

WILLIAM NOYES WEBSTER FOUNDATION, INC.

46 Stonehedge Drive
Barnstable, MA 02630
jane@wnwfoundation.org
949-873-3953

April 6, 2016

Eric Sheehan, Interim Bureau Director
Department of Public Health
Medical Marijuana Program
RMD Applications
99 Chauncy Street, 11th Floor
Boston MA 02111

Re: William Noyes Webster Foundation – Second Revised Management and Operation Profile – Application 1 of 2

Dear Director Sheehan:

This letter is in response to your request for information letter dated March 29, 2016, requesting further information from the Foundation as to Management and Operations Profile it filed on October 9, 2015, Application 1 of 2.

Question 1

Your revised application refers to Patrick Pericak as William Noyes Webster Foundation, Inc.'s "Cultivation Manager/Master Grower/Cultivation Specialist." The Medical Use of Marijuana Program was notified on March 9, 2016 that Patrick Pericak has not in fact reached an agreement with William Noyes Webster Foundation, Inc. to serve in such roles. Please clarify Patrick Pericak's role with William Noyes Webster Foundation, Inc. and resubmit completed responses to questions D.20 and E.21 to include information on the correct individual/entity responsible for marijuana for medical use cultivation operations, and submit an Employment and Education Form, a Character and Competency form, background check authorization forms, and background check fee for this individual/entity.

RECEIVED
APR 8 - 2016
MA Dept. of Public Health
99 Chauncy Street
Boston, MA 02111

Answer 1

Patrick Pericak is an employee of the consulting group Mindful. The Foundation, Mindful, and the new investors failed to reach agreement relative a management contract in which Mr. Pericak was to be the "Cultivation Manager/Master Grower/Cultivation Specialist."

We are pleased to inform you that the Foundation has enlisted the services of Frederick J. Green as the Head of Cultivation. Mr. Green is a highly respected consultant to the cannabis industry. He has been advising clients in the USA, Canada, and Australia on facility design, environmental control, and best growing practices for pharmaceutical grade medical cannabis since 2013. We are attaching revised Question D. 20 and E. 21, as well as an Employment and Education Form and Character and Competency Form. Mr. Green's completed background application has been submitted to CSI.

Question 2

On February 20, 2016, the applicant submitted a Character and Competency form for Linda Moulton that indicates that she is serving in the roles of "CFO, Acting Treasurer, Director, Board of Directors." Applicant must resubmit a completed response to Question C.13 that incorporates this information.

Answer 2

You have asked the Foundation to resubmit Question 13 of the Management and Operations Profile Application relative to Linda Moulton since she has listed herself as the "CFO, Acting Treasurer, Director, Board of Directors" on the Character and Competency form which was submitted by the Foundation relative to Ms. Moulton on February 20, 2016. Question 13 of the application asks the applicant to identify whether any members of the Board of Directors are also serving as an employee of the proposed RMD and, if so, their title and role with the proposed RMD. The Foundation did not include Ms. Moulton in Question 13 because she is not employed by the Foundation. Ms. Moulton's capacity as a member of the Board of Directors, Acting Treasurer and CFO, is strictly a voluntary one. She is not a paid employee of the Foundation. However, based on your request, the Foundation resubmits Question 13, listing Ms. Moulton in her role as the CFO. The Foundation states in the answer that Ms. Moulton is a Volunteer. The revised Question 13 is attached hereto.

Question 3

Please clarify if any of the experiences described in the response to Question D.17 for Paul Covell were paid employment over the past 10 years. If so, please have him include these experiences in his Employment and Education Form and resubmit the form.

