

APPENDIX



**State of New Jersey**  
**CANNABIS REGULATORY COMMISSION**  
P.O. BOX 216  
TRENTON, N.J. 08625-0216

PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

DIANNA HOUEYOU, *Chair*  
KRISTA NASH, *Commissioner*  
MARIA DEL CID-KOSSO, *Commissioner*  
SAMUEL DELGADO, *Commissioner*  
CHARLES BARKER, *Commissioner*  
JEFF BROWN, *Executive Director*

**May 12, 2022**

**Senate Judiciary Committee Testimony**

*Executive Director Brown – Overview of Cannabis Regulatory Commission Progress*

Good morning Chairman Stack, Senate President Scutari, and members of the Committee:

Thank you for inviting the Cannabis Regulatory Commission to testify on the progress we've made in the past year, and the work that lies before us in establishing New Jersey's legal cannabis industry – and continuing to expand access to medicinal cannabis.

Today marks 13 months since the CRC was established. While the Commission is still in its infancy as a State agency, in those 13 months of existence, the CRC has made remarkable progress enacting the laws that this body historically drafted and passed to legalize cannabis.

In those 13 months the Commission has:

- Held 15 public meetings that demonstrably engage the public to help shape the rules governing the cannabis industry
- In 4 months, drafted and adopted 261 pages of comprehensive rules for the cultivation, production, and retailing of recreational cannabis.
- In 8 months, launched a licensing platform and began accepting applications for cultivators and manufacturers.
- In 11 months, began accepting applications for cannabis retailers.
- In 12 months, issued 102 conditional licenses for new cannabis businesses.
- Then, -- 1 year and 9 days after our formation – the CRC authorized recreational sales to begin on April 21, 2021.

The Commission also expanded access to the medicinal cannabis program by issuing 44 additional awards for medicinal cannabis businesses, and adopted comprehensive testing standards.

The CRC's goals from the beginning have been threefold:

- Shore up and expand access to medicinal cannabis for patients;
- Begin new business licensing under the CRC's regulations which prioritize review and issuance of licenses to social equity businesses and diversely-owned businesses; and
- Pursuant to the carve-out for ATCs in CREAMMA, work with current medical industry to approve ATC expansion

We have made great strides in all of these efforts, and when we look at how New Jersey compares against other states, we fair pretty well. We had one of the fastest timelines to new business applications (those for non-medical operators), and are on-par with states like California, Colorado, Michigan, and Montana with how long it took to begin sales.

Prior to approving the beginning of sales, the CRC had to be certain that adequate supply was available for patients and that the ATCs put in place the proper safeguards to ensure those patients could continue to access their medicine. We have done that and now are holding ATCs accountable when they don't live up to the patient access standards required of them.

While the law required the CRC to review the ATCs for transition outside of the normal application process, beginning new business licensing was always an equal if not more important priority for establishing this recreational cannabis market.

In November 2021, the Cannabis Regulatory Commission announced the beginning of the historic process of accepting applications for new recreational cannabis businesses. We began with growers, manufacturers, and testing laboratories on December 15, 2021. On March 15, 2022, we began accepting applications for retailers. To date, we have received just over 900 applications. I am also proud to report that CRC staff have reviewed 500 of these applications, and applicants have either been moved forward for approval or returned to cure application deficiencies and resubmit.

The CRC has approved 102 conditional licenses, issued 327 cure letters, and we continue to process and review additional applications.

From the start, the CRC has acted in an intentional manner to ensure New Jersey's cannabis industry is as diverse as our great state. The regulations and the Notice of Application Acceptance adopted in November 2021 institute priority review and approval for Social Equity Businesses, Diversely-Owned Businesses, and Impact Zone Businesses. Our application and annual fees are among the lowest in the country - particularly for microbusinesses. The CRC launched a brand new application platform in record time - mere months - and it is simple and easy to understand. Our webinars and website provide free access to all the information the application process requires. Additionally, the NJ-CRC's regulations include protections against predatory contract agreements and our team of investigators work to verify that applicants for businesses licenses are truthful on their applications.

We have done this new work, even as we have completed the work we inherited from the Department of Health. We completed the 2018 and 2019 RFA process and approved 44 of medicinal cannabis business permits - significantly more than intended at the time of those RFAs to ensure we are meeting patient need. Half of those awardees are either minority-owned or minority and women-owned.

The CRC has embraced the outsized responsibility that comes with starting this particular industry in New Jersey. Even as we understand that stakeholder priorities are varied - speed, seizing the economic opportunities, safety, social equity – we have remained committed to building it on a foundation of equity and safety that will be a model for other states. We are committed to ensuring that our regulatory actions and decisions are reflective of our deep understanding that the criminalization of marijuana has had negative and disproportionate effects on people and communities of color. We have known from the beginning this would be difficult and ongoing work, but we are proud of the framework we have already put in place.

The Commission's rules require businesses to adhere to strict testing standards and ensure cannabis items are contained in child-resistant packaging. Personal-use cannabis items must be labeled with specific details so that consumers know exactly what they are getting, including: the identities of the cannabis businesses that created the product, expiration dates, active and inactive ingredients, and a list of all potential allergens in the product. Packages are also required to contain several warnings indicating the product contains cannabis and the toll-free telephone number of the poison control center.

The CRC is willing to take swift action against any business that fails to adhere to these requirements.

Beginning recreational sales on 4/21/22 was an important milestone. But it doesn't mark the end of the process, it marks an important step in a multi-year effort to establish New Jersey as the premier cannabis market on the East Coast. We are doing so in a way that is deliberate, based on lessons-learned in other states, and in a manner that holds true to our core values: equity and safety. We are sure hindsight will agree that the NJ-CRC's path and pace and deliberateness is good for New Jersey and this cannabis market.

The CRC remains dedicated to ensuring this market reflects the diversity of our great state and helps to alleviate the many mechanisms of inequality created by the criminalization of cannabis. To that end, we've provided the Committee with some in-depth data on where we stand with new licensees and we will continue to release data on this growing industry so that all stakeholders have an accurate view. I'm also joined by the Director of the Office of Diversity and Inclusion, Wesley McWhite, who is going to share some updates on progress directly with the Committee.

Looking forward, the Commission's upcoming work will focus on:

- Adopting additional rules for the personal-use industry;
- Modernizing the existing rules for the medicinal industry;
- Monitoring and enforcing rules to ensure compliance; and
- Continued information-sharing on the composition of the cannabis industry and the Commission's future priorities.

There are also several challenges that we need to continue to work on to achieve the goal of making New Jersey's market equitable and accessible. These include:

- Expanding access to capital for new entrepreneurs
- Removing impediments to finding real estate
- Educating municipalities to open up new opportunities for more applicants

- Ensuring medicinal cannabis access is unimpeded by recreational sales

Thank you for your time today. I'm going to turn it over to Director of the Office of Diversity and Inclusion, Wesley McWhite and then we are happy to answer any questions you may have.

*Director McWhite – Office of Diversity and Inclusion Testimony*

Good morning Chairman Stack, Senate President Scutari, and members of the Committee:

The Office of Diversity and Inclusion, termed the Office of Minority, Disabled Veterans, and Women Cannabis Business Development in the statute, is tasked with:

- Promoting participation in the cannabis industry from persons from socially and economically disadvantaged communities;
- Conducting advertising and promotional campaigns to increase awareness of opportunities in the industry; and
- Developing and recommending policies, practices and protocols to ensure diverse representation among owners, operators and employees in the cannabis industry.

The vision of the Office of Diversity and Inclusion is to continue to build upon the social equity framework that has been established by the CRC and the statute. That framework includes our priority application review for social equity, diversely owned and impact zone business, equitable access to information and continuous and ongoing outreach, engagement and relationship building through the Office of Diversity and Inclusion.

The CRC's social equity framework ensures a firm and solid foundation with which we will continue to build, implement and recommended policies that result in cannabis businesses and a workforce that reflect the diversity of our State. NJ stands tall and has been recognized for its social equity efforts so far and there is much more to come.

To meet our charge and our visions, specifically, the Office of Diversity and Inclusion has:

- Established 185 contacts with re-entry groups, minority advocacy groups, disabled veterans/veterans Groups, tribal communities, cannabis industry leaders, many others.
- Held 80 outreach meetings and presentations to stakeholders, community groups, and potential entrepreneurs.
- Established a "Leaders of the Legacy" workgroup to develop recommendations to help people currently or formerly operating in the unregulated market transition to the regulated market.
- Assisted the CRC with ongoing oversight of corporate social responsibility plans and equity at NJ's Alternative Treatment Centers. The Office will be developing an Equity Scorecard so that these efforts are transparent to the public.

I am proud to report that throughout the last 13 months, the CRC has held true to our values of both safety and equity.

While we are only at the beginning of recreational cannabis business licensing, the CRC's policies show promise. We can report that of the 102 conditional licenses 37 are self-identified majority

black-owned and 13 are self-identified as majority Hispanic or Latino/a owned. These conditional license holders must still establish sites and gain municipal approval to convert to a full annual license. Roughly a third of the 102 businesses have owners who have past marijuana convictions.

Of the 44 companies that were recently issued medicinal cannabis awards, half are either minority-owned or minority and women-owned, including 4 that are black or African American owned, 3 that are Hispanic or Latino/a owned, and 8 that are Asian owned. The statute sets goals for medicinal cannabis for 15% minority owned permit-holders and 15% women or disabled veteran-owned. If all these awardees complete the permitting process, New Jersey's medicinal cannabis market will be 19% minority-owned, 19% minority and women-owned, and 33% women-owned.

Continuing to work together is the only way to ensure our industry reflects the diversity of our state – in terms of geographic location, business size, and demographics of business operators and workers.

Cannabis legalization is only one part of addressing issues caused by the War on Drugs. Legalization alone is not enough to undo centuries of systemic exclusion from economic, political, and social opportunities. Social equity, diversity and inclusion is not a destination it is a journey.

We at the Cannabis Regulatory Commission are committed to doing our part to effectuate the justice goals expressed by the Legislature, the Governor, and the public. And we look forward to continued work with our partners, including this body, and any others who share that vision.

Thank you for your time.

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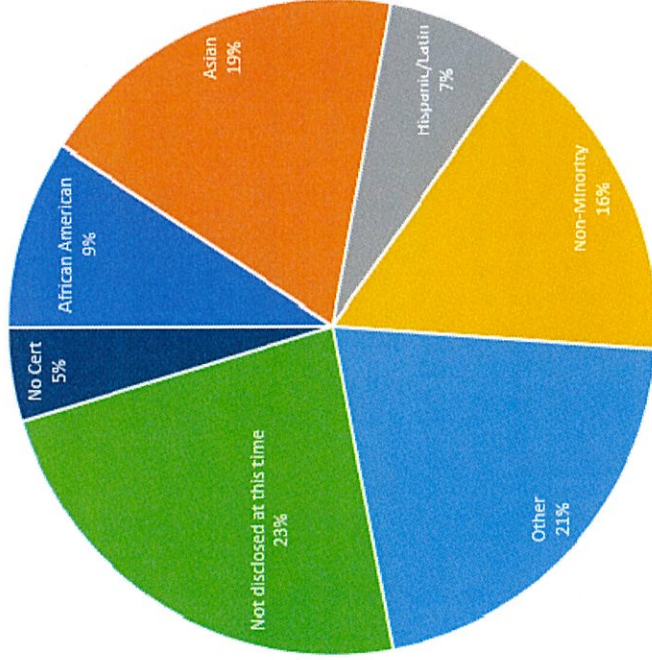
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# 2019 RFA Overview

## Majority Ownership of 2019 RFA Awardees

	Number	Percentage
Asian	8	19%
Black or African American	4	9%
Hispanic or Latino of All Races	3	7%
Non-Minority	7	16%
Other/Not Disclosed	19	44%
No Certification	2	5%
<b>Total</b>	<b>43</b>	<b>100%</b>



\* Subject to verification. Additional information may be available when permitting is complete.

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# Race & Ethnicity

Applications Received Thru May 5<sup>th</sup>, 2022

Majority Owner Race or Ethnicity	
Race or Ethnicity	Number
Asian	7
Black or African American	37
Blank	13
Other or Not Listed	24
White	21
<b>Grand Total</b>	<b>102</b>
	<b>100%</b>

Majority Hispanic or Latino	
Response	Number
Blank	21
No	68
Yes	13
<b>Grand Total</b>	<b>102</b>
	<b>100%</b>

Race or Ethnicity	Majority Ownership		Grand Total
	Not Disclosed	Female	
Asian	0	7	7
Black or African American	3	9	37
Blank	21	0	21
Other or Not Listed	0	7	13
White	0	15	24
<b>Grand Total</b>	<b>24</b>	<b>38</b>	<b>102</b>

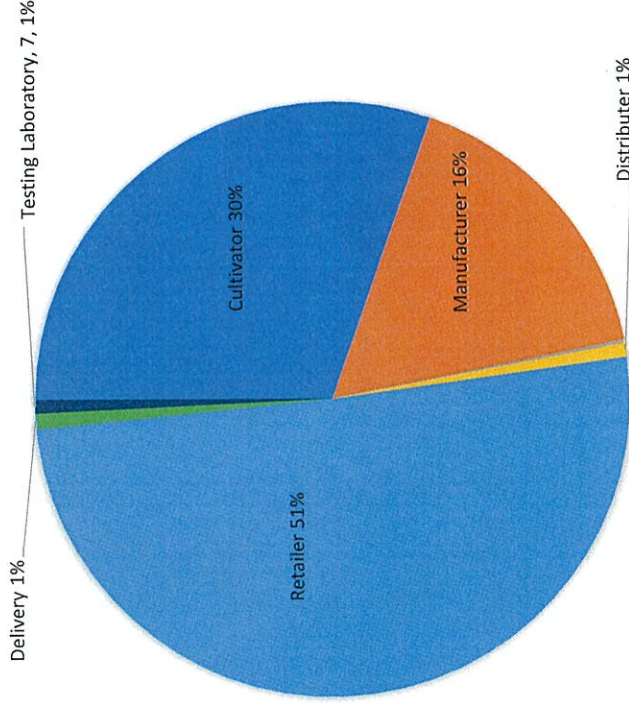
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# Recreational Business Applications

Applications Received Thru May 5<sup>th</sup>, 2022

	<u>Annual</u>	<u>Conditional</u>	<u>Grand Total</u>
Class 1 Cultivator	45	243	288
Class 2 Manufacturer	32	124	156
Class 3 Wholesaler	0	2	2
Class 4 Distributor	1	6	7
Class 5 Retailer	65	415	480
Class 6 Delivery	3	5	8
Testing Laboratory	7	0	7
<b>Grand Total</b>	<b>146</b>	<b>802</b>	<b>948</b>



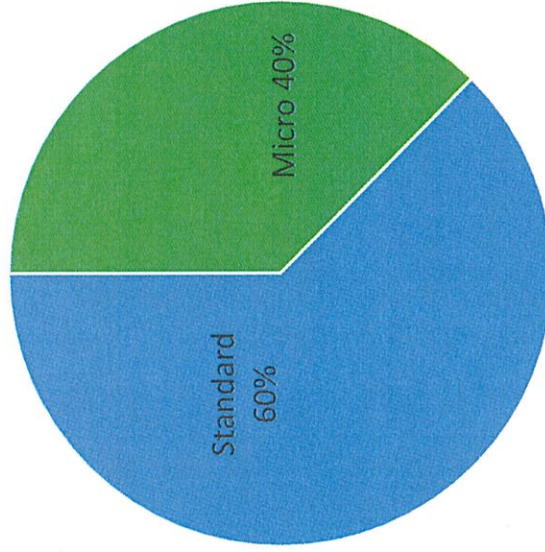
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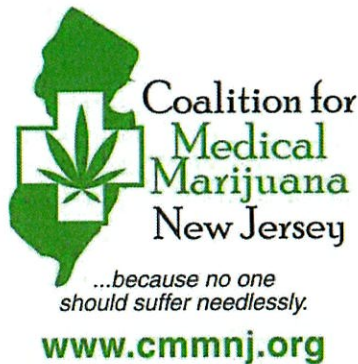


# Application Business Categories

Applications Received Thru May 5<sup>th</sup>, 2022

<u>Business Category</u>	<u>Number</u>	<u>Percentage</u>
Micro-Business	376	40%
Standard-Business	572	60%
Grand Total	948	100%





**Testimony to the Senate Judiciary Committee**

**In support of S313: Authorizes insurance coverage for medical marijuana**

**March 10, 2022**

Insurance coverage for medical cannabis will have profoundly positive effects. It will greatly increase the number of patients who can use this therapeutic modality, it will lower healthcare costs in the state, and it will produce a healthier New Jersey.

New Jersey has some of the most expensive medical cannabis in the country, with an ounce of premium buds costing between \$400-\$500. This makes the medical benefits of cannabis unavailable to many residents who have been impoverished by their illnesses or injuries. We urge New Jersey legislators to pass S313, so that the poor can also have access to the therapeutic benefits of cannabis.

When passed into law, this bill will reduce healthcare costs in the state. Cannabis stabilizes multiple conditions in individuals. Greater access to cannabis therapy will result in fewer emergency room visits, fewer hospitalizations, and fewer surgical procedures. A study released in February 2020 showed a 6.7% decline in workers compensation claim activity where states have approved medical marijuana.

Fears of the federal government's involvement in this issue are unfounded. Congress has forbidden the Department of Justice to interfere with state medical marijuana laws. Please pass S313 into law so that more state residents here can enjoy the multiple benefits of cannabis therapy. Thank you.

Ken Wolski, RN, MPA  
Executive Director, Coalition for Medical Marijuana--New Jersey, Inc.  
219 Woodside Ave., Trenton, NJ 08618  
609.394.2137 [ohamkrw@aol.com](mailto:ohamkrw@aol.com)

Attachments (3): Resume of Ken Wolski, RN  
"Medical marijuana should be covered by health insurance. What's the hold up?" K. Wolski, 2021.  
"Study links lower comp frequency to medical marijuana laws," Louise Esola, Feb. 10, 2020

*The Coalition for Medical Marijuana—New Jersey, Inc. is a 501(c)(3) non-profit educational organization whose mission is to educate the public about medical marijuana.*

**Kenneth R. Wolski, RN, MPA**  
219 Woodside Ave  
Trenton, NJ 08618  
(609) 394-2137, ohamkrw@aol.com

### **Professional Employment**

#### **Self Employed Registered Nurse (RN)**

August 2006 to present

Provide medical marijuana information and updates, via PowerPoint and Zoom presentations, to healthcare and community groups; also, advise individual patients on this issue.

#### **Health Services Manager**

New Jersey Department of Corrections (NJDOC)

Edna Mahan Correctional Facility for Women, Clinton, NJ

East Jersey State Prison, Rahway, NJ

January 2005 to August 2006

Ensured that all contracted health care activities (Medical, Dental and Mental Health) were delivered in accordance with NJDOC policies and procedures at two adult institutions.

#### **Quality Assurance Coordinator**

East Jersey State Prison, Rahway, NJ

February 1997 to January 2005

Provided QA oversight over five central institutions. Participated in Statewide audits. Chairman of the Statewide Policy Committee and the Statewide Telemedicine Committee. Member of the Electronic Medical Record Continuous Quality Improvement Committee (EMR/CQI). Assisted in the implementation of Logician, the statewide electronic inmate medical records system. Utilization Review at St. Francis Medical Center.

#### **Quality Assurance Specialist**

Juvenile Medium Security Facility, Bordentown, NJ

April 1996 to February 1997

Monitored and evaluated the private vendor's contract compliance. Identified and remediated Quality Assurance issues in medical, dental, and mental health disciplines.

#### **Supervisor of Nursing Services**

Lloyd McCorkle Training School for Boys and Girls, Skillman, NJ

April, 1986 to April 1992

Supervised the nursing care of 200 minimum security juvenile inmates. Assisted in the national accreditation of the Training School through the American Correctional Association.

New Jersey State Prison, Trenton, NJ

April 1992 to April 1996

Supervised the nursing care of 2,000 maximum security adult inmates. Supervised twelve RNs and LPNs. Represented State of New Jersey at Institutional and Administrative Law Hearings. Served as Infection Control Officer. Prepared detailed reports on a monthly and annual basis. Developed applicable policies and procedures.

**Graduate Nurse**

NJDOC

Lloyd McCorkle Training School for Boys and Girls, Skillman, NJ

June 1984 to April 1986

Responsible for providing nursing care on all three shifts for 200 juvenile inmates.

**Critical Care PRN Pool RN**

Thomas Jefferson University Hospital

Philadelphia, Pennsylvania 19107

February 1982 to April 1984

Independent Contractor delivering nursing care in eight different critical care units. Medical ICU; Surgical ICU, Neurological ICU; Respiratory ICU; Surgical CCU; Medical CCU; Intermediate CCU; Pediatric ICU.

**Public Health Nurse**

City of Trenton: City Hall

August 1980 to February 1981

Visited homes of city residents and performed prenatal and infant examinations. Scheduled and ran Child Health Conferences. Visited city schools weekly and functioned as School Nurse. Periodically participated in various health clinics for city residents: Flu shots, VD Clinics, etc. Kept associated records.

**Critical Care Primary Nurse**

Mercer Medical Center

Trenton, New Jersey 08608

August 1978 to July 1980

Professional Registered Nurse in the Intensive Care Unit and Coronary Care Unit of a community-based acute care facility.

**Psychiatric Staff Nurse**

Carrier Clinic

Belle Mead, New Jersey

January 1977 to August 1978

Registered Nurse on locked and open units in private psychiatric hospital.

**Institutional Attendant/Charge Attendant; Graduate Nurse/Acting Supervisor**

Trenton Psychiatric Hospital, Trenton, NJ

New Jersey Department of Institutions and Agencies

June 1973 to December 1976

Direct care of psychiatric patients in The Annex. Since June 1976, Graduate Nurse in charge of nursing care for up to 400 psychiatric patients on the 3-11 shift. Supervised a staff of 20.

