



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
**Medical Use of Marijuana Program**  
99 Chauncy Street, 11<sup>th</sup> Floor, Boston, MA 02111

CHARLES D. BAKER  
Governor

KARYN E. POLITO  
Lieutenant Governor

MARYLOU SUDDERS  
Secretary

MONICA BHAREL, MD, MPH  
Commissioner

Tel: 617-660-8370  
[www.mass.gov/medicalmarijuana](http://www.mass.gov/medicalmarijuana)

December 28, 2015

RECEIVED

FEB 09 2016

MA Dept of Public Health  
99 Chauncy Street  
Boston, MA 02111

Mr. Alan Rothenberg  
Olde World Remedies, Inc.  
One Longfellow Place, Suite 3811  
Boston, MA 02114

Re: Request for Information

Dear Mr. Rothenberg,

This letter is to inform you that the Department of Public Health ("Department") has reviewed Olde World Remedies, Inc.'s *Management and Operations Profile* (Application 2 of 2). The *Management and Operations Profile* requires the following information before the Department may complete its evaluation:

1. The applicant must submit Character and Competency forms for Suzanne Rothenberg, Paul Genzberg, and Matthew Skomurski.
2. Section 7.03 of the applicant's Bylaws does not appear compliant with the Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance (<http://www.mass.gov/eohhs/docs/dph/quality/medical-marijuana/applications/non-profit-compliance-guidance.pdf>). Please submit amended bylaws that comply with the Nonprofit Guidance.
3. On the Employment and Education form, Alan Rothenberg did not state his degree. Please have him specify the degree acquired and resubmit the form.
4. On the Employment and Education form, Matthew Skomurski did not state the year that he earned his degree. Please have him specify the year his degree was acquired and resubmit the form.
5. In the table in Section F, the dollar figures identified in the column "Amount of Initial Capital Committed" are not consistent with percentages identified in the column "Percentage of Initial Capital Committed." Please resubmit a completed table in Section F, in which the dollar figures are consistent with the percentages.

6. In response to Question D.17, the applicant did not describe the length of experience of the Corporation's Chief Executive Officer, Chief Operations Officer, or Chief Financial Officer with running a non-profit organization or business. Applicant must resubmit a completed response to Question D.17, including that information.
7. In response to Question D.18, the applicant did not describe the length of experience of the Corporation's Chief Executive Officer, Chief Operations Officer, or Chief Financial Officer with providing health care services. Applicant must resubmit a completed response to Question D.18, including that information.
8. In response to Question D.19, the applicant did not describe the length of experience of the Corporation's Chief Executive Officer, Chief Operations Officer, or Chief Financial Officer with providing services for marijuana for medical purposes. Applicant must resubmit a completed response to Question D.19, including that information.
9. In response to Question D.20, the applicant did not describe the length of experience of the Corporation's individual responsible for RMD security plan and security operations with providing services for marijuana for medical purposes. Applicant must resubmit a completed response to Question D.20, including that information.
10. In its response to Question E.24, the applicant did not fully answer the question. Instead, the applicant largely cited regulations and stated that the Chief Security Officer will comply with them. Applicant must resubmit its response to Question E.24 that fully and adequately answers the question, including providing a summary of operating procedures for the provision of security at the RMD, not merely the responsibilities of the Chief Security Officer.
11. In its response to Question E.25, the applicant refers to "105 CMR: Department of Public Health." This citation unclear. Applicant must resubmit a completed response to Question E.25 that identifies the correct section of the Regulations.
12. Also in its response to Question E.25, applicant states, "As Approved by the Public Health Council – Last Modified 5.8.13." This appears to be an editing error. Applicant must resubmit a completed response to Question E.25 that corrects the editing error.
13. In the applicant's response to Question E.30, it is not clear whether the applicant intends to comply with the requirements in 105 CMR 725.200. Applicant must resubmit a completed response to Question E.30 that complies with 105 CMR 725.200.
14. In response to Question E.31, the applicant refers to "105 CMR 725(1)(4)." This citation is unclear. Applicant must resubmit a completed response to Question E.31 that identifies the correct section of the Regulations.

15. In its response to Question E.32, the applicant refers to “105 CMR.” This citation unclear. Applicant must resubmit a completed response to Question E.32 that identifies the correct section of the Regulations.
16. Also in its response to Question E.32, applicant states, “Pursuant to 105 CMR 725.010(H), They will be asked to fill out a patient registration form and in return be given a registration card to be used at each of their following visits.” 105 CMR 725.010(H) pertains to certification time periods, and not the filling out of patient registration cards at the proposed RMD. Applicant must resubmit a completed response to Question E.32 that clarifies this citation.
17. Also in its response to Question E.32, the applicant refers multiple times to a “registration” card. It is unclear whether the applicant is referring the Department of Public Health-issued registration card or the registration card issued by Olde World Remedies. Applicant must resubmit a completed response to Question E.32 that clarifies what type of registration card the applicant is referring to in each instance.
18. The applicant’s response to Question E.33 is not clearly written. Applicant must resubmit its response to Question E.33 with a clearly written response.
19. In its response to Question E.34, applicant states, “The materials will be available for the hearing-impaired as well as in many different languages at a low reading level.” Pursuant to 105 CMR 725.105(K), “Educational materials must be available in languages accessible to all patients served by the RMD, including for the *visually- and* [emphasis added] hearing-impaired.” Applicant must resubmit a completed response to Question E.34 that clarifies that educational materials will also be made available and accessible for patients that are visually-impaired.
20. In its response to Question E.35, applicant does not fully answer the question by providing a summary of the RMD’s operating procedures for patient or personal caregiver home-delivery, and instead only addresses the transportation manifest. Applicant must resubmit a completed response to Question E.35 that fully answers the question.
21. In its response to Question E.36, applicant states, “Financial Aide will only be available to patients who meet the criteria of an accepted patient by having a valid registration card, valid identification, verification of their income, and approved application.” It is not clear that the applicant intends to use eligibility factors that comply with 105 CMR 725.004 which defines “Verified Financial Hardship” to mean “that an individual is a recipient of MassHealth, or Supplemental Security Income, or the individual’s income does not exceed 300% of the federal poverty level, adjusted for family size.” Applicant must resubmit a completed response to Question E.36 that complies with the definition of Verified Financial Hardship.

