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June 14, 2018

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

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

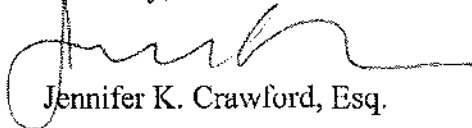
RE: Response to Request for Information for ACK Natural, Inc. Management and Operations Profile (Application 1 of 1)

Dear Medical Use of Marijuana Program:

This letter is in response to your Request for Information dated June 8, 2018. Please find an updated Employment and Education form for Michael Sullivan. Additionally, please find updated answers to Management and Operations Profile questions 17, 18, 19, 21, 24 and 29.

As always, we appreciate your attention to this matter. Please do not hesitate to contact me should you have any further questions.

Sincerely,



Jennifer K. Crawford, Esq.

Enclosures

EMPLOYEMENT AND EDUCATION FORM

Michael Sullivan

Applicant Corporation

ACK Natural, Inc.

SECTION D. EMPLOYMENT AND EDUCATION FORM

This Employment and Education form must be completed and signed by each of the following individuals: The applicant's Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, individual responsible for marijuana for medical use cultivation operations, and individual responsible for the RMD security plan and security operations. If the applicant does not have a Chief Executive Officer, Chief Operating Officer, or Chief Financial Officer, it must identify the individuals performing the equivalent duties for the Applicant and submit this form for each said individual. 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 of Individual

Michael Sullivan

Residential Address of Individual

Title of Individual (at Applicant Corporation)

CEO; Board Member

Name of Applicant Corporation

ACK Natural, Inc.

Highest Education Attained – Institution, Degree, and Year

Cambridge College, Masters in Education, 1999

Applicant Corporation

ACK Natural, Inc.

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
Oh Deer Nantucket	Owner/Operator	2016-Present
Cisco Brewers	Manager	2008-2018
CBD4me.net	Co-Founder	2015-2016
Weston Public Schools	Teacher/Coach	2010-2015

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

6/11/2018

Date Signed

6/11/2018

UPDATED MANAGEMENT AND OPERATIONS PROFILE QUESTIONS

SECTION D. EXPERIENCE

16. Attach a completed and signed *Employment and Education Form* (use template provided) for each required individual (as outlined in the *Employment and Education Form*)
17. Describe the experience, and length of experience, of the applicant's Chief Executive Officer, Chief Operating Officer, and Chief Financial Officer, or their equivalent, with running a business.

Chief Executive Officer: Michael Sullivan

Since 2016, Mr. Sullivan has been the owner and operator of the company Oh Deer Nantucket. This company is an all natural tick, mosquito and deer control company, servicing over 100 homes and businesses on Nantucket. Mr. Sullivan runs the day to day operations of the company, oversees the spray consultants, manages the customer relations and new business and handles all the bookkeeping of the company. Additionally, Mr. Sullivan has been the seasonal bar manager of Cisco Brewery in Nantucket since 2008. In this position he oversees a staff of 25 employees while also working in roles in production, sales and marketing.

Chief Financial Officer: Douglas Leighton

Mr. Leighton is co-founder and a principal partner of Dutchess Capital, a Boston-headquartered global hedge fund, which has managed an investment portfolio of over \$2 billion in transactional value. He oversees the funds' risk management, CFO and CEO. Mr. Leighton manages deal origination in North America, Europe and Australia and is a member of the firm's Investment Committee. He has founded several companies and has over two and a half decades of experience in management, investment banking, asset management. While the funds are industry agnostic, Douglas has been largely focused on the legal marijuana market for over the past 5 years, initially as an observer while he conducted due diligence for several deals, and now as an investor for Bask, Inc. (formerly Coastal Compassion, Inc.) As Bask, Inc. holds one Final Certificate of Registration issued by the Department of Public Health and has been approved to sell medical marijuana and has one other active medical application, Mr. Leighton understands that pursuant to 105 CMR 725.100(A)(2) no executive, member or any entity owned or controlled by such executive or member, may directly or indirectly control more than 3 RMDs and he will remain compliant with this regulation.

Chief Operating Officer: Zachary Harvey

Mr. Harvey has founded and operated several businesses over the past decade, including a real estate development company established in 2008, an equipment leasing company established in 2016, and most recently a cannabis lab design, training, and consulting company, known as VYB Holdings, LLC, which was founded in 2017. Mr. Harvey has consulted with several successful medical cannabis projects, including lab design, SOP implementation, and employee training. Mr. Harvey was previously an investor in Ermont, Inc., which has been approved as an RMD. He is also currently serves as Director of Cultivation for TYCA Green, Inc., a RMD applicant with one active application but has not yet been granted a Provisional Certificate of Registration. Mr. Harvey understands that pursuant to 105 CMR 725.100(A)(2) no executive, member or any entity owned or controlled by such executive or member, may directly or indirectly control more than 3 RMDs and he will remain compliant with this regulation.

18. Describe the experience, and length of experience, of the application's Chief Executive Officer, Chief Operating Officer, and Chief Financial Officer, or their equivalent, with providing health care services.

Chief Executive Officer: Michael Sullivan

Mr. Sullivan is the co-founder of www.cbd4me.net, a platform dedicated to helping people in Brazil identify the most reliable and trustworthy information and accessible CBD medicine. The company was formed in a response to the realization that many of the CBD brands then available to Brazilian patients were sourced from China and had inconsistent test results for levels of effective CBD. The lack of consistency negatively affects the efficacy of the products, which leads to wasteful usage, inaccurate dosing, over-spending and patients not receiving the best quality medicine. Mr. Sullivan worked with the Instituto Estadual do Cérebro Paulo Niemeyer in Rio De Janeiro Brazil to export the highest quality CBD oil for epileptic patients in Brazil. The business was in operation from 2015-2016.