### **Educational Degrees**

Master of Public Administration (MPA)  
Rutgers University, Newark, New Jersey  
February, 1990 to January 1992

Associate in Applied Science (Nursing), with honors  
Mercer County Community College, West Windsor, New Jersey  
September, 1974 to June 1976

Bachelor of Arts, with Distinction in Philosophy  
Rutgers University, New Brunswick, New Jersey  
September, 1969 to June 1971

### **License and Certification**

New Jersey Registered Nurse Multistate License #26NO06161700 expires 5/31/23.  
Certified Public Manager (CPM), Levels I – VI; New Jersey Department of Personnel/Rutgers University, November 1987 to June 1989

### **Volunteer/Professional Associations**

Co-founder and Executive Director of the Coalition for Medical Marijuana—New Jersey, Inc. (CMMNJ), since 2003.  
Founding Board member of the American Cannabis Nurses Association, (ACNA) 2010.  
Governor’s AIDS Advisory Council alternate, 2001-2005.  
Past Board Member and Chairman of the Governmental Affairs Committee of the Southern New Jersey Chapter of the Association of Practitioners of Infection Control (APIC).  
Member of American Nurses Association and New Jersey State Nurses Association.  
Past Board Member, Mercer County Community College Alumni & Friends.

### **Awards**

New Jersey State Governor’s Jefferson Award Presented to CMMNJ in the Volunteer Group Category, 2021.  
New Jersey State Nurses Association/Institute for Nurses “DON Award” for a decade of advocacy for medical marijuana in New Jersey, 2012.  
The National Organization for the Reform of Marijuana Laws (NORML) “Peter McWilliams Award” For Outstanding Achievement in Advancing the Cause of Medical Marijuana, 2016.  
Capital City Area Black Caucus “Community Recognition for Your Commitment to Persons of Color & Minority Participation in New Jersey’s Cannabis Industry,” 2019.  
Cannabis Social Equity in America Community Service Acknowledgement Honoree, 2021.  
New Jersey Governor’s “Certificate of Appreciation” for Improving Government in New Jersey, for conceiving of, and implementing, the NJDOC Telemedicine Project, 2005.

# It's time for N.J. to fully embrace medical marijuana

By [Ken Wolski Times of Trenton Guest Columnist](#) January 20, 2016

Recently, the Legislature passed and Gov. Chris Christie signed into law A 4587, a bill requiring schools and facilities for the developmentally disabled [to allow the administration of medical marijuana to qualifying patients](#).

This law was inspired by Genny, the 16-year-old daughter of the Barbour family of Maple Shade, N.J. Genny has a seizure disorder that was not controlled by conventional drugs or even by brain surgery. Only medical marijuana controlled her seizures. Genny's school, however, would not permit her caregiver/mother to give a noon time dose of marijuana oil to her while she was in the facility.

A 4587 will allow Genny's mother to come into the school and give Genny her medicine.

Genny is lucky that she has a caregiver who is able to come to her school on a daily basis. But what about all the other "Gennys" in the state?

A woman recently called me from Bergen County. She said her son also had a poorly controlled seizure disorder. She wanted medical marijuana for him, but he lived in a group home that was an hour away. She said she was not physically able to drive to the group home every day, let alone multiple times a day, to give her son the doses of marijuana that would be required to control his seizures.

Nor should she have to. It is entirely impractical, and in most cases impossible, for a caregiver to duplicate the duties of a nurse and give the doses of marijuana throughout the day that the patient requires.

A broader exception needs to be created for institutionalized patients so that nurses may administer oral doses of medical marijuana along with all the other medications that they give. The State of New Jersey must recognize its status as caregiver of last resort to the many patients who are under its care — this applies not only to residents of facilities for the developmentally disabled, but also to residents in psychiatric hospitals, nursing homes, group homes, and hospices, as well as to inmates in correctional facilities.

I know these facilities. I worked for four years at Trenton Psychiatric Hospital and for 22 years at the New Jersey Department of Corrections. Some of the residents and inmates at these facilities suffer from cancer, HIV/AIDS, seizures, multiple sclerosis and other conditions that qualify for medical marijuana.

There is no reason to withhold oral doses of medical marijuana from these patients and in fact, it may well be illegal to do so. The courts have determined that inmates in New Jersey are legally entitled to "community standard of care" and right now, that care includes marijuana therapy. The Compassionate Use Medical Marijuana Act only forbids smoking marijuana in state correctional facilities—it does not forbid oral forms of marijuana to be dispensed there.

The staff in these facilities is already trained to administer and account for controlled substances. They are trained to observe for side effects and adverse reactions. The State simply needs to develop policies and procedures to administer oral forms of marijuana to the patients in its care who qualify, under state rules, for this therapy.

The Medicinal Marijuana Program Rules adopted by the New Jersey Department of Health on Nov. 23, 2011 specifically allowed medical marijuana to be packaged and dispensed not only in dried flower form, but also as "Oral lozenges...or Topical formulations for direct dispensing to qualifying patients." Sadly, over four years later, no marijuana lozenges or patches are yet available from the State's Alternative Treatment Centers. Hopefully, these lozenges will be available soon so that caregivers, like Genny's mother, will not have to use their home kitchens and internet recipes to convert the dried flowers into oral preparations.

Beyond the legal and moral obligations to meet the needs of these institutionalized individuals in this way, there are compelling financial reasons to do so. It can save the State tens of millions of dollars to replace extremely expensive pharmaceuticals with marijuana lozenges. With marijuana's broad range of therapeutic effects, it is not surprising to see that one or more additional problems are also managed when the qualifying condition is adequately treated. For example, Genny Barbour also has autism, and her self-injurious autistic behavior is controlled much better now that she takes regular doses of marijuana oil for her seizures.

Of course, when marijuana lozenges are finally available, the State will have to undo the absurd restriction imposed by Gov. Christie in 2013 that limits oral marijuana preparations only for minors but not for adults. When the State finally does implement its role as medical marijuana caregiver for the institutionalized, the result will be improved healthcare at tremendous savings.

Ken Wolski, RN, MPA, is the executive director of the Coalition for Medical Marijuana — New Jersey, Inc.  
[http://www.nj.com/opinion/index.ssf/2016/01/nj\\_needs\\_to\\_embrace\\_medical\\_marijuana\\_opinion.html](http://www.nj.com/opinion/index.ssf/2016/01/nj_needs_to_embrace_medical_marijuana_opinion.html)

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curaleaf

Social Impact Report 2021

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## Introducing Curaleaf's Social Impact Report

A message from our CEO Joe Bayern:



Something we say often here at Curaleaf is that there's never been a better time to be in cannabis, and there's never been a better place to be than Curaleaf. We also like to say that big cannabis can be good cannabis, and good cannabis can be big business. The proof points are visible in the hard work of our Rooted in Good initiative, and the mission-driven culture that we've built.

What we are doing every day changes people's lives. There's a difference between talk and action. As the CEO of Curaleaf, I am beyond proud that we are a company that walks the walk — we do what we say we will do. One of the things we said we'd do is launch Rooted in Good with a focus on three key pillars: Diversity, Equity & Inclusion; Social Equity; and Sustainability. I am thrilled that we've surpassed many of our internal benchmark metrics against the key goals we set in early 2021 when we launched the program, such as:

- 420x25: Do business with 420 new cannabis brands, ancillary suppliers and advocacy organizations from underrepresented communities by 2025. We're now working with 170 new and diverse partners and suppliers after one year of this program.
- Employ at least 10% of all new hires from populations impacted by low-level cannabis-related offenses. In 2021, 3.7% of new hires met this criteria, and we look forward to increasing that number in 2022.
- Contribute at least \$1 million in community investment to programs that address collateral consequences associated with marijuana-related offenses. In total, our Curaleaf and Select brands contributed more than \$2,400,000 to our partner organizations across the country in 2021.

As a company, we believe in giving back; we believe in supporting the communities we do business in and we believe in sharing the wealth and opportunities of this industry with the people who were disproportionately affected by the War on Drugs. These values live at the center of Curaleaf, and we bring them to life through Rooted in Good. We've done this work with a localized focus, placing a narrow lens on the communities we serve. The core of our focus at Curaleaf is on the health and wellness of our customers and patients, and holistic community health is not possible if all of our citizens do not have their basic needs met.

Beyond these key pillars, we also support our communities by focusing on the following causes: social justice, food insecurity, health and wellness and cannabis education, and this report, our first, highlights some of the work we've been doing in those areas.

To meet our community goals, we rely on our company values, which come to life at every retail location, cultivation facility and corporate office that we operate. From our Executive Roundtable Program to our Employee Resource Groups and 420x25 partners, I'm incredibly proud of the work and the progress highlighted in this report, and the company culture we've built together.

We look forward to continuing to bring Rooted in Good to life in the communities we serve all over the world. We thank our customers, patients, partners, team members and the entire cannabis community for their support in making our first ever social impact report possible. We know there is much more work to do, and we are proud to be a leader on that journey.

Thank you,  
Joe Bayern

# About Curaleaf

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Curaleaf is America's largest provider of consumer products in cannabis. Our vision is to become the world's leading cannabis company by leading the world in customer focus, education and accessibility to high-quality products backed by science. Our mission is to improve lives by providing clarity around cannabis and confidence around consumption.

At Curaleaf, we understand that being a leader in the industry comes with a great responsibility for our communities and our planet. We're dedicated to ensuring that our actions and decisions prove that big cannabis can be good cannabis—for businesses, customers, patients, communities and causes.

Curaleaf is headquartered in Massachusetts, with corporate hubs in Arizona, California, Florida, Illinois, Nevada, New York, Oregon, and the U.K., and more than 140 dispensary and cultivation locations throughout the

United States and Europe. Our 5,400 team members help support 554,000 patients in the communities we serve.

Curaleaf was founded in 2010 as one of the first medical device companies to help late-stage cancer patients use cannabis in the hospital. As the company's passion for helping patients in need of alternative treatment methods expanded, a new course was charted. The team pivoted to medical cannabis dispensaries in 2015, opening our first location in New Jersey.

Curaleaf announced the acquisition of EMMAC Life Science Group in March 2021—now Curaleaf International—bringing our operations global. Curaleaf International is Europe's largest vertically integrated cannabis company, bringing together pioneering science and research with cutting-edge cultivation, extraction and production.

At the close of 2021, we operate 118 retail locations in

23 states for both medical and adult-use cannabis, and growing.

At its core, Curaleaf is committed to our team members, patients, customers and the planet through our Diversity, Equity & Inclusion (DEI), social equity and sustainability efforts as part of Rooted in Good, our Corporate Social Responsibility (CSR) initiative. Rooted in Good delivers social impact through focused efforts that prioritize resources for social equity opportunities throughout the industry and within our communities.

We believe that to be Rooted in Good is to walk the walk. We work quickly to move beyond conversation and into action. As a leading global cannabis company, these commitments are not an addendum to our success; rather, our success is a direct result of these efforts to build a more diverse, equitable and sustainable cannabis ecosystem.

# What We Stand For

## Our Mission

To improve lives by providing clarity around cannabis and confidence around consumption

## Our Vision

To be the world's leading cannabis company through education, accessibility and customer satisfaction with high-quality products backed by science

## Our Values

- Passionate Commitment
- Driven to Deliver
- Respect for All
- Commitment to Innovation
- One Curaleaf

## Our Rooted in Good Pillars

### DIVERSITY, EQUITY & INCLUSION

We've appointed a diverse Task Force of Curaleaf team members to spearhead our Corporate Social Responsibility activities and define the path for inclusive, positive impact. From our internal teams to our supply chain, we are generating greater diversity and equity for all involved.

As a part of this work, we've successfully implemented Employee Resource Groups (ERGs) to connect our people with the services they need to thrive. We've also initiated a company-wide unconscious bias training.

### SOCIAL EQUITY

As a cannabis company of our size, it's our responsibility to use our leadership for good.

That means we're working to increase economic opportunities for folks within historically disadvantaged communities, and we provide mentorship and assistance to aspiring cannabis entrepreneurs.

We also support organizations that tackle current social issues, like mitigating the harm of the War on Drugs and fighting for criminal justice reform.

### SUSTAINABILITY

Challenges with environmental sustainability run deep in any industry. That's why we believe it's the responsibility of our business to lead by example and change the status quo.

We're auditing our practices, identifying new ways to work and reporting on the areas we know that we can improve. We also partner with consultants to find eco-driven solutions to lighten our footprint wherever we can.

This planet gave us cannabis, after all. We say it's time to give back.

## Our Causes



CANNABIS EDUCATION



HEALTH



WELLNESS



FOOD INSECURITY



SOCIAL JUSTICE

20x

# Who We Are

Curaleaf's management team pushes the organization and cannabis industry forward through thoughtful and intentional leadership.



Photography: @johnmichaelliam  
www.johnmichaelliam.com/

Cannabis  
Confrontive



## Joseph Bayern | Chief Executive Officer

Joe Bayern joined Curaleaf in December 2019. As Chief Executive Officer, Joe is responsible for the overall performance of the company against a wide array of stakeholders. His job is to inspire every function, from cultivation to communications, to flawlessly execute our vision: To be the world's leading cannabis company by leading the world in customer focus, education and accessibility to high-quality products backed by science. Joe begins each day embodying the organization's value of **Passionate Commitment** by driving his team to identify and execute against economic, environmental and social risks and opportunities both for Curaleaf and the industry as a whole.



## Antonio Costanzo | Chief Executive Officer, Curaleaf International

Antonio Costanzo joined Curaleaf International in September 2018 when our U.K. operations were still under the name of EMMAC Life Sciences, where Antonio was the co-founder and CEO. Antonio is an experienced senior executive with a successful track record in public and private companies and in innovating complex and highly regulated industries.



## James Shorrtis | Chief Compliance Officer

James Shorrtis joined Curaleaf in March 2020. As Senior Vice President, Chief Compliance Officer and Counsel, Jim leads the company's regulatory compliance and security program across the Curaleaf footprint. By seeking to ensure that Curaleaf complies with all state and local regulations when cultivating, manufacturing and delivering its products, Jim and his team members are focused on supporting the company's efforts to market and sell safe,

high-quality products to patients and consumers who also value Curaleaf's commitment to transparency and respectfulness, aligning with our **Driven to Deliver** value.



## Matt Darin | President, U.S.

Matt Darin joined Curaleaf in July 2020. As President of Curaleaf, Matt oversees the execution of our company initiatives, focusing on retail, wholesale, operations, cultivation technology, quality, real estate and supply chain. Matt's work aligns with our **One Curaleaf** value as he continuously looks to create a cohesive workforce oriented in creating a winning culture rooted in effective communication, respect and the desire to improve lives by providing clarity around cannabis and confidence around consumption.



## Kate Lynch | SVP, Marketing

Kate Lynch joined Curaleaf in January 2019. As Senior Vice President of Marketing, Kate oversees and spearheads brand and product strategies as well as retail, wholesale and digital channel marketing efforts in support of these strategies. Aligned with Curaleaf's **Driven to Deliver** value, Kate and her team continually look to establish processes and ways of thinking that drive efficiencies, improve the quality and output of work, and use data-driven decision making to optimize the overall performance of our product and marketing efforts.



## Jessie Kater | SVP, Innovation, Research and Development

Jessie Kater joined Curaleaf in February 2018. As Senior Vice President of Innovation, Research and Development, Jessie oversees research and product development. This work is

focused on furthering cannabis and cannabinoid science and understanding, a broad array of product and process development platforms, collaborations with clinical and academic partners and consumer safety initiatives. Jessie continues to build an R&D platform that aligns with our **Commitment to Innovation** value, bringing diverse skill sets and individuals together to collaboratively further the science of cannabis in a socially and ethically responsible manner.



**Talley Wettlaufer | SVP, Retail**  
Talley Wettlaufer joined Curaleaf in July of 2020. As Senior Vice President of Retail, Talley oversees and leads the largest team within Curaleaf with over 2,500 members that make up our retail

division. Her work aligns with our **Driven to Deliver** value, as she is continually striving to foster an inclusive environment driven by the desire to improve the lives by creating confidence and accessibility around cannabis use.



**Tracy Brady | VP, Corporate Communications**  
Tracy Brady joined Curaleaf in 2019 after holding several senior roles in marketing, advertising and entertainment at a variety of

Fortune 100 companies. As the Global VP of Corporate Communications for Curaleaf, Tracy is charged with driving awareness and visibility of the company's mission, vision and values, and elevating Curaleaf's profile for internal and external stakeholders. She is *Driven to Deliver* the **One Curaleaf** and **Respect for All** values—by raising awareness and engagement for the external CSR programs and partnerships of Rooted in Good, and by sponsoring and advising internal initiatives such as the DEI Task Force, ERGs and the Executive Roundtable.

**Khadijah Tribble | SVP, Corporate Social Responsibility**



Khadijah Tribble joined Curaleaf in March 2020 as Vice President of Corporate Social Responsibility, and was promoted to Senior Vice President in early 2022. As Senior Vice President of Corporate Social Responsibility, Khadijah oversees and spearheads our Rooted in Good initiatives, focusing on Social Equity, Environmental Sustainability, and Diversity, Equity & Inclusion. Her work aligns with our **Respect for All** value, as she continuously explores avenues to create a diverse, meaningful and inclusive culture for all team members, customers and communities.

## Curaleaf Board of Directors



**Boris Jordan | Executive Chairman of the Board**

Boris is the co-founder of Curaleaf. Boris is an American businessman and the co-founder of Renaissance Capital Group, an international investment and advisory firm and the Sputnik Group, a private equity and advisory group with investments across the United States and Europe.



**Joseph Lusardi | Executive Vice Chairman**

Joseph Lusardi is the co-founder of Curaleaf. Joseph is a pioneer in the U.S. cannabis industry and is credited with opening one of the first medical cannabis operations on the East Coast. He has a decade of cannabis industry experience, as well as 20 years' experience in finance, private equity and entrepreneurship.



**Mitchell Kahn | Director**

In 2014, Mitchell Kahn co-founded Grassroots Cannabis to provide safe and efficacious cannabinoid products to consumers. As Chief Executive Officer of the largest private, vertically

integrated cannabis operation in the United States, he established operations in 11 states, obtained more than 60 licenses and empowered over 1,100 team members.



**Karl Johansson | Director**

Karl Johansson has broad experience in multinational accounting and the coordination of international tax engagements, mergers and acquisitions, and due diligence

projects in key global markets. Karl has been a member of the Emerging Europe Business Council and Corporate Governance Task Force of the World Economic Forum, as well as the Foreign Investment Advisory Councils of Kazakhstan, Ukraine and Latvia.



**Peter Derby | Director**

Peter Derby is a founding partner of Concinity Advisors, LP, the sub-advisor with investment discretion for the Capital Stewardship Strategy, formed in 2011. During William H.

Donaldson's 2003-2005 tenure as Chairman of the Securities Exchange Commission, Mr. Derby served as the Securities Exchange Commission's Managing Executive for Operations and Management.



**Dr. Jaswinder Grover, M.D. | Director**

Jaswinder Grover, M.D., is an orthopedic and spine surgeon who has practiced in Las Vegas for the past 25 years. Dr. Grover is

the founder, developer and the owner of the Allegiant Institute and the Smoke Ranch Surgery Center, a referral center for patients with spine and pain disorders, which together employ more than 100 people in Las Vegas.

# By the Numbers

23

States in which Curaleaf operates

118

Dispensaries across the country

554,000+

Medical patients served

25

Cultivation sites for hand-grown plants

5,428

Team members worldwide

5,230,000

Medical transactions

\$1,209,661,000

Total revenue in 2021

The numbers speak volumes, but they don't always tell the full story. Curaleaf's 2021 accomplishments—from market expansion to customer base—are the result of the company's investment in its team members and communities. By empowering our team members and working to rectify the harm caused by the War on Drugs, we help move our organization—and the industry as a whole—forward.

## Curaleaf International

**Terre Verde**  
Portugal | Cultivation

**Medalchemy**  
Spain | Manufacturing, R&D

**Rokshaw**  
England | Manufacturing

**CPBM Access**  
England | Pharmacy

\$585,734,000

Gross profit from cannabis sales

\$298,037,000

Adjusted EBITDA

\$.15

Net loss per share

% Year Over Year Change:

93%

Total Revenue

113%

Gross Profit from Cannabis Sales

107%

Adjusted EBITDA

# Rooted in Good

At Curaleaf, we understand that being a leader in cannabis comes with great responsibility to the industry, our communities and the planet. Our values, including **One Curaleaf** and **Respect for All**, help to inform a company culture that embraces differences, encourages growth, considers reflection and strives to rectify the historical missteps of the cannabis industry.

## A Strategy Rooted in Impact

Rooted in Good, our Corporate Social Responsibility initiative, delivers social impact through focused efforts that match Curaleaf's capabilities while prioritizing resources for social equity programming to deliver real opportunities across the cannabis ecosystem. To be Rooted in Good is to consider the holistic health of the entire community—patients, team members, neighbors and our shared local and global environment.

While we must always continue to discuss, reflect and seek input, our success is dependent upon action. To help chart our course of action, we direct our efforts into three foundational pillars.

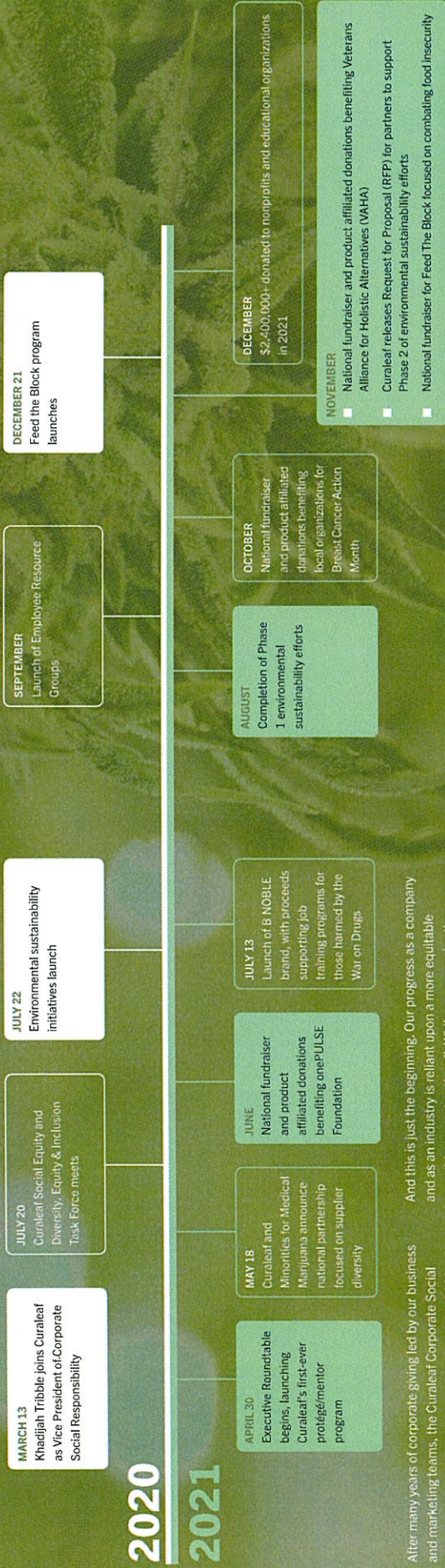
## Rooted in Good Initiatives

(Established Q1, 2021)

- Employ at least 10% of all 2021 new hires from populations touched by low-level cannabis-related offenses.
  - 420x25: Do business with 420 new cannabis brands, ancillary suppliers and advocacy organizations from underrepresented communities by 2025.
  - Contribute at least \$1 million in community investment to programs that address collateral consequences associated with marijuana-related offenses.
- To achieve these goals, Curaleaf cultivates **Strategic Social Partnerships** to prioritize resources and increase impact. Our partners include organizations such as Women Grow, Minorities for Medical Marijuana, onePULSE Foundation, Veterans Alliance for Holistic Alternatives and B NOBLE.