If the applicant has been requested to resubmit their response to a question, please do so using the page on the application form for that particular question, and include an initialed attestation at the bottom of the

page. The applicant need not resubmit the entire application and may submit only the page for the particular question that needs to be submitted.

Please remember to type all responses in the information or materials resubmitted to the Department, other than any required signatures, as well as include the name of the Applicant Non-Profit Corporation *and* the number of the application (e.g., Application 1 of 1) at the top of each page of the resubmitted information or materials.

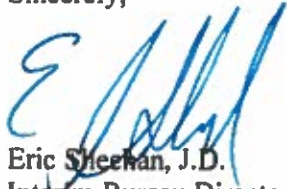
Please resubmit the additional or revised information as outlined above, via U.S. mail or hand-delivery, to:

Department of Public Health  
Medical Use of Marijuana Program  
RMD Applications  
99 Chauncy Street, 11<sup>th</sup> Floor  
Boston, MA 02111

Upon receipt, the Department will review the information and will notify the applicant if it is invited to submit a *Siting Profile* or if further information is required before the applicant may proceed.

If you have questions or need assistance, you may contact the Department at 617-660-5370 or [RMDapplication@state.ma.us](mailto:RMDapplication@state.ma.us).

Sincerely,



Eric Sheehan, J.D.  
Interim Bureau Director  
Bureau of Health Care Safety and Quality  
Massachusetts Department of Public Health

## RESOLUTION NUMBER 2

**WHEREAS**, the Board of Directors of the Olde World Remedies Inc. (The Organization) deems it to be in the best interests of the Organization that the following actions be taken by the Directors of this corporation pursuant to this Resolution;

**NOW, THEREFORE, BE IT RESOLVED** that, pursuant to applicable law, the undersigned, being all of the Directors of this corporation hereby consent to, approve, and adopt the following:

### BOARD RESOLUTION APPROVING AMENDMENT OF BYLAWS OF OLDE WORLD REMEDIES, INC A NON-PROFIT CORPORATION

**RESOLVED FURTHER**, that Section 7.03 “CONTRACTS WITH DIRECTORS AND OFFICERS” of the Bylaws of this corporation is hereby amended to delete such Section in its entirety and to replace such Section with the following:

**7.03 REAL ESTATE:** Payment for real estate purchased or leased by The Organization should reflect fair market value for the property in question, particularly if a related party transaction is involved. The Organization must be prepared to provide an appraisal of the property’s purchase or rental value by a Massachusetts licensed real estate appraiser specializing in commercial property to demonstrate compliance with the Regulations.

**RESOLVED FURTHER**, to add two sections to ARTICLE VII, after section 7.03 as follows:

**7.04 COMPENSATION FOR EMPLOYEES:** Compensation for employees should be commercially reasonable for the medical use of marijuana market or a comparable industry. If required, The Organization must be prepared to provide an analysis of employee compensation by an independent compensation consultant to demonstrate compliance with the Regulations.

**7.05 BOARD OF DIRECTORS: CONFLICTS OF INTEREST AND COMPENSATION:**

The Organization will evaluate the independence of its Board and ensure that conflicts of interest do not undermine the Board's ability to serve its purpose effectively. If The Organization determines it needs to compensate members of its Board of Directors, it should be prepared to demonstrate -when required- that the decision to do so is compliant with the applicable Regulations.

**RESOLVED FURTHER**, that the officers of this corporation are, and each acting alone is, hereby authorized to do and perform any and all such acts, including execution of any and all documents and certificates, as such officers shall deem necessary or advisable, to carry out the purposes and intent of the foregoing resolution.

**RESOLVED FURTHER**, that any actions taken by such officers prior to the date of the foregoing resolutions adopted hereby that are within the authority conferred thereby are hereby ratified, confirmed and approved as the acts and deed of this corporation.

**BE IT FURTHER RESOLVED** that all other provisions of the Bylaws as adopted shall remain in effect and the foregoing amendment shall be incorporated into the standing Bylaws of Olde World Remedies Inc.

**PASSED AND ADOPTED** this the 5th day of February 2016 by a unanimous vote of the Board of Directors of Olde World Remedies Inc.:

1. Paul Genzburg, Director: Yes
2. Suzanne Rothenberg, Director: Yes
3. Alan Rothenberg, Director: Yes

Signed and dated by the President of the Board of Directors of Olde World Remedies Inc on this the 5th day of February, 2016.

