.

Date of this notice: 09-30-2013

Employer Identification Number:
[REDACTED]

Form: SS-4

Number of this notice: CP 575 A

CONSTITUTION CARE LLC
CONSTITUTION CARE
% ROBERT MAYERSON MBR
1131 TOLLAND TPKE STE O
MANCHESTER, CT 06042

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN [REDACTED]. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

Based on the information received from you or your representative, you must file the following form(s) by the date(s) shown.

Form 941	04/30/2014
Form 940	01/31/2015
Form 1065	04/15/2014

If you have questions about the form(s) or the due date(s) shown, you can call us at the phone number or write to us at the address shown at the top of this notice. If you need help in determining your annual accounting period (tax year), see Publication 538, *Accounting Periods and Methods*.

We assigned you a tax classification based on information obtained from you or your representative. It is not a legal determination of your tax classification, and is not binding on the IRS. If you want a legal determination of your tax classification, you may request a private letter ruling from the IRS under the guidelines in Revenue Procedure 2004-1, 2004-1 I.R.B. 1 (or superseding Revenue Procedure for the year at issue). Note: Certain tax classification elections can be requested by filing Form 8832, *Entity Classification Election*. See Form 8832 and its instructions for additional information.

A limited liability company (LLC) may file Form 8832, *Entity Classification Election*, and elect to be classified as an association taxable as a corporation. If the LLC is eligible to be treated as a corporation that meets certain tests and it will be electing S corporation status, it must timely file Form 2553, *Election by a Small Business Corporation*. The LLC will be treated as a corporation as of the effective date of the S corporation election and does not need to file Form 8832.

If you are required to deposit for employment taxes (Forms 941, 943, 940, 944, 945, CT-1, or 1042), excise taxes (Form 720), or income taxes (Form 1120), you will receive a Welcome Package shortly, which includes instructions for making your deposits electronically through the Electronic Federal Tax Payment System (EFTPS). A Personal Identification Number (PIN) for EFTPS will also be sent to you under separate cover. Please activate the PIN once you receive it, even if you have requested the services of a tax professional or representative. For more information about EFTPS, refer to Publication 966, *Electronic Choices to Pay All Your Federal Taxes*. If you need to make a deposit immediately, you will need to make arrangements with your Financial Institution to complete a wire transfer.

The IRS is committed to helping all taxpayers comply with their tax filing obligations. If you need help completing your returns or meeting your tax obligations, Authorized e-file Providers, such as Reporting Agents (payroll service providers) are available to assist you. Visit the IRS Web site at www.irs.gov for a list of companies that offer IRS e-file for business products and services. The list provides addresses, telephone numbers, and links to their Web sites.

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.

IMPORTANT REMINDERS:

- * Keep a copy of this notice in your permanent records. **This notice is issued only one time and the IRS will not be able to generate a duplicate copy for you.** You may give a copy of this document to anyone asking for proof of your EIN.
- * Use this EIN and your name exactly as they appear at the top of this notice on all your federal tax forms.
- * Refer to this EIN on your tax-related correspondence and documents.

If you have questions about your EIN, you can call us at the phone number or write to us at the address shown at the top of this notice. If you write, please tear off the stub at the bottom of this notice and send it along with your letter. If you do not need to write us, do not complete and return the stub.

Your name control associated with this EIN is CONS. You will need to provide this information, along with your EIN, if you file your returns electronically.

Thank you for your cooperation.



CONSTITUTION
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Appendix K8

Backer Federal, State and Foreign Tax Returns

In Re: RFA Section E Question 8

REQUEST FOR FREEDOM OF INFORMATION ACT EXEMPTION

The applicant respectfully requests that this information be classified as exempt from disclosure under the Connecticut Freedom of Information Act for one or more of the following reasons: (i) pursuant to C.G.S. Sec. 1-210(b)(2), this information constitutes personnel or medical files and/or similar files the disclosure of which would constitute an invasion of personal privacy; (ii) pursuant to C.G.S. Sec. 1-210 (b) (5)(A), this information derives independent economic value 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 are the subject of reasonable efforts to maintain secrecy; (iii) pursuant to C.G.S. Sec. 1-210 (b) (5)(B), this information constitutes commercial or financial information given in confidence and is not required by statute; (iv) pursuant to C.G.S. Sec. 1-210 (b) (8), this information constitutes a statement of personal worth or personal financial data required by the Department of Consumer Protection for this application to establish the applicant's personal qualification for the license applied for; (v) pursuant to C.G.S. Sec. 1-210 (b) (10), this information constitutes a record, tax return, report, or statement exempted by federal law or state statute or is a communication privileged by the attorney-client relationship.

Please contact the applicant for any questions or comments regarding this request for exemption.

BACKER FEDERAL, STATE AND FOREIGN TAX RETURNS

1.0 BACKER AND BACKER MEMBER TAX RETURNS OVERVIEW

Constitution Care LLC's backer, Columbia Care CT LLC, was formed in late September 2013 specifically to apply for the Connecticut dispensary facility license. On the following pages, please find the Columbia Care CT LLC's notice of its employer identification number from the Internal Revenue Service, which states that the company is not obligated to file Form 1065 until April 15, 2014.

Columbia Care CT LLC's sole member is Columbia Care LLC, which was formed in late September 2013 specifically to be an obligated financial sponsor Columbia Care CT LLC. On the following pages, please also find Columbia Care LLC's notice of its employer identification number from the Internal Revenue Service, which states that the company is not obligated to file Form 1065 until April 15, 2014.

Date of this notice: 09-26-2013

Employer Identification Number:
[REDACTED]

Form: SS-4

Number of this notice: CP 575 B

COLUMBIA CARE CT LLC
ROBERT MAYERSON MBR
1131 TOLLAND TPKE STE O
MANCHESTER, CT 06042

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN [REDACTED]. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

Based on the information received from you or your representative, you must file the following form(s) by the date(s) shown.

Form 1065

04/15/2014

If you have questions about the form(s) or the due date(s) shown, you can call us at the phone number or write to us at the address shown at the top of this notice. If you need help in determining your annual accounting period (tax year), see Publication 538, *Accounting Periods and Methods*.

We assigned you a tax classification based on information obtained from you or your representative. It is not a legal determination of your tax classification, and is not binding on the IRS. If you want a legal determination of your tax classification, you may request a private letter ruling from the IRS under the guidelines in Revenue Procedure 2004-1, 2004-1 I.R.B. 1 (or superseding Revenue Procedure for the year at issue). Note: Certain tax classification elections can be requested by filing Form 8832, *Entity Classification Election*. See Form 8832 and its instructions for additional information.

A limited liability company (LLC) may file Form 8832, *Entity Classification Election*, and elect to be classified as an association taxable as a corporation. If the LLC is eligible to be treated as a corporation that meets certain tests and it will be electing S corporation status, it must timely file Form 2553, *Election by a Small Business Corporation*. The LLC will be treated as a corporation as of the effective date of the S corporation election and does not need to file Form 8832.

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.