# Recent Timeline of Corporate Social Responsibility



After many years of corporate giving led by our business and marketing teams, the Curaleaf Corporate Social Responsibility team came to fruition in March 2020, when Khadijah Tribble joined the team as Vice President. During the remainder of that year, the CSR team created and fine-tuned its strategy. This includes designating Rooted in Good's pillars and national causes, along with a road map to guide Curaleaf on its journey to being a more socially and environmentally conscientious company.

And this is just the beginning. Our progress as a company and as an industry is reliant upon a more equitable cannabis ecosystem for all. While we recognize these accomplishments that move us forward, we remain bolstered by the fact future success requires we remain vigilant and action-oriented in our commitment to CSR.



Curaleaf Social Impact Report

## 420x25

By 2025, Curaleaf aims to do business with 420 new cannabis brands, ancillary suppliers and advocacy organizations from underrepresented communities including veteran-, women-, queer-, disabled-, and minority-owned businesses.

## 420x25 Spotlight: Bouqué

Bouqué, a Black-owned premier rolling paper brand founded in 2017, became one of Curaleaf's first 420x25 retail partners in 2021. Our team worked strategically to ensure a successful relationship with Bouqué through retail events, virtual events, social media and newsletter features. Since this partnership, Bouqué experienced the following year over year growth:

- 300% increase in revenue
- 760% increase in unit sales
- 400% increase in overall orders

## 170

New and diverse partners and suppliers in 2021



19

Bouqué was founded in 2017 in Washington, D.C., with a focus on making the cannabis flower the forefront of the cannabis experience with rolling papers and other products.

Our relationship with Curaleaf has helped us scale and meet consumers across different markets. I have also definitely gained some skills as an entrepreneur in terms of conducting business and best practices.

For example, we are now in the Illinois market. Because of Curaleaf, we have a reason to go into that market and meet the cannabis users in it. With Curaleaf in other states and having our products on their shelves, it allows us to have that reach to different people in different markets—both physically and socially. Just giving us that reach across state lines has been extremely beneficial. And with that, the size of the orders that come in through Curaleaf has helped us to scale our business and grow it faster.

This stamp of being in a partnership with Curaleaf has been great for my business and for other brands or businesses that want to do business with

Bouqué—and you can't quantify it. You can't put a number to it. I just know that we have seen other business opportunities because of our partnership with Curaleaf.

I think what stands out with Rooted in Good is the initiative—coming out and approaching different brands to do this. It is important work that benefits a lot of parties. Sometimes in this industry, people can speak a good game. But from my experiences, Curaleaf has delivered on that promise in terms of really making sure that we were able to hit the shelves and have the exposure that they felt that we needed.

This work is making a unique impact because it's a conversation. With that conversation, people have to talk about things that may be uncomfortable—things that people might not want to hear. Some people just want to consume their cannabis and don't really care about the social impact of everything, so it forces people to have that conversation.

It also creates a unique opportunity for good commerce. People now find a brand that speaks to them and they're willing to pay for that.

— Corey Dunson | Founder and CEO of Bouqué and 420x25 partner

26X

## 420x25 Spotlight: Illinois Equity Staffing

At Illinois Equity Staffing, we have three goals: raise awareness; get folks hired; and change policy. We want people to know that there are massive barriers to entry from a job opportunity perspective for those who are justice-impacted or who have criminal records. We also want people to know that it is going to take policy and legislative change to lower and eradicate those barriers. That's why we collect case studies. Being able to partner with Curaleaf—they've helped to give us the case studies that prove on paper that with a real person's life that this is really happening.

Here in Illinois, we took a case study and presented it at the state level with regulators and served on a panel with the Illinois State Police and others. We talked through how the badging process in Illinois is affecting Black and Brown people. Now the plan is to have a piece of legislation on the table to combat the issues that we saw. Case studies helped in starting that conversation.

Curaleaf is trying to help people understand that we're still in the same boat. Even though laws for cannabis possession have been lowered or eradicated, the actual long-term effects of being justice-impacted are still keeping the very people who built the industry out of the industry. They're trying to find a way to change policy.

No other multi-state operator (MSO) that is plant-touching is talking about justice-impacted candidates except for Curaleaf. Now other people want to start having the conversation. At the end of the day, the more merrier. The more people we can get involved in the conversation, the more impact we can have. I think they effectively started that ripple effect.

—Shawnee Williams | Co-founder, Illinois Equity Staffing

3.7% Percentage of 2021 new hires that meet Second Chance criteria\*

6% Percentage of new hires in our Western region that meet Second Chance criteria

\*Due to a hiring freeze, the Second Chance Hiring initiative was temporarily paused in Q3 of 2021

## 420x25 Spotlight: Mass CultivatED

In 2018, a huge reform bill was passed in Massachusetts to allow a lot of people in our criminal justice system to transition back into society. At the same time, the state legalized cannabis recreationally. We saw those two things as going hand-in-hand. That's when we started Mass CultivatED. We saw education as a way for us to prepare a new workforce to be able to start in the cannabis industry.

Curaleaf provided us with a platform to get our name out there. As we are thinking about growing our organization, we want to place people in jobs, but we also want to give people the opportunity to create their own businesses if they have that entrepreneurial interest. Curaleaf has done a great job of helping to build our network with Black-owned businesses. We can create mentorship

opportunities with people in our programs so that they can meet individuals who are getting their licenses and opening up, and learn about the process of getting investments and developing business plans. Curaleaf has been really hands-on. They've shown up to each of our planning meetings when we were developing our curriculum, thinking about what we need to add to the fellowship. They sponsor our record sealing and expungement events. They'll be a featured presenter at that clinic to explain what opportunities are available. I've had people from the Rooted in Good team talk about their journey in cannabis, and also give the right training on how to do things at a cultivation site or a retail site. Between the planning, showing up to our events and coming into the classroom, Curaleaf provides a lot of great support and resources to all of our fellows and to our organization.

— Ryan Dominguez | Executive Director, Mass CultivatED

## Second Chance Hiring Initiative

To lift those impacted by low-level cannabis-related offenses, Curaleaf works with strategic partners to create a pipeline of hiring in eligible states, including Arizona, Illinois, Massachusetts and New Jersey. Throughout this process, we strategically partnered with local recruiting agencies including Illinois Equity Staffing, RiseKit, Olive Harvey College, THC Staffing, ConConnect and Mass CultivatED.

Although we set a steep hiring goal for ourselves, we understand that change doesn't occur overnight. In addition, current laws in many states prohibit people with prior cannabis convictions from working at cannabis companies. We look forward to these laws changing with the support of our Government Relations team. In the meantime, we are making this initiative one of our top priorities.

# Passionate Commitment



To be Rooted in Good is to deliver social impact through focused efforts that lift up the community. We're dedicated to supporting entrepreneurs, patients and each other.

23

Working closely with my mentor I am utilizing the program to successfully rebrand and relaunch Verdure CBD skin care while gathering social wealth accumulation within the cannabis industry. This experience has been life-changing. I have not only built a strong relationship with my mentor and his family, but he has also taught me so much about bringing a concept that is in your brain to a tangible item and brand. The Executive Roundtable is allowing me to enhance the skills I have while also gaining new ones.

— William Clark IV | Customer Support Specialist at Curaleaf and cannabis entrepreneur



As a leading global brand, it's our responsibility to go beyond the conversations and work toward change. For members of communities located in areas disproportionately impacted by the War on Drugs, opportunities for entrepreneurship and networking can be limited. Addressing this inequity is part of redefining the culture of cannabis as a whole.

## Executive Roundtable

Launched in 2021, the Curaleaf Executive Roundtable provides mentorship, education, networking opportunities and entrepreneurial support for individuals from communities harmed by the War on Drugs. Throughout a full-time, one-year curated program, protégés work closely with Curaleaf executives from the C-Suite to VPs. This relationship provides guidance from industry leaders who are invested in protégés success and growth. By matching mentees through analysis of goals and resources, the Executive Roundtable opens doors to opportunities.

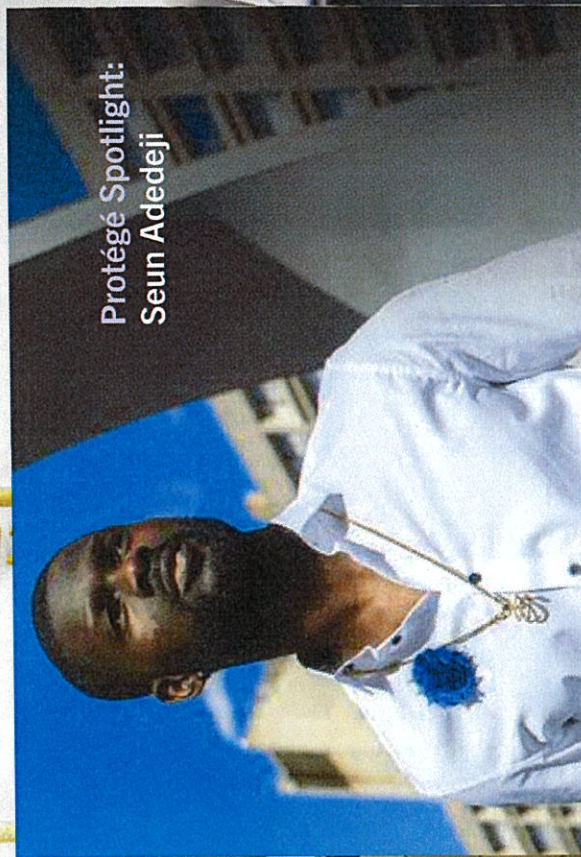
In April 2021, Curaleaf introduced our first cohort of 19 protégés: creators, innovators and entrepreneurs pushing to bring their ideas to life, in need of support from established business professionals. Since the creation of the Executive Roundtable, we have been proud and excited to see our protégés opening dispensaries, creating new product lines and finding their "cannabis family"—a true mentor they can reach out to connect them with industry contacts, and someone who sees them as an extension of the Curaleaf family.

The work of these entrepreneurs will impact the future of social equity in cannabis.

28X

gold

ket



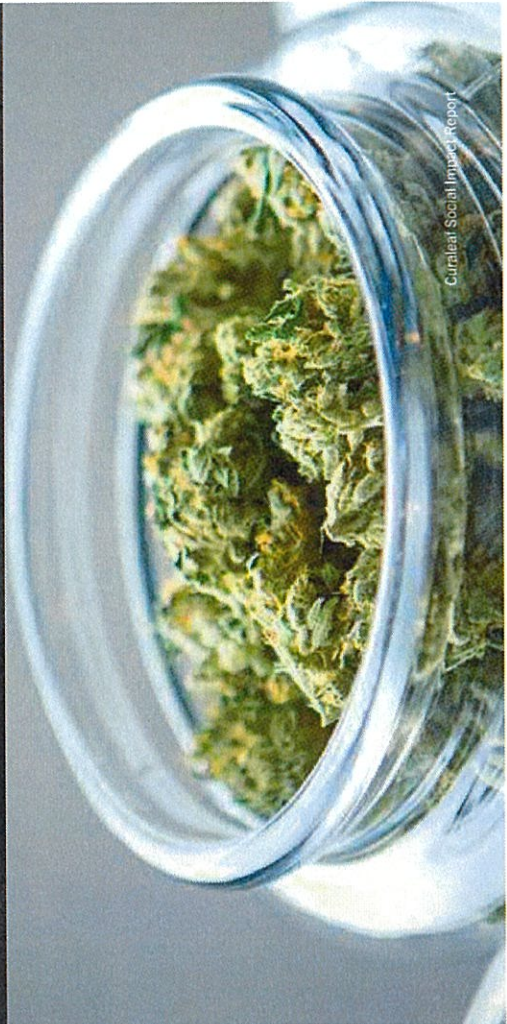
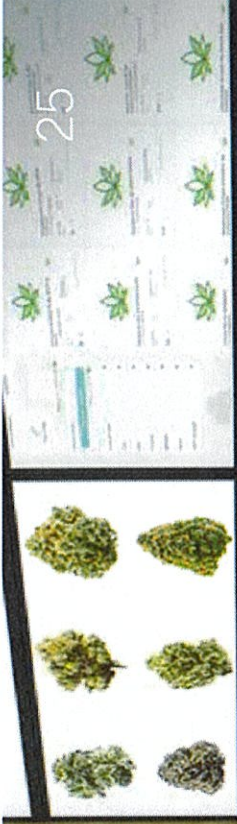
### Protégé Spotlight: Seun Adedeji

Founder of Elev8 Cannabis, a minority-owned business operating in Massachusetts and Oregon, Seun was matched with Curaleaf Northeast Regional President Patrik Jonsson as part of the Executive Roundtable. The two are in regular communication, with Patrik supporting Seun at in-person events while traveling the country. Their relationship has grown into something meaningful to both of them.

“I’m a young minority business owner. I’m pouring a tremendous amount of capital into the licensing process, into the lobbying effort, into going to the town community agreements—selling them on our vision and mission and selling them on who we are. Curaleaf has been a big help with product. They gave us close to a quarter of a million dollars in product when we needed it. Things like that go a long way for a mom-and-pop business. That’s why I’m so appreciative of what Curaleaf really stands for—they are truly trying to do good, period.”

— Seun Adedeji | Founder, Elev8 Cannabis

# Elev8 CANNABIS



Curaleaf Social Impact Report

29x



**\$9,000,000+**

Amount of money saved by patients through compassion discounts in 2021

**\$66,000**

Worth of medicine donated in 2021

Accessing cannabis is vital to the health and wellbeing of many patients and caregivers. In addition to monetary donations, in-kind product donations play a key role in helping many access compassion products. Removing that barrier between patient and plant is one way that Curaleaf continues to break stigmas and advocate for medicinal cannabis.

### Donating Product to Patients

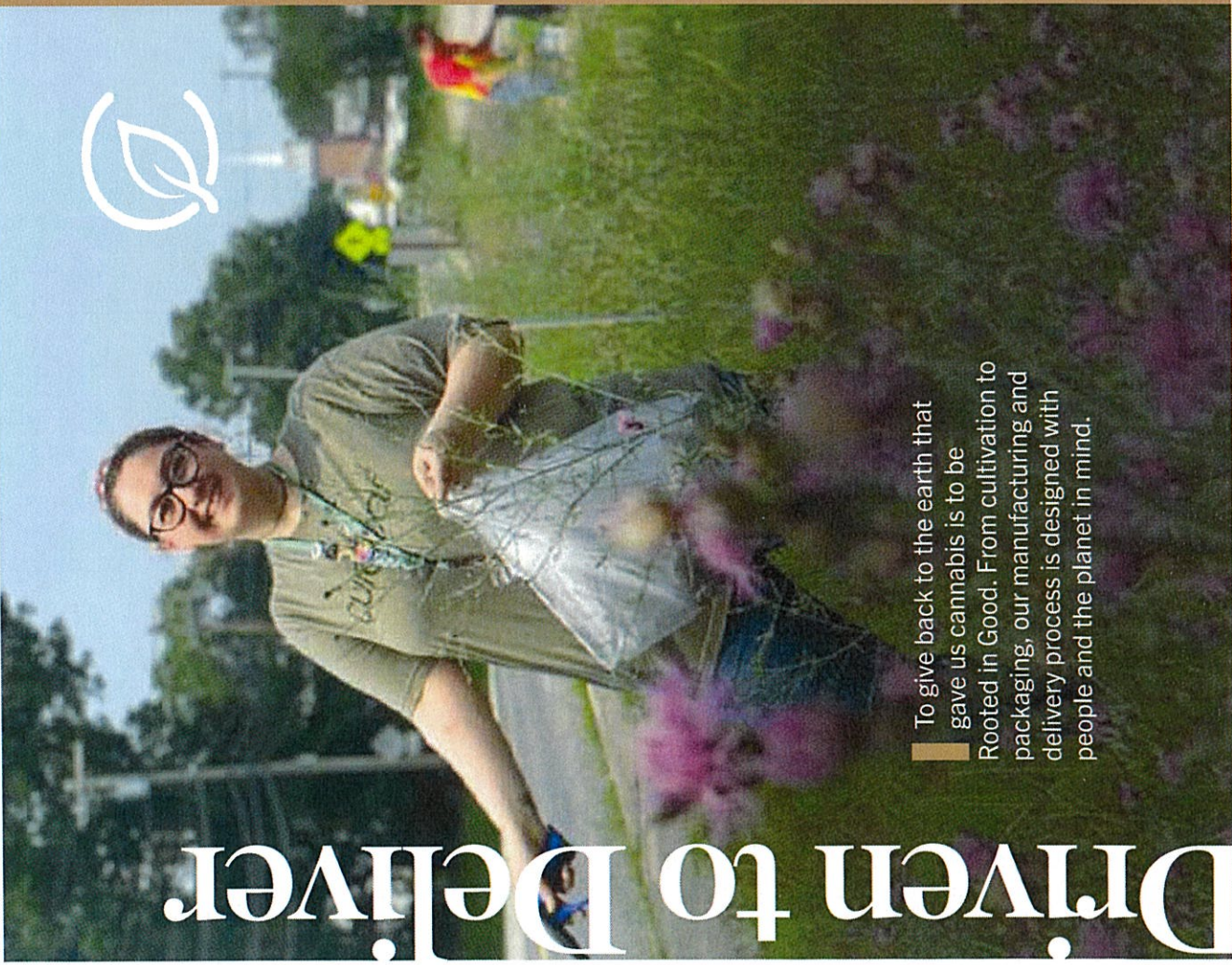
The passing of the Dennis Peron and Brownie Mary Act in California grants licensed retailers the right to donate free cannabis and cannabis goods to qualified medical patients and their caregivers. Under this legislation, Dear Cannabis—a non-profit uniting the cannabis supply chain to support patients unable to afford their medicine—was formed to coordinate in-kind donations and services. Curaleaf works continuously with partners like Dear Cannabis to deliver free, quality cannabis products to patients across the country.

At Curaleaf locations, patients are treated with respect and dignity. For many patients, existing medical costs make affording their medical cannabis difficult. Since our very first dispensary opened, we've offered permanent compassion discounts available to seniors, pediatric patients, veterans and SSDI members.



I love. I marry. I go all in.  
 I see ALS take hold.  
 I feel his fear. I search for help.  
 I incorporate the plant.  
 I see him at peace.  
 I battle the skeptics.  
 I battle the stigma.  
 I make the most of fading time.  
 I de-stigmatize. I normalize.  
 I honor his legacy.

**I Cannabis.**  
 JULIE FRATES / ALS ACTIVIST



# Driven to Deliver

■ To give back to the earth that gave us cannabis is to be Rooted in Good. From cultivation to packaging, our manufacturing and delivery process is designed with people and the planet in mind.

From electricity used in cultivation facilities to the use of plastic in cannabis packaging, it's no secret that the cannabis industry has work to do to become more environmentally friendly.

## Understanding our Footprint

In April 2021, Curaleaf took two large steps towards becoming a more sustainable cannabis company: We created an internal Sustainability Task Force, made up of Curaleaf team members located across the county and in a variety of departments, including commercialization, cultivation, engineering, manufacturing, processing, procurement, retail and more.

To better understand our current footprint, Curaleaf also partnered with Map Collective, a female-founded carbon tracking and supply chain transparency startup that maps out environmental data on one unified map. Working in tandem, we examined and established a baseline of environmental impact to benchmark against our future efforts. In addition to a company-wide assessment of the organization's current carbon footprint, this team made recommendations for consideration in Phase 2 of our carbon neutrality goal and executable plan.

As a result of the work done by our Sustainability Task Force and Map Collective, Curaleaf completed Phase 1 of our environmental work—establishing our baseline environmental footprint. Using MTCO<sub>2</sub>e (metric tons of carbon dioxide equivalent) as a measurement for our environmental impact, it is estimated that Curaleaf's 2021 emissions reached 22,000 MTCO<sub>2</sub>e. This comprised of 1,747 Scope 1 GHG emissions and 20,034 Scope 2 emissions.

With the release of an RFP seeking a sustainability partner, our next steps in this process have already begun. Working with an environmental partner, Curaleaf will design and

develop a carbon neutrality and recycling action plan. The organization is reviewing and scoring all submissions before selecting our final partner in Q1 of 2022.

**Our goal: Achieve carbon neutrality by 2025**

## Sustainability

We lead by example, work in new eco-friendly ways and change the status quo by giving back to the planet that gave us cannabis.

In October 2021, Curaleaf proudly joined the American Society for Testing and Materials (ASTM) International's Cannabis Subcommittee on Sustainability. ASTM International is a leading standards organization focused on developing and publishing technical standards for a wide range of materials, systems and services. The Committee of Cannabis was established to develop standards for cannabis, its products and processes, directly tied to the key United Nations Sustainable Development Goals.

The cannabis industry is just beginning to develop the best strategies for achieving net zero. Furthermore, the regulatory environment may prove to be a challenge when it comes to formulating new carbon reduction strategies. We believe that together with Curaleaf, we will be able to pave the way toward a carbon neutral future for cannabis.

— Tara Gupta | CEO of Map Collective

31X

## Packaging for the Planet

We recognize that packaging is an important part of the cannabis experience, and that many packaging laws prevent delivery systems from being eco-conscious. In the United States and abroad, we are working to improve packaging and recycling efforts for a more sustainable future.

Curaleaf's key packaging vendor has launched an ocean plastic recycling initiative in the Dominican Republic, with a target of 100% upcycled plastic for all plastic packaging components by 2023.



## Taking Initiative

Operating in multiple states and countries provides us with the opportunity to take advantage of local initiatives for improving environmental impact on a local, national and global scale.

### ■ HIGH 5 RECYCLING

In Maryland, Curaleaf partnered with the High 5 Initiative to promote sustainable practices among cannabis patients. As part of the initiative, patients are encouraged to return their #5 plastic packaging containers to any of Curaleaf's three locations in the state to be recycled and diverted from landfills.