Answer 3

You ask if Mr. Covell's experiences listed in Question D. 17 were ones of paid employment over the past 10 years. You further ask if the experiences were paid employment, for the Foundation to resubmit an Employment and Education form Mr. Covell and list said experiences on the form. Question D. 17 asks to "Describe the experiences, and length of experiences of the Corporation's Chief Executive Officer, Chief Operations Officer, and Chief Financial Officer with running a non-profit organization or business." The Question does not ask if any of the officers served in these positions as paid employees or as a volunteer. Mr. Covell serviced in these positions as a non-paid volunteer. The Foundation resubmits Question D. 17 listing Mr. Covell as a non-paid volunteer which is attached hereto. Since Mr. Covell was a volunteer, receiving no payment, the Foundation will not be submitting a revised Employment and Education form for Mr. Covell.

Question 4

In its revised response to Question E.35, the applicant refers to 105 CMR (F) (1) (a). This citation is unclear. Applicant must resubmit a completed response to Question E.35 that identifies the correct citation.

Answer 4

You asked the Foundation to clarify its response to question E. 35. Relative to the Foundation's citing of "105 CMR (F) (1) (a)." In the first paragraph of the Foundation's revised response to Question E. 35 the Foundation cites "105 CMR 725(F) (1) (a)." There was a typographical error in the citation. The first sentence should have read, "The Foundation's home-delivery for patients and personal caregivers will comply with 105 CMR 727.105(F) (1) (a) and 105 CMR 725.110(E)." The Foundation resubmits its answer to Question E. 35, which now contains the aforementioned corrected sentence that is attached hereto.

Question 5

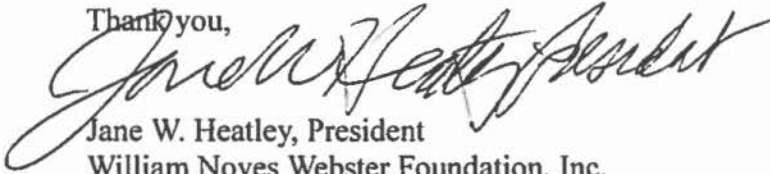
The applicant submitted updates to the initial capital for their *Application of Intent* (Application 1 of 2) on February 2, 2016. A financial account summary was not submitted for the First Republic Securities Company LLC "IRA FBO Richard Winter Pershing LLC as custodian" account as indicated in the table in Section D. Applicant must submit this financial account summary. The financial account summary must be dated no earlier than December 31, 2015.

Answer 5

You state that the Foundation did not submit as part of its update of its Application of Intent, Application 1 of 2, and the financial account summary for First Republic Securities Company LLC "IRA FBO Richard Winter Pershing LLC as custodian" account. You state that account summary must be dated no earlier than December 31, 2015. The account summary is attached hereto. It is for statement period 1/1/2016 to 1/31/2016.

Please let me know if you have any question regarding the above or attached.

Thank you,



Jane W. Heatley, President
William Noyes Webster Foundation, Inc.
46 Stonehedge Drive
Barnstable, MA 02630
jane@wnwfoundation.org
949-873-3953

Enclosures

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.

Frederick J. Green (Head of Cultivation) Mr. Green is a highly respected consultant to the cannabis industry. He has been advising clients in the USA, Canada, and Australia on facility design, environmental control, and best growing practices for pharmaceutical grade medical cannabis since 2013. Mr. Green has a Master's Degree in Horticulture from Cornell University, and has over 40 years experience in commercial plant production. Mr. Green employs protocols based on science, and proven methodologies used successfully in the horticulture industry.

Richard Nagle (Security Manager)
 Detective Lieutenant Nagle served as a member of the Massachusetts State Police from 1981 to his retirement in 2011, rising to the rank of Detective Lieutenant. Lt. Nagle was the Officer in Charge, assigned to the Division of Investigative Services, Disabled Person Protection Agency. He managed investigations for the District Attorney's office and law enforcement. Lt Nagle developed and implemented emergency preparedness and management plans including workplace violence and emergency threat/evacuation procedures. In this position, Lt. Nagle's responsibilities included security oversight, prevention of crimes and investigation of the Department of Mental Health, Department of Developmental Service and Massachusetts Rehabilitation Commission throughout the State. He developed and implemented training, presentations and collaborative team relationships for health care facilities, local police, the District Attorney's office and court personnel. He was responsible for employee related investigations and developing policy and procedures as such.