Date of this notice: 08-05-2013

Employer Identification Number:
[REDACTED]

Form: SS-4

Number of this notice: CP 575 B

COL CARE DELAWARE
MICHAEL ABBOTT MBR
130 W 57TH ST APT 9B
NEW YORK, NY 10019

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN [REDACTED]. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

Based on the information received from you or your representative, you must file the following form(s) by the date(s) shown.

Form 1065

04/15/2014

If you have questions about the form(s) or the due date(s) shown, you can call us at the phone number or write to us at the address shown at the top of this notice. If you need help in determining your annual accounting period (tax year), see Publication 538, *Accounting Periods and Methods*.

We assigned you a tax classification based on information obtained from you or your representative. It is not a legal determination of your tax classification, and is not binding on the IRS. If you want a legal determination of your tax classification, you may request a private letter ruling from the IRS under the guidelines in Revenue Procedure 2004-1, 2004-1 I.R.B. 1 (or superseding Revenue Procedure for the year at issue). Note: Certain tax classification elections can be requested by filing Form 8832, *Entity Classification Election*. See Form 8832 and its instructions for additional information.

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To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.



CONSTITUTION
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Appendix L

Employee Working Environment Plan

In Re: RFA Section F Question 1

EMPLOYEE WORKING ENVIRONMENT PLAN

1.0 EMPLOYEE WORKING ENVIRONMENT PLAN OVERVIEW

Constitution Care LLC is an equal opportunity employer who will provide a safe, healthy and economically beneficial working environment for all dispensary facility employees. The company has formulated and will implement workplace safety and environmental standards, codes of conduct, healthcare benefits, educational benefits, retirement benefits, and fair wage standards.

2.0 WORKPLACE SAFETY AND ENVIRONMENTAL STANDARDS

Constitution Care LLC is committed to maintaining a safe and healthful working environment. To achieve this goal, the company has created and implemented an Injury and Illness Prevention Program. The company's goal in designing this program is to prevent injuries, illnesses and accidents in the workplace. The primary purpose of the program is to ensure the safety and health of the dispensary facility's employees and to provide a safe, healthful environment for themselves and their patients

Company Housing Keeping Policy and Administration

Good housekeeping is an integral part of any effective safety program. Keeping work areas clean reduces the chance of accidents and injuries. Well-organized work areas also increase the ability of employees to perform their jobs efficiently. Each dispensary facility employee is responsible for keeping their work area neat and orderly. Each area of the facility has a unique clean-up checklist that must be followed before the end of each shift. Employees are required to initial the checklist tasks which they personally oversaw and completed or which they undertook and completed with others.

Injury & Illness Prevention Policy and Program Administration

The injury and illness prevention program is administered by the Dispensary Facility Manager and department managers accordingly. The Dispensary Facility Manager is responsible for the overall implementation and maintenance of the program. Each department manager is responsible for the implementation and maintenance within their department area. Manager duties include the following:

- Provide training materials to ensure that managers and employees are trained on workplace safety and are familiar with the safety and health hazards TO which employees may be exposed;
- Provide educational opportunities and training on company safety rules and policies;

- Provide materials for managers to thoroughly train employees both in group and one-on-one sessions;
- Provide the knowledge and tools necessary to inspect, identify and evaluate workplace hazards on a continuing basis;
- Develop methods to identify and prevent workplace hazards, and ongoing, regular education process to share them with staff ; and
- Institute systematic procedures to insure identified workplace hazards are dealt with in a timely and effective manner.

Hazard Assessment Control

In order to timely identify workplace hazards, Constitution Care LLC staff will be trained to spot facility issues, including but not limited to unsafe conditions or dangerous procedures, and immediately report them to the proper manager for remediation.

Once a facility hazard has been identified, the Dispensary Facility Manager will arrange for the inspection and investigation of the issue. Appropriate staff members will be notified of the investigation so as to protect against potential injury before remediation is completed. The Dispensary Facility Manager will be responsible for documenting all unsafe conditions and other hazards and for demonstrating the corrective measures taken to address the problems at issue.

All daily check lists required to be completed by staff will be updated at least twice a year to accurately reflect any new or on-going safety issues.

3.0 CODE OF CONDUCT

Constitution Care LLC's Code of Conduct is contained within the Employee Handbook issued to every dispensary facility employee during orientation training. The handbook is a guide to expected employee behavior, including the staff's relationship with the company. Topics include the following:

- Section 1: The Way We Work
- Section 2: Your Pay and Progress
- Section 3: Time Away from Work and Other Benefits
- Section 4: On the Job (covers various aspects of conduct policy and procedures)
- Section 5: Safety in the Workplace (includes OSHA training where applicable)

The company's Code of Conduct focuses on collaboration, caring, integrity, accountability and compliance. Specifically, the following points are highlighted:

- Employees are members of the same team and must partner with each other to achieve the goals of the organization;
- Employees must treat each other and our customers with respect and compassion understanding that each must feel valued and appreciated;
- Constitution Care LLC and its employees must operate with professionalism and integrity in all of their dealings and all of the time.
- Employees must take personal ownership over their actions;
- Employees must act within the letter and the spirit spirit of all Connecticut laws, rules, regulations and guidelines and within the letter and spirit of all company policies and procedures.

4.0 COMPENSATION PROGRAM

Constitution Care LLC knows its dispensary facility employees are the backbone of the organization and play an important role in the company's ability to achieve its strategic goals. *We believe strongly in treating our employees well by looking out for their health, safety and well-being through our attractive compensation and benefits program.* As such, the company will provide appropriate incentives for employees, including competitive wages, merit based raises, comprehensive medical insurance, an enhanced vaccination service, and benefits programs. All starting salaries are expected to meet or exceed market averages for comparable roles at similar institutions.

We view team member base compensation as the basis for each team member's career with the company. Our decision to generally pay above market for personnel is based on our interest in hiring the most competitive candidates and retaining quality personnel over many years. Although not considered direct compensation, we invest approximately 100% of the annual salary for each incoming employee in registration fees and training to ensure their preparedness and satisfaction prior to their beginning work. Our continuing education programs add to the investment made in each employee that we believe will yield higher levels of team member satisfaction, work quality and attention to detail.

Merit Based Raises

Employees have the opportunity to increase their wages based on overall job performance, particularly when they meet and exceed defined objectives on a regular basis. Such increases will be at the discretion of management, but will be determined by how well the employee performs in key indicators such as overall quality of work, efficiency, attitude, helpfulness, and willingness to take on more responsibilities.

Merit based raises also include year-end bonuses and discretionary bonuses that occur when a team member makes a particularly unique contribution. These could be payments or other gifts (dinners, travel vouchers, extra vacation days, etc.) based on workplace performance or good citizenship that reflects well upon the company and our team.

Year-end bonuses can take the form of either cash or equity in the company based on tenure and contribution.