**APPROVED:**  
Signature:   
Name: Alan Rothenberg  
President of the Board

**ATTEST:**


Signature: 

Name: Suzanne Rothenberg

Clerk

### **CERTIFICATION**

**I HEREBY CERTIFY** that the foregoing is a true and correct copy of a resolution regularly presented to and adopted by the Board of Directors of Olde World Remedies Inc. and that such resolution is duly recorded in the minute book of this corporation; that the officers named in said resolution have been duly elected or appointed to, and are the present incumbents of the respective offices set after their respective names; and that the signatures set above their respective names are their true and genuine signatures.

  
\_\_\_\_\_  
Suzanne Rothenberg  
Clerk

## SECTION D. EMPLOYMENT AND EDUCATION FORM

This Employment and Education form must be completed and signed by each of the following individuals: The Corporation's Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity responsible for the RMD security plan and security operations. Submit one Employment and Education form for each of the above individuals when submitting a *Management and Operations Profile* to the Department of Public Health.

**Name**

Alan M Rothenberg

**Residential Address**

[REDACTED]

**Title (at applicant non-profit corporation)**

CEO, COO, and CFO

**Name of Applicant Non-Profit Corporation**

Olde World Remedies, Inc.

**Highest Education Attained – Institution, Degree, and Year**

Attended Boston University Engineering School 1981-1985 BS General Engineering

**Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.**

Employer	Title	Time Period
Olde World Remedies, Inc	CEO	2015-
The Real Magic Potion Co.	CEO	2007-2015
Diffraction Ltd.	COO/CFO	2003-2007
Lehman Bros. /Rainmaker investments	VP/Director	2000-2003
JuniorNet Corp.	CEO	1996-2000



Applicant Non-Profit Corporation Olde World Remedies, Inc.

Rich's Dept. Stores	Senior Store Manager/MIS Manager/ Security Manager	1990-1996
---------------------	---	-----------

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

  
\_\_\_\_\_  
Signature of the Individual

2/3/16  
Date Signed

## SECTION D. EMPLOYMENT AND EDUCATION FORM

This Employment and Education form must be completed and signed by each of the following individuals: The Corporation's Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity responsible for the RMD security plan and security operations. Submit one Employment and Education form for each of the above individuals when submitting a *Management and Operations Profile* to the Department of Public Health.

**Name**

Matthew Skomurski

**Residential Address**

[REDACTED]

**Title (at applicant non-profit corporation)**

Director of Cultivation & Operations

**Name of Applicant Non-Profit Corporation**

Olde World Remedies, Inc.

**Highest Education Attained – Institution, Degree, and Year**

Bachelor's of Science University of Connecticut , 2013



**Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.**

Employer	Title	Time Period
Private Employer	Gardener	June 2013 – October 2013
University of Connecticut – Plant Science Department	Grower / Researcher	May 2012 – September 2012
University of Connecticut – Ecology & Evolutionary Biology Collections Greenhouse	Plant Care Technician	September 2011 – May 2013
University of Connecticut – Soil Science Lab	Lab Assistant	September 2009 – May 2010

Applicant Non-Profit Corporation Olde World Remedies, Inc.

--	--	--

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

   
\_\_\_\_\_  
Signature of the Individual

2/3/16  
Date Signed

## SECTION D. EMPLOYMENT AND EDUCATION FORM

This Employment and Education form must be completed and signed by each of the following individuals: The Corporation's Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity responsible for the RMD security plan and security operations. Submit one Employment and Education form for each of the above individuals when submitting a *Management and Operations Profile* to the Department of Public Health.

**Name**

Nick Messer

**Residential Address**



**Title (at applicant non-profit corporation)**

Master Grower

**Name of Applicant Non-Profit Corporation**

Olde World Remedies

**Highest Education Attained – Institution, Degree, and Year**

Plymouth State University  
Have 1 class left  
Major: Finance  
Minor: Economics  
Time: 2008-

**Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.**

<b>Employer</b>	<b>Title</b>	<b>Time Period</b>
TopCrop Consulting	CEO	2015-2016
New Age Builders	Owner	2009-Present

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

  
Signature of the Individual

01-27-2016

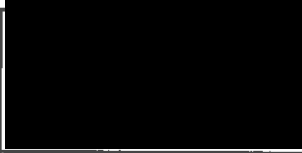
Date Signed

**SECTION D. EMPLOYMENT AND EDUCATION FORM**

This Employment and Education form must be completed and signed by each of the following individuals: The Corporation's Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity responsible for the RMD security plan and security operations. Submit one Employment and Education form for each of the above individuals when submitting a *Management and Operations Profile* to the Department of Public Health.

**Name**

Kevin Young

**Residential Address****Title (at applicant non-profit corporation)**

Master Grower

**Name of Applicant Non-Profit Corporation**

Olde World Remedies

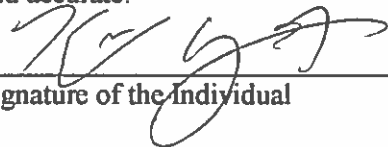
**Highest Education Attained – Institution, Degree, and Year**

Plymouth State University  
Have 1 class left  
Major: Finance  
Minor: Economics  
Time: 2008-

**Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.**

<b>Employer</b>	<b>Title</b>	<b>Time Period</b>
TopCrop Consulting	CEO	2015-2016

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

  
\_\_\_\_\_  
Signature of the Individual

01-27-2016

\_\_\_\_\_  
Date Signed

**SECTION F. CAPITAL CONTRIBUTORS**

List all persons and entities known to date that are committed to contributing 5% or more of initial capital to operate the proposed RMD. For entities contributing initial capital to operate the proposed RMD, list the entity's Chief Executive Officer/Executive Director and President/Chair of the Board of Directors.