Lt. Nagle was the Supervisor of Narcotics Inspection for the State Police. He conducted internal investigations to account for all evidence and narcotics seized by the State Police. He reviewed and implemented changes to security related issues in the courts, barracks and the central evidence storage facility. His new policies and procedures were implemented throughout the State.

Lt. Nagle was the Director of Community Relations for the City of Cambridge as well as a Vista Volunteer.

Lt. Nagle received a BS in Criminal Justice from Western New England College in 1988 as well as a MS in Criminal Justice from Westfield State College in 1992.

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: *JWN*

SECTION E. OPERATIONS

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

The Foundation's operating procedures for the cultivation of marijuana are as follows:

The Foundation has engaged Frederick J. Green as Head of Cultivation. Mr. Green has over 40 years experience in commercial plant production, and his growing methods are in full compliance with 725.105(A). Mr. Green's best practices are documented in The Foundation's manuals on Full Cultivation Cycle Stage, Cloning, Nursery Room, Veg Rooms, Flowering Rooms, Harvest, Trimming and Curing Department. The first harvest in the Cultivation Facility will be from seed. Once the mother plants have developed from this harvest the Foundation will grow only from clones thereafter.

During the "vegetative stage" the plants grow without producing flowers and are maintained by providing at least 18 hours of constant, uninterrupted light for a 4 week period.

When the plants have reached the optimal height and other characteristics, the light cycle will be changed to 12 hours on and 12 hours off. This stage is known as the "flowering stage". On average, marijuana requires 8 to 11 weeks of flowering to mature and reach its full medicinal potential.

The Foundation will use coco for its growing medium. The plants will be hand watered instead of using automated watering systems. The Foundation's watering method will result in less use of water, thereby eliminating waste of a natural resource.

The Foundation's cultivators will utilize the staking method. This will enable the cultivators to adjust the spacing between the plants to minimize the risk of damaging the plants. While watering the plants by hand, cultivators will be able to individually inspect each plant at least once every day. As a result, if an individual plant has a pest or mold problem, that specific plant can be dealt with without sacrificing entire harvest.

The Foundation has engaged ProVerde Laboratories to provide testing services to ensure the highest quality of its marijuana. ProVerde is an accredited third party laboratory which provides testing services for pesticides, residue analysis, cannabinoid potency, profiling, microbial contamination, heavy metal concentrations and all the biological and chemical analysis required by DPH.

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:



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

Frederick J. Green

Residential Address

[REDACTED]

Title (at applicant non-profit corporation)

Head of Cultivation

Name of Applicant Non-Profit Corporation

William Noyes Webster Foundation, Inc.

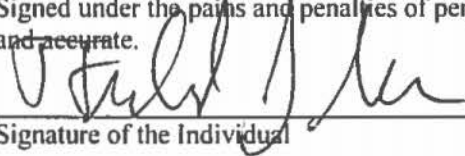
Highest Education Attained – Institution, Degree, and Year

Cornell University, Master's Degree, 1979

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
Fred Green Consulting 66 Calamint Hill Road North Princeton, MA 01541	Owner	Oct 2013 to Present
Abba Medix Group Inc. 1773 Bayly Street Pickering, ONT, Canada L1W 2Y7	Director of Operations	Aug 2014 to Sept 2015
Medical Marijuana of Massachusetts 9 Collins Ave. Plymouth, MA 02360	Head of Cultivation	Mar-July 2014
Princeton Sweet Peas 66 Calamint Hill Rd North Princeton, MA 01541	Owner	Jan 2011 - Mar 2014
Stow Greenhouses 84 Walcott Street Stow, MA 01775	Owner	Jan 1979 - Dec 2010

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

04/05/2016

 Date Signed

Fred Green - Head of Cultivation

Since 2013, as a highly respected consultant to the cannabis industry, Mr. Green has been advising clients in the USA, Canada, and Australia, on facility design, environmental control, and best growing practices for pharmaceutical grade medicinal cannabis. With a Masters Degree in Horticulture from Cornell University, and over 40 years experience in commercial plant production, Mr. Green employs protocols based on science, and proven methodologies used successfully in the horticulture industry.