Benefits Programs

Constitution Care LLC intends to offer several benefit programs to dispensary facility employees, including but not limited to, paid time off, tuition reimbursement (high school equivalency, trade school, college and graduate level programs), life insurance, and retirement planning (including bonus plans, equity ownership plans and eventually, a 401K plan). Additionally, Constitution Care LLC is dedicated to providing the best comprehensive health insurance to its employees. Like we have done with our affiliates, Constitution Care LLC will provide all qualified employees a complete health insurance package, at no out-of-pocket cost, which includes medical, dental, and vision for themselves and all of their dependents.

The paid time off program allows employees to balance work and personal time by providing a specified number of paid days each year to use for scheduled, unscheduled and/or emergency absences from work. Such paid time off will not be affected by company-observed holidays and is intended to provide flexibility in scheduling time off from work for reasons such as personal vacations, holidays, doctor appointments, and the like. Employees who work at least 24 hours a week will earn paid time off after 90 days of employment. Temporary employees are not eligible for such benefits.

The enhanced vaccination program offers employees free influenza vaccinations each year provided by the dispensary facility itself. This program, in addition to other health benefits, is a win-win for Constitution Care LLC as employees are given this complimentary service benefiting their health while the company effectively reduces the number of sick days taken by staff.



CONSTITUTION
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Appendix M

Compassionate Need Plan

In Re: RFA Section F Question 2



COMPASSIONATE NEED PLAN

1.0 COMPASSIONATE NEED PLAN OVERVIEW

As a licensed dispensary operator for the State’s Medical Marijuana program, one of our primary responsibilities is to ensure that that all patients have adequate access to the care, medicine, and health services they require. To meet this obligation, we will voluntarily implement several reduced cost pricing schedules for senior citizens, military veterans, the terminally ill and those who can demonstrate a financial need so that they will have subsidized access to medical marijuana, its derivative products and all related services

2.0 COMPASSIONATE NEED PROGRAMS

Program	How to qualify
Senior Discount. A 10% discount on all purchases by senior citizens (65+)	Valid State issued ID.
Military Veteran Discount. A 10% discount on purchases.	Valid military or VA ID.
Terminally Ill Discount. A 10% discount on purchases. In some cases, complimentary products.	Signed note from doctor.
Low Income Discount. A 10-20% discount on purchases dependent on extent of need.	Medicaid Card, SSI letter. Other proof of low income status.
“Care Beyond” Discount. Discretionary discount on a case by case basis.	Team member discretion

3.0 CARE BEYOND DISCOUNTS

Our team members are empowered to provide products and services to all qualifying patients, regardless of their ability to pay, so that no one in need is ever turned away. If one of our patients is thought to be in financial need, our staff is encouraged to take the time to understand the patient’s individual circumstances. If a need is identified, each of our facility employees can then, on a case-by-case basis, and with management authorization, offer products or services at either a reduced rate or for free to the qualifying patient. We believe these “Care Beyond” discounts are an integral part of the corporate responsibility that comes with the right to service patients in accordance with the Connecticut Medical Marijuana program.

4.0 CRITERIA FOR FINANCIAL ASSISTANCE

Qualifying patients must meet the following criteria to be eligible for low income discounts or to be eligible for increased discretionary discounts:

- Possess a valid and current Connecticut-issued qualifying patient registration card
- Be an existing registered patient with Constitution Care LLC's dispensary facility
- Be a minimum of 18 years of age
- Have exhausted all external subsidized funding sources first, which include but are not limited to:
 - Group or individual plans and health insurance
 - Medicare or Medicaid programs
 - Other Federal, State, or military programs
 - Worker's compensation programs
 - Health Reimbursement Accounts (HRAs)
 - Grant or other funds for which the patient may be eligible

Constitution Care LLC may require a patient to provide written proof that such patient is not eligible for external subsidized funding sources or has exhausted all external subsidized funding sources identified in the above list before providing assistance through the compassionate need program. Decisions are made without regard to age, race, sex, creed, ethnicity, religion or any other protected class. A letter will be sent to the patient within 7 days of applying notifying the patient whether they have been approved or denied (in other jurisdictions, we have 99% approval rates). The letter will define the time period for which the assistance will qualify. If the patient is denied, the letter will inform them as to the reason why and will contain information about appealing the decision to the facility. Patients will have 30 days from receipt of a denial letter to appeal and provide any additional information.

5.0 PROGRAM PARTNERSHIPS

Constitution Care LLC intends to partner with any number of willing organizations, including but not limited to, the licensed Connecticut production facilities. Our company has already received a commitment from Great River Growers LLC, an affiliated producer license applicant, to provide discounted products, which will help offset the cost of medicine and services to our patients.

Our organization's goal is provide increased access to the State's qualifying patients. As such, we welcome any strategic, compassionate-need program partners, including non-affiliated licensed producers, who can add value to our own compassionate need program. Upon the successful award of a dispensary facility license, Constitution Care LLC will proactively seek to establish reliable and passionate program partners.



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Appendix N

Research Plan

In Re: RFA Section F Question 3

RESEARCH PLAN

1.0 RESEARCH PLAN OVERVIEW

Constitution Care LLC’s research plan is a detailed proposal to conduct and facilitate scientific studies related to the use of Medical Marijuana. The company has partnered with the University of Connecticut-School of Pharmacy to create and implement a comprehensive research proposal, which will not only use data obtained from Constitution Care LLC’s Connecticut dispensary facility operations, but also that of its affiliates in other Medical Marijuana states. Please note, that Constitution Care LLC’s affiliated production facility applicant, Great River Growers LLC, is also an important partner in the proposed research study.

Additionally, the Connecticut Pharmacists Association (“CPA”) will partner with Constitution Care LLC in conducting a Research Monitoring Program related to the use of Medical Marijuana. The CPA intends to collaborate with the Canadian Consortium for the Investigation of Cannabinoids (“CCIC”) to conduct this proposed research study.

Included in the following pages is (1) a letter from the University of Connecticut-School of Pharmacy, (2) a description of the Research Plan proposed by Constitution Care LLC in collaboration with the University of Connecticut-School of Pharmacy, and (3) a letter from the CPA describing the Research Plan proposed by the CPA and CCIC in which Constitution Care LLC will participate.



November 15, 2013

To Whom It May Concern:

The purpose of this letter is to inform the State of Connecticut Department of Consumer Protection(DCP) that the **Connecticut Pharmacists Association (CPA)**, a 501(c)6 professional organization representing pharmacists in the State of Connecticut since 1876, will be conducting a Research Monitoring Program in the State of Connecticut related to the medicinal use of cannabis.

It is the intent of the CPA to partner with the **Canadian Consortium for the Investigation of Cannabinoids (CCIC)** in order to conduct this proposed research monitoring program with the marijuana growers and dispensaries that receive licenses from the State of Connecticut. CCIC is a federally registered Canadian nonprofit organization of basic and clinical researchers and health care professionals established to promote evidence-based research and education concerning the endocannabinoid system and therapeutic applications of endocannabinoid and cannabinoid agents.

Please note that Constitution Care, LLC, the subject of this application, has committed to the CPA that it will financially support this Research Plan and study initiative if their company is selected by the State of Connecticut to grow and produce medical cannabis.

