

Four Daughters Compassionate Care, Inc.
(A non-profit Massachusetts Corporation)
584 Mountain Street, Sharon, Massachusetts 02067

Brian Striar
Chief Executive Officer

Stanley Rosen
Chief Operating Officer

January 5, 2016

Eric Sheehan, J.D.
MA Department of Public Health
Medical Use of Marijuana Program
RMD Applications
99 Chauncy Street, 11th Floor
Boston, Massachusetts 02111

Dear Eric Sheehan, J.D.:

In response to your Request for Information dated December 31, 2015, the following items are enclosed:

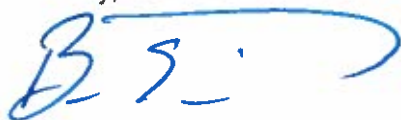
1. Updated Employment and Education Form for Daniel Moore, showing degree/diploma obtained.
2. Updated response to question D.17 showing revised date for Soozen Tribuna at Striar Development Corp.
3. Updated response to question D.18 regarding the length of experience of the Corporation's Chief Executive Officer in providing health care services. (Please see additional comment at end of this letter regarding this updated response.)
4. Updated response to question E.21 clarifying reference to CFR.
5. Updated response to question E.28 clarifying citation reference.
6. Updated response to question E.31 clarifying citation reference.
7. Updated response to question E.31 clarifying an additional citation response, and incorporated with the above response for question E.31.
8. Updated response to question E.36 that complies with the definition of Verified Financial Hardship.
9. Updated response to question E.40, that clarifies our insurance coverage.

Additional comment regarding our updated response to question 7.18-CEO:

Mr. Brian Striar is the son of Daniel Striar, who had substantial ownership of Westwood Lodge Hospital and Pembroke Hospital. Brian Striar has experience with the provision of non-healthcare specific aspects of overall hospital non-clinical operations, but he has no experience in providing healthcare services.

Please let me know if you require anything further.

Sincerely,



Brian Striar

RECEIVED

JAN 06 2016

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

Applicant Non-Profit Corporation _____

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

Daniel Moore

Residential Address

[Redacted]

Title (at applicant non-profit corporation)

individual responsible for RMD security plan and security operations

Name of Applicant Non-Profit Corporation

Four Daughters Compassionate Care

Highest Education Attained – Institution, Degree, and Year

Marlboro High School 1959, High School Diploma

Application 1 of 1 Applicant Non-Profit Corporation _____

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.

Brian Striar, President and CEO, has been a businessman, real estate developer, and entrepreneur for over 25 years. He has been owner, manager, partner, and involved with all facets of day-to-day operations, including oversight of staff, licensing, purchasing, planning, and customer/guest relations for the following: Glen Ellen Country Club, MA, Alden Pines Country Club, FL., Round Hill Country Club, MA, Holiday Hearth Motel, MA, and others. Mr. Striar has been involved in all facets of real estate development and investment from assessment and acquisition through permitting, construction, and property management. Responsibilities include presentations at public hearings, hiring and coordinating engineers, architects, and related professionals for a variety of properties including: NWM, Stop and Shop Plaza, Walpole MA, Old Post, LLC: 64 Unit affordable Housing Project, Shaorn MA, Rattlesnake Corporation: 90,000 sf office space, Dartmouth MA and Sunset, FL, Westwood Lodge Corp: psychiatric hospital, Westwood MA, Pembroke Hospital corp: owner and developer of psychiatric hospital, Pembroke MA, as well as numerous residential developments.