## Cultivating for the Future

The cultivation process is an important part of creating a more sustainable cannabis future. From soil to lighting, we take advantage of opportunities to improve the process at every step of the way.

### ■ RECYCLING

In Florida, we recycle soil and compost. Curaleaf looks forward to expanding this process into new states in 2022. We are conscientious of our waste streams and how recycling and composting soil can support our cultivation facilities in various locations. In addition to recycling media in Florida, we are adjusting our cultivation practices nationally by lowering the plant count needed to fill our canopy square footage. This allows us to maintain productivity and improve quality by focused attention on the value of each individual plant. By improving productivity and quality of individual plants through reduced plant density, we are reducing our plastic pot usage by 25%. Additionally, we are exploring media options that use compostable fabric bags which will reduce our use of plastic pots even further.

### ■ PESTICIDES & ORGANICS

At Curaleaf, it's our goal to evaluate where our current sustainability practices lie and to improve and fine tune those processes in 2022. We currently incorporate

integrative pest management during which beneficial insects are used in place of pesticides.

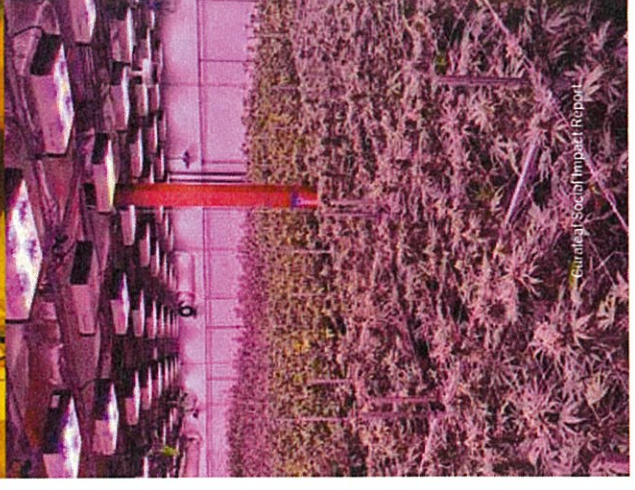
### ■ WATER USE EFFICIENCY

We have begun piloting a facility design that has all humidity pulled from indoor grow rooms to be collected and recycled. In some locations, we have systems that recycle all waste water. Cultivation is deploying additional sensor technology to improve our water and fertilizer use efficiency. By measuring and analyzing our rootzone moisture and employing more precise irrigation strategies, we are effectively reducing the amount of water runoff and fertilizer inputs, while growing more high-quality cannabis flower.

### ■ ENERGY CONSUMPTION

Reduction of our carbon footprint, primarily through sustainable and natural lighting options, is important to our cultivation team. At several Curaleaf facilities, we make adjustments to reduce our energy consumption based on surrounding environmental factors. This includes:

- Working with demand response teams to lessen our electric usage by dimming and/or shutting off lights and other equipment when the electric grid is reaching a point that risks rolling blackouts
- Hoop houses focused on extractable flower, a low-cost and low-impact system for producing this material
- Increased use of natural sunlight to reduce energy consumption
- When natural sunlight is not an option, in some states our cultivation teams have begun utilizing LED technology, which compared to traditional HID fixtures is more efficient at converting electricity to plant usable photons. LED lights not only produce more light, but less heat. Therefore, the electrical use needed to cool our grow rooms is also reduced.





## Curaleaf International

### Global Sustainability

We take our commitment to operating sustainably seriously. Curaleaf International works to maintain the highest operating standards throughout the organization, building on the success and support of our team members and partners.

### Environmental, Social & Governance (ESG)

With the launch of Curaleaf International in March 2021, our team adapted its approach to a global market.

#### ■ CURALEAF INTERNATIONAL'S MISSION:

*To be Europe's leading cannabis company, providing high-quality, accessibly priced cannabis products for patients and consumers, driven by the highest degree of scientific rigor and ethical standards and powered by our vertically integrated business model.*

#### ■ CURALEAF INTERNATIONAL'S VISION:

*To shape the future of cannabis through our commitment to research and product excellence, and bring the life-enhancing potential of cannabis to those who need it.*

Responsible environmental stewardship is central to our business. This is especially true at Terra Verde, our cultivation site in Portugal. At this site, we maintain a keen focus on the consumption of water and energy to minimize our environmental impact. This requires effective management and use of resources, from utilization to disposal, across operations.

ESG risks and opportunities vary greatly throughout the organization. Therefore, we make sure to have the appropriate structures, processes and procedures in place to meet and, where possible, exceed compliance standards.

Curaleaf International operates pharma-grade processes while meeting EU Good Manufacturing (EU-GMP) guidelines. As a result, we strive to meet and exceed quality compliance at both a site-specific and global level.



### Curaleaf International ESG goals

- Achieve carbon footprint goal or offset by 2025/2030
- Pursue recycling initiatives at processing and cultivation sites, as well as retail facilities
- Pursue resource-efficient and energy-efficient solutions and LEED certification at processing, cultivation and retail facilities
- Commit to supplier diversity that includes ethical sourcing and fair pay

As a scientifically driven company, we work continuously to advance our understanding of the therapeutic value of cannabis and how it may improve the lives of more people all around the world. We believe only a data-led approach can facilitate a true move forward in the use of medical cannabis.

#### ■ LEADING THE WAY

Curaleaf International's research program is shaping the future of medicinal cannabinoid therapeutics across the globe. Working with our research partners—including the Imperial College London in the U.K. and the University of Insubria and University of Milan in Italy—we are developing the pre-clinical and clinical evaluation of cannabis-derived medicinal products underpinned by the most robust science. These strategic partnerships put Curaleaf International at the forefront of research into the potential medical benefits of cannabis.



Good manufacturing practices aren't just about regulatory compliance; they're about providing an exceptional product. Curaleaf International partners with experienced, leading companies in the EU to ensure innovative manufacturing processes backed by science. Our state-of-the-art facilities are operated by highly skilled researchers and talent, all working to put patient safety first.

35

- 0** GMO practices | Pesticides used | Chemicals emitted during cultivation
- 1st** Active cannabis cultivation license in Portugal
- 8** Hectares of greenhouse and outdoor cultivation

In 2014, Terra Verde—Curaleaf International's cultivation site in Portugal—acquired the country's first active cultivation license. With a focus on responsible water use and sourcing, Terra Verde leads the way in producing sustainable, high-grade medical-grade cannabis that meets the highest E.U. standards for agricultural practices.

**REDUCING IMPACT IN CULTIVATION**

Water is a precious commodity, and Curaleaf International carefully manages its water consumption. At Terra Verde, we use an automated system to ensure the plant has the optimum amount of water, heat and humidity to maximize the productivity of its growth cycle. By using our borehole as a water source, we limit the impact of water sourcing on the local community. Our water is used to maximum efficiency, producing a limited amount of wastewater. Because we cultivate using a natural growth cycle, no pesticides are used and no chemicals are emitted throughout the process.

Portugal's climate provides excellent conditions for agrarian practices, a key factor for investing in Terra Verde. To power our greenhouses and guarantee conditions that are optimal for growing cannabis, we use natural gas when possible—a lower carbon-emitting source of energy when compared to other fossil fuels. All products cultivated at Terra Verde meet the standards of the EU Good Agricultural and Collection Practices (GACP). This compliance provides regulators and health care providers with the confidence that Curaleaf International's products are a safe and high-quality choice for patients.

**INNOVATION IN MANUFACTURING**

Our goal is to become an industry-leading manufacturer of Active Pharmaceutical Ingredients (APIs) through continued growth and innovation in research and production. To make this a reality, Curaleaf International works with two EU-GMP-certified facilities in Europe.

Medalchery, a technology-based manufacturing company located on the University of Alicante campus in Spain, brings more than a decade of experience in the research, development and manufacturing of APIs. Using strict standards, and fueled by a pipeline of talent through the university, Medalchery operates under the ISO 9000 environment—the world's best-known quality management standard for organizations of any size.

Rokshaw Laboratories is a state-of-the-art facility and premium environment for the manufacturing of industry-leading products, located in Sunderland, England. Working with highly trained and experienced staff, Rokshaw ensures outstanding product quality without compromising on service. Through an ongoing apprenticeship program with Sunderland College, the company received the college's Apprenticeship of the Year Award in 2019 for its commitment to supporting pharmacy and technician training.

**PROGRESS IN PACKAGING**

We believe consumers should have access to a safe, high-quality and reliable supply of products. Packaging plays a major role in how patients and consumers engage confidently and safely with cannabis.

Curaleaf International products are EU-GMP certified, providing regulators and healthcare providers with the confidence that our products are a safe and high-quality choice. By working with two certified facilities in Europe—Medalchery and Rokshaw Laboratories—the distribution of our products and packaging are robust and pharma-compliant. Additionally, we regularly audit all suppliers to maintain this level of quality.

**2** EU-GMP certified facilities in Europe  
**40%** Percentage of female team members at Medalchery

34X

In 2010, while riding his bicycle in Louisiana, Bernard Noble was stopped, frisked and found to be carrying just enough cannabis for two joints. This so-called crime resulted in a 13-year sentence of hard labor without parole. Bernard served seven years away from his family before his case sparked the national attention needed to prompt his early release.

### Creating a Social Justice Brand

Advancing social equity in cannabis to provide opportunities to those directly impacted by the War on Drugs

As a cannabis industry leader, Curaleaf is using its platform to bring awareness to cycles of unwarranted, racially charged punishment and replace them with equitable cannabis access and industry opportunities for every community member, regardless of race or place.

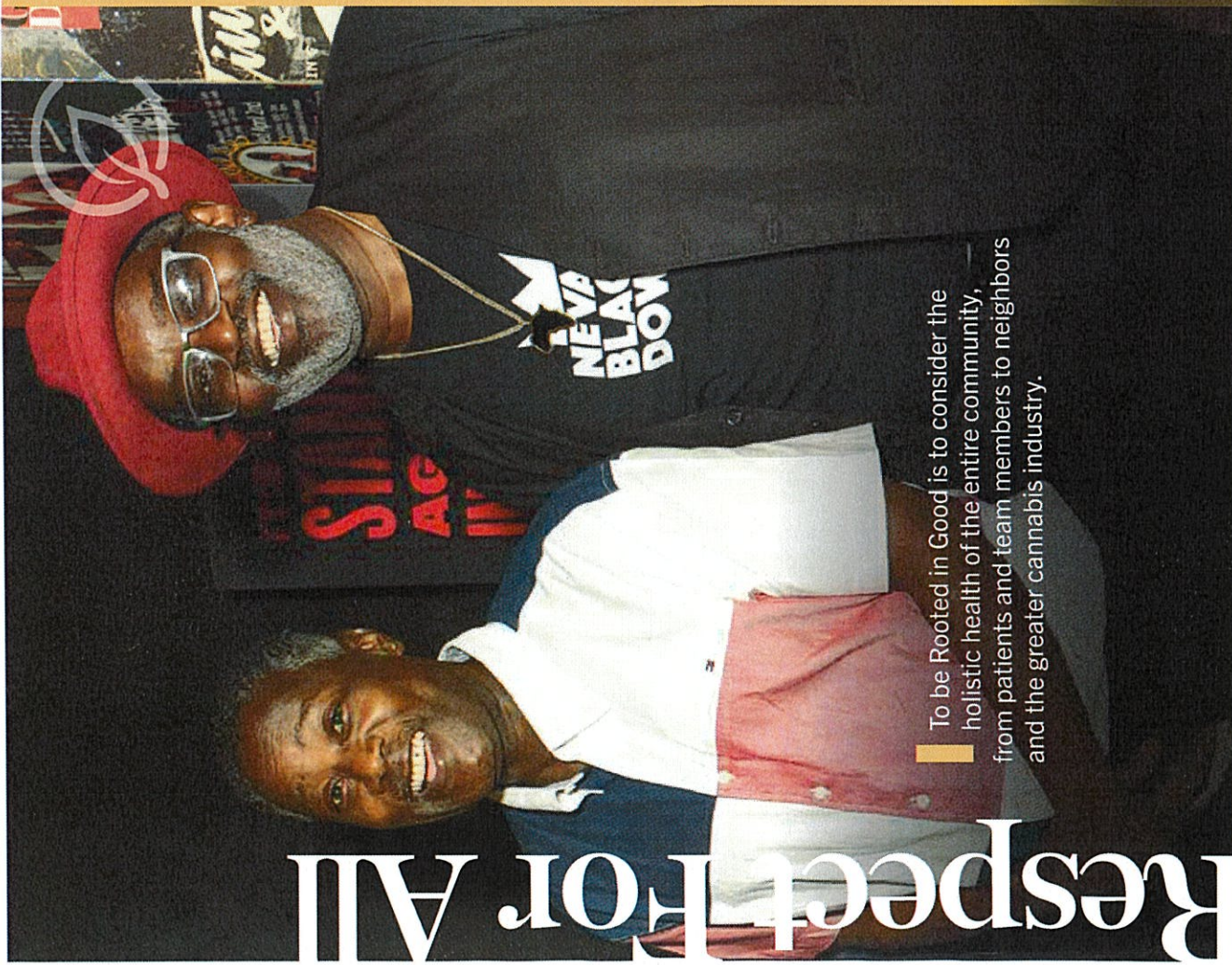
Founded by celebrity artist, filmmaker and cannabis advocate Fab 5 Freddy, **B NOBLE** exists to generate legal funding for the defense of people wrongfully charged with non-violent cannabis-related crimes. Curaleaf puts the power of the plant to this brand with B NOBLE pre-rolls that use the highest-quality flower strains. Proceeds from every pre-roll purchase are donated to partner organizations working to:

- End unwarranted cannabis criminalization
- Support liberated citizens with a cannabis-related record
- Remove the societal barriers associated with that record
- Create pathways for a successful, post-incarceration future

B NOBLE launched on July 13, 2021, in Massachusetts and Maryland, expanding to an additional eight states throughout the fall. In November, Curaleaf and B NOBLE announced the expansion of this initiative to medical dispensary locations in New York, one of the first partnerships of its kind in the state.

Our B NOBLE partner organizations:

	THE S.T.A.R.T. PROJECT ARIZONA
	COLORADO CRIMINAL JUSTICE COALITION COLORADO
	NORTH LAWNDALE EMPLOYMENT NETWORK ILLINOIS
	MASS CULTIVATED MASSACHUSETTS
	OREGON JUSTICE RESOURCE CENTER OREGON
	CHANGING PERCEPTIONS MAINE, MARYLAND, MICHIGAN, NEVADA



To be Rooted in Good is to consider the holistic health of the entire community, from patients and team members to neighbors and the greater cannabis industry.

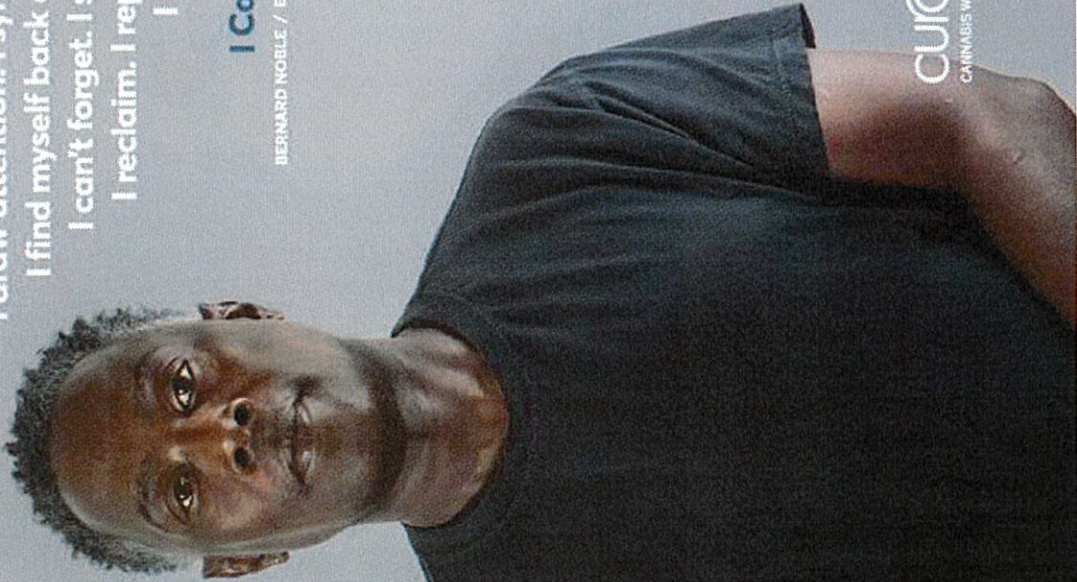
# Respect For All

35X

# I Cannabis.

I carry the plant.  
 I face 13 years. I serve 7.  
 I don't deserve.  
 I draw attention. I symbolize.  
 I find myself back outside.  
 I can't forget. I still rise.  
 I reclaim. I represent.  
 I remind.

**I Cannabis.**  
 BERNARD NOBLE // ENTREPRENEUR



curaleaf  
 CANNABIS WITH CONFIDENCE



<b>7/13</b>	Launch date of B NOBLE, representing the seven years of a 13-year sentence served by Bernard	<b>10</b>	States serving consumers and patients with B NOBLE products
<b>2</b>	Packs of B NOBLE high-quality one-gram pre-rolls, symbolizing the two grams of cannabis for which Bernard was arrested	<b>6x</b>	The likelihood of Black men to be incarcerated for low-level drug offenses in comparison to white men
<b>10%</b>	Proceeds from B NOBLE that are donated to partner organizations focused on cannabis-related racial and social injustice	<b>2.5x</b>	The likelihood of Latino men to be incarcerated for low-level drug offenses in comparison to white men



36X

Curaleaf Social Impact Report

We always look for ways to go beyond writing checks. We write the checks—yes—but we also share our platform. We strive to amplify voices and work in concert with our partners to destigmatize cannabis and expand the conversation around the plant and the good that it can bring to communities and people's individual lives.

— Raheem Uqadah | Director of Corporate Social Responsibility, Curaleaf

**\$2,400,000+**

Donations made to strategic partner organizations in 2021



Our Strategic Social Partnerships are an important part of how we prioritize resources and increase impact across the cannabis industry.

### Strategic Social Partnerships

Curaleaf's Corporate Social Responsibility team created a vetting process for developing partnerships with outside organizations. In doing so, the organization not only mitigates risk associated with partnerships, but also ensures we create robust and meaningful ongoing relationships. In total, our Curaleaf and Select brands contributed over \$2,400,000 to our partner organizations across the country in 2021. This was all made possible through company donations, fundraising at our retail locations and product-affiliated donations.

### Commitment to Illinois

*Working with the residents of Chicago to advance social equity while providing opportunities to communities disproportionately impacted by the War on Drugs, institutional oppression and cannabis injustices*

At Curaleaf, we're passionate about building meaningful relationships within the communities we serve. We operate 10 dispensaries throughout the state of Illinois, which is why we're also committed to advancing social equity in cannabis throughout the Chicago area. As part of this initiative, we contributed \$950,000 to six Chicago partnerships, including two community colleges and three job training centers:

### ILLINOIS CANNABIS BUSINESS DEVELOPMENT FUND

Managed by the Illinois Department of Commerce, this fund is intended to provide technical assistance and training to support prospective entrepreneurs interested in applying for cannabis business establishment licenses.

### OLIVE-HARVEY COLLEGE

This community college on Chicago's far Southside will introduce an educational cannabis program to help mold the next generation of cannabis leaders. It will also offer a paid scholarship program and paid internship.

### GROWING HOME

Chicago's leading expert in farm-based training for people with employment barriers will continue to provide on-the-job experience, job-readiness and help people overcome issues like criminal records and medical needs. With their USDA-Certified organic urban farms, Growing Home is also committed to serving its Greater Englewood neighbors through access to local, healthy, high-quality and affordable produce accompanied by essential nutritional and cooking education.

### OAKTON COMMUNITY COLLEGE

Curaleaf is supporting a local community college's plans to develop and introduce a cannabis program that will educate, mentor and provide internships and career opportunities within cannabis for students.

### GREATER WEST TOWN COMMUNITY DEVELOPMENT PROJECT

This project provides educational and economic opportunities for disadvantaged residents of the Greater West Town communities, areas that have been disproportionately harmed by the War on Drugs.

### CARA CHICAGO

Working with people affected by poverty and challenges like recovery, domestic violence, episodic homelessness and incarceration, Cara helps unlock the power and purpose within the community and its people to achieve real and lasting success.

## Innovation Meets Action

Curaleaf crafts quality, lab-tested cannabis products using the latest research, development and technology. Then, we apply that innovation to support our Rooted in Good causes. In 2021, Curaleaf launched:

**144**

Stock-keeping unit (SKU) combinations in all states in which we operate

**10**

States with B NOBLE pre-roll distribution

**93,000+**

LGBTQ+ Pride pre-roll units sold in five states

**125,000+**

Breast Cancer Action Month pre-roll units sold in five states



37x

It's been a great experience, both for the program and personally. Our program has been able to support a full-time faculty, administrator, \$100,000 in scholarships and so much more. We have hosted events and participated in curriculum development, as well as provided scholarships to students to take credit cannabis classes. **Olive-Harvey College will continue to lead the efforts in cannabis education due to this partnership with Curaleaf.**

— Amanda Gettes | Executive Dean—  
Urban Agriculture, Olive-Harvey  
College



## onePULSE

*Uplifting the queer community and supporting allyship*

In celebration of Pride Month in June 2021, Curaleaf launched an initiative at its retail locations to raise funds for the National Pulse Memorial & Museum. The National Pulse Memorial & Museum is the official nonprofit that manages the design and construction of the national memorial, museum and survivor's walk dedicated to the PULSE tragedy that took place on June 12, 2016, in Orlando.

By both allocating a portion of sales from its Pride Month pre-rolls and vape pen batteries to the onePULSE Foundation as well as facilitating donations from patients and customers, Curaleaf raised over \$155,000 toward the memorialization of the lives lost and impacted by the tragedy. In addition to the memorial and museum, these funds will be used to support the 49 Legacy Scholarships to inspire and empower students' dreams, ambitions and goals.

Curaleaf operates more than 40 medical dispensaries throughout Florida, where the National Pulse Memorial & Museum is located. Year round, we show our commitment to the LGBTQ+ community through QUSH, an employee resource group, whose mission is to support and uplift the queer community through education about queerness and allyship within the organization and beyond. Team members held a moment of silence on Saturday, June 12, 2021, honoring the 49 lives taken during the Pulse nightclub tragedy, and participated in the OUTLOVE HATE campaign in support of the National Pulse Memorial & Museum.