The Research Plan will be designed independently by CPA and CCIC after soliciting input from, and working with, the DCP, growers, dispensaries and other stakeholders.

The objectives will be to quantify the doses and modes of the cannabis administration and to explore the associations between cannabis products and patient phenotypes. At this time, it is not known how long a study such as this will take to complete.

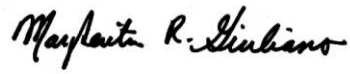
In general, the overall goal will be to systematically collect long-term data on the safety and efficacy of herbal cannabis used for medical purposes. What makes this study unique is that with this **international collaboration**, data collection from each country can be compared and studied to provide a very in-depth analysis and outcomes summary.

It is our estimation that the results and data gleaned from the study will be used to inform policy-makers and regulatory agencies about safety aspects of medical cannabis; clinicians will be better informed about best practice guidelines and safety issues, and the medical cannabis producers will receive beneficial information about the efficacy of their products in real world situations. Most importantly, due to how the

Connecticut regulations are written, the pharmacists, who are an integral piece to both the data collection and dispensing activities, will have a comprehensive and data driven approach when educating patients about their medical use of cannabis.

The CPA has a strong and positive history of working with state agencies, universities and the pharmacists we represent in programs that involve both pharmacists and patient outcomes. It is due to this synergy and focus that the CPA feels that it is well-positioned to be the critical component to ensure that the Research Plan reflects the highest quality evidence-based “best practices” and continuing education for all those involved in this, emerging sector of patient care in Connecticut.

Sincerely,



Margherita R. Giuliano, RPh
Executive Vice President
Connecticut Pharmacists Association



Mark A. Ware MD MSc
Executive Director
Canadian Consortium of the Investigation of Cannabinoids



November 1, 2013

Application Review Committee
c/o: William M. Rubenstein, Commissioner
Department of Consumer Protection
165 Capitol Avenue
Hartford, Connecticut 06106-1630

To The Application Review Committee:

The Health Outcomes, Policy and Economics (HOPE) Collaborative Group is a multifaceted group interested in outcomes research. Over the past decade, we have worked with federal and state governmental agencies, insurers, foundations and industry partners to answer important healthcare-related questions utilizing patient registries/observational studies, randomized controlled trials, systematic reviews/meta-analyses and economic modeling. HOPE Collaborative Group members have published over 300 peer-reviewed manuscripts in highly-respected journals *including JAMA, Annals of Internal Medicine, Lancet, American Journal of Medicine and Circulation.*

Connecticut is now the 16th state to approve legislation regarding the production and distribution of medical marijuana for palliative uses. The passed legislation calls for the Connecticut Department of Consumer Protection (DCP) to oversee a two-tier system; of producers which will be responsible for the growth and manufacture of medical marijuana into various dosage forms, and dispensary facilities which will dispense the products made by producers to the public. As you know, **State regulations also call for detailed data collection and an assessment plan to demonstrate medical marijuana is used in an appropriate, transparent and scientifically-guided manner.**

We support the application submitted by Constitution Care, LLC, and Great River Growers, LLC and commit to developing and pilot testing (as described below) a patient registry (dubbed IMPACT or "Improvements in Patient Ability due to Cannabis Therapy") in exclusive partnership with Constitution Care and Great River Growers and their team to scientifically assess the effectiveness and safety of medical marijuana through the collection of patient-reported outcomes (PROMs) data in addition to data that must be collected per State regulations. All such data will be collected in a manner which protects the confidential information of individual patients as required by both the State regulations and HIPAA. A certificate of confidentiality will be sought, which if granted would prevent the Federal government from using study related data for prosecution now or in the future. This is commonly given to University of Connecticut investigators studying at risk populations. Comprehensive measures have been extensively addressed and will be implemented upon licensure to maintain strict compliance with the confidentiality requirements of the law.

Although the application submitted is CT state-specific the IMPACT registry will be implemented in Constitution Care-affiliated dispensaries in other states (including Arizona, Washington, D.C. and potentially Massachusetts) to enhance the results and offer the broadest assessment available for the benefit of the State of Connecticut and its patient population.

Please do not hesitate to contact me with any questions concerning this letter of support. Thanks you in advance for your consideration.



Craig I. Coleman, PharmD, FASHP
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Co-Director and Methods-Chief, HOPE Collaborative Group
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Designing and Pilot Testing a Patient Registry (Improvements in Patient Ability due to Cannabis Therapy-IMPACT) to Scientifically Assess the Effectiveness and Safety of Medical Marijuana

There is a robust and longstanding methodology for the collection and evaluation of PROM data with medical institutional board review (IRB) oversight; and the implementation of the IMPACT registry will comply fully with those precepts. The proposal below describes our recommended steps for designing and pilot testing the IMPACT registry. It first describes our methodology for determining the optimal PROMs for collection by the registry questionnaire, and then the pilot implementation of the registry for a select number of approved medical marijuana indications.

1. Designing the Registry Content

1.1. Objectives

- Prepare the IMPACT question modules (modules will include shared questions for all disease states and disease-state specific questions and PROMs)
- Identify potential validated generic and disease-specific PROMs for the key disease states for medical marijuana treatment
- Review the psychometric properties (reliability, validity and responsiveness) of the identified validated PROMs
- Implement one disease-specific PROM for use in each of the key disease states
- Implement one generic measure that could be used for utility assessment across all key disease states (there may actually be additional modules for other states than CT)
- Field test the mode of administration and timing for collection of selected PROMs

1.2. Methods

- Perform a comprehensive and systematic review of the medical literature to identify previously conducted medical marijuana research to gain a better understanding of the types of PROMs utilized, any methodological difficulties in collecting data or administering PROMs in these patient groups, and general strengths and limitations of the study/registry designs
- Perform a systematic review to identify recent (in the past 2-years) clinical trials of interventions in select (key) disease states for which medical marijuana is indicated to identify contemporary PROMs that could potentially be used to assess effectiveness and safety in a prospective patient registry.
- Search Medline, Embase, Cochrane Library and CINAHL, check the reference lists of selected articles and consult experts in each of the key disease states
- Determine article inclusion
 - Must report on the use of a PROM in English in adults in a culturally relevant setting (i.e., the study of a measure outside of Europe or North America would not be appropriate for use in a US setting)
 - Applied in a relevant disease state and indication (ie, spasticity in multiple sclerosis, not urinary dysfunction)
- Extract data
 - Measures used, population assessed, mode of administration and timing will be extracted from included articles using a standard form

- Appraise each PROM using explicit criteria, including frequency of use and gold standard psychometric methods (done independently by two reviewers).
- Assess three operational criteria (acceptability, interpretability and feasibility/burden).
- Invite clinicians experienced in treating each of the key disease states to comment to ensure clinical credibility

The final decision about which measures to implement in the IMPACT registry in each area will be informed by the systematic review and operational evidence (patient views) and clinicians' views.