Stanley Rosen, COO, has 18 years experience as Director of Pharmacy for the non-profit Pharmacy Dept. at McLean Hospital, an affiliate of MGH and a member of Partners Healthcare. As Director of Pharmacy for Hospital and Research, he established non-profit annual budgets for various business units,; was substantially involved in capital purchases, negotiations and contracts; was in charge of pharmaceutical purchasing and vendor selection. He was responsible for over 20 professional staff. Mr. Rosen was responsible for the redesign of the main pharmacy for an automated medication dispensing machine system. He oversaw 24/7 access control and alarm monitoring review for the Pharmacy Dept. He represented McLean Hospital at many Partners Healthcare Committees, such as the Chief Pharmacy Officers Council and the system-wide Pharmacy Comm. At McLean he served on the Institutional Review Board (IRB-Research), Infection Control Comm, General Management Comm, Compliance Comm, and the Clinical IT Comm, involved in the design and implementation of new clinical computer systems. He was also responsible for Pharmacy regulatory compliance in accordance with hospital regulatory requirements for MDPH, Dept. of Mental Health, the Board of Pharmacy, DEA, Joint Commission, and HHS. Until March of 2015 Mr. Rosen was a member of the Board of Health in Sharon MA for over 10 years, serving as chair for 4 years.

Soozen Tribuna, CFO, has been CEO/CFO of Striar Development Corp., Braintree MA since 1999. In this capacity she has oversight of more than 12 privately held real estate portfolios valued in excess of \$30M. Managed assets include residential developments, commercial and retail property management, including acquisition, sales, financing, leasing, property maintenance and investment consulting.

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: BS

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.

Brian Striar, President and CEO

Mr. Striar has no experience in providing healthcare services.

Stanley Rosen, COO

Mr. Rosen is currently a Registered Pharmacist in Massachusetts (since 1969) and in Rhode Island, and has previously been registered in the states of Maryland and New Hampshire. He is currently a Licensed Nursing Home Administrator in Massachusetts (since 1997) as well as a Registered/Certified Health Officer (since 1989) in Massachusetts.

Mr. Rosen was Director of Pharmacy Services for Hospital and Research at McLean Hospital, an affiliate of the Massachusetts General Hospital, and a member of Partners Healthcare. He retired from this position in November 2014, after 18 years of service.

For the last thirty years, Mr. Rosen has been a Fertility Specialist Pharmacist, providing phone consultations and arranging for after-hours emergency specialized medication deliveries. He continues in this role at Village Pharmacy (a specialized fertility pharmacy) located in Waltham, MA. Mr. Rosen is a fellow of the American Society of Consultant Pharmacists (FASCP).

Mr. Rosen served more than ten years as Chief Operating Officer of Westwood Lodge Hospital. He is Board Certified in Healthcare Management and a Fellow of the American College of Healthcare Executives (FACHE).

Mr. Rosen is principal and Chief Pharmacy Officer of the - The Healthcare Consultancy, a Healthcare Consulting firm located in Sharon, MA.

Soozen Tribuna, CFO, has no experience in providing healthcare services.

SECTION E. OPERATIONS

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

FDCC intends to cultivate marijuana for medical use that is safe, high quality, and lab tested for consistent cannabinoid profiles for the benefit of registered patients in the Commonwealth of Massachusetts.

FDCC practices are based upon Standard Operating Procedure ("SOPs") developed to comply with 105 CMR §725.105(A). The SOPs were developed by employing marijuana cultivation best practices, Good Agricultural Practices ("GAP"), Good Manufacturing Practices ("GMP") and always keeping sanitation and patient safety at the forefront. FDCC's SOPs are designed to limit contamination, including but not limited to mold, fungus, bacterial diseases, rot, pests, non-organic pesticides, mildew, and any other contaminant identified as posing potential harm. FDCC will not use any non-organic pesticides in compliance with U.S. Department of Agricultural organic requirements of 7 CFR (Code of Federal Regulations) Part 205. FDCC intends to employ pharmaceutical standards in the storage and production of medical marijuana products. All phases of cultivation will take place in designated, locked, limited access areas monitored by a surveillance camera system in accordance with 105 CMR §725.110(D)(1)(d)-(i).