Mr. Green has served as Director of Operations for Abba Medix Group Inc. located in Pickering, Ontario. In that role, he was responsible for the design and construction of a 14,000 sq. ft. state-of-the-art facility for the production of pharmaceutical grade medicinal cannabis products. Abba Medix is a Public Corporation, whose stock is traded on the Canadian Securities Exchange (CSE).

Prior to employment at Abba Medix, Mr. Green held the position of Head of Cultivation for Medical Marijuana of Massachusetts. In January, 2014, the company received 3 of the 20 provisional licenses granted by the State of MA from a pool of 160 applicants. Mr. Green was instrumental in the design and construction of the 30,000 sq. ft. production facility in Plymouth, MA.

Mr. Green was the owner and operator of Stow Greenhouses in Stow, Massachusetts from its inception in 1978 to its sale in 2010. Mr. Green built his company into New England's premier year-round wholesale grower of cut flowers, with one acre of highly automated, modern glass greenhouses, and several acres of outdoor production. Following the sale of his company, Mr. Green was the founder, owner, and operator of Princeton Sweet Peas, cultivating 4-acres of field grown cut flowers for the local wholesale and retail markets in eastern Massachusetts.

His industry accomplishments include serving as Facilities Committee Chairman on the Board of Directors of the Boston Flower Exchange Corporation. He also was on the Advisory Board of First Pioneer Farm Credit in Bedford, NH. He has been the Vice President of the Massachusetts Flower Growers Association. As a well-known speaker in the cut flower industry, he has made several presentations at the New England Greenhouse Conference, Southeast Greenhouse Conference, Grower Expo in Chicago, and Association of Specialty Cut Flower Growers National Conference.

DegreeVerify Certificate

Transaction ID#: [REDACTED]

Date Requested: 03/04/2014 11:59 EST

Requested by: FREDERICK GREEN

Date Notified: 03/06/2014 14:55 EST

Status: Confirmed

Fee: \$14.95

INFORMATION YOU PROVIDED

Subject Name: **FREDERICK**
First Name

JACKSON
Middle Name

GREEN
Last Name

Name Used While
Attending School:
(if different from above)

Date of Birth: **09/24/1952**
mm/dd/yyyy

School Name: **CORNELL UNIVERSITY**

Degree Award Year: **1979**

Attempt To: **Verify a degree**

INFORMATION VERIFIED

Name On School's Records: **FREDERICK JACKSON GREEN**

Date Awarded: **01/16/1979**

Degree Title: **MASTER OF PROFESSIONAL STUDIES (AGRICULTURE)**

Official Name of School: **CORNELL UNIVERSITY**

Major Course(s) of Study: **N/A**

Dates of Attendance: **09/05/1977 to 12/23/1978**

All information verified was obtained directly and exclusively from the individual's educational institution. The Clearinghouse disclaims any responsibility or liability for errors or omissions, including direct, indirect, incidental, special or consequential damages based in contract, tort or any other cause of action, resulting from the use of information supplied by the educational institution and provided by the Clearinghouse. The Clearinghouse also does not verify the accuracy or correctness of any information provided by the requestor.

BOWDOIN COLLEGE

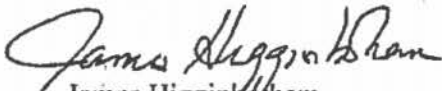
September 1, 2014

To Whom It May Concern:

This is to certify that Frederick J. Green was enrolled full-time at Bowdoin College beginning September 1, 1971 until his graduation on May 24, 1975. Frederick received a Bachelor of Arts degree with a major in Classics.