2. Pilot Testing the Registry

Raw patient data will be provided by Constitution Care and augmented by survey data collected directly from patients in affiliated dispensaries. Great River Growers will provide raw product data. The HOPE group at the University of Connecticut will crosslink and maintain all data (in a manner which protects the confidential information of individual patients as required by both the State regulations and HIPAA) and be responsible for pilot project data analysis. Data to be supplied by either Constitution Care or Great River Growers and included in IMPACT registry will include (as required by State regulations):

- **From Great River Growers:**
 - The name and address of the producer
 - The brand name of the marijuana product that was registered with the department pursuant to section 21a-408-59 of the Regulations of Connecticut State Agencies
 - A unique serial number that will match the product with a producer batch and lot number so as to facilitate any warnings or recalls the department or producer deem appropriate
 - The date of final testing and packaging
 - The expiration date
 - The quantity of marijuana contained therein
 - A terpenes profile and a list of all active ingredients, including: tetrahydrocannabinol (THC) tetrahydrocannabinol acid (THCA), cannabidiol (CBD), cannabidiolic acid (CBDA), any other active ingredient that constitute at least 1% of the marijuana batch used in the product
 - A pass or fail rating based on the laboratory's microbiological, mycotoxins, heavy metals and chemical residue analysis
 - Other information necessary to comply with state of Connecticut labeling requirements for similar products not containing marijuana
- **From Constitution Care:**
 - Drug Enforcement Administration Pharmacy number
 - The serial number of assigned to each marijuana product dispensed to a patient, as assigned by the dispensary facility
 - Patient Birth date
 - Patient Sex code
 - New or refill code
 - Quantity

- Days supply
- Drug Enforcement Administration Prescriber identification number
- Date order written, which shall be the date the written certification was issued
- Number of refills authorized
- Order origin code, which shall be provided by the department
- Patient last name
- Patient first name
- Patient street address
- State
- Drug name, which shall be the brand name of the marijuana product
- The date of dispensing the marijuana
- The quantity of marijuana dispensed
- The name and registration certificate number of the qualifying patient and, where applicable, the primary caregiver
- The name of the certifying physician
- Such directions for use as may be included in the physician's written certification or otherwise provided by the physician
- Name of the dispensary
- Name and address of the dispensary facility
- Any cautionary statement as may be required by Connecticut state statute or regulation

2.1. Objectives

- **Assess the feasibility of data collection methods:**
 - Provide the registry questionnaire to the patient to complete at the time of first and second refill, and then every 6 months (the pilot would only include the first refill)
 - Determine the proportion of ineligible patients (such as those who cannot complete a written questionnaire in English)
 - Determine the proportion of eligible patients who are not invited before initiation of medical marijuana to participate by data collection coordinators who are dispensary facility employees (completion of enrollment survey)
 - Determine the proportion of patients who decline to participate when invited
 - Determine the proportion of patients who do not respond to a follow-up questionnaire at the time of refill prescription (completion of the update survey; primary endpoint)
- **Compare performance between disease states/indications:**
 - Explore differences in data quality and compliance among evaluated disease states
 - Adjust for pre-treatment patient characteristics
 - Explore measures of the uncertainty in the disease-specific estimates (e.g. confidence intervals)

- **Methodological considerations:**
 - Provide estimates of the mean and standard deviation of the pre- and update PROMs
 - Produce definitions of 'minimally important differences' for each of the chosen measures
 - Compare the responsiveness of generic and disease-specific PROMs
 - Most of the analysis will use descriptive statistics
- **Intended use of study results (primary analysis to demonstrate medical marijuana is being used in an appropriate, transparent and scientifically-guided manner):**
 - Provide evidence of which products/brands work best for which qualifying conditions for Constitution Care/Great River Growers patient
 - Provide pertinent information to Great River Growers about which products to produce or how better to produce them for the benefits of patients

2.2. Methods

- Conduct multiple prospective cohort studies, each covering one of the selected/key disease states/medical marijuana indication (selected because of their higher frequency of medical marijuana prescribing)
- Recruit consecutive patients before filling their prescription through the administration of an enrollment survey by data collection coordinators who are dispensary facility employees (after getting informed consented for participation in the registry).
 - The survey will then collect demographic, socioeconomic, employment, insurance, disease history, co-morbidity and PROM data informed by part 1 of this project) directly from patients
- Provide a registry update questionnaire to the patient again at the second fill, and then every 6 months thereafter
- Target an enrollment of ~470 patients for the pilot project
 - Using response rate to the second survey as the primary endpoint; 377 patients needed to provide a response rate estimate with margin of error +/-4%; 470 needed if we assume a 25% drop-out rate.
 - Indefinite planned duration of IMPACT registry
- Conduct semi-structured interviews (either as individuals or in groups) with a randomly selected data collection coordinators who are dispensary employees to explore the efficiency of the data collection process, to discover any problems that had arisen, and for staff to suggest ways the process could be improved
- Conduct semi-structured interviews (either as individuals or in groups) with a randomly selected patients (at least one patient in each disease state group) to explore the efficiency of the data collection process, to discover any problems that had arisen, and for staff to suggest ways the process could be improved
- Conduct two focus groups to explore stakeholders' views of the best means of using existing data and expanding the registry out of the pilot stage.

3. Importance of a Medical Marijuana Registry

Any and all data collected from the IMPACT registry will be used to address important clinical and policy research questions. This registry will be conducted as a clinical protocol with informed consent and IRB approval, and HIPAA compliance to protect all patient rights information and confidentiality. A certificate of confidentiality will be sought, which if granted would prevent the Federal government from using study related data for prosecution now or in the future. This is commonly given to University of Connecticut investigators conducting research in at risk populations. Analysis of data that is entered into the database will be used to evaluate:

- Hypothesis regarding clinical benefit of medical marijuana in the following indications:
 - Cancer, glaucoma, HIV/AIDS, Parkinson's disease, multiple sclerosis, damage to the nervous tissue of the spinal cord with objective neurological intractable spasticity, epilepsy, cachexia, wasting syndrome, Crohn's disease and post-traumatic stress disorder
- Descriptive statistics about subsets (demographics) within indications, gender, age, race, geography
- Post-hoc research questions from clinicians with interest in finding efficacious and safe alternative treatments for disease
- Post-hoc research question from national disease advocacy groups to ascertain information about their patient groups (i.e. the National Multiple Sclerosis Society has formally called for additional medical marijuana research to be conducted to support its use to treat many of the disease's common symptoms)

Any data analysis requested by clinicians or advocacy groups will need to be approved by the Scientific Advisory Board before it is agreed upon.