Attach additional tables if needed.

Individual Name	Amount of Initial Capital Committed	Percentage of Initial Capital Committed
Harvey E. Rothenberg	\$ 650,000.00	46.43%
Judith Rothenberg	\$ 650,000.00	46.43%
Alan Rothenberg	\$ 100,000.00	7.14%
	\$	
	\$	

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: AR



**SECTION D. EXPERIENCE**

16. Attach an *Employment and Education* form (use template provided) for each of the following individuals: The Corporation's Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity responsible for the RMD security plan and security operations.
17. Describe the experience, and length of experience, of the Corporation's Chief Executive Officer, Chief Operations Officer, and Chief Financial Officer with running a non-profit organization or business.

Mr. Rothenberg has 35 years of experience running businesses both non-profit and for profit. He was COO, and CFO of diffraction ltd, working directly as a contractor for the DOD, SOCOM, and Special forces developing highly classified materials. Built 3 level 1/1000 clean rooms. Led several highly detailed inspections and physical and financial audits with our customers, the DOD, SOCOM and the State of Vermont. As CEO formed 2 non-profit corps. to help children. Built largest safe on-line content provider from scratch which employed over 150 people while having exclusive deals with 60 major contractors. He built one of the leading technology companies in the industry as well as developing new technologies. Mr. Rothenberg implemented Sarbanes-Oxley approved accounting methods. Mr. Rothenberg worked side by side while leading teams of world class scientists, who worked with lasers in the light spectrum both common and highly classified. He also created a level 3 secure facility for military R&D and production.

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: MR

18. Describe the experience, and length of experience, of the Corporation's Chief Executive Officer, Chief Operations Officer, and Chief Financial Officer with providing health care services.

As CEO Mr. Rothenberg founded a company that currently makes macrosystems for the healthcare industry and was involved with this company for four years. Analyzed, researched and implemented all the healthcare policies for his numerous companies during the 35 years he ran them. These companies ranged in size from 12 to 2,600 employees. He is very proactive [REDACTED] the past 10 years doing extensive research to find new advancements in treatments. Mr. Rothenberg is also very involved with the Kennek Foundation for the past 2 years which works closely with the Shriners and the Hasbaro Children's Hospital.

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: AR

19. Describe the experience, and length of experience, of the Corporation's Chief Executive Officer, Chief Operations Officer, and Chief Financial Officer with providing services for marijuana for medical purposes.

Alan Rothenberg has studied extensively the field of providing services for the use of marijuana for medical use for the past four years. He has read numerous publications on this subject, including the health benefits, production, DNA strains, rules and regulations as they pertain to the medical use of marijuana in the state of Massachusetts. Mr. Rothenberg has also completed an eight week semester at the New England Grass Roots Institute covering the history of cannabis, politics, science, the Endocannabinoid system, setting up a grow room, cooking with cannabis and Mass Regulations. He is presently enrolled in the Cannabis Training University for Marijuana to obtain his Masters Certificate. For the the past six months he has been doing research and development with Port City Relief one of Maine's most respected and highest rated growers and caregivers.

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: AR

20. Describe the experience, and length of experience, of the Corporation's individual/entity responsible for marijuana for medical use cultivation operations and individual/entity responsible for the RMD security plan and security operations with providing services for marijuana for medical purposes.