Partnerships that go beyond fundraising: Our partnership with onePULSE is versatile and full of meaningful relationships developed over time. Barbara Poma, onePULSE Foundation Founder, speaks on panels for Curaleaf while supporting our internal queer-focused initiatives. Barbara has even invited Khadijah Tribble, our SVP of Corporate Social Responsibility, to serve as a trustee on the onePULSE Foundation board.



In the past, Curaleaf has generously sponsored our Family Day events—social gatherings of Pulse-affected families in a social setting. The families are a moral support for one another, and it's an opportunity for the onePULSE Foundation team to build rapport and help connect them to resources they might need to aid in their journey of healing. Curaleaf has helped make some of those Family Day gatherings possible.

Serving the community is important to them and important to us. We don't provide direct services in regards to healthcare. But we do our best to make sure that folks that we know that were affected by the tragedy are connected to resources. Curaleaf has been an asset in that regard, educating and building awareness about the benefits of medical cannabis for this community.

They have been unbelievably instrumental in helping with our fundraising. They participated in the OUTLOVE HATE campaign with us in June 2021, their first charitable fundraiser held nationwide. We didn't have any preconceived notions about what it might

result in—I thought a few thousand dollars would be fantastic. Curaleaf not only gave us a portion of proceeds from products that they had on the shelves, but also solicited donations for us from their patients and the folks they see in their dispensaries. And they raised a little over \$155,000. I was blown away. Those funds went to support the foundation and our mission at large. It benefits the memorial museum, our scholarships, and then our education. It was *beyond* wonderful to have so many Curaleaf team members visit in September for the check presentation and to have them fully understand what onePULSE is all about and the impact that the gift has on our efforts and those we serve.

Curaleaf educated their team about who we are and what we're doing. And allowed them to engage their patients and customers. That's amazing for us on so many levels—not just financially, but by building awareness about who we are around the country.

— Raychel Cesaro | Director of Philanthropy,  
onePULSE Foundation

38X

## Fighting Food Insecurity

*Working on the ground and with partners to provide meals in our communities*

In addition to social justice, health and wellness, and cannabis education, Curaleaf's Rooted in Good initiative focuses on food insecurity as one of its main causes. Access to food is a fundamental part of humanity that produces a wide-ranging set of positive impacts for society. At Curaleaf, our team members work with a variety of partners to help fight food insecurity through community volunteerism.

In August 2021, Curaleaf team members worked with ThreeSquare Food Bank, The Just One Project and Forgotten Not Gone while at an offsite leadership meeting in Nevada. The team sorted and packaged produce on-site, ultimately preparing 13,420 meals to be dispatched to Nevadans facing food insecurity.

Just a few months later in November, Curaleaf continued its Feed the Block initiative, which continues to assist local organizations across the country working to feed individuals and families throughout the communities served by Curaleaf.

Combined with monetary donations from patients and customers at dispensaries, a portion of proceeds from select products sales helped us donate more than 10,000 meals and \$1,000,000 to the following organizations:

ARIZONA – Waste Not	MASSACHUSETTS – Friendly House, Inc.	NEW YORK – Black Farmer Fund & Long Island Coalition for the Homeless
ARKANSAS – Potluck Food Rescue	MARYLAND – Manna Food Bank	NORTH DAKOTA – Great Plains Food Bank
CONNECTICUT – Hands on Hartford	MAINE – Trinity Jubilee Center	OREGON – Equitable Giving Circle
COLORADO – Metro Caring	MICHIGAN – Sons and Daughters United	PENNSYLVANIA – Urban Affairs Coalition & Central PA Food Bank
FLORIDA – ISeeYou Foundation, Second Harvest Food Bank & Treasure Coast Food Bank	NEVADA – Three Square Food Bank	UTAH – Utahns Against Hunger
ILLINOIS – Growing Home & Thornton Township Food Pantry	NEW JERSEY – Food Bank of South Jersey	VERMONT – Greater Bennington Interfaith Community Services



45

13.8 million

American households facing food insecurity\*

27

Food accessibility partners in 2021

8,900

Pounds of produce sorted by Curaleaf team members

18

States receive monetary and food donations as part of Feed the Block

13,420

Meals prepared by Curaleaf team members for Nevada food distribution partners

\*Source: 2020 U.S. Department of Agriculture

Curaleaf Social Impact Report

39x

I walk the straight edge.  
 I dismiss. I judge.  
 I get diagnosed.  
 I hear "terminal."  
 I sink deep.  
 I lie awake. I hurt.  
 I give in. I try the plant.  
 I amaze. I maintain.  
 I live as I die.  
 I praise. I lobby. I advocate.

I Cannabis.  
 BETH FAIRCHILD / ADVOCATE, ARTIST & YOGI

curaleaf  
 CANNABIS WITH CONFIDENCE

Curaleaf Social Impact Report

# I Cannabis.

For breast cancer fighters, survivors and their loved ones, awareness isn't enough. It's time to take action. At Curaleaf, we participate in Breast Cancer Action Month to raise funds for partner organizations while working to destigmatize the use of cannabis as a medical treatment option for breast cancer patients.

## Taking Action Against Breast Cancer

Beth Fairchild holds many titles: mother, tattoo artist, activist, yoga instructor and, as of May 2014, a stage 4 metastatic breast cancer patient. As the second leading cause of death in women in the United States, it can be an overwhelming diagnosis—especially when delivered with a two-year survival rate, as Beth was told.

Having grown up very conservatively, Beth never considered cannabis as a treatment option until a friend brought it to her house. She began using it to treat the side effects of her chemotherapy, including issues around sleep, anxiety, appetite, pain and overall quality of life. Now a daily cannabis user, Beth devotes her energy to advocacy for breast cancer research and healthcare benefits. And, incredibly, she's outlived her prognosis by five years.

In Oct. 2021, Curaleaf worked with Beth and others to take action against breast cancer. Going beyond the ribbon, we sold Pre-Rolls with a Purpose in select locations, with proceeds from special pink-edition products donated to partner organizations in the communities we serve. In total, we helped raise more than \$140,000 for the following nonprofits:

- LYNN SAGE FOUNDATION | Arkansas and Illinois
- IMPACT ONE BREAST CANCER FOUNDATION | Arizona
- CONNECTICUT BREAST HEALTH INITIATIVE | Connecticut
- BADGES OF COURAGE | Florida
- THE SNELL FOUNDATION | Maine
- THE RED DEVILS MD | Maryland
- THE MASSACHUSETTS BREAST CANCER COALITION | Massachusetts
- SHADES OF PINK FOUNDATION | Michigan
- BREAST FRIENDS OREGON | North Dakota and Oregon
- LIVING BEYOND BREAST CANCER | Ohio and Pennsylvania
- THE INK RIBBON FOUNDATION | Nevada
- PINK AND TEAL PROJECT | New Jersey

**1 in 8** Women diagnosed with breast cancer in the U.S.

**42,000** Men and women die from breast cancer each year in the U.S.

**42%** Breast cancer patients who use cannabis in addition to their treatment, according to a 2021 Breastcancer.org survey

**\$140,000+** Donated to breast cancer organizations

**select**

40x



Millions of veterans face debilitating conditions. Yet, federal law makes it illegal for the U.S. Department of Veterans Affairs (VA) to recommend cannabis as a treatment option through its physicians and facilities. By working with leading veterans organizations, Curaleaf hopes to increase cannabis awareness and access for service members and their families.

### Serving Those Who Served our Country

After serving 11 years in the U.S. Marine Corps as both an enlisted Marine and infantry officer, Gary Hess returned home with symptoms of post-traumatic stress disorder (PTSD). Like most veterans, he turned to the VA for his medical care. After struggling with the pharmaceuticals prescribed in treatment, he turned to cannabis. Gary says cannabis allowed him to explore and process his trauma, rather than anesthetize it. Now, he advocates for other veterans to have access to the plant through Veterans Alliance for Holistic Alternatives (VAHA), for which he serves as founder and executive director.

To help serve those that served our country, Curaleaf entered into a partnership with VAHA in 2021 to raise money and awareness for veterans' access to cannabis. As part of this partnership, Curaleaf donated \$1 from sales of specific products to VAHA from November 1-15, 2021. In total, this effort raised more than \$100,000 for VAHA and its mission: to increase awareness of the efficacy of medical cannabis; empower patients to regain control over their health through a holistic approach; and reform barriers restricting access to medical cannabis.

This work builds upon our partnership with the Veterans Cannabis Project (VCP), a leading organization that advocates for unrestricted access to medical cannabis

49

83%

Of U.S. veterans support medical cannabis programs\*

0%

Of VA facilities provide medical cannabis\*

114,000+

American veterans lost to suicide since the inception of the wars in Afghanistan and Iraq

\$100,000+

Raised for the Veterans Alliance for Holistic Alternatives in just 1.5 days

\$45,000

Donated to Veterans Cannabis Project through product sales

for veterans. In 2019, Curaleaf launched a nationwide initiative with the VCP to help bring additional visibility to this issue and help the millions of veterans dealing with chronic pain and other conditions have better access to quality medical cannabis. Proceeds from our VCP-branded pre-roll box, distributed at dispensaries throughout the country, are donated to the organization.

### Supporting Veterans at our Locations

In 2021, Gary Hess joined a Curaleaf town hall to speak with our teams about the mental and physical health impacts that veterans face and how we can better support them. The conversation was welcomed by team members, including our veteran team members.

Twenty-two veterans take their own lives every single day, and we're still sitting here talking about whether or not our military veterans should be allowed access to cannabis.

— Gary Hess | Founder and Executive Director, Veterans Alliance for Holistic Alternatives

Curaleaf's initial investment was the first thing that allowed us to scale up and bring on new staff.

— Ryan Dominguez | Executive Director, Mass CultivatiED

At Women Grow, our goal is to be the resource and connector to unique opportunities for women in the industry, and Curaleaf's 420x25 program aligns with our vision. Together we will provide women entrepreneurs a chance to expand their business reach. We have worked closely with an incredible team of women at Curaleaf on this initiative, but the commitment shows from the top leadership down they are here to provide a solution to a gap in our industry.

— Gia Morón | President, Women Grow

To be Rooted in Good means to work with organizations on the ground in the communities that we serve. While local partnerships help fuel meaningful connections with the individuals in those markets, Curaleaf remains committed to advancing social causes on a national scale. Our national partners play a key role in moving the conversation forward.

### Across the Country

We believe that the future of cannabis needs to be diverse and inclusive. To help create opportunities for all—and particularly those disproportionately impacted by the War on Drugs—Curaleaf continues to maintain close partnerships with organizations taking action to rectify the harms of the past and help support diversity throughout each sector of the cannabis industry.

Our partners:

#### ■ MASS CULTIVATED

Located in Massachusetts, Mass CultivatiED is the first jails-to-job training programs specific to the cannabis industry. Curaleaf was proud to support this nonprofit through a \$100,000 donation in addition to supporting the organization's record expungement clinics.

#### ■ WOMEN GROW

In March 2021, Curaleaf announced a national partnership with Women Grow as part of its 420x25 supplier diversity initiative and to support and amplify women in the cannabis space. Women Grow connects, educates, inspires and empowers the next generation of cannabis industry leaders. The organization is focused on creating programs, community, and events for aspiring and current women in business.

The best way to rectify the past harms inflicted on communities of color by the War on Drugs is to ensure that the present and future of the cannabis industry is inclusive, equitable and just. We're excited to have Curaleaf as a partner for our diversity supplier initiative. The program envisioned by our organization will allow entrepreneurs from impacted communities the opportunity to participate meaningfully in the industry and access its emerging economic benefits while providing value, creating jobs and powering its growth.

— Roz McCarthy | Founder and CEO, M4MMM

#### ■ MINORITIES FOR MEDICAL MARIJUANA (M4MM)

In May 2021, Curaleaf announced a national partnership with Minorities for Medical Marijuana (M4MM). Established in 2016, M4MM is a nonprofit organization based in Orlando, Florida working to provide advocacy, outreach, research and training to support social reform, equitable public policy, economic development and expanded access to health and wellness in the cannabis industry. Curaleaf's partnership with M4MM is organized under three initiative pillars: education, outreach and programming. Each pillar will work towards helping empower Black and Brown business owners and organizations through an array of educational opportunities and community events, while also continuing to focus on Diversity, Equity & Inclusion.

#### ■ HOOD INCUBATOR

Hood Incubator is a nonprofit focused on economic justice, power building and policy advocacy. Through our partnership with the Hood Incubator, we were able to support several educational sessions on a national level with cannabis consumers eager to learn more.

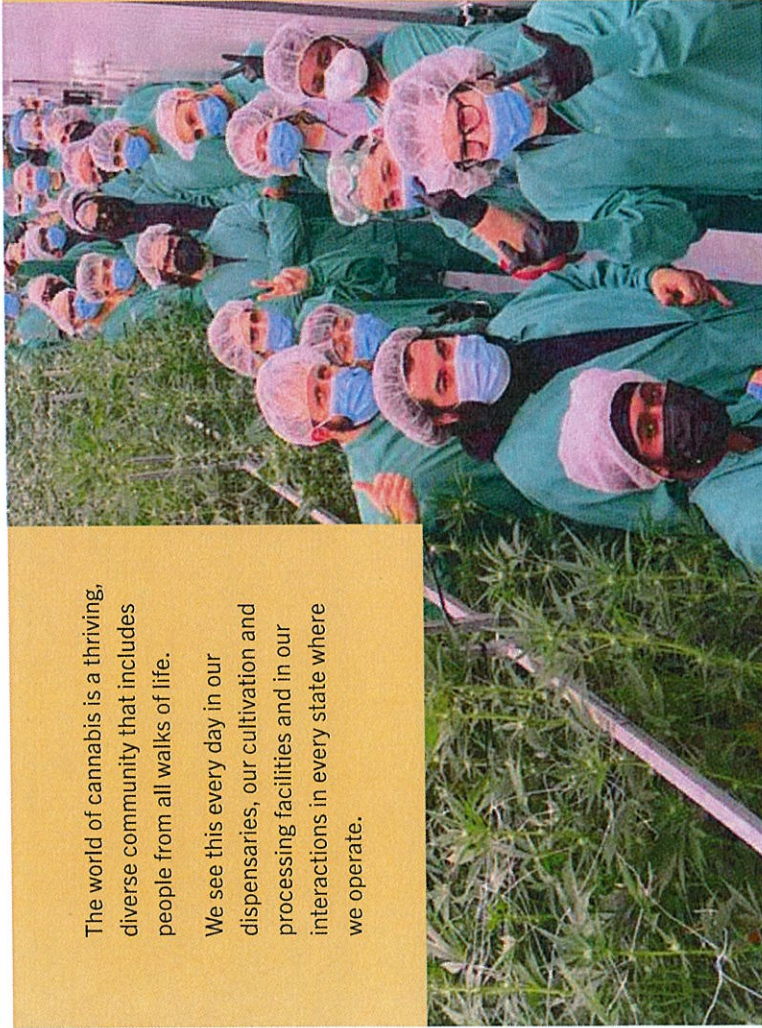
#### ■ MARIJUANA MATTERS (M2)

Marijuana Matters (M2) envisions a world no longer disadvantaged by marijuana's criminalization. M2 works toward that goal through advocacy, entrepreneurship and education focused on social justice. Curaleaf partnered with Marijuana Matters to provide both internal and external education specific to the damage created by the War on Drugs and how allies and cannabis consumers can push the industry to rectify those wrongs. The organization was founded by Khadijah Tribble, Curaleaf's Senior Vice President of Corporate Social Responsibility.

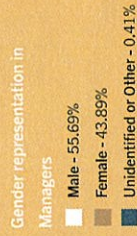
420x25

The world of cannabis is a thriving, diverse community that includes people from all walks of life.

We see this every day in our dispensaries, our cultivation and processing facilities and in our interactions in every state where we operate.



Curaleaf continues to share diversity information with its DEI Task Force, understanding that transparency is key. We take all feedback to heart because if there's one thing we know, it's that we don't know everything.



**Our goal:**  
Increase the diversity of our Senior Leadership team by 25% in 2022

### Curaleaf Diversity Initiatives

In July 2020, Curaleaf held its first DEI Task Force meeting, bringing together senior leadership, managers and state team members—all with the same hunger for brainstorming and idea sharing on ways that Curaleaf could become an even more diverse and inclusive company for our team members, our patients and our customers.

This task force informed our plan of action, including identifying which Employee Resource Groups were most needed; which team members had interest in forming our workforce development and supplier diversity subcommittees; and how team members want to see Curaleaf handle important cultural moments.

The goals accomplished so far by the DEI Task Force include:

- Creation of five Employee Resource Groups that bring a sense of belonging and inclusion to our 5,400+ team members
- Launch of two subcommittees, focused on workforce development and supplier diversity
- Piloting of company's first ever leadership development course, completed by more than 60 team members
- Determination of supplier diversity efforts and practices baseline for more efficient system and program implementation

43X

## Employee Resource Groups

Curaleaf's Employee Resource Groups (ERGs) are team member-led groups that foster a diverse and inclusive workspace. We've successfully implemented ERGs to connect our people with the services they need to thrive. In 2020, Curaleaf launched five internal ERGs:

- 1. Curaleaf Cares | *Volunteering*
- 2. Curaleaf in Color | *BIPOC membership*
- 3. FamilLeaf | *Working parents*
- 4. QUSH | *LGBTQ+ membership*
- 5. Women's Cannabis Collective | *Women's membership*

ERGs are a meaningful way for our team members to connect and support one another through shared experiences. In 2021, these groups went above and beyond to provide meaningful opportunities for colleagues.

**February:** Curaleaf in Color led the Black in Cannabis panel, featuring guests Jason White (MTV), Chaney Turner (Beyond Equity), Dr. Rachel Knox (Doctors Knox, American Cannabinoid Clinics, Pivotal Edu) and Hope Wiseman (Mary and Main).

**May:** The Women's Cannabis Collective partnered with Dress for Success, a nonprofit that empowers women to achieve economic independence through support and professional development, to lead a "Commuting to Cannabis" event focused on the transition from traditional industries to the cannabis space.

**June:** QUSH headed a Queering the Workplace panel featuring queer advocates from across the country.

**July:** Led by Curaleaf Cares, team members took part in an organized community cleanup, during which nearly 200 participants picked up a total of 258 bags of litter through 435 hours of volunteering.



If we're counting, one idea became one committee. One committee held 52 meetings. Fifty-two meetings birthed and cradled five Employee Resource Groups plus two subcommittees: Curaleaf in Color, Women's Cannabis Collective, FamilLeaf, Curaleaf Cares, and QUSH. Five groups and two subcommittees hosted biweekly meetings for one year, so that's another 182 official meetings conducted with at least six people in attendance for planning 30 educational sessions, volunteering activities, and team building opportunities. If we average the number of event attendees, then multiply, we'll only get part of the story—because those numbers represent people, and people did the work that made this idea a reality.

Last year, individual team members living in a pandemic held virtual hands to form new groups within Curaleaf, devoting their precious time to supporting and celebrating others. During a time of shutdown and isolation, many faced unimaginable personal struggles. Members understood the need for connection and empathy, dedicating themselves to the ideals of diversity, equity and inclusion because they believe in the inherent goodness of those initiatives. They insisted on togetherness when circumstances demanded separation. Who are we and what good do we do if we don't lead by example? If we, as a company, are not in the business of making room for all our team members to sit, speak

and eat at our internal table, how can we possibly do our external work of advocating for diversity, social equity and inclusion across our industry?

Many Curaleaf team members stepped up to the plate and without their contributions, we would not have achieved what we have thus far. I'm grateful for every moment they have to bring these ideals we champion into the forefront. People emerged as leaders: Kate Steinberg and Raheem Uqdah from the CSR team, Kyle Crossley from Legal, and Jennifer Fascina and Lanett Austin, both from Talent Management, have gone above and beyond to support our Steering Committee and the Employee Resource Groups. I'm proud of you. I'm proud of us. We collaborated to promote diversity, social equity and eco-responsibility, and as cannabis leaders, we set a precedent of inclusion in this expanding industry that we are so fortunate to participate in. We hold ourselves and our partners to a higher standard because we believe big cannabis can be good cannabis. We refuse to accept the narrative that large corporations are nefarious. We are powerful people creating a company culture that empowers, and we are just getting started.

— Khadijah Tribble | Senior Vice President of Corporate Social Responsibility at Curaleaf

**November:** Curaleaf Cares and FamilLeaf partnered to create the Embrace a Family program, an annual opportunity for Curaleaf to support team members in need by supplying Thanksgiving meals.

**December:** Embrace a Family continues, with gift cards provided to team members annually to assist in the costs associated with purchasing holiday gifts.

**Looking ahead:** In 2020, we focused on creating the structure for our Employee Resource Groups. In 2021, we committed to trialing and adjusting that framework. In 2022, Curaleaf will focus on letting our ERGs use lessons learned to improve the activations and educational sessions led by those teams.

160

Team members joined ERG meetings

30

ERG events and activations in 2021

258

Bags of litter collected during our community cleanup

In the past year, I was really excited about the increased growth and visibility of the Employee Resource Groups and how these ERGs became an important source of comfort, camaraderie and education for many team members. I was able to interact with like-minded team members that I normally would not have interacted with on a daily basis.

— Al Ochoa | Director of Insurance, Risk & Safety Compliance at Curaleaf

454X

Our team members are at the heart of our organization. To empower our staff to learn the skills that make them prosperous, Curaleaf focuses on several workforce development initiatives.

## Creating a Culture of Growth

We encourage our team members to grow their expertise and focus on their personal and professional aspirations. In 2021, we invested over \$1 million in training and workforce development opportunities for our team members. This includes investment in:

- 15Five, our performance management tool
- Kantola, our anti-harassment and anti-discrimination training
- LinkedIn Learning, a learning platform for reaching professional goals

## Performance Management

As a part of our 15Five performance management software, all team members have weekly check-ins with their managers, reviewed by our talent management team regularly. This system is also utilized for our annual review process, completed by every Curaleaf team member.