As an example of the latter, the National Multiple Sclerosis Society has formally called for additional medical marijuana research to be conducted to support its use to treat many of the disease's common symptoms including (but not limited to) unusual muscle tension or stiffness (spasticity) and uncontrolled movements (tremor). On the organizations website, they state:

"The question of whether marijuana (Cannabis sativa) should be used for symptom management in MS is a complex one. It is generally agreed that better therapies are needed for distressing symptoms — including pain, tremor, and spasticity — that may not be sufficiently relieved by available treatments. Development of more treatments for MS symptoms like this one and others is a priority for the Society in its 2011-2015 strategic response. Yet there are serious uncertainties about the benefits of marijuana relative to its side effects. Conflicting results of previous research, coupled with the need for additional therapies to treat symptoms of MS, make it important that more research be done on the potential of marijuana and its derivatives." –**National Multiple Sclerosis Society 2013**

Partnering with such organizations will allow us to conduct studies from our registry that will help answer organizations' key efficacy and safety questions; hopefully allowing them to more comfortably endorse the use of medical marijuana. Moreover, analyses from the registry may aid in identifying the need for and designing more rigorous randomized trials to answer specific research questions (i.e., what is the effect of different strains of cannabis on HIV viral load and CD4 cell count?)

4. Budget to Develop and Pilot Test the IMPACT Registry

- **Design:**
 - Assemble a research team and perform a systematic review of literature and compilation of PROMs questionnaires for the baseline situation, and the 4-5 key clinical diseases (\$50,000)
 - Construct and maintain a database to collect and cross-link data provided by Constitution Care, Great River Growers and self-reported data from surveys (that will be electronically downloaded) (\$40,000)
- **Pilot Test:**
 - Load data collection electronic tablets with questionnaires and beta-test in a few patients/day at dispensaries; eventually expanded to all consecutive consenting patients (\$100,000)
- **Data Analysis:**
 - The original hypotheses used in the protocol will be analyzed at different time points after adequate data (pre-specified) has been acquired (\$60,000)



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Appendix 0

Community Benefits Plan

In Re: RFA Section F Question 4



COMMUNITY BENEFITS PLAN

1.0 CONSTITUTION CARE LLC'S PLEDGE AND COMMITMENT TO COMMUNITY BENEFITS

Constitution Care LLC is committed above all to our internal community of team members, patients, partners and regulators:

- We pledge to provide our team members with a sound operating platform that gives them the opportunity to earn good wages and benefits for in return for their partnership and trust.
 - The company will only succeed if our team members succeed. We will train and mentor you and give you the ability to develop and grow into new opportunities as they arise.
 - Everything is merit based – but regulators', patients' and healthcare providers' interests always come first.
- We pledge to be responsible corporate citizens, to contribute to and support our communities and to follow the regulations and rules without deviation to ensure the flawless execution of the program
- We pledge to abide by and support the regulators, politicians, communities and members of law enforcement who have trusted us with this very sensitive program
 - We will always offer transparency and raise our hands first if we see something has gone wrong.

By taking a broad approach to supporting our communities, we hope to eventually earn a role as part of the foundation that all stakeholders can rely upon

Constitution Care LLC believes strongly in giving back to the community as evidenced by the community benefits plans implemented by its various affiliates in other Medical Marijuana states. Our corporate policy is to donate up to 15% of profits to various local charities to ensure we have a meaningful and positive impact on our community. In keeping with the spirit of community improvement, the company plans to implement a Connecticut-specific plan comprised of philanthropic support, sponsored research, community service and strategic partnerships/sponsorships.



2.0 PHILANTHROPIC SUPPORT

The following is a list of foundations and non-profits that Constitution Care LLC plans to support through philanthropic giving once licensed in Connecticut:

- Epilepsy Foundation of Connecticut
 - The Epilepsy Foundation of Connecticut is dedicated to improving the lives of people with epilepsy and their families. The organization is Connecticut's only affiliate of the national Epilepsy Foundation.
 - www.epilepsyct.com
- Lea's Foundation for Leukemia Research
 - Lea's Foundation for Leukemia Research, Inc. was formed in 1998 to honor the memory of Lea Michele Economos, who at the young age of 18 was diagnosed with leukemia, and subsequently lost her battle with the disease when she was only 28 years old.
 - Lea's Foundation raises money to fund research into the causes of and cures for leukemia and its related cancers (lymphoma, Hodgkin's lymphoma and multiple myeloma). All of the money raised by the Lea's Foundation stays in Connecticut, so all donations from Constitution Care LLC will remain local in nature.
 - Lea's Foundation also provides limited financial assistance to patients affected by leukemia and similar blood-related diseases. The Foundation further provides increased public awareness of these cancers through its participation and support of community health care programs.
 - <http://leasfoundation.org/>
- National MS Society- Connecticut Chapter
 - The Connecticut Chapter of the MS Society strives to provide knowledge and assistance to help people with Multiple Sclerosis and their families maintain the highest possible quality of life. As such, the goals of the National MS Society and Constitution Care LLC are in line.
 - <http://www.nationalmssociety.org/chapters/CTN/index.aspx>



3.0 SPONSORED RESEARCH

- University of Connecticut School of Pharmacy
 - In partnership with the University of Connecticut School of Pharmacy/Hartford Hospital Evidence Based Practice Center and the Health Outcomes Policy and Economics (“HOPE”) Collaborative Group, CC is sponsoring and participating in a proprietary research project that will iterate over the next several years beginning with the formation of the IMPACT (Improvements in Patient Ability due to Cannabis Therapy) patient registry. This will be the first such research project in the United States and provide the basis for leading clinical trials.
 - This research will be made available to the public and serve as one of the major reference points for medical providers and researchers alike, not only in the State of Connecticut but also nationwide.

- Connecticut Pharmacists Association
 - In partnership with the Connecticut Pharmacists Association in partnership with the Canadian Consortium for the investigation of Cannabinoids, CC is sponsoring and participating in ongoing, proprietary research project that will iterate over the next several years to research doses and modes of cannabis administration to measure and quantify outcomes.

4.0 COMMUNITY SERVICE

The following is a list of community service programs that Constitution Care LLC plans to participate in once licensed in Connecticut:

- Connecticut Community for Addiction Recovery
 - The Connecticut Community for Addiction Recovery (“CCAR”) organizes the recovery community, which includes people in recovery and their family members, friends and allies, to bring public awareness of addiction recovery services and provide recovery support services. In keeping with

Constitution Care LLC's substance abuse prevention plan, the company feels a strong connection to CCAR and will ask management and employees to volunteer time to assisting with the organization.

- <http://www.ccar.us/>
- Community Renewal Team (“CRT”)
 - Since 1963 the Community Renewal Team has helped individuals, families and entire communities throughout the State of Connecticut address societal issues such hunger, homelessness, addiction and rehabilitation, veterans affairs and affordable housing
 - We have already initiated a dialogue with CRT through our advisors and have begun preliminary discussions regarding the funding of the first assisted living facility for veterans as well as supporting operations throughout the State of Connecticut related to operations drug education, addiction prevention and rehabilitation.
 - <http://www.crt.org>

5.0 STRATEGIC PARTNERSHIPS/SPONSORSHIPS

The following is a list of strategic partnerships/sponsorships in which Constitution Care LLC plans to engage as a member and/or sponsor once licensed in Connecticut:

- Connecticut Police Chiefs Association
 - The Connecticut Police Chiefs Association is an organization dedicated to (1) enhancing the quality of life of the residents of the State of Connecticut, (2) aiding other government bodies within and external to the State of Connecticut in the administration of justice, ensuring that all are treated equally before the law, and (3) striving always to provide service to the public of the highest attainable quality by constantly searching for those methods that will keep Connecticut law enforcement in the forefront of public safety issues.
 - Our Chief of Security, Bernard Sullivan, has served as past President of the Connecticut Police Chiefs Association and is presently a life time member.