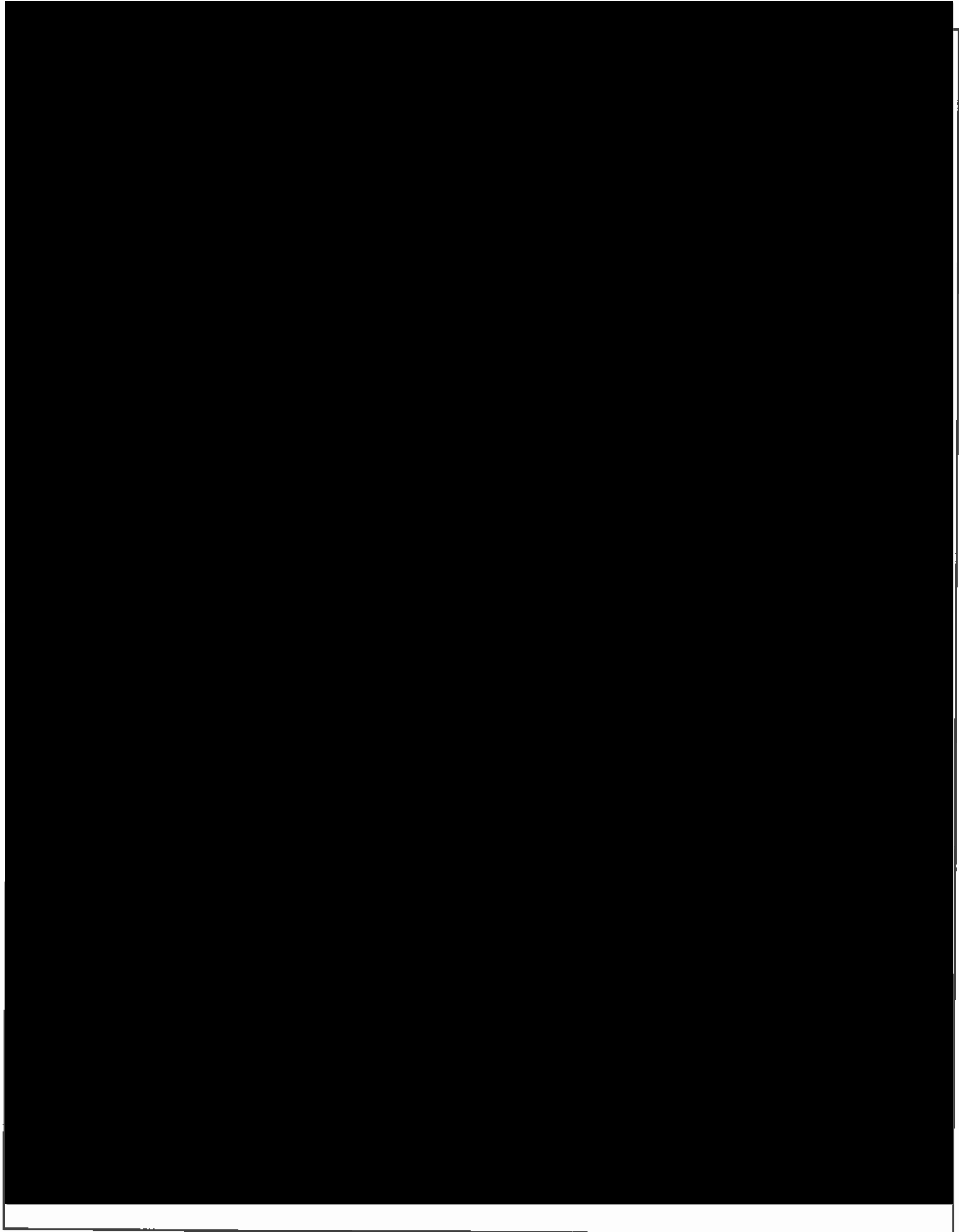
Mr. Genzberg is responsible for security of the RMD he held the senior-most security position at GE Medical Systems (now GE Healthcare). He was in Diplomatic Security in the U.S. State Department and recently headed the security divisions of leading financial corporations in the U.S. He was V.P. of Global Security for Ziff Brothers investments, their personal family. Prior to that position he was Chief Security Officer for financier George Soros and family, The Soros Foundation and Soros Fund Management. While in the U.S. State Dept. he served tours in NY, Moscow, El Salvador and Beirut. He Joined T&M Protection Resources a worldwide provider of security, consulting and investigative solutions where he was the security advisor and principal consultant for a New York consortium for a year for their growth facilities and dispensaries.

Matthew Skomurski is responsible for cultivation operations as Lead Horticulturist. Matthew has a B S in Horticulture from the University of Conn. This intensive agricultural education coupled with well-rounded job experience in greenhouses, labs, fields and gardens help increase expertise in plant health. Working in Ecology and Evolutionary Biology collections greenhouse for 3 years strengthened large scale indoor grow conditions. Matthew is well trained in greenhouse management, integrated pest control, nutrient disorders, organic and conventional fertilizers. His experience as a Cannabis cultivator is the summation of about 2 years of indoor cultivation for personal use as a medical patient and research specifically related to Cannabis cultivation for more than 6 years. Matthew is also licensed Journeyman Plumber, useful for installation of hydroponics and drainage systems.

Nicholas Messer is Master Grower at OWR. He is responsible for business operations of a large scale medical marijuana grow and retail operation in ME. He went to school for Finance and economics. He started a consulting company TopCrop for Marijuana which focuses on the scope, price, rough-in and finish installation, growing services are also available. While working hands on with marijuana for the past 3 years he has learned to manage plants, test labs, organic and salt based fertilizers, and integrated organic pest management. He is well rounded in the marijuana industry and a very successful master grower and caretaker.