FDCC's SOPs will focus on implementing policies and procedures including but not limited to:

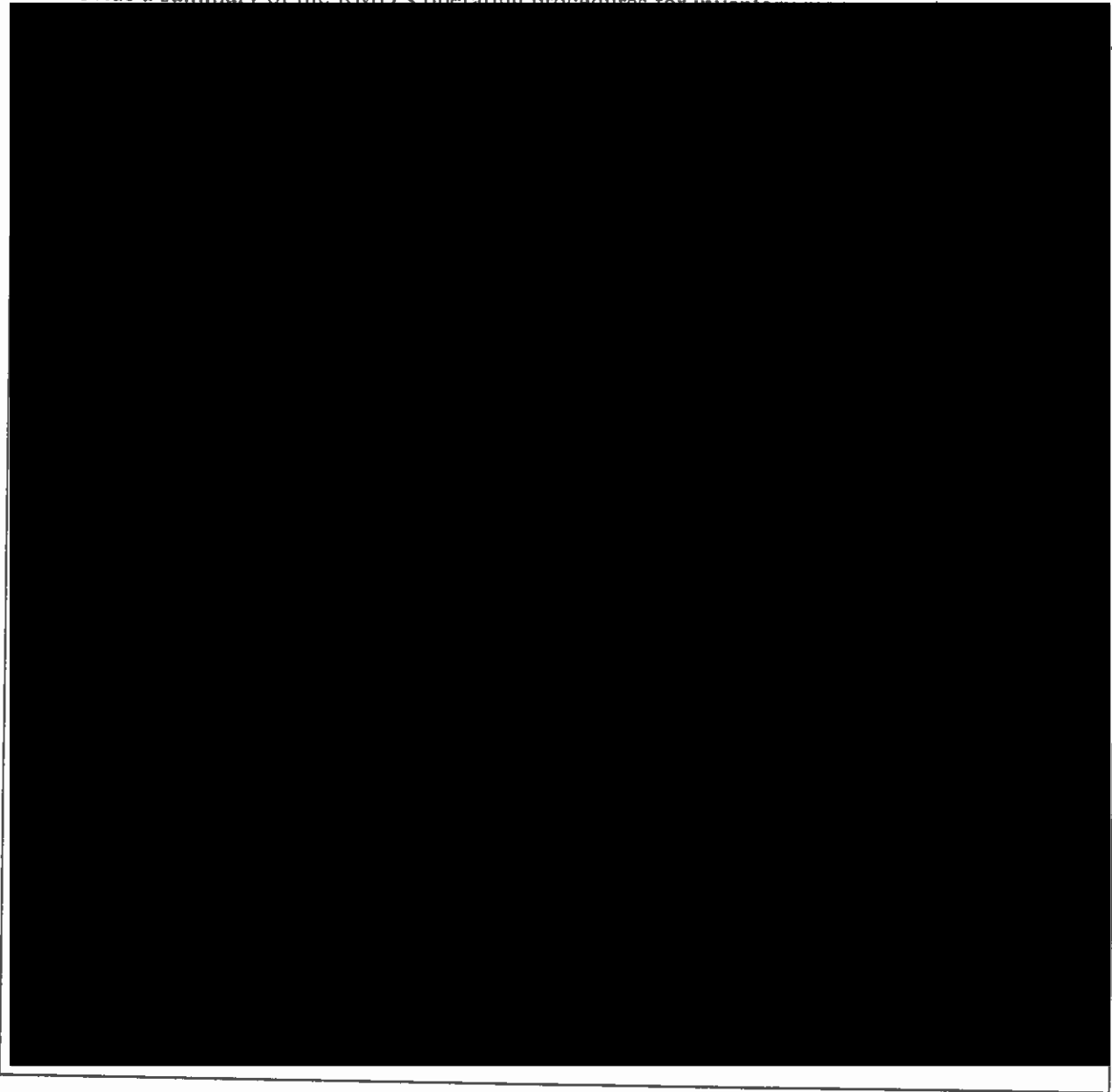
- . Anti-Contamination Procedures
- . Propagation protocols
- . Vegetative Protocols
- . Flowering Protocols
- . Harvest Protocols
- . Drying and Curing Protocols

FDCC will provide dispensary agents with thorough training in all of the above areas and will implement its own compliance checks in addition to DPH inspections.