- <http://www.cpcanet.org/>
- Hundred Club of Connecticut
 - The Hundred Club of Connecticut is a charitable, non-profit, tax exempt organization of more than 2,400 leading citizens from all parts of Connecticut who are committed to the task of easing the financial burdens of the surviving spouse and children of police officers, volunteer and paid firefighters, and correction officers who have given their lives in the performance of their duties.
 - The Hundred Club is unique in the overall assistance it provides to the surviving spouse and children of those who have died in the line of duty. In the forty-five years of its existence, more than \$9,400,000 has been given to family members covering a multitude of financial necessities.
 - Our Chief of Security, Bernard Sullivan, is particularly passionate about this organization as is the whole of Constitution Care LLC. Mr. Sullivan is the on the Board of Directors of the Hundred Club of Connecticut and is the current President.
 - <http://www.hundredclubofct.org/>
- Our Hero's Classic golf tournament
 - Our Hero's Classic is an event hosted by the Hartford Police Union to benefit the activities of the Hartford Patrolmen's Benevolent Association ("PBA").
 - The PBA is a 501(c) designated non-profit organization chartered to provide assistance to its members and their families in times of need, provide and sponsor events to promote long term camaraderie and stress relief, and donate to charitable causes and activities in which its membership participates.
 - Constitution Care LLC will sponsor the event annually.



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Appendix P

Substance Abuse Prevention Plan

In Re: RFA Section F Question 5



SUBSTANCE ABUSE PREVENTION PLAN

1.0 SUBSTANCE ABUSE PREVENTION PLAN OVERVIEW

Constitution Care LLC cares deeply about the health and well-being of its employees, patients and community. We believe all licensed Medical Marijuana dispensaries have a responsibility to aid in the fight to combat substance abuse in the State of Connecticut through direct contributions of financial and human capital as well as offering infrastructure and logistical support. We have a stated corporate policy that requires us to contribute to 15% of our after-tax profit to local charities and not-for-profit organizations. Implementing initiatives and supporting organizations dedicated to preventing substance use disorders and treat those who are affected by alcohol or other drug misuse is rooted in our philosophy of being a good corporate citizen and steward of the State's Medical Marijuana program. Substance use disorders affect individuals, families and communities in a variety of ways, and we believe that it is paramount to offer assistance to those who suffer as a result of dependence or abuse.

Constitution Care LLC is absolutely committed to working with and supporting groups in the State of Connecticut that are committed to identifying and addressing the underlying social and familial factors that affect individuals and communities in their efforts to limit the unlawful use and abuse of all drugs. Moreover, we recognize that recent changes in healthcare policy driven by a combination of Federal legislation and limited resources at the State level have forced caregivers and charitable entities to adjust the scope of services they are able to offer, and in some cases they have been forced to adjust their overall mission

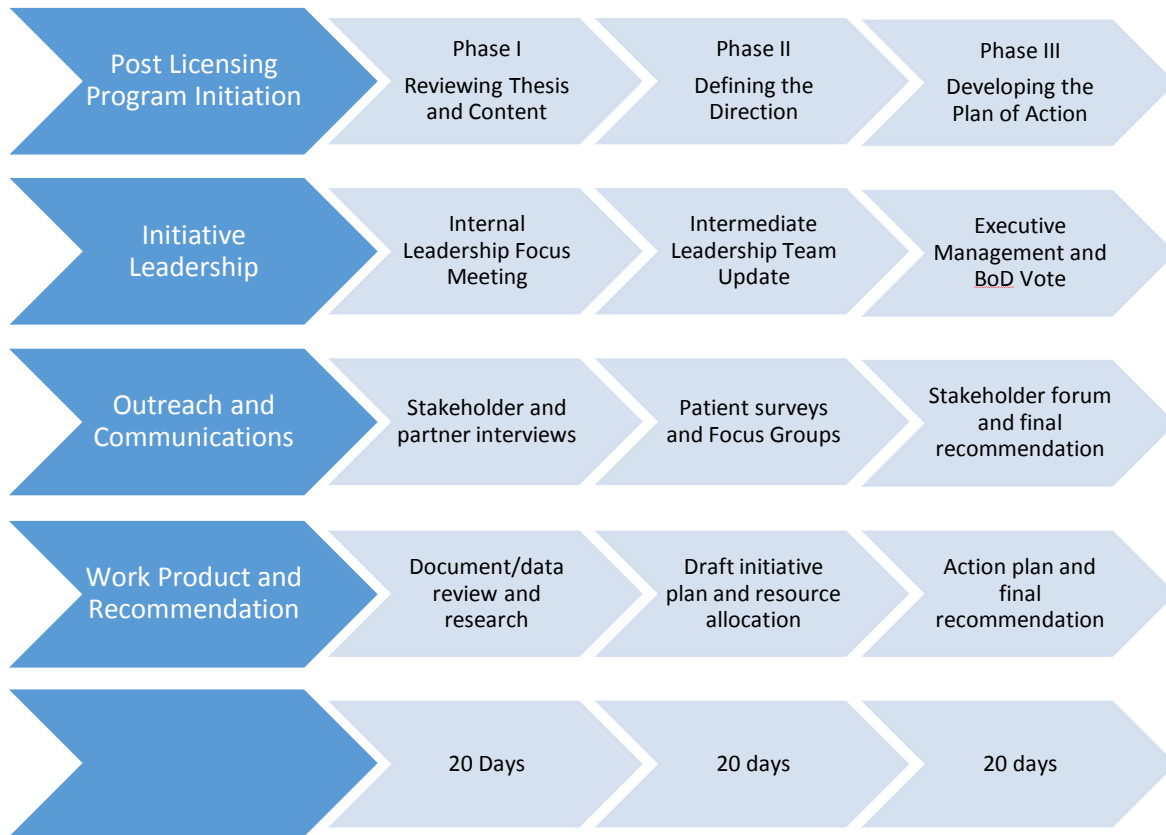
Accordingly, we intend to use our resources as efficiently as possible by supporting groups with an established infrastructure and caring approaches that do more than simply address the symptom of these underlying problems. We believe that our efforts will yield the strongest and most positive outcomes if we work towards new and innovative partnerships that build upon one another's existing strengths to address this serious issue and ensure that all of the people in our communities have the opportunity to pursue a happy and fulfilling life without the burden of alcohol or drug addiction.

To aid in the battle against substance abuse, Constitution Care LLC has created and intends to implement a comprehensive substance abuse prevention plan, a preliminary view of which is described below.