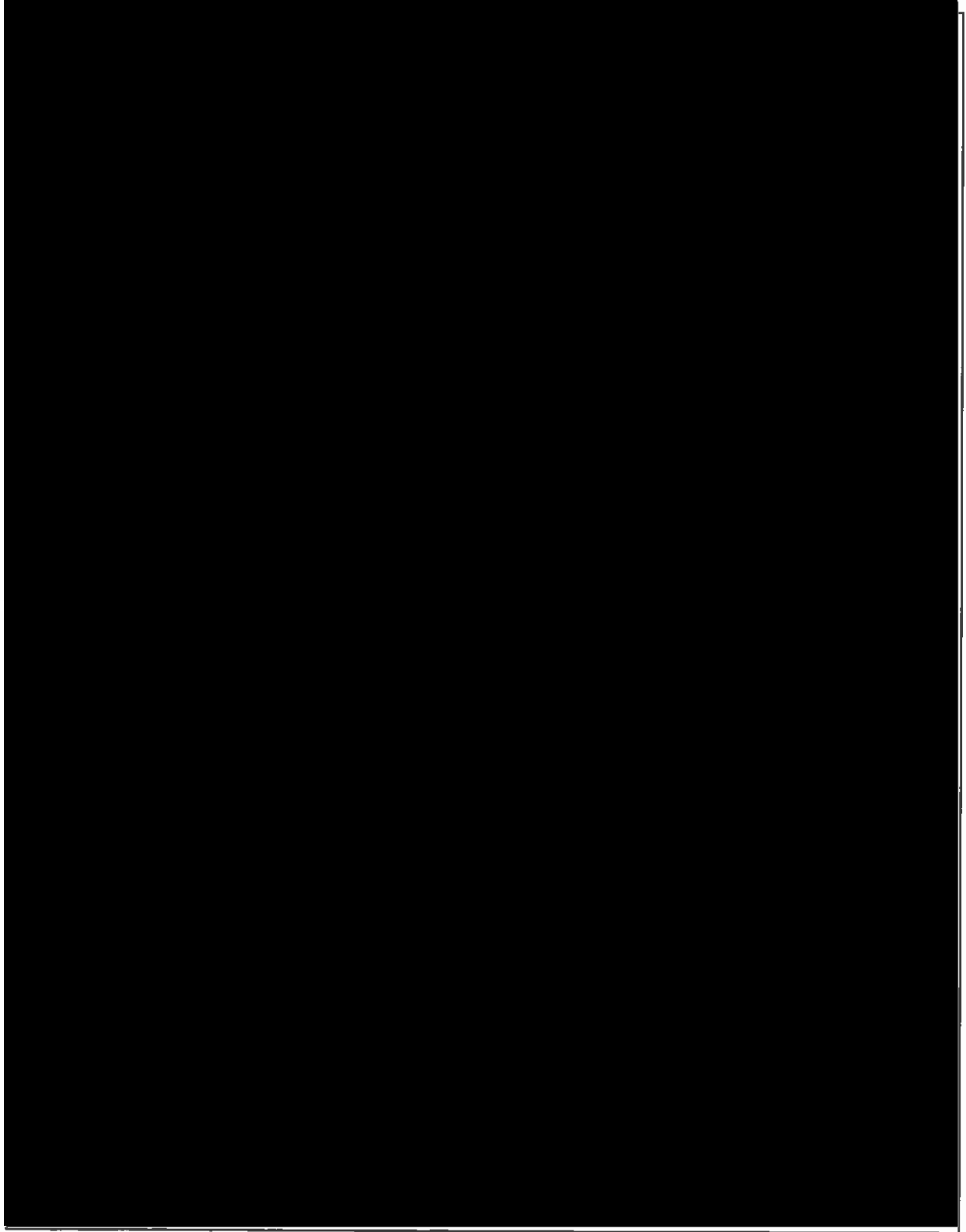
Kevin Young is Master Grower at OWR. He studied Marijuana in every aspect for over 6 years. He attended Plymouth State he majored in Finance and minored in Economics. He moved to ME and started TopCrop Consulting which consults to the Marijuana industry. Over the next two years the company became a very successful business helping large companies and individuals grow high quality marijuana. Kevin owns Port City Relief a caregiver/patient lounge. His expertise and knowledge allows him to give the patient proper medicine they need he has dealt with all aspects of the business from growing to dispensing medicine.


24. Provide a summary of the RMD's operating procedures for the provision for security at the RMD.



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: RO

25. Provide a summary of the RMD's operating procedures for the prevention of the diversion of marijuana.



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: 

30. Provide a summary of the RMD's operating procedures for maintaining confidentiality of registered qualifying patients, personal caregivers, and dispensary agents, as required by law.

OWR, Inc. will comply with all requirements in 105 CMR 725.200.(A)-(D) and all sub paragraphs with these sections. All Patient information collected will be handled according to the Mass law that pertains to patient information which states that all patient information collected in a healthcare facility be kept fully confidential. Our patient data will be kept and maintained by MJ Freeway which has extra security built into their programs to ensure additional protection. We will have at least one member on our staff trained in the HIPPA laws. All staff will be trained and will be expected to adhere to the patients rights to complete confidentiality as required by the law and will be a condition of their employment. Caregivers and Dispensary agents will also be required to adhere to this strict policy as part of their employment as association OWR, Inc.