## Unconscious Bias Training

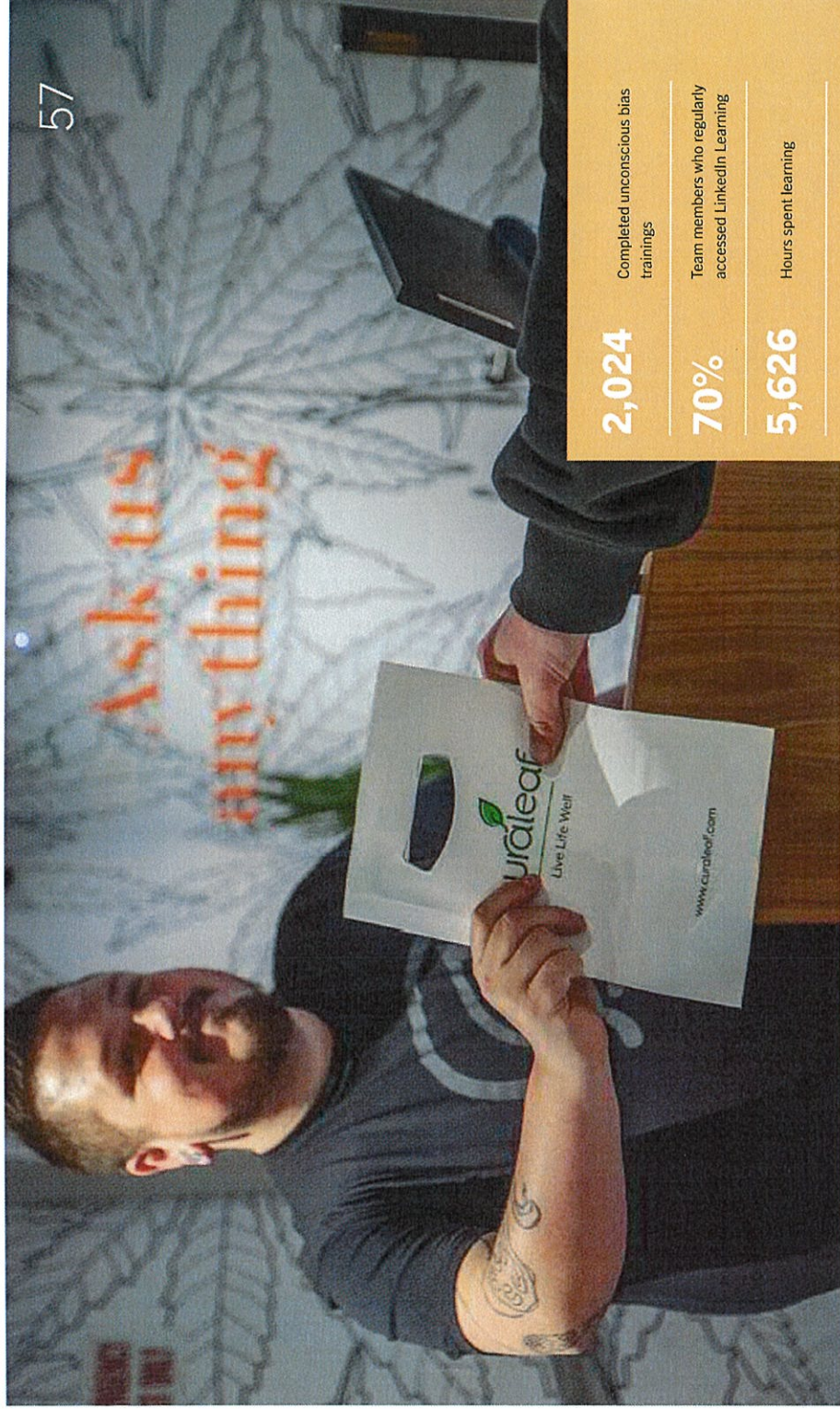
Addressing unconscious bias in the workplace is just one way that we're working toward creating a more equitable environment for all. As part of our Diversity, Equity & Inclusion efforts at Curaleaf, we acknowledge the need to be proactive in identifying our unconscious biases and working past them as a company and as individuals. As part of this journey, we've partnered with a diverse-owned, science-based assessment and development company to help us address and manage unconscious bias in the workplace.

We understand that while unconscious bias training impacts everyone, it's important that we start from the top-down to ensure those making high-level decisions are doing so without bias impacting those decisions. For that reason, our training is split into three segments: senior leadership, mid-level managers and associates.

As of Dec. 31, 2021, the first two groups have completed their training with a 92% completion rate. The remainder of Curaleaf team members will complete this training in 2022.

## Never Stop Learning

In 2021, Curaleaf supported workforce development endeavors by providing all team members with access to LinkedIn Learning. This acclaimed online educational platform provides opportunities for individuals to gain and grow skills in business, creative and technology fields. By building upon these courses, ranging from beginner to expert, team members can earn certifications on topics that speak to their goals.



2,024

Completed unconscious bias trainings

70%

Team members who regularly accessed LinkedIn Learning

5,626

Hours spent learning

7,508

Total certificates earned by team members since launching the initiative

14,842

Educational courses viewed by team members

127,600

LinkedIn Learning videos viewed

45x



“The Cultivate the Leader in YOU! initiative was an amazing experience that helped me elevate professionally and personally. I truly believe that because of it I was able to receive a promotion.

— Dan Strong | HR Generalist, Curaleaf

## Talent Management: Looking Ahead

Supporting our team members is an integral part of maintaining Curaleaf’s future success. As we look ahead, we’ve set goals and planned initiatives to ensure that we stay on an upward trajectory to further provide our teams with the tools that they need to succeed.

- **2022 INITIATIVES**
- Employee Resource Groups will increase their engagement goal with a minimum of one company-wide activation per month
- New leadership and training programs focused on career development for all team members, including a 12-week entry-level and above Cultivate the Leader in YOU! Program and a 16-week Manager Bootcamp
- New learning management software, to be piloted in Q1 of 2022 and rolled out company-wide in Q2
- **2022 GOALS**
- Update Diversity, Equity & Inclusion Task Force with demographic data every quarter
- Aim for 10% of all hires in 2022 to come from communities directly impacted by the War on Drugs as part of the Second Chance Hiring Initiative
- Launch our partnerships with the United States Cannabis Council (USCC) and Congressional Black Caucus Foundation (CBCF)
- Increase diversity of Senior Leadership by 25%
- Recruit at least five institutions as part of Historically Black Colleges and Universities (HBCU) partnerships

## CuraForce: Inspiring Leadership

Alongside our Employee Resource Groups, CuraForce is one of Curaleaf’s subcommittees advancing inclusion within the organization. Its mission is to assist in building a proud and confident workforce by providing every team



CuraForce’s Cultivate the Leader in YOU! program was the first of its kind in terms of leadership development. Team members were asking about development and training opportunities in the company. Cultivate the Leader in YOU! was founded with the idea of giving the courage and empowerment to team members to take their own development under their wing through a 14-week course infused with technology. Through a partnership with LinkedIn Learning, the program involves roundtable discussions, quizzing and testing, and peer-to-peer mentorships. It allows team members to be better in their positions, grow and succeed. We’ve had an outpouring of praise about the program from both team members and executives. Our measurement of KPIs points to improvements across

the organization, showing that the program is helping us overall as a company.

“If you want to change the way something is done, you have to think differently and you have to act differently. Somehow we have all found each other in this space and have the same common goal to make a difference. The way we show up, the way we educate, what we’re trying to do—it’s what’s so unique about Rooted in Good. At its core, we stand by our mission: being dedicated to doing the right thing for each other, our customers and our communities.

— Brooke Zutter | Manager of Learning and Development, Curaleaf



member with opportunities and acknowledgement. As part of this work, CuraForce developed Cultivate the Leader in YOU!, a three-month program consisting of 10 LinkedIn Learning courses and three roundtable panel discussions led by our own team members. This program speaks to the potential associated with trusting our team members and providing them with the platform and space to create and grow.

In surveying the 60 Cultivate the Leader in YOU! graduates, we found that:

<b>82%</b>	Feel more committed to working at Curaleaf
<b>36</b>	Applied for a promotion
<b>91%</b>	Feel confident to excel their career path
<b>98%</b>	Recommend the program to colleagues

### Talent Management & Diversity

At Curaleaf, we believe our team members are our most important asset. We also believe that diversity, inclusion and opportunity are essential to our mission to improve lives by providing clarity around cannabis and confidence around consumption.

Our Human Resources and Corporate Social Responsibility departments developed this Diversity and Inclusion Strategic Plan for Fiscal Years 2020-2022 to provide a foundation to build upon:

#### STATEMENT

Ensuring diversity, inclusion and opportunity are integral commitments to the vision and values of Curaleaf.

#### PURPOSE

Our purpose is to continue to make progress towards building, maintaining and promoting a workforce that reflects diversity, inclusion, supplier diversity and opportunity in this ever-changing industry and communities we proudly serve.



#### DIVERSITY RECRUITMENT

Diversity and inclusion is a strategic approach to recruitment that accepts and includes all team members including people of color, women, people with disabilities and veterans, as well as any other groups of individuals regardless of their beliefs, religions, perspectives, values, political views or sexual orientation. Curaleaf aims to adopt diversity initiatives that do not simply look to prevent workplace discrimination but also aim to achieve a wider range of outcomes.

#### FOSTERING INCLUSION

Led by our Talent Management and Diversity team, themed months are scheduled for all team member participation, engagement and recognition. We also host weekly Employee Resource Group meetings specific to the communities and allies of: BIPOC, women, working parents, LGBTQ+ and community volunteerism. In addition to our Employee Resource Groups, our team conducts weekly pulse checks and solicits feedback from team members to capture real-time engagement and strategy to address and/or uplift for additional recognition.

#### ACCOUNTABILITY

Curaleaf has established a Diversity Action Plan (DAP) to execute the strategy and policies of the company's diversity plan. Our Diversity Action Plan demonstrates a strong commitment to inclusive actions and creating an equal opportunity workplace. The plan sets forth, with good faith, the purpose of promoting equality of opportunity. Curaleaf is committed to increase the recruitment of qualified women, veterans and minorities for selection as it relates to all areas of the company, including contractors.



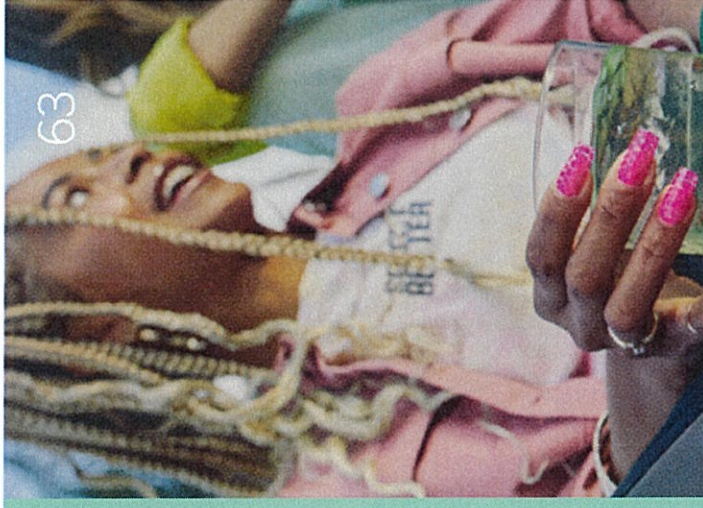
47X

# Commitment to Innovation



In addition to cultivating the cleanest, purest cannabis strains, Curaleaf crafts quality, lab-tested cannabis products using the latest research, development and technology. To best serve our patients and customers throughout this industry's evolution, we remain Rooted in Good—embracing innovation at every turn.

48X



63



## Innovation in Action: Select Squeeze

A fast-acting beverage enhancer created with the latest technology and design

On March 23, 2021, Curaleaf launched Select Squeeze, a fast-acting THC-infused beverage enhancer featuring Nano-emulsification technology. In addition to the product's innovative nature, the debut of Select Squeeze marks a significant milestone as one of the cannabis industry's widest national product launches.

Select Squeeze is an advanced formulation that utilizes Nanotechnology to transform any beverage into a THC-infused, flavor-enhanced experience. By turning cannabis oil into tiny water-soluble molecules, the THC compounds not only dissolve evenly into any beverage but are also more rapidly and efficiently absorbed into the bloodstream, with effects felt in as little as 15-30 minutes, significantly faster than traditional edibles. The product's intuitive, proprietary bottle design features a unique fill-and-pour reservoir that makes precision dosing more straightforward than ever. The compact design also makes it ideal for discreet enjoyment on the go.

4 Flavor varieties

Minutes to feel effect

15-30 Adults age 21+ with access to Select Squeeze at launch

94 million



Curaleaf Social Impact Report

## Connecting with Consumers

Social media is an increasingly important vehicle for sharing information with our patients and customers. In 2021, our social team made leaps and bounds in making our online presence so successful. Our posts that share messages of Corporate Social Responsibility often meet or exceed our traditional social media posts, showing that cannabis patients and customers have a hunger for doing good and seeing others do good.

**50,000+** Instagram followers, 15K in growth from the previous year

**860%** Growth in impressions on Corporate Social Responsibility posts in 2021

**26%** Growth in engagement rate on Corporate Social Responsibility posts in 2021



Curaleaf Social Impact Report



## Innovation in Action: Cliq by Select

More than just a stylish piece, Cliq's features, mechanics and design create a state-of-the-art vaping experience

On Sept. 22, 2021, Curaleaf released Cliq by Select, a breakthrough hardware system from its Select brand designed to significantly upgrade the consumer's vaping experience. Cliq is the culmination of years of research and development to create the perfect marriage of Select's award-winning cannabis oil with a new, intelligently designed delivery system.

With a proprietary gravity-led pod and ultra-tough stainless steel casing combined with its premium design and convenient USB-C charging port, Cliq comfortably brings the best of Select's high-quality oil and innovative hardware into the hands of cannabis consumers. The contoured pod design ensures patients and customers get every last drop of premium Elite cannabis oil, while the strong magnetic pod and device connection ensures a secure fit that closes with a signature "click" sound. Cliq by Select utilizes an "auto draw" feature (inhalation activates the device), and allows for variable battery voltage, creating a bespoke potency experience to match user preferences at any moment.



## Innovation in Action: Select Snooze Bites

Leading the way in sleep-enhancement

On October 13, 2021, Curaleaf expanded its suite of innovative products with the addition of Select Snooze Bites. Through the combined power of THC:CBN, this fast-acting platform is a true disruptor as an efficacious nighttime product.

Designed for the perfect wind-down, Snooze Bites combine a unique 1:1 ratio of fast-acting THC and long-lasting CBN. The scientifically developed formula incorporates 5mg of Nano-encapsulated THC, which is made by creating tiny, water-soluble molecules from cannabis oil and is therefore quickly absorbed into the bloodstream with effects typically experienced within 15 to 30 minutes. When paired together with 5mg of CBN—a cannabinoid typically known for its relaxing and restorative qualities—users can expect a heightened combined experience.



**#1** Reason adults choose to consume edibles is to "sleep better"\*

**1:1** Ratio of THC to CBN

\*Source: BDS Analytics

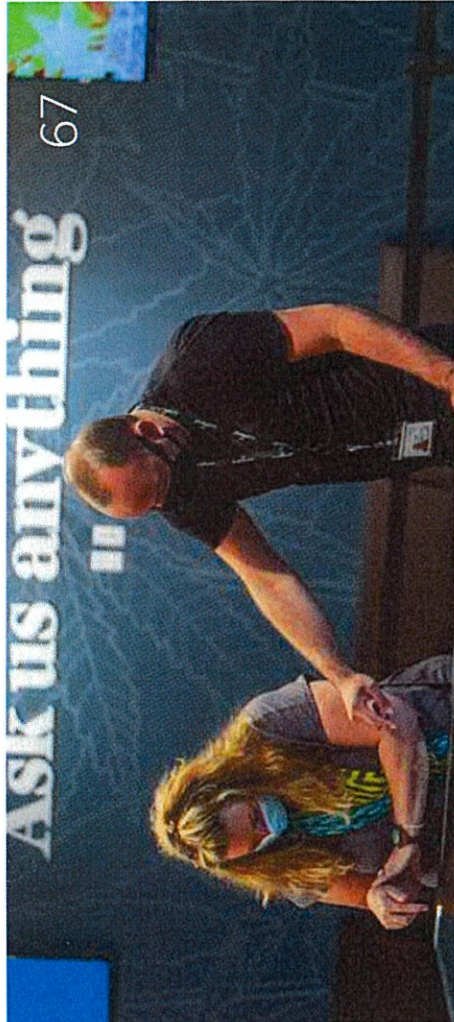


49x

# One Curaleaf

Together, we are Rooted in Good.  
Together, we are One Curaleaf.

50x



Our team members are essential.

When COVID-19 impacted our team members across the nation, the Curaleaf Corporate Social Responsibility team took action to create a Virtual Perks Pantry. By working with companies across the United States, this pantry provided our essential workers with coupon codes for steep discounts on everyday necessities and additional perks like swag, cannabis accessories and more.

## Adapting to the Pandemic

Since March 2020, we have provided all corporate team members with the opportunity to work remotely for their safety and well-being. Many of these team members continue to work remotely. Since not all team members have the ability to work remotely, we worked closely with all of our facilities to ensure the safety of team members, including extra cleanings, an abundance of PPE, time off for team members potentially exposed to the virus, and an increase in mental health support through our Employee Assistance Program.

Throughout the pandemic, Curaleaf maintained a commitment to those in need. From first responders to the restaurant workers, our teams worked to help support groups and individuals across industries impacted by COVID-19.

## Supporting Those Suffering Most

Across the nation, Curaleaf showed up for those who needed us most during the pandemic. This included support for first responders, healthcare workers and local businesses. This included the purchase of masks and other critical PPE that we provided to schools, hospitals, homeless shelters and law enforcement. To help those needing assistance with necessities, Curaleaf supported several food banks and soup kitchens, to help feed our team members while supporting restaurants in the communities served by our locations, we also ordered meals from local establishments.

Altogether, Curaleaf provided \$96,000 in support for healthcare workers and first responders.

management team, including HR, Compliance and Legal. However, if a team member prefers to raise concerns anonymously, they are invited to reach the Compliance Hotline to report concerns either confidentially or anonymously.

Curaleaf has zero tolerance for any form of retaliation and will promptly review and investigate every concern that is raised.

**CODE OF ETHICAL CONDUCT**

To avoid any appearance of a conflict of interest, team members are expected to abide by the following code of ethical conduct. Team members are encouraged to consult their supervisor or Human Resources if they have any questions.

Team members of Curaleaf may not solicit anything of value from any person or organization with whom Curaleaf has a current or potential business relationship. Gifts may not be given or accepted if the intent is to improperly influence a business decision with customers, vendors, healthcare providers or government officials.

Team members of Curaleaf may not accept or provide any item, the value of which exceeds \$100, from or to any party in relation to business or the prospect of business between Curaleaf and that other party.

Proposed gift(s) that exceed \$100 in value per year to an individual or business must be approved in writing by the Compliance department. This policy does not apply to promotional merchandise of Curaleaf or other parties.

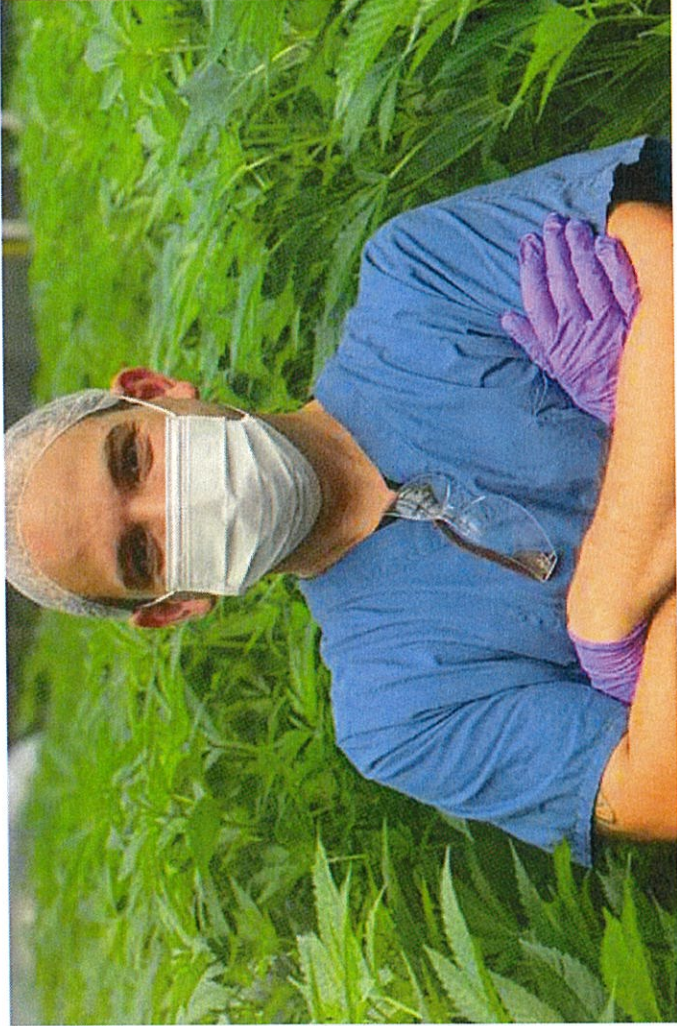
If team members are faced with and are unsure how to handle a situation that they believe has the potential to violate this code of ethical conduct, they are encouraged to notify their supervisor or Human Resources.

**INSIDER TRADING**

Curaleaf has created a formal Insider Trading policy that provides guidelines to directors, officers, team members, consultants, and contractors of Curaleaf and its subsidiaries (collectively the "Company") with respect to transactions in the Company's securities.



We believe that fostering an inclusive environment means leading with integrity. Curaleaf provides a clear ethical code for team members, with resources provided to ensure everyone feels comfortable in the workplace.



**Ensuring Ethics in our Day-to-Day**

At Curaleaf, it's important that we empower our team members to handle ethical dilemmas that they may encounter in everyday work. We encourage discussion of ethics and compliance to create an environment of safety for all.

**COMPLIANCE HOTLINE**

We created a compliance hotline using a third party vendor to ensure that every team member feels comfortable sharing potential ethical issues. We believe that every team member has a responsibility for reporting violations of our Team Member Handbook, Code of Conduct, Policies and Procedures, and Federal and State Laws and Regulations.

Team members are encouraged to raise questions or concerns to their supervisor or other members of the

**Ensuring Safety at our Retail Locations**

Based on cannabis-use studies in 2020, it's clear that cannabis is an important tool for coping with uncertainty as well as the emotional impacts and stressors caused by the pandemic. By providing patients and adult-use consumers with safe, regulated cannabis products during an unprecedented time, Curaleaf met the demands of the moment.