2.0 COMMUNITY AND PATIENT SUBSTANCE ABUSE PREVENTION PLAN

Our first proposed initiative will be to develop and implement a thoughtful and effective substance abuse and prevention plan with an accomplished service provider. We recognize that coordination and planning are critical to maximize efficiency and eliminate the likelihood that we operate in competition with rather than in collaboration with existing providers of similar programs.

Along those lines, we have established a simple framework for making long term financial and resource commitments to specific projects (as described below):



Once we have established a pathway forward, we will develop with our partners the metrics and timelines necessary to determine the most effective way to concentrate our efforts.

These analytical standards can be measures in a variety of ways that will adjust over time (based on practice). Every program we support must have transparent, clear objectives and timelines where leadership is engaged and constantly reviewing performance, effectiveness and resource requirements. These are monitored through regular OKR (Objectives and Key Results/Resources) reviews between initiative managers, team members responsible for execution and members from the governance committee.

Our initial objectives (to be commenced within 60 days of starting the plan per the schedule above) are to establish three independent partnerships with existing community support groups to address the following rehabilitation/prevention issues;

- i) Veteran addiction and rehabilitation¹,
- ii) Adolescent drug prevention and education, and;
- iii) Organizations which support the family and friends of those individuals combating

¹ We have already discussed supporting CRT (Community Renewal Team) on selected veterans affairs initiatives.



debilitating addictions.

Once we have identified and committed to specific programs and partners, the next requirement would be to establish a set of analytical benchmarking criteria to analyze, measure and improve the programs that we initiate or support. Targeted goals could include, but are not limited to; i) increasing participant satisfaction rates, ii) increasing medical compliance rates, iii) increasing the regularity of counseling interactions, iv) improving treatment outcomes and program compliance, v) increasing the number of participants in a given program, vi) a decline in the number of hospitalizations that (correlated with prolonged substance abuse or acute episodes of behavioral recidivism.

Independent of these efforts (which are going to rely heavily upon partners with the infrastructure and expertise to successfully manage programs like this), we are committed to unilaterally providing addiction prevention and rehabilitation counseling services to all of our patients. Upon each patient's first visit to the dispensary facility, and from time to time thereafter, patients will be informed of available substance abuse resource counseling offered by Constitution Care LLC directly and by trusted off-site third-party sources, such as Celebrate Recovery in Hartford and the Connecticut Community for Addiction Recovery in Bridgeport. Counseling will include education, support, and medical attention if necessary (provided by local hospitals or substance abuse programs).

If a patient is suspected of substance abuse, substance abuse resource counseling will be offered in a discrete manner, always with patient confidentiality in mind. Patient participation in any substance abuse prevention programs will also remain confidential and dispensary facility employees will always maintain due respect for patient privacy.

3.0 SUBSTANCE ABUSE PREVENTION PLAN PARTNERS

Constitution Care LLC intends to partner with an assortment of reputable, established and like-minded third-party substance abuse prevention programs across Connecticut, such as Celebrate Recovery in Hartford and the Connecticut Community for Addiction Recovery in Bridgeport. The dispensary facility also intends to partner with its affiliate production facility, Great River Growers LLC, if awarded a license, as well as any other Connecticut Medical Marijuana program licensee willing to enter into a fruitful partnership for the benefit of the State's patients.

Having already met with members of the Community Renewal Team ("CRT") senior team in Hartford and toured one of their rehabilitation and re-education facilities – we believe that their broad footprint will enable Constitution Care LLC a platform to assist in directly supporting community efforts in our local areas. CRT's multi-cultural approach (offering counselors who speak Spanish, Cambodian, Japanese, Vietnamese as well as English) and commitment to see every patient within one week of being referred ensures broad and immediate access to an array of recovery, mental health and substance abuse programs that includes partial hospitalization programs.



Of course, due to the scope and importance of this issue, CC also intends to reach out to Connecticut's Department of Mental Health and Addiction Services (DMHAS). DMHAS has been serving the citizens of the State for many years providing prevention services to improve the quality of life of the people of Connecticut by offering an integrated network of comprehensive, effective and efficient mental health and addiction services that foster self-sufficiency, dignity and respect. Once licensed, one of our first initiatives would be to reach out to DMHAS to find out from the State's perspective which areas need our support the most. Supporting a network of over 122 prevention coalitions, 60 community-based prevention programs and 170 community-based substance abuse programs statewide – DMHAS will be a great resource for us to refine our plan and focus our efforts.

We have no expectations that our company will receive any direct benefit from the support we provide other organizations. The purpose of this effort is to be involved with groups that are engaged in thoughtful and worthwhile prevention and treatment programs. The way in which we interact with our own patients, team members and community will enable us to reach our long term goal - to be a source of strength and support to the community and its allies to improve the lives of our patients and communities.

4.0 WORKPLACE SUBSTANCE ABUSE PREVENTION PLAN

Finally, in addition to the work we intend to undertake in the communities we operate in Constitution Care LLC is committed to provide a safe, alcohol-free and drug-free work environment in full compliance with the Drug Free Workplace Act of 1988. Substance abuse is incompatible with the health and safety of our employees, and the company does not permit it.

Dispensary facility employees are expected to perform their duties in a satisfactory manner and without impairment due to drugs or alcohol. Compliance with this policy is a condition of employment for all employees, without exception, whether full-time, part-time or temporary.

The unauthorized use, consumption, possession, manufacture, sale, exchange or purchase of any illegal substances at the dispensary facility premises or at any time when representing the company is strictly prohibited and will subject the offending staff member to disciplinary action, including possible discharge. Prescription drugs ordered by a physician, which do not interfere with job performance or threaten safety, health, security or property, are permitted. Constitution Care LLC employees should never come to work under the influence of alcohol, drugs or any other substance that could impair their ability to perform their job or jeopardize the safety of others.

A failure by any dispensary facility employee to comply with the laws, rules, regulations or guidelines governing Constitution Care LLC's business, Constitution Care LLC's code of conduct and substance abuse policy, or any other Constitution Care LLC policy or requirement, may subject Constitution Care LLC and the staff member(s) involved to civil and/or criminal penalties or prosecution, which is patently unacceptable.

Non-compliance with Constitution Care LLC's substance abuse prevention plan includes failure to properly supervise subordinates to prevent and detect misconduct. It also includes knowing



about violations, but failing to report them. Failure to abide by the substance abuse prevention plan may result in disciplinary action against the employees and their supervisors, including possible termination of employment and legal proceedings if warranted.

If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect such employee's job performance or adversely affect such employee's safety or that of others in the workplace, the manager may request an alcohol and/or drug screening. Reasonable suspicion leading to such screening request may be based on objective symptoms, such as an employee's appearance, behavior or speech.

In the unfortunate event a team member does develop or have a substance abuse problem, we offer our employees' healthcare benefits as part of their employment package and would encourage them to seek professional help to address any such issue head on. To that end, if an employee has the courage to preemptively come forward and ask for assistance, provided there is no basis for dismissal due to non-performance or a breach in compliance, Constitution Care LLC has adopted a leave of absence program so team members can seek help with the comfort knowing that their job is waiting for them if they successfully complete the rehabilitation program and stay true to its tenets.