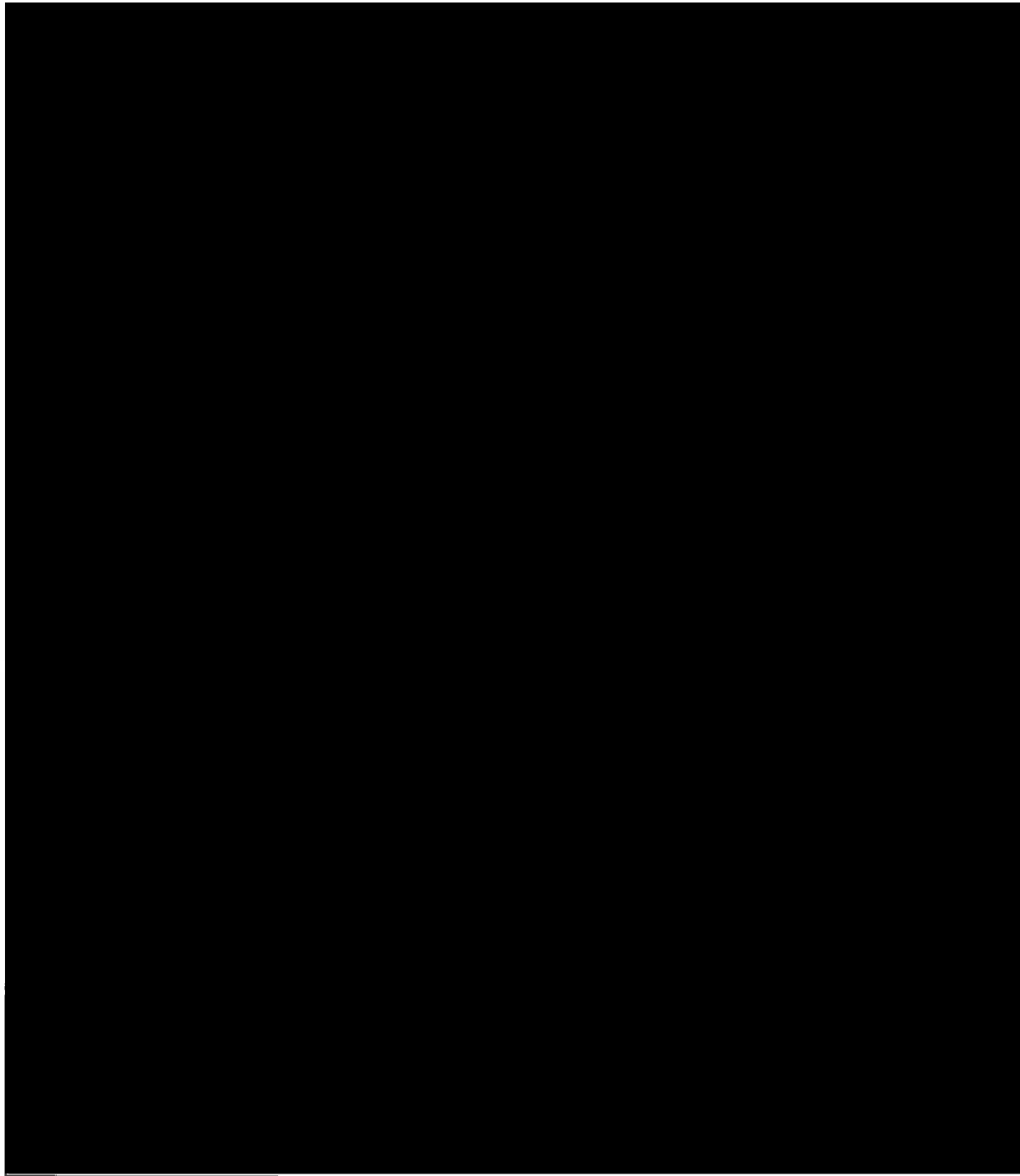
Information on this page has been reviewed by the applicant and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: AD

## 31. Provide a summary of the RMD's personnel policies.

At OWR, Inc. human resources will be responsible for keeping policies up-to-date. The personnel policies will be found within the employee handbook and will be given to new employees to review, and they will be asked to sign a statement saying that they read and understand the policies. The personnel policy section will govern how the business is run. Within this section of the handbook, employees will understand Training and Orientation, Employee Benefits, Work Schedule, Breaks and Leave, Salaries and Pay Schedule, Performance Reviews and Promotions, Terminating Employment, and any other company policies such as dress code or drug policy. OWR will hold all employees to the highest standards. Before employment, all applicants will be pre-screened for compliance with the DPH regulations. All employee records will be kept in a secure location.



32. Provide a summary of the RMD's operating procedures for dispensing of marijuana for medical use.



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: AD

## 33. Provide a summary of the RMD's operating procedures for record keeping.

Mj Freeway has industry-leading software & professional services that help maximize efficiency from the grow to the sale of the marijuana. It will help us meet or exceed any State or Federal requirement for tracking cannabis with a clear and understanding system. MJ Freeway is broken up into three parts.

Growtracker will allow us to easily manage our grow operation from seed to harvest. This system is designed exclusively for grow production and tracking management.

MixTracker easily manages the entire manufacturing process for marijuana products, such as edibles, concentrates, and extracts. Any by-product of marijuana can be tracked in order to prevent problems from occurring.

Gram tracker allows us to track every gram and every dollar and has customized inventory tracking tools. It will help control costs and maximize efficiency.

OWR will make all records from MJ Freeway and any other method of record keeping of our RMD available for inspection by the Department, upon request. Written records that are required and are subject to inspection include but are not necessarily limited to all records required in any section of 105 CMR 725.000, in addition to the following:

- (1) Operating procedures as required by 105 CMR 725.105(A);
- (2) Inventory records as required by 105 CMR 725.105(G);
- (3) Seed-to-sale tracking records for all marijuana and MIPs as required by 725.105(G)(5);