Chief Financial Officer: Douglas Leighton

Mr. Leighton does not have any experience with providing health care services.

Chief Operating Officer: Zachary Harvey

In 2017, Mr. Harvey founded and operates a cannabis lab design, training, and consulting company, known as VYB Holdings, LLC. Mr. Harvey has personally consulted with several successful medical cannabis projects, including lab design, SOP implementation, and employee training. Mr. Harvey was previously an investor in Ermont, Inc., which has been approved as an RMD. He is also currently serves as Director of Cultivation for TYCA Green, Inc., a RMD applicant with one active application but has not yet been granted a Provisional Certificate of Registration. Mr. Harvey understands that pursuant to 105 CMR 725.100(A) (2) no executive, member or any entity owned or controlled by such executive or member, may directly or indirectly control more than 3 RMDs and he will remain compliant with this regulation.

19. Describe the experience, and length of experience, of the applicant's Chief Executive Officer, Chief Operating Officer, and Chief Financial Officer, or their equivalent, with providing services for marijuana for medical purposes.

Chief Executive Officer: Michael Sullivan

Mr. Sullivan is the co-founder of www.cbd4me.net, a platform dedicated to helping people in Brazil identify the most reliable and trustworthy information and accessible CBD medicine. The company was formed in a response to the realization that many of the CBD brands then available to Brazilian patients were sourced from China and had inconsistent test results for levels of effective CBD. The lack of consistency negatively affects the efficacy of the products, which leads to wasteful usage, inaccurate dosing, over-spending and patients not receiving the best quality medicine. Mr. Sullivan worked with the Instituto Estadual do Cérebro Paulo Niemeyer in Rio De Janeiro Brazil to export the highest quality CBD oil for epileptic patients in Brazil. The business was in operation from 2015-2016.

Chief Financial Officer: Douglas Leighton

Mr. Leighton does not have any experience with providing services for marijuana for medical purposes.

Chief Operating Officer: Zachary Harvey

In 2017, Mr. Harvey founded and operates a cannabis lab design, training, and consulting company, known as VYB Holdings, LLC. Mr. Harvey has personally consulted with several successful medical cannabis projects, including lab design, SOP implementation, and employee training. Mr. Harvey was previously an investor in Ermont, Inc., which has been approved as an RMD. He is also currently serves as Director of Cultivation for TYCA Green, Inc., a RMD applicant with one active application but has not yet been granted a Provisional Certificate of Registration. Mr. Harvey understands that pursuant to 105 CMR 725.100(A)(2) no executive, member or any entity owned or controlled by such executive or member, may directly or indirectly control more than 3 RMDs and he will remain compliant with this regulation.

SECTION E. OPERATIONS

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

ACK Natural, Inc. ("ANI") Standard Operating Procedures (" SOPs ") for the cultivation of marijuana for medical use will be developed to ensure compliance with all applicable regulations, protocols and guidance documents, including but not limited to: 105 CMR 725.105, DPH Protocol for Sampling and Analysis of Finished Medical Marijuana Products and MIPS, and the DPH Protocol for Sampling and Analysis of Environmental Media.

These SOPs will ensure that:

- All cultivation shall be consistent with 105 CMR 725.105(B)(1) and best practices shall be used to limit contamination, including, but not limited to mold, fungus, bacterial diseases, rot, pests, pesticides not approved by the Department, mildew and any other contaminants as posing potential harm.

- Access to grow areas will be restricted to appropriate personnel, who will wear personal protective equipment designed to protect not only the personnel but also the plants from potential contamination. SOPs require that the cultivation facility be maintained in a clean and sanitary condition.

- Inspections of all plants for pathogens throughout all phases of cultivation. Pursuant to 105 CMR 725.105(B)(1)(d) only pesticides approved by the Department will be used. Leaves and flowers from only female marijuana plants will be processed.

- All phases of cultivation of marijuana will take place in designated locked, limited access areas that are monitored by a video camera system in accordance with 105 CMR 725.110(D)(1)(d)-(i).

- All marijuana in the process of cultivation will be accessible only to the minimum number of specifically authorized dispensary agents essential for efficient operation and 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 105 CMR 725.110.

- All marijuana will be tagged and tracked including all marijuana seeds, plants, and products, using an industry specific seed-to-sale software program.

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

29. Provide a summary of the applicant's operating procedures for quality control and testing of product for potential contaminants.

ANI SOPs for quality control and testing of product for potential contaminants will ensure compliance with all applicable regulations and guidance documents including but not limited to: 105 CMR 725.105(C) and the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana Infused Products.

These SOPs ensure that:

- ANI will contract with an independent third-party testing laboratory in Massachusetts that is compliant with 105 CMR 725.105(C)(2)(d) for our required testing.
- This lab, at a minimum, and pursuant to 105 CMR 725.105(C)(2)(a) we will test our marijuana and MIPs for the cannabinoid profile and for contaminants as specified by the DPH, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides as well as any additional testing required by the DPH.
- Quality Control Procedures such as Current Good Manufacturing Practices and Good Agricultural Practices are used at all times.
- All plants at each phase of cultivation are examined daily for signs of undesirable characteristics such as the presence of male plants, contamination in the form of pests, molds, fungi and other threats to vegetative growth. Any plant showing these characteristics will be quarantined and disposed of immediately.
- All agents must maintain adequate personal cleanliness and all rooms, areas and equipment will be kept in a clean and sanitary condition.