If you need additional information or have questions, please do not hesitate to contact the Registrar's Office at (207)725-3521.

Sincerely,



James Higginbotham
Interim Registrar

JH:sem

OFFICE OF THE REGISTRAR

4500 College Station • Brunswick • Maine 04011-8436 • Tel 207.725.3521 • Fax 207.725.3338
registrar@bowdoin.edu


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13. Please identify whether any members of the Board of Directors are also serving as employees of the proposed RMD and, if so, their title and role with the proposed RMD.

Paul J. Covell, the Clerk of The Foundation, a member of its Board of Directors, and serves as the Chief Executive Officer. He reports to the Board of Directors, and takes direction from it. He is responsible for overall management of the Foundation.

Jane W. Heatley, the President of The Foundation, a member of its Board of Directors, and serves as the Chief Operating Officer. She reports to the CEO. She is responsible for overseeing the daily operation of The Foundation.

Linda Moulton, the CFO, a member of its Board of Directors and the Board's Acting Treasurer, and serves as the Chief Financial Office Officer. She reports to the Board of Directors, and takes direction from it. She is responsible for financial management of the Foundation. She is an unpaid employee in this role, volunteering her time.

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: 

SECTION D. EXPERIENCE

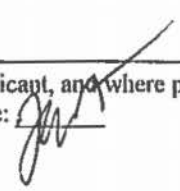
- 16. **Attach** an *Employment and Education* form (use template provided) for each of the following individuals: The Corporation's Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity 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.

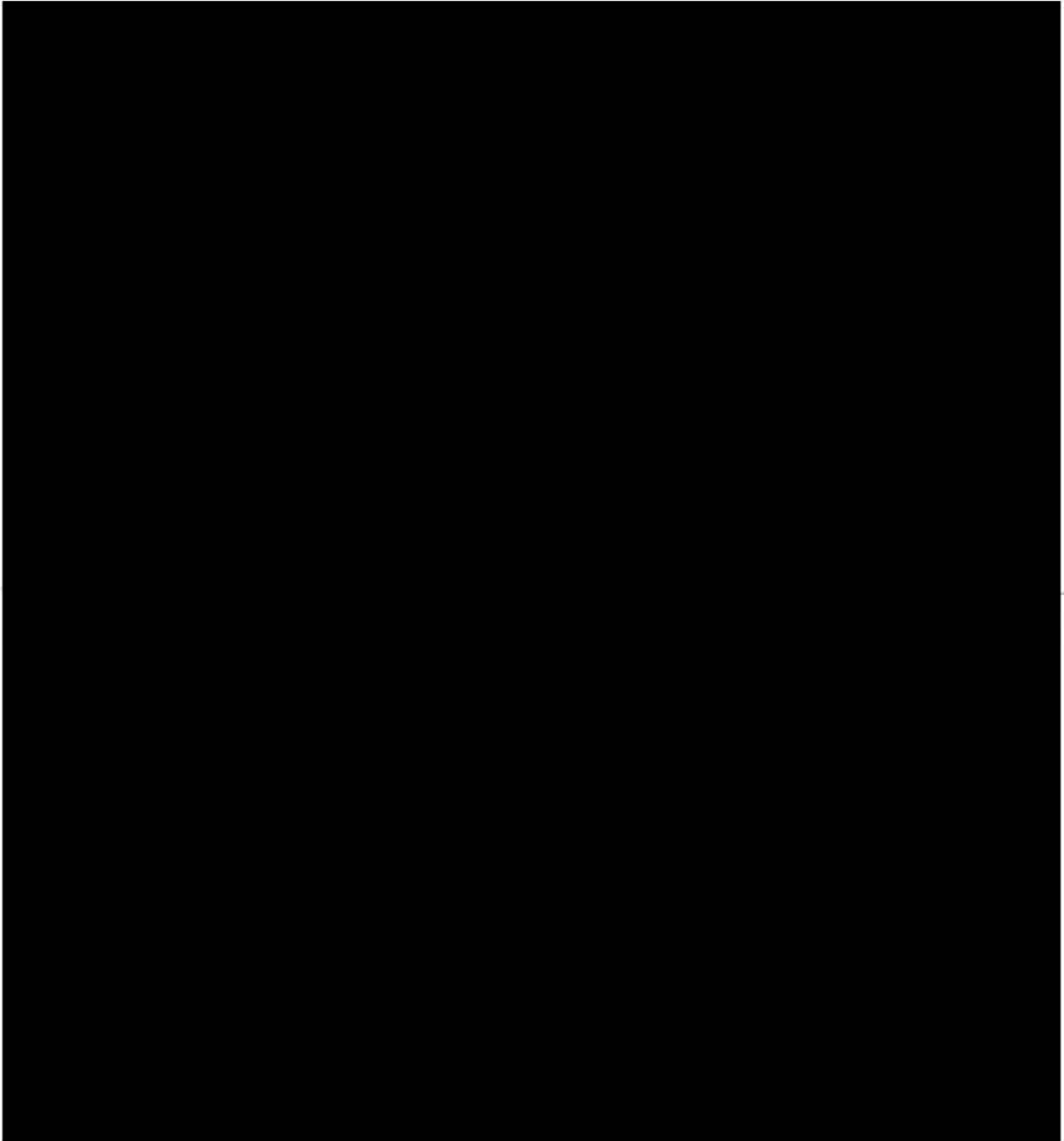
Paul J. Covell, CEO
Paul has served as Trustee for nine years at the Cape Cod Hospital in Hyannis helping to handle the hospital's multi-million dollar budget. Paul is the former Director of both the Cape Cod and Islands Partnership to Reduce Substance Abuse and the Family Counseling and Guidance Center. He has been the Community Coordinator of the March of Dimes for the Town of Dennis, has served as the Director of the Kiwanis Foundation of New England, Inc., has served as the President of the Dennis-Yarmouth Kiwanis Club, and currently volunteers as the Chairman of the Board of Health for the Town of Dennis. Paul has the experience and exemplary skills necessary to ensure the success of the proposed RMD. In all of the aforementioned positions, Paul served as a non-paid volunteer.