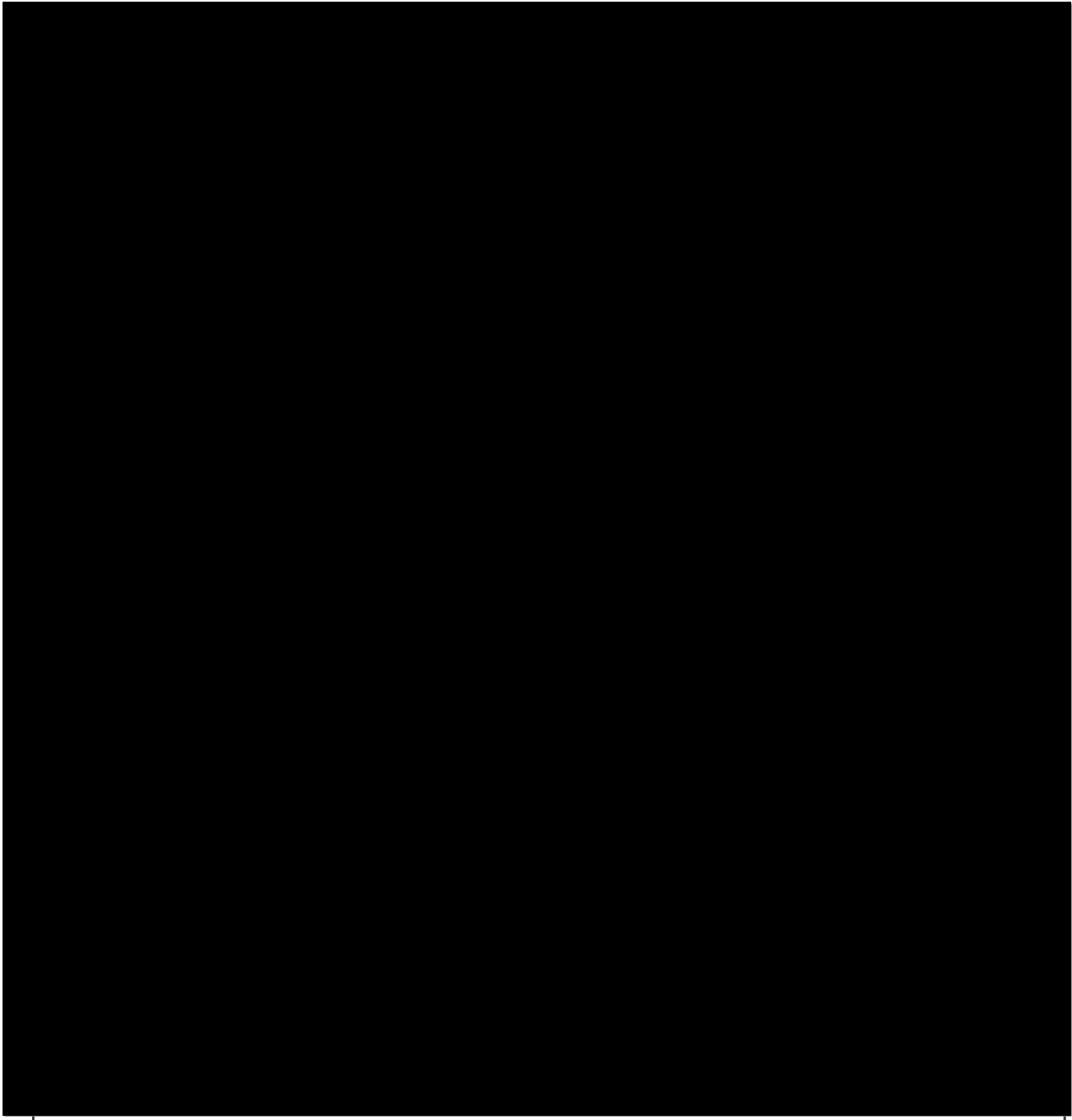
## 34. Provide a summary of the RMD's plans for providing patient education.

In accordance to 725.105(K), OWR, Inc. will provide patients & caregivers with an abundance of up to date educational material. The materials will be available for the hearing-impaired and visually impaired as well as in many different languages at a low reading level. We will hold patient/caregiver consultations, educational meetings, provide educational materials, as well as, the following items but not limited to these:

A warning that Marijuana is not FDA approved and that there could be side effects, health risks, keep away from children, do not drive under the influence which is prohibited by M.G.L.c.90.s.24, machinery should not be operated. there will be information to assist in selection of strain of product, according to needs of patient. Patient will be given a tracking log so they can keep track what works best for them. There will be guidelines on dosage, tolerance and withdrawal, substance abuse, dependence, treatment centers. Also statement that patient may not distribute marijuana to anyone else, or use any contaminated product which must be returned immediately for disposal. They will be given their patients rights booklets about their condition and any other requirements of the DPH. The DPH will have full access to anything listed above.

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: AR

35. Provide a summary of the RMD's operating procedures for patient or personal caregiver home-delivery, if the RMD plans to provide home-delivery services.



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: AD

36. Provide a summary of the RMD's policies and procedures for the provision of marijuana for medical use to registered qualifying patients with verified financial hardship without charge or at less than the market price.

OWR, Inc. will provide financial assistance to patients who qualify by demonstrating financial hardship. When they qualify that they cannot afford the out of pocket expense of paying for marijuana the potential patient will be able to apply to our financial aide(FA) program to have their medicine priced for them on a sliding scale according to their income level. The applications will be readily available to all and any patient upon request. FA will be available for patients that meet eligibility factors that comply with 105 CMR 725.004 which defines "verified financial hardship" to mean "that an individual is a recipient of MassHealth, or a Supplemental security income, or the individual income does not exceed 300% of the federal poverty level, adjusted for family size.

The Aide application contains information and documents that discloses the patients level of income and their ability to obtain their medicine with or without aide. Staff members who are specifically trained will review these applications and decide the level of aide the patient will receive. All information that will be gathered from these forms is highly confidential and will remain so while in OWR, Inc's possession which will be at least a year. FA applications will be reviewed every month and decisions will be made in a timely manner of no more than ten days from receipt of the application. Notification of approval will be in writing. OWR, Inc's goal is to provide patients with as much FA as needed.