THE CAREGIVER PATIENT CONNECTION

Department of Public Health
Medical Use of Marijuana Program
RMD Applications
99 Chauncey St., 11th Floor
Boston, MA 02111

February 1, 2017

Response to MOP Request for Information

To Whom It May Concern:

The Caregiver-Patient Connection respectfully submits the following requested responses from the Department's January 26, 2017 letter to the applicant. Please find the following:

1. A completed attestation page (page #34)
2. The applicant will submit loan and lease agreements, as well as an independent legal opinion ensuring that the financial agreements described in our response to Questions C.12 and C.14, are in compliance with the non-profit requirements of 105 CMR 725.100(A)(1) and the Guidance for Registered Marijuana Dispensaries Regarding Non Profit Compliance, as well as an opinion from an appraiser regarding said agreements prior to receiving a PCR. These agreements have not been drafted nor executed at this time.
3. A revised answer to Question C. 15.
4. A revised answer to Question E.21 with the correct section of the regulation identified.
5. A revised answer to Question E.24 with a completed and clarified response.
6. A completed response to Question E.26 with the correct section of the regulations identified.
7. A completed response to Question E.27 that clarifies what times are being randomized.
8. A completed response to Question E.33 with the correct regulations cited.

Regards,

Dean Iandoli
Vice-President
The Caregiver-Patient Connection
Signed under the pains and penalties of perjury, I, the authorized signatory of the non-profit applicant corporation, agree and attest that all information included in this application is complete and accurate and that I have an ongoing obligation to submit updated information to the Department if the information presented within this application has changed.

[Signature]

Signature of Authorized Signatory

[2/1/17]

Date Signed

[Print Name]

Print Name of Authorized Signatory

[Title]

Title of Authorized Signatory

I hereby attest that if the corporation is allowed to proceed to submit a Siting Profile, the corporation is prepared to comply with all Siting Profile requirements.

[Signature]

Signature of Authorized Signatory

[2/1/17]

Date Signed

[Print Name]

Print Name of Authorized Signatory

[Title]

Title of Authorized Signatory

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: [Initials]
15. Please identify any contract or agreement, executed or proposed, under which a percentage or portion of the applicant’s revenue will be distributed to a third party and summarize the terms of any such agreement or contract.

There are no contracts, executed or proposed, under which a percentage or portion of CPC revenue will be distributed to a third party.

The applicant agrees and attests that it will operate in compliance with all applicable state laws and regulations, including, but not limited to, laws regarding child support and taxation, as well as the “Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance.”

[Signature]
Signature of Authorized Signatory

[Date Signed]
Date Signed

[Print Name]
Print Name of Authorized Signatory

[Title]
Title of Authorized Signatory

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: [Initials]
SECTION E. OPERATIONS

21. Provide a summary of the RMD's operating procedures for the cultivation of marijuana for medical use.

The Caregiver-Patient Connection's operating procedures for the cultivation of marijuana will comply with 105CMR725.105 and 105CMR 500, as well as all applicable cultivation, sampling and testing requirements as described in the Department's Protocol for Sampling and Analysis of Finished Medical Marijuana Products and MIP's for Massachusetts Registered Medical Marijuana Dispensaries, and Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries will include the following:

The RMD will cultivate at its' location for only the Caregiver-Patient Connection RMD and other RMD's per 105 CMR 725.105(B)(1) and (2).

All phases of cultivation of marijuana shall take place in a designated locked, limited access areas that are monitored by a surveillance camera system in accordance with 105 CMR 725.110(D)(d)-(i).

All cultivation will be consistent with 105CMR725.105 (B)(1)(d-f).

Soil for cultivation shall meet the U.S. Agency for Toxic Substances and Disease Registry's Environmental Media Evaluation Guidelines for residential soil levels and shall be sampled and analyzed in accordance with the Department's Protocol for Sampling and Analysis of Environmental Media for Massachusetts RMD's. Marijuana waste will be disposed in compliance with 105 CMR 725.105(f).

The cultivation process shall use best practices to limit contamination, including, but not limited to mold, fungus, bacterial diseases, rot, pests, non-organic pesticides, mildew and any other contaminants as posing potential harm.

The cultivation facility will be maintained in an environment, which will be cleaned on a daily basis and kept free of any contaminants posing potential harm.

Marijuana will be cultivated and harvested in traceable "cultivation batches," such that all marijuana within a cultivation batch has been produced with the same seed or plant stock, soil or other solid growing media, water, other agricultural/ hydroponic inputs, and growing conditions in said cultivation batch. Cultivation batches will be sequentially numbered and traced throughout post harvest production steps, and manufacturing/processing batch numbers will be included on the labels of all products to facilitate product recalls per 105CMR725.105(E)(2)(e) and 105 CMR 725.105(E)(3)(g).

Marijuana in the process of cultivation will be accessible only to the minimum number of specifically authorized dispensary agents essential for efficient operation, shall be returned to a secure location immediately after the completion of the process or at the end of the business day and shall be securely locked with security measures consistent with 105CMR725.110(D)(1)(d)-(i).
33. Provide a summary of the RMD’s operating procedures for record keeping.

Record keeping shall be in accordance with 105 CMR 725.105 and shall include the following records:

- Operating procedures as required by 105CMR725.105(A);
- Inventory records as required by 105CMR725.105(G);
- Seed to sale tracking as required by 105CMR725.105(G)(5);
- Personnel records as required by 105CMR725.105(I)(4);
- Business records as required by 105.CMR725.105(I)(5);
- Waste disposal records as required by 105CMR725.105(J)(5); and
- Manifests for Transportation records as required by 105CMR 725.110 (E)(2).

These records will be accessible to DPH and will be stored in such a manner as to be immediately accessible to DPH upon request.

In the event of a closure CPC will ensure that all records will be kept for at least 2 years at the expense of CPC in a form and location acceptable to the Department.