To provide a safe environment for all, Curaleaf maintained strict guidelines and processes throughout its facilities. This included:

- Mandatory mask requirements for team members, patients and consumers
- Curbside pickup in states where permitted
- Deep cleaning

A safe environment is critical for team members, patients and adult-use consumers. With cannabis consumption on the rise throughout the pandemic, providing a space where everyone feels comfortable accessing this product was an important mission.



# Looking Ahead

It's not enough to rest on our accomplishments. To remain Rooted in Good, we must continue to recognize our present while planning our future. Together—through our intentions, actions and commitments—we move our work forward.



52x

## Reflecting on our Future

A message from Khadijah Tribble, SVP of Corporate Social Responsibility



Thank you for reviewing Curaleaf's first-ever Social Impact Report. Just over one year ago we launched our Corporate Social Responsibility Program, Rooted in Good, with the intention to deliver social impact through focused efforts that match Curaleaf's capabilities while prioritizing resources for social equity programming to deliver real opportunities across the cannabis ecosystem.

We aligned as a company on the idea that to be Rooted in Good is to consider the holistic health of the entire community—patients, team members, neighbors, as well as the environment we impact, both locally and globally. With this initial report, we hope you can see that we've made tangible progress toward many of the broad goals that we set as a company when we first began this initiative.

Our work here is not done and we know that the road ahead will require diligence and a relentless focus on doing the right thing for all of those stakeholders. As Rooted in Good continues to grow, we are committed to remaining transparent and community-centric in our approach.

At Curaleaf, we understand that being a leader in the industry comes with great responsibility to the industry, our communities and our planet. As our CEO Joe has said, we're dedicated to ensuring that our actions and decisions prove that big cannabis can be good cannabis—and good cannabis can be big business—for businesses, customers, patients, communities and causes.

In order to be successful, we as a company and an industry must engage with and listen to the needs of the community, because inclusion is never one size fit all. It's been proven again and again that having a team with diversity of thought, experience, gender, race, social economic status or geographical origin, delivers better solutions with long term benefits across the business.

In closing, I want to express our gratitude to all of the teams that helped make this work possible. To our Team Members, Executive Roundtable participants, Employee Resource Group members, our 420x25 partners across all facets of our business, and the various consultants, recruiting partners and vendors who help us achieve our mission to impact lives everyday through cannabis and tell our stories, we thank you.

I'm hopeful that by continuing to work together, we will see a robust patient and consumer-centric industry that is both inclusive and innovative. It is through opportunity, education, and investment that we can see an inclusive cannabis industry flourish and take its rightful place in mainstream culture and business.

Please join me in celebrating this moment.

Thank you,

Khadijah Tribble

## Acknowledgments

The work outlined in this report would not be possible without the dedication, heart and perseverance of our team members and partners. We extend our gratitude to them.

## Strategic Social Partners

Curaleaf's Strategic Social Partners across the nation help us increase impact and advance social equity. We are proud of the work that we have achieved together in social justice, education and the support of diverse and underrepresented communities. Below are just a few of the partners who have received a minimum \$50,000 donation from Curaleaf or with whom we have worked with for more than a year:

Thank you to our partners:

- B NOBLE
- Cara Chicago
- Dear Cannabis;
- Forgotten Not Gone
- Greater West Town Community Development Project
- Growing Home
- Hood Incubator
- Illinois Equity Staffing
- Marijuana Matters
- Mass Cultiva!ED
- Minorities for Medical Marijuana
- Oaktown Community College
- Olive Harvey College
- onePULSE
- Veterans Alliance for Holistic Alternatives
- Women Grow

## Team Members

It takes a village to change the reputation that big cannabis is bad cannabis. We're working hard through our actions to show the opposite—that big cannabis can be good cannabis. We could not achieve our accomplishments without the support of every Curaleaf team member. At every level, they continue to move our work forward. While we don't have the space to list every team member, we are grateful to them. We would like to acknowledge a few of those team members who epitomize what it means to be Rooted in Good.

### ■ CORPORATE SOCIAL RESPONSIBILITY

Khadijah Tribble | Senior Vice President  
Raheem Uqadah | Director  
Kate Steinberg | Analyst  
Asya Hill | Manager

### ■ COMMUNICATIONS

Tracy Brady  
Jordan Rahmil  
Noah Bathke  
Tony Shehata  
Stephanie Cunha  
Maxwell Greenhut-Snyder

### ■ OTHER CURALEAF TEAM MEMBERS

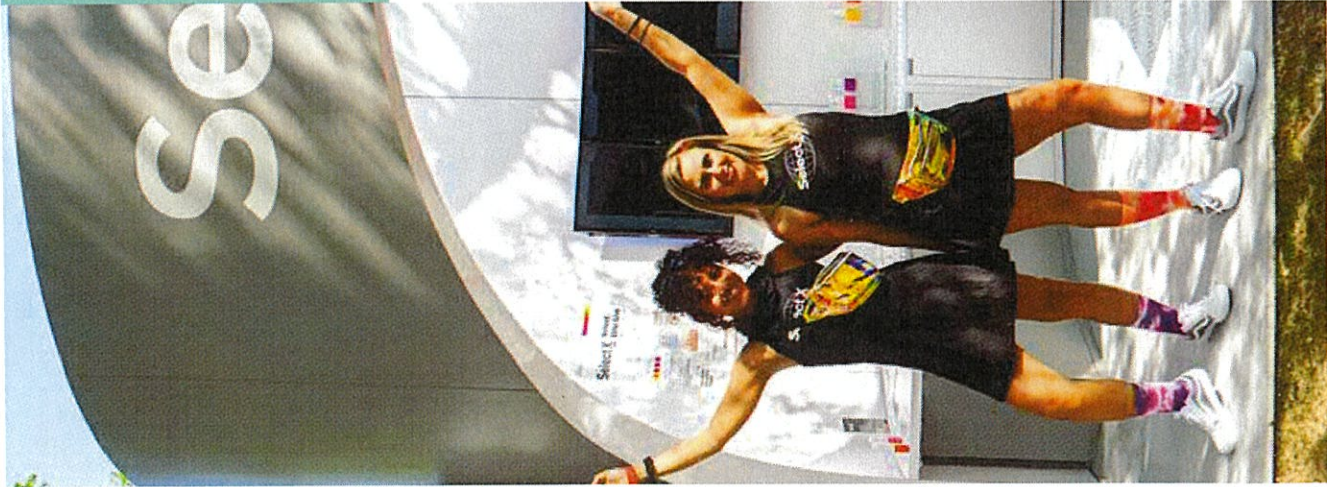
Amy Schmidt  
Angela Denk  
David Tart  
Keith McNaboe  
Kerin Orlandi  
Kimberly Gamboa  
Kennedy Sullivan  
Lanett Austin  
Meg Stackler  
Norma Tejeda  
Patrick Jonsson  
Rachael Yellin  
Stephanie Cade  
Tricia Juliani  
Valeria Podobny  
Vince Bonina

### STEERING COMMITTEE, DEI TASK FORCE, ENVIRONMENTAL TASK FORCE, SOCIAL EQUITY TASK FORCE, SOCIAL IMPACT TASK FORCE, SUPPLIER DIVERSITY TASK FORCE

Al Ochoza  
Allison Badia-Gonzalez  
Amanda Bielski  
Amanda Hargreaves  
Angela Denk  
Bailey Vipond  
Ben Hall  
Beth Marchand  
Brooke Zutler  
Colin Ahern  
Colleen McQuade  
Cortney Schmerfeld  
Cristina Nutzman  
Daniel Strong  
Don Williams  
Ducias Charles  
Erica McLaughlin  
Erick Ramirez  
Evan Pharm  
Ian Brooks  
Jason White  
Jed McWhorter  
Jennifer Facsina  
Jennifer Mariotti  
Jim Broden  
Jordan Rahmil  
Josh Rubin  
Kaila Strong  
Kate Steinberg  
Keisha Brice  
Keith McNaboe  
Kevin Behan  
Khadijah Tribble  
Kimberly Gamboa

Kyle Crossley  
Lanett Austin  
Lauren Funk  
Leah Sigety  
Lesley Jenne  
Luke Flood  
Mariah Redmond  
Mary Hayes  
Matthew Pascuzzi  
Michelle Blank  
Neil Steen  
Nik Berndt-Rodriguez  
Paisley Stout  
Patrick Morrow  
Raheem Uqadah  
Rebecca Wilgus  
Ryan Graziano  
Samantha Saunders  
Sandra Perez  
Sara Diehl  
Sharron Cannon  
Sheridan Doan  
Silka Colon  
Stephanie Kronen  
Tamarra Roddy  
Tiffany Gray  
Tom Janus  
Tony Gage  
Tracy Brady  
Valeria Podobny  
Vinit Patel  
Whitney Conroy  
Yesenia Garcia  
Zach Granowitz

53x



## Honors and Awards

Change is rooted in action. In 2021, Curaleaf and its CSR leadership team received recognition for its efforts to increase diversity, equity and inclusion in the cannabis industry. These honors serve as a reminder that to be true to our convictions—to remain Rooted in Good—we must continue to act.

### 2020 DIVERSITY & INCLUSION CHAMPION OF THE YEAR

Awarded in January 2021 by Minorities for Medical Marijuana for Curaleaf's extraordinary contributions to promote a more diverse and inclusive industry.

### 2020 GOOD NEIGHBOR AWARD

Awarded in February 2020 by Cannabis Doing Good in recognition of Curaleaf's community engagement programs, volunteerism, and for meeting community needs.

### CLIO CANNABIS 2021 BRONZE AWARD

Awarded in December 2021 by Clio Cannabis Awards for marketing of Curaleaf's partner brand B NOBLE in the Social Good category.

### 2021 CANNABIS 50 LIST BY MACIAS GINI AND O'CONNELL, LLP (MGO)

Highlighting companies, organizations and individuals positively impacting the cannabis industry, this list recognized multiple people, initiatives and brands under the Curaleaf name, including:

- Boris Jordan, Executive Chairman — "Doing Well" List
- Rooted in Good CSR Program — "Doing Good" List
- Fab 5 Freddy, B NOBLE — "All the Lights" List



### EXPLORE MARYLAND CANNABIS AWARDS

Multiple honors awarded in December 2021, including:

- Dispensary of the Year: Curaleaf Reisterstown
- Best Packaging and Marketing: Curaleaf/Select/Grassroots
- Best Social Impact Brand: B NOBLE
- Best Place to Work: Curaleaf/Select/Grassroots

### MG MAGAZINE'S INFLUENTIAL PEOPLE OF COLOR IN CANNABIS, 2022

CSR Director Raheem Uqadah was recognized in January 2022 for his contributions to the cannabis industry, and his work on Curaleaf's Rooted in Good program.

### AMNY INDUSTRY POWER PLAYERS LIST, 2022

Executive Chairman Boris Jordan and SVP of CSR Khadijah Tribble were recognized in January 2022 for their contributions to the New York cannabis industry.

### PROFILES IN DIVERSITY JOURNAL BLACK LEADERS WORTH WATCHING, 2021

VP of CSR Khadijah Tribble was recognized for her contributions to the cannabis industry, and her work on Curaleaf's Rooted in Good program.

### 2022 SOCIAL IMPACT AWARDS "CSR TEAM OF THE YEAR"

The Curaleaf CSR team was listed as a finalist in the "CSR Team of the Year" category for its Rooted in Good work.



# About This Report

Curaleaf's 2021 Social Impact Report provides an overview of our company's Corporate Social Responsibility progress and future goals. We are committed to reporting on our Corporate Social Responsibility performance annually and look forward to following up with the 2022 Social Impact Report.

## The scope of this report focuses on key areas determined by the Curaleaf team:

- Diversity, Equity and Inclusion
- Social Equity
- Strategic Social Partners
- Environmental Sustainability

### REPORTING YEAR

The information contained in the report primarily focuses on fiscal year 2021, unless otherwise noted. The dates of our fiscal year 2021 are Jan. 1, 2021, to Dec. 31, 2021.

### INFORMATION INTEGRITY

Curaleaf is responsible for the preparation and integrity of the information in this report. The metrics and key areas covered were determined through a rigorous process involving internal subject matter experts. We are confident this report both accurately and fairly represents programming, activations and successes led by the Curaleaf Corporate Social Responsibility team and the Curaleaf team at large. This report has not been verified by an independent third party.



### ABOUT CURALEAF HOLDINGS

Curaleaf Holdings, Inc. (CSE: CURA) (OTCQX: CURLF) ("Curaleaf") is a leading international provider of consumer products in cannabis with a mission to improve lives by providing clarity around cannabis and confidence around consumption. As a high-growth cannabis company known for quality, expertise and reliability, the Company and its brands, including Curaleaf and Select, provide industry-leading service, product selection and accessibility across the medical and adult-use markets. In the United States, Curaleaf currently operates in 23 states with 118 dispensaries, 25 cultivation sites, and employs over 5,400 team members. Curaleaf International is the largest vertically integrated cannabis company in Europe with a unique supply and distribution network throughout the European market, bringing together pioneering science and research with cutting-edge cultivation, extraction and production. Curaleaf is listed on the Canadian Securities Exchange under the symbol CURA and trades on the OTCQX market under the symbol CURLF.

For more information, please visit <https://ir.curaleaf.com>.

### ABOUT CURALEAF INTERNATIONAL

Curaleaf International (formerly EMMAC Life Sciences Group) is Europe's largest vertically integrated cannabis company, bringing together pioneering science and research with cutting-edge cultivation, extraction and production. With a unique supply and distribution

network throughout Europe, Curaleaf International's vision is to bring the life-enhancing potential of cannabis to the people who need it. EMMAC Life Sciences was acquired by Curaleaf Holdings in March 2021.

For more information about Curaleaf International, please visit [curaleafinternational.com](http://curaleafinternational.com).

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**TESTIMONY OF DOMINIC O'BRIEN**  
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Good morning Chairman Stack, Senate President Scutari, and members of the Judiciary Committee. My name is Dominic O'Brien. I am the Senior Vice President of Revenue at Green Thumb Industries, Inc., the parent company of GTI New Jersey, which does business here and in 13 other states as RISE. It is an honor and my privilege to testify on behalf of RISE, which operates cultivation, manufacturing and retail facilities in Paterson, and retail dispensaries in Bloomfield and Paramus. I would also like to acknowledge and thank Vice Chair Pou and Senator Lagana. Senators, Paterson and Paramus have been great hosts and partners on this journey.

As a New Jersey native born and raised in East Windsor, it is a special privilege for me to lead GTI's New Jersey operations and to share our experiences in transitioning to the adult use market today.

First and foremost, we must acknowledge the enormity of the task before the Legislature and the Executive Branch to stand up a new agency and industry simultaneously, especially in the shadow of the COVID pandemic the past two years. In our view, New Jersey has done a very good job at an exceptionally difficult task.

GTI has significant experience with medical to adult use transitions in Illinois, Massachusetts, and Nevada. In our experience, no transition is ever perfect, and there are always lessons to be learned from each transition. And applying the lessons GTI learned elsewhere in the New Jersey rollout, GTI was successful in launching adult use sales at two of its retail locations, in Paterson

and Bloomfield, on time and without disruption or complaint from its neighbors and host communities.

We were well prepared for the anticipated surge in customers. Working with the CRC staff, we prepared detailed supply, traffic and patient access plans that assured uninterrupted patient access to needed medication, and a first rate retail experience for our new adult use customers. We have maintained ample supply for medical patients, and they have not had to wait in line at our stores – they enter and get service.

At the same time, we have maintained ample supply for our adult use customers. We did not have hours-long lines. Through careful site selection and thorough planning of traffic inside and outside our dispensaries we have been able to avoid any issues related to parking and traffic.

Once the Commission announced the April 11 meeting at which adult use approvals were issued, the GTI team worked 24/7 to ensure our success. We are very grateful to our 150 New Jersey based employees for all the hard work they put in to serve New Jersey patients and customers alike. GTI's New Jersey team reflects the diversity of New Jersey itself:

- 57% of our team identify as Black, African American, Latino, Hispanic or two or more races.
- 51% identify as women or nonbinary.
- 24% reside in an Impact Zone municipality.
- 20% live in an Economically Disadvantaged Area.

We are proud of them. Without their hard work, none of this could have happened.

We also must recognize the Commission's staff for their dedication and responsiveness to assuring a successful adult use rollout. From our perspective, it was quite evident that once

committed to proceeding with adult use sales, the Commission staff made itself available as and when needed to provide guidance, authorizations and recommendations that allowed us to get the doors open on time and without incident. Success in any governmental endeavor is usually the product of a real partnership between industry and regulators, and we appreciate that the CRC staff worked with us to deliver an adult use rollout that is the smoothest we have seen across the country to date. We hope that spirit of partnership continues.

The rapid transition was not without bumps along the way, to be sure. Transitioning from medical to adult use rules in under 30 days was very challenging for all. Assuring cannabis product was properly tested before being sold was also challenging. Perhaps most concerning however is the undercurrent of criticism directed at the currently licensed ATCs for the costs of adult use cannabis relative to the unregulated, “legacy” or illegal/unregulated market.

To be clear, operating a medical or adult use cannabis business anywhere is much more challenging and costly than most people think. That is especially true in New Jersey. A cannabis license is not a lottery ticket. It is not a license to print money, as some seem to believe. The Legislature needs to be aware of the real obstacles future licensees face:

- Real estate supply is highly limited given the reluctance of some landlords to rent to cannabis companies, the restrictive zoning many towns establish, and the State’s prohibition on locating on any property that has received an economic incentive from any public agency.
- Industrial and commercial rents, already through the roof, are subject to a cannabis premium.
- New Jersey’s land use approval process is daunting for even something as noncontroversial as adding a porch or pool to one’s property. Securing approval of a retail or production facility for cannabis requires a great deal of engineering services and legal services and a lengthy process that will be very costly.

- The state's important union and social equity requirements for cannabis businesses add complexity and costs that most businesses don't have.
- New Jersey's regulatory requirements are strict, and the costs of testing product and assuring compliance with those requirements are significant.
- The lack of full banking services drives up the cost of capital and loans.
- And hanging over all of this is the federal tax code provision known as 280E, by which cannabis businesses face federal taxes of 50% and more on their revenues, double that of most other businesses.

All these factors drive up costs and the amount of capital needed to produce a safe, well regulated product and to open the doors to the public.

GTI is not complaining about the unique aspects of the cannabis business, or the cost of doing business in a state that prides itself on social equity, union participation, and close regulation of a product that is used for medical and recreational purposes. GTI strongly supports each of the State's goals.

But this Committee and new licensees need to be aware of the many obstacles to success and the extraordinary costs of operating in New Jersey. Customers and the media need to understand that these local factors and policy goals are the reason regulated cannabis costs twice as much as so-called "legacy" or unregulated cannabis:

- Unregulated operators do not pay taxes to the federal, state or local government to advance social equity and assure a safe product and well-regulated industry.
- Unregulated operators do not support community groups that make lives better in the communities in which they operate.
- Unregulated operators do not comply with state mandates to use no pesticides, to assure their product doesn't contain harmful mold or other bacteria, to test each batch of product to ensure it is safe for use, or label it so that consumers have the basic information they need to understand the source and potency of the product they are purchasing.

- Unregulated operators do not recognize workers' right to organize and provide their employees a safe workplace, fair wages, and health benefits.

In addition to legacy operators, there is a new breed of unscrupulous businesses that “gift” cannabis in exchange for a payment for some other non-regulated product. We have seen these businesses advertising on billboards and online, and we have even seen open “dispensaries” operating in strip malls and gas stations around New Jersey.

Acting Attorney General Platkin has stepped up enforcement efforts around these problems.

Those who wish to participate in the licensed, regulated business should be thankful for that.

Despite the legalization of cannabis, enforcement of the State’s regulatory requirements remain essential if local, small businesses and social equity applicants are to succeed in this business.

New operators currently being granted licenses do not have the financial resources to weather the effects of the unregulated, legacy markets. Their hopes will be dashed by those who refuse to participate in the carefully-balanced, consumer-oriented system this Legislature established.

We support efforts to bring legacy operators into the regulated marketplace, and a fair industry in which smaller operators can flourish. GTI believes strongly in providing small local businesses the support and funding they need to get started and be successful. To this end, GTI has committed:

- to provide at least \$1 million in funding to social equity licensees, and is in active discussions with several minority owned licensees to provide funding on fair terms;
- to supply cannabis product to social equity licensees on fair and equitable terms;

- to provide technical support and training to help them with the steep learning curve of this business, and
- to continue supporting expungement and reentry programs across the state. We are especially proud to have donated our first day profits from adult use sales to the New Jersey Reentry Corporation and other nonprofit organizations that are helping right the wrongs of the War on Drugs.

In closing, GTI thanks New Jersey for the privilege of operating its cultivation and retail businesses here, and for the chance to speak with you today. I will be happy to answer any questions you may have.

# The Public Benefits of Banking Cannabis Businesses



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# The Public Benefits of Banking Cannabis Businesses

## I. Introduction

As of early 2019, 33 states and the District of Columbia have legalized cannabis use in some form. These jurisdictions cover roughly 70% of the U.S. population. However, the possession, distribution, or sale of cannabis remains illegal under federal law. Because of the conflict between state and federal law, most banks will not provide services to the industry. This means that most cannabis firms and their suppliers are typically forced to operate in cash — posing heightened economic and security risks to customers, employees, and the larger community.

The problems caused by blocking cannabis and cannabis-related businesses from the banking sector are only going to grow as the cannabis industry expands. According to industry analysts, the legal cannabis industry now exceeds \$10 billion and employs as many as 160,000 workers.<sup>1</sup> Conservative estimates suggest that the legal cannabis market will grow to \$25 billion by 2025,<sup>2</sup> while more expansive projections have the industry reaching \$75 billion by 2030.<sup>3</sup> As a result, the industry is expected to create at least 300,000 jobs by 2020.<sup>4</sup>

While the debate over legalizing marijuana continues, there are clear public benefits in allowing banks to serve cannabis businesses in the states where voters have chosen to make it legal in some form. This paper outlines some of those benefits, including:

- **Increased support for local economic growth.** Allowing the industry to access banking services will ensure that its employees, suppliers, and service providers also remain within the banking system, supporting sustainable local economic growth.
- **Improved security and safety.** Cannabis businesses are increasingly targeted by criminals due to the vast amounts of cash they handle. Banking the industry will improve public safety by reducing the amount of cash kept on hand.
- **Reduced tax evasion.** Tax evasion is pervasive among cash-reliant businesses. Banking cannabis businesses will improve financial transparency and nudge the industry toward improved tax compliance.
- **Increased efficiency of tax collection.** Because they are unbanked, many cannabis businesses make tax payments in cash, posing challenges to federal, state, and local governments. Banking the industry will allow cannabis businesses to make secure, efficient electronic payments instead.
- **More accurate assessments of economic risks.** Banking cannabis businesses will make it possible to evaluate the industry's performance and develop a clearer picture of its impact in the local economies to which it contributes.