FDCC SOP's specify policies and procedures in the following areas: FDCC will monitor its inventory through sophisticated controls in order to ensure that the patients of the commonwealth are getting safe access to marijuana for medical use and FDCC is able to respond to market forces in order to provide affordable products.

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: BS

28. Provide a summary of the RMD's operating procedures for inventory management.



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: BS

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

FDCC is an equal opportunity employer that will seek to recruit locally within Sharon. All board members, employees, executives, managers and volunteers associated with FDCC will be registered dispensary agents and remain compliant pursuant to 105 CMR §725.030 (A)-(E). FDCC will keep staffing records in compliance with 105 CMR 725.105(I) (4). FDCC will notify DPH and law enforcement of the immediate dismissal of any dispensary agent who has engaged in unsafe RMD practices or diverted marijuana. DPH will be notified within 24 hours whenever a dispensary agent is no longer associated with FDCC. FDCC will provide employees with a detailed Personnel Policy that will be contained within the Employee Handbook and is compliant with 105 CMR 725.105 (A). All employees will be required to read and familiarize themselves with the contents of the Handbook. The manual outlines policies including, but not limited to:

- Equal Opportunity
- Non-discrimination and Sexual Harassment
- Disaster Plan
- Arbitration
- Attendance
- Employee Status
- Hours
- Meals and Break periods
- Overtime
- Confidentiality
- Technology
- Conflicts of Interests
- Tours
- Illegal Activity
- Employee Relations
- Performance Improvement
- Termination
- Travel Reimbursement
- Employee Benefits
- Holidays
- Leaves of Absence
- Alcohol and Drug Free Workplace
- Human Resource Records
- Personal Appearance
- Smoke-Free Environment
- Use of Company Property

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.

FDCC provides assistance to qualified persons who demonstrate a financial hardship.

FDCC understands that many patients in need may have difficulty affording their marijuana for medical purposes due to their conditions. Many patients are unemployed or underemployed due to their illness, and medical cannabis products are not currently covered by insurance or Medicaid.

To help alleviate the financial burden on residents of Norfolk County, FDCC will implement a sponsored patient care program which will offer marijuana for medical purposes at a reduced cost to those patients qualifying for the program. In order to qualify for the program patients must provide verification that they are recipients of Masshealth, or Supplemental Social Security income, or that their income does not exceed 300% of the Federal poverty level.

FDCC will offer limited patient quantities of marijuana for medical purposes at a reduced fee for patients falling within these income guidelines. Applicants will receive a written notification stating whether or not their application has been approved.

Funding will determine the number of hardship cases that we approve annually. Access to the program will grow as revenue permits.

38. Will the Corporation provide worker's compensation coverage to the RMD's Dispensary Agents?

Yes No

39. Will the Corporation obtain professional and commercial insurance coverage?

Yes No

40. Describe the Corporation's plan to obtain liability insurance or place in escrow the required amount to be expended for coverage of liabilities.

FDCC plans to obtain and maintain a general liability insurance policy with coverage of no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually and product liability insurance for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually. the deductible for such policy shall be no higher than \$5,000 per occurrence. We will seek only an A,M,Best A or A+ rated carrier for placement of coverages. FDCC will carry automobile coverage, as well as property and casualty coverage.

Coverage will include business interruption protection. Replacement costs will be used to value all property ensuring a full recovery in the event of a catastrophe. Business interruption coverage will allow FDCC to continue paying employees, vendors, taxes, and fees during reconstruction, if necessary. Coverage will also provide capital for any necessary emergency inventory purchases from another RMD. FDCC will also carry personal and advertising injury insurance, as well as employment practice liability coverage for directors and officers. FDCC will consider additional coverage based upon needs.

In the event that FDCC is unable to obtain minimum liability insurance coverage, FDCC will place \$250,000 in escrow to be expended for coverage of liabilities. Any expenditure from the escrow account will be replenished within 10 business days. Compliance with 105 CMR §725.105(Q) will be documented in a manner and form determined by DPH pursuant to 105 CMR §725.105(M)

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: BS