Jane W. Heatley, COO
Jane has served as President of The William Noyes Webster Foundation since its inception in August, 2013. The Foundation received its Provisional License January 29, 2014 and Jane continues to work for the Foundation to date.

Linda Moulton, CFO
Linda has been the CEO of Lahey International Health, a division of Lahey Hospital and Medical Center, from January 2015 to present, and works to develop markets to provide outstanding medical care to patients residing outside of the United States. Linda served as Vice Chair on Board of Lahey Health. She also served on Executive Finance, Strategy and Audit Compliance Committees at Lahey Health. Linda is on the Salem State University Advisory Board. Linda also sits on the Advisory Board of the Asian American Civic Association (AACA) and Linda serves as well on the International Business Board of Associated Industries of MA.

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: 

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.



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Handwritten initials in black ink, appearing to be 'JWH', written over the text 'indicated by the initials of the authorized signatory here:'.



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 E-MAIL: investment@firerepublic.com

IRA FBO RICHARD WINTER
 PERSHING LLC AS CUSTODIAN
 ROLLOVER ACCOUNT



Rollover Individual Retirement Account Statement

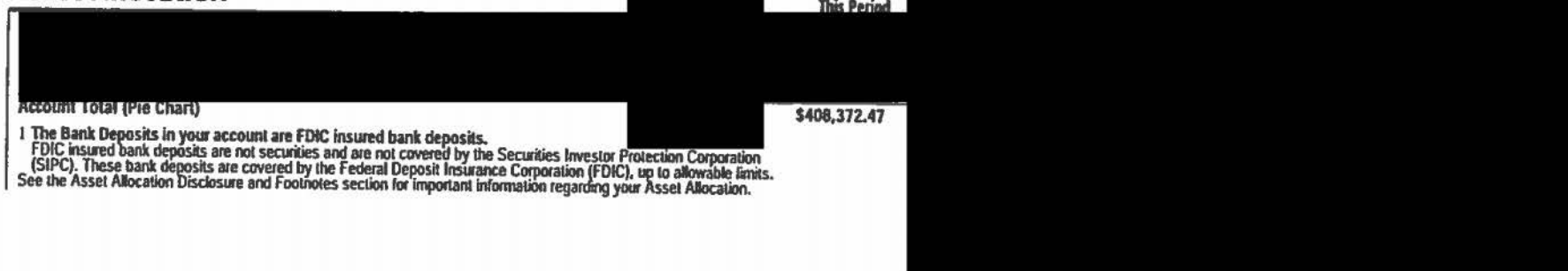
Account Number: [REDACTED]
 Statement Period: 01/01/2016 - 01/31/2016

Portfolio at a Glance

This Period

Ending Account Value	\$408,372.47
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Asset Allocation



1 The Bank Deposits in your account are FDIC insured bank deposits.
 FDIC insured bank deposits are not securities and are not covered by the Securities Investor Protection Corporation (SIPC). These bank deposits are covered by the Federal Deposit Insurance Corporation (FDIC), up to allowable limits. See the Asset Allocation Disclosure and Footnotes section for important information regarding your Asset Allocation.





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IRA FBO RICHARD WINTER
 PERSHING LLC AS CUSTODIAN
 ROLLOVER ACCOUNT

[REDACTED]

[REDACTED]

[REDACTED]

Rollover Individual Retirement Account Statement

Account Number [REDACTED]
 Statement Period: 01/01/2016 - 01/31/2016

Portfolio at a Glance

	This Period
Ending Account Value	\$408,372.47

Asset Allocation

	This Period
Account Total (Pie Chart)	\$408,372.47

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IRA FBO RICHARD WINTER
 PERSHING LLC AS CUSTODIAN
 ROLLOVER ACCOUNT



Rollover Individual Retirement Account Statement

Account Number [REDACTED]
 Statement Period: 01/01/2016 - 01/31/2016

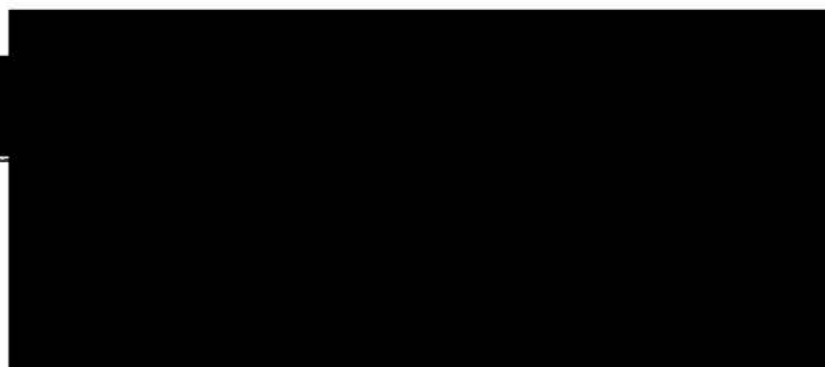
Portfolio at a Glance

	This Period
[REDACTED]	[REDACTED]
Ending Account Value	\$408,372.47

Asset Allocation

	This Period
[REDACTED]	[REDACTED]
Account Total (Pie Chart)	\$408,372.47

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IRA FBO RICHARD WINTER
 PERSHING LLC AS CUSTODIAN
 ROLLOVER ACCOUNT



**Rollover
 Individual Retirement
 Account Statement**

Account Number: [REDACTED]
 Statement Period: 01/01/2016 - 01/31/2016

Portfolio at a Glance

	This Period
Beginning Account Value	[REDACTED]
Ending Account Value	\$408,372.47

Asset Allocation

	This Period
Account Total (by Credit)	\$408,372.47

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