Each of these topics are explored in greater depth below.

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## II. Support Growth of Local Economies

As the cannabis industry grows, it will become increasingly integrated into local economies. This has great potential to boost local growth and expand the tax base, but that growth may be tempered if the industry's employees, suppliers, and service providers are excluded from the banking system.

This rapid expansion has spurred indirect growth across local economies as cannabis businesses require services and supplies from lawyers, consultants, data analysts, climate engineers, insurers, real estate companies, security specialists, marketing firms, and HVAC businesses among others. For example, the Marijuana Policy Group estimates that nearly 30% of the 18,000 jobs added to Colorado's economy in 2015 due to cannabis legalization were generated by demand for supplies and services from cannabis businesses and general spending by cannabis industry employees.<sup>5</sup>

The Federal Reserve Bank of Kansas City reports that as a result of these trends, about 5.5% of the total change in Colorado employment in the first half of 2017 is attributable to the cannabis industry,<sup>6</sup> demonstrating that the cannabis sector is integral to the local labor market and underscoring the importance of accurate data pertaining to the industry's performance.

However, if the industry, along with its suppliers and service providers, cannot access the banking system, new employees risk being cast aside into the shadow economy. This includes workers at businesses that provide marketing, real estate, security, insurance, legal, and consulting services, as well as manufacturers and climate engineering, construction, and HVAC specialists.<sup>7</sup> In Colorado alone, excluding both cannabis and "cannabis-periphery" businesses from the banking system would increase the state's unbanked population by 20%.<sup>8</sup>

Anecdotal evidence suggests that segments of local economies are already losing access to banks because of their business relationships with cannabis firms. For example, security companies that provide much-needed services to cannabis companies cannot access traditional loans to buy armored trucks and expand their operations despite heightened demand for their services.<sup>9</sup> Lawyers, data analysts, and accountants who serve cannabis businesses have similarly found themselves frequently dropped by their banks, as have agricultural supply companies that furnish cannabis dispensaries with soil and tools. The same is true for climate engineering firms that work with cannabis growers and companies producing accessories used for legal cannabis consumption.<sup>10</sup>

Furthermore, since cannabis businesses cannot access the banking system, it is more difficult to reinvest the industry's revenues — which by some estimates could reach \$75 billion by 2030 — into the community via bank lending.<sup>11</sup> Instead, cash proceeds gather dust in business-held safes.

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### III. Improve Security and Safety

Cannabis businesses are attractive targets for criminals – and they endanger owners, employees, customers and communities because they operate predominantly in cash. Banking the industry will mitigate this risk and keep communities safe by reducing the vast amounts of cash that cannabis businesses currently handle, store, and transport.

Colorado has one of the most developed cannabis markets, and thus the impacts of the cannabis industry there make a compelling case study. According to the City of Denver, cannabis businesses make up less than 1% of all local businesses but have accounted for 10% of all reported business burglaries from 2012-2016.<sup>12</sup> Within a year of legalization, Denver's community of approximately 325 cannabis businesses experienced over 120 burglaries and robberies. This burglary problem remains acute. On average, more than 100 burglaries occur at cannabis businesses each year according to the Denver Police Department.<sup>13</sup> Burglaries and theft comprise almost 80% of Denver's cannabis industry-related crime.<sup>14</sup>

Anecdotal evidence from other locations where cannabis is legal is consistent with the experience in Denver. Government officials in California's "Emerald Triangle" (the Mendocino, Humboldt, and Trinity Country area -- home to the nation's largest cannabis-growing region) have described a surge in home invasions and missing person cases as criminals seek out cannabis business' stockpiles of cash. Similarly, there has been an increase in media reports of burglaries, murders and kidnappings of cannabis dispensary owners and security guards across California, Washington, and Oregon.<sup>15</sup>

Major Neil Franklin, Executive Director of the Law Enforcement Action Partnership, noted in 2019 testimony before the U.S. House Committee on Financial Services that "current conditions, which require all-cash transactions in every aspect of the [cannabis] business encourage tax fraud, add expensive monitoring and bookkeeping expenses, and — most importantly — leave legitimate businesses vulnerable to theft, robbery, and the violence that accompanies those crimes."<sup>16</sup>

In May 2019, a bipartisan group of 38 state attorneys general sent a letter to ten congressional leaders recognizing that cannabis business' preclusion from the banking system and reliance on cash "contributes to a public safety threat as cash intensive businesses are often targets for criminal activity."<sup>17</sup>

Similarly, in April 2019, a bipartisan group of 17 state treasurers sent their own letter to congressional leaders, noting that "Processing, storing, and moving large amounts of cash puts business owners, their employees, and their customers at risk of violent crime."<sup>18</sup>

Former deputy director of the National Cannabis Industry Association (NCIA) Betty Aldworth stated in 2014 that "The lack of access to banking is hands down the single most dangerous aspect of legal marijuana."<sup>19</sup>

While not specific to cannabis, a 2014 study published by the National Bureau of Economic Research found that by switching from paper-based payments to electronic payments, states can reduce overall crime levels by nearly 10%. The study found a notable decrease in the prevalence of burglary, larceny, and assault — crimes often committed in pursuit of cash.<sup>20</sup>

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#### IV. Combat Tax Evasion

Tax evasion is common among cash-based businesses, constituting the norm rather than the exception.<sup>21</sup> Given their lack of access to banking services, the risk of tax evasion among cannabis businesses is higher than traditional businesses. Moreover, this risk could extend beyond cannabis businesses to their employees, suppliers, and service providers. Banking the cannabis industry would improve financial transparency and reduce both the opportunity and incentive to evade taxes.

Due to the hard-to-trace nature of cash transactions, it is common for cash-based businesses to intentionally underreport income. Myriad studies published by behavioral economists demonstrate that due to the low-visibility of cash-based transactions, taxpayers are less likely to report cash income than payments received by check or those subject to third-party reporting or withholding.<sup>22</sup>

Cash-based businesses face competitive pressures to evade taxes. New York University (NYU) researchers concluded that due to extensive noncompliance across the cash business sector, “honest” business owners who would otherwise comply with tax laws often cave under the pressure and evade taxes in order to remain competitive with their tax-evading competitors.<sup>23</sup> The IRS estimates that income underreporting across the cash economy is the single largest contributor to the U.S. tax gap, leading to revenue losses of about \$100 billion annually.<sup>24</sup>

Although compliance rates are difficult to estimate, researchers at Stanford University suggest that cash-based businesses underreport their income by at least 50%.<sup>25</sup> Self-employed individuals operating businesses on a cash basis (a description that fits most cannabis proprietors) report less than 20% of their income to the IRS.<sup>26</sup>

Although the cannabis industry is regulated and therefore likely more tax-compliant than unregulated cash-based businesses, initial studies show that there are still significant tax evasion challenges in the current environment. The city of Sacramento estimated that cannabis dispensaries amass \$9 million per year in underpaid taxes due to poor recordkeeping or filing inaccurate financial statements with local tax collectors. This tax evasion amounts to nearly double the revenue collected by the city through fees and taxes on annual reported cannabis sales.<sup>27</sup>

Given that tax revenues from the cannabis industry are often earmarked for education and public health initiatives, compliance is critical to the well-being of local communities. For example, Colorado allots \$40 million annually from the state’s cannabis tax to the construction and renovation of schools, \$18 million to public health and cannabis education, and \$8.4 million to boosting literacy, improving graduation rates, and reducing bullying.<sup>28</sup>

Banking the cannabis industry is a straightforward way to ensure that businesses have the means and motivation to remain fully tax compliant.

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## V. Increase Tax Collection Efficiency

Cannabis businesses frequently pay taxes and fees in cash because they are unbanked, which presents additional collection challenges to government agencies. Allowing banks to serve the cannabis industry would eliminate these inefficiencies and allow cannabis businesses to quickly and securely file tax payments electronically, as other legal businesses do.

The U.S. government collected an estimated \$4.7 billion in taxes from cannabis businesses in 2017, and industry analysts estimate that up to \$17.5 billion in federal, state, and local tax revenues could be generated by 2030.<sup>29</sup> Since only 30% of cannabis businesses hold a bank account, most firms pay their taxes in cash at local IRS offices. They make their payments in secure rooms equipped with machines that count and verify the authenticity of each bill.<sup>30</sup>

Processing such paper-based returns costs the IRS nearly 17 times more compared to an e-filed return,<sup>31</sup> and sometimes requires local tax offices to invest in additional security measures. IRS offices in Oregon and Colorado have invested millions in safety glass and security cameras.<sup>32</sup> Further, the IRS has agreed to pay nearly \$2 million to the Mitre Corporation to assist with processing tax payments received in cash from the cannabis industry.<sup>33</sup>

The IRS typically assesses a 10% penalty on companies that pay taxes in cash rather than electronically. However, since cannabis businesses are precluded from the banking system, the IRS does not levy these charges on the cannabis industry. The IRS, and therefore taxpayers, bear the full brunt of these additional cash-counting costs.<sup>34</sup>

State and local governments experience similar struggles with processing all-cash tax payments. A 2018 survey conducted by the Council of State Governments found that the majority of state governments intend to move away from paper-based tax payments in order to reduce the cost of collection.<sup>35</sup> However, the lack of access to banking among cannabis businesses suggests that tax offices in Colorado, California, and Washington likely collected much of the nearly \$1 billion in cumulative tax revenue generated by this industry in cash.<sup>36</sup>

## VI. Accurately Assess Economic Risks

The cannabis industry's heavy reliance on cash poses a challenge to policymakers seeking to accurately assess its size and economic health. This in turn, makes it difficult to assess the opportunities and risks that may develop in local economies that are heavily reliant on the industry. Banking the cannabis industry and bringing it out of the shadows will enable policymakers, economists, and researchers to monitor and evaluate the industry's performance and, by extension, achieve a better understanding of the health of local economies to which it contributes.

The cannabis industry shapes local economies not only through its impact on the labor market, as detailed above, but also through its impact on local property values. Colorado's legal cannabis industry has driven investment in cultivation and retailing infrastructure and boosted competition for warehouses, driving property values higher.<sup>37</sup> According to CBRE Research, the influx of dispensaries has led average warehouse lease rates in Denver to double.<sup>38</sup> As the industry expands, it

may continue to influence real estate prices and thus introduce into the local economy new risks and opportunities that could be difficult to measure due to the industry's lack of access to the banking sector and heavy reliance on cash.

Furthermore, since the cannabis industry is administered at the state-level, most cannabis spending remains within the borders of the state where it is spent. As a result, the industry generates more local output and employment per dollar spent than most other sectors, and its performance is likely to be felt by the local economy more than that of similarly sized sectors whose transactions cross state lines.

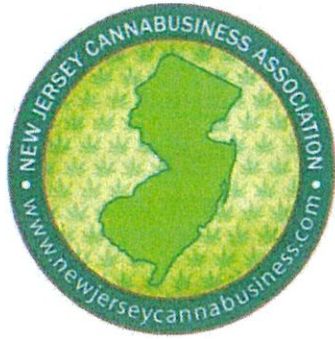
For example, the Marijuana Policy Group has found that each dollar spent on cannabis retail in Colorado generates \$2.40 in state output. By comparison, the traditional retail sector generates only \$1.88 per dollar, and the mining sector generates just \$1.79 per dollar spent.<sup>39</sup> As a result, fluctuations within the local cannabis industry could have a greater impact on local economies than that of other sectors.

## End Notes

- <sup>1</sup> Associated Press (2018), "[Legal Marijuana Industry Toasts Banner Year](#)" citing New Frontier Data.
- <sup>2</sup> New Frontier Data (2018), "[New Frontier Data Projects U.S. Legal Cannabis Market to Grow to \\$25 billion by 2025.](#)"
- <sup>3</sup> Cowen Equity Research (2018).
- <sup>4</sup> Payscale.com citing New Frontier Data. See (2017), "[New Marijuana Industry Jobs to Eclipse New Manufacturing Jobs by 2020.](#)"
- <sup>5</sup> Marijuana Policy Group (2016), "[The Economic Impact of Marijuana Legalization in Colorado.](#)"
- <sup>6</sup> Kansas City Federal Reserve (2018), "[The Economic Effects of the Marijuana Industry in Colorado.](#)"
- <sup>7</sup> Kleperis (2017), "[Investigating the Role of Financial Institutions in the Legal Cannabis Industry](#)" and Marijuana Policy Group (2016), "[The Economic Impact of Marijuana Legalization in Colorado.](#)"
- <sup>8</sup> Marijuana Policy Group (2016); U.S. Census Bureau (2018), "[Quick Facts Colorado](#)"; Kansas City Federal Reserve (2018), "[State Profile: Colorado.](#)"
- <sup>9</sup> Guillot (2018), "[Marijuana, Banks, and the Perils of a Growing Business.](#)"
- <sup>10</sup> Testimony Submitted on Behalf of the National Cannabis Industry Association before the U.S. House of Representatives Consumer Protection and Financial Institutions Subcommittee (2019); Chiang (2017), "[Letter to the California Congressional Delegation: Miller \(2017\). 'Cannabis-Industry Lawyer Raises Questions After his Bank Terminates Account'](#)"; Horowitz (2018) "[Cannabis in Canada: Big banks are missing a boom.](#)"
- <sup>11</sup> Cowen Equity Research (2018).
- <sup>12</sup> City of Denver (2018), "[The Denver Collaborative Approach: Leading the way in municipal marijuana management.](#)"
- <sup>13</sup> Burglary data available from the Denver Police Department. See: [City of Denver Open Data Catalog](#) (2018). According to an analysis of licensing data conducted by cannabis-industry data analytics firm Marijuana Business Daily, there were approximately 325 cannabis companies in Denver as of 2014. See: CNBC (2014), "[Robber Gangs Terrorize Colorado Pot Shops.](#)"
- <sup>14</sup> According to the City of Denver, in 2017 burglary or attempted burglary accounted for 67% of cannabis-industry related crime and larceny accounted for another 12%. See City of Denver (2018), "[The Denver Collaborative Approach: Leading the way in municipal marijuana management.](#)"
- <sup>15</sup> Chiang (2017), "[Banking Access Strategies for Cannabis-Related Businesses](#)"; Northwest High Intensity Drug Trafficking Area (2017), "[Washington State Marijuana Impact Report: Volume 2](#)"; NBC (2018), "[Marijuana dispensary robbery caught on camera.](#)"
- <sup>16</sup> Franklin (2019), [Testimony of Major Neill Franklin.](#)

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- <sup>17</sup> [State Attorneys General Letter to Congress](#) (2019).
- <sup>18</sup> [State Treasurers Letter to Congress](#) (2019).
- <sup>19</sup> Altman (2014), [Pot's Money Problem](#).
- <sup>20</sup> Wright et al. (2014), "[Less Cash, Less Crime: Evidence from the Electronic Benefit Transfer Program](#)."
- <sup>21</sup> Morse et al. (2009), "[Cash Businesses and Tax Evasion](#)"; Lederman (2003), "[The Interplay between Norms and Enforcement in Tax Compliance](#)"; Slemrod (2001), "[Cheating Ourselves: The Economies of Tax Evasion](#)"; Bankman (2007), "[Eight Truths About Collecting Taxes from the Cash Economy](#)." Roth et al. (1989), "[Taxpayer Compliance: An agenda for research](#)"; Andreoni et al. (1998), "[Tax Compliance](#)"; Richardson and Sawyer (2001), "A Taxonomy of Tax Compliance Literature: Further Findings."
- <sup>22</sup> Robben, Hessing, and Elffers (1990), "Legal Controls and Type of Employment in Tax Evasion Behavior;"; Robben et al. (1990), "Decision Frame and Opportunity as Determinants of Tax Cheating"; Webley et al., (1991), "Tax Evasion: An Experimental Approach"; Richardson and Sawyer (2001); Lederman (2003); and Morse et al. (2009).
- <sup>23</sup> Bankman and Karlinsky (2001), "Cash Business Owners and Their Tax Preparers," quoted in Lederman (2003); Morse et al. (2009).
- <sup>24</sup> The "cash economy" refers to taxable income from legal activities not reported to the IRS by third parties. This definition includes businesses operating strictly in cash, as well as others that handle a portion of their transactions in cash or receive other payments not subject to third party reporting. See IRS (2007), "[A Comprehensive Strategy for Addressing the Cash Economy](#)."
- <sup>25</sup> The "cash sector" includes small businesses with low-to-medium incomes that sell primarily at the retail level and often receive and make payments in cash. See Morse et al. (2009); Bankman (2007).
- <sup>26</sup> U.S. Department of the Treasury (2006), "[A Closer Look at the Size and Sources of the Tax Gap](#)."
- <sup>27</sup> Conti-Brown (2018), "[The Policy Barriers to Marijuana Banking](#)."
- <sup>28</sup> Green Entrepreneur (2017), "[Here's Where Colorado Spends its Skyrocketing Pot Tax Revenue](#)."
- <sup>29</sup> New York Times (2018), "[Bags of Cash and Stealthy Deliveries: How Pot Start-Ups Pay Taxes](#)" and Cowen Equity Research (2018), "[Cannabis: \\$75B Opportunity](#)."
- <sup>30</sup> Marijuana Business Daily (2015), "[Sixty Percent of Cannabis Companies Don't Have Bank Accounts](#)." Rohlrich (2018), "[Cannabis companies are paying federal taxes in cash and it's giving the IRS a headache](#)." Baily (2018), "[How do I pay my tax without a bank account?](#)"; Smith (2018), "[IRS collects billions in pot taxes, much in cash](#)."
- <sup>31</sup> GAO (2010), "[2010 Tax Filing Season: IRS's Performance Improved in Some Key Areas, but Efficiency Gains are Possible in Others](#)."
- <sup>32</sup> Quinton (2016), "[Why Marijuana Businesses Still Can't Get Bank Accounts](#)"; Arrowsmith (2017), "[IRS Goes Green](#)"; Mordock (2018), "[Cash is King](#)."
- <sup>33</sup> USASpending.gov (2018), [Contract Summary](#).
- <sup>34</sup> Rohlrich (2018) and Brager (2015), "[Penalty relief available for cash-only businesses](#)."
- <sup>35</sup> 32 states responded to the Council of State Governments' survey. Of these, 72% reported that the cost of collecting and processing payments was their main reason for accepting few paper-based payments. Council of State Governments (2018), "[Cash-less State Governments: Electronic Collections and Benefit Disbursements](#)."
- <sup>36</sup> Colorado Department of Revenue (2019), [Marijuana Tax Data](#); California Department of Tax and Fee Administration (2019), "[California Department of Tax and Fee Administration Reports Cannabis Tax Revenues for the Fourth Quarter of 2018](#)"; Washington State Liquor and Cannabis Board (2018), "[Annual Report: Fiscal Year 2018](#)."
- <sup>37</sup> Marijuana Policy Group (2016).
- <sup>38</sup> Kansas City Federal Reserve (2018).
- <sup>39</sup> Marijuana Policy Group (2016).



Thank you, Senate President Scutari, Mr. Chairman, Madame Vice Chair, and members of the committee for the invitation to address the topic of “Access to Capital in the Cannabis Industry.” It is an honor to join you and my distinguished colleagues in discussing this and other urgent matters as it relates to moving the state’s newest significant contributor to our economic, social, and physical landscapes forward.

As President of the New Jersey CannaBusiness Association, the state’s first and largest trade association founded to help New Jersey develop a responsible, sustainable, diverse, and profitable cannabis industry, I would be remiss if I did not recognize association co-founders Scott Rudder and Michael Turner of Burton Trent Public Affairs. It was Michael and Scott who coincidentally traveled out West with the legislative delegation over five years ago to witness first-hand the emerging adult-use cannabis markets. I could not sit here confidently without their advice and counsel. More importantly, it is with the support of the Board of Directors and membership that I am proudly serving in my second term of what is now widely known as the “New Jersey Cannabis Chamber of Commerce.”

Before I delve into the heart of my remarks, I would like to offer once again my sincere thanks to you, Senate President for all your work to make cannabis legalization a reality for the state. Your focus on making social justice a legislative priority and stemming the tide of wasted investment in the prison industrial complex speaks volumes of your wisdom and character as you set us down the right path of beginning to correct the injustices of the past and creating future opportunities.

It is the notion of opportunity that begs the questions “Is there access to capital? Is there access to resources for those we deemed legislative and regulatory priorities?”

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This becomes a moot point if the Federal government would address the disparities in banking and insurance laws and provide equitable access to essential services for small and start-up cannabis businesses.

The one word that seems consistent in conversations about cannabis commerce is "Disparity." The reality is all new business start-ups, regardless of market segmentation, require access to capital. What presents the greatest challenge to cannabis start-ups is the lack of traditional avenues of access to certain resources.

Cannabis legalization does not magically wipe away the devastation wrought upon historic communities of color and poor communities. I would use the analogy that we have prevented certain classes of people from legally participating in the 100-yard dash of the cannabis economy, and other economies for that matter, for years. Now we say it is okay to get to the starting line. When we examine the field, we find that certain participants do not have starting blocks, others do not have running shoes, and oh yes, the rest of the field has a 50-yard head start.

What New Jersey has done well early is lower the bar to entry to the industry by creating licensing categories like Conditional Licenses where the applicant does not need to possess all local approvals or a site to apply. There is also the Micro License category where the applicant is applying for smaller, scalable operations mitigating certain cost factors. We are pleased that the state has approved over 100 Conditional and Micro Licenses to date.

Allow me to focus on three aspects of capital and other resource management issues, and how we might better facilitate better access. Those three areas of capital and resource management are personal access, private access, and public access.

Just last week I participated in a panel discussion on new license holders and what they can expect when pursuing a cannabis license. The new license holder on the panel was a dispensary owner/operator from Massachusetts. The young lady shared her local and state authority administrative challenges. And when asked about investment issues including cost overruns – a natural part of any development project, she said "I went to the Bank of Dad, and he wasn't always happy about it." It might have been insulting had she not been such a nice person. This year the New Jersey Institute of Social Justice reported the Black median household income is less than a tenth of White

72x

households. Going to the “Bank of Dad, Mom, Grandmom, Cousin, etc.” is not an option. At the New Jersey CannaBusiness Association, we are collaborating with legislators and regulators to make sure that we caution those interested in entering the cannabis market that their investment is done at-risk because of the free-market system we are engaged in.

Private access to capital by virtue of venture capital and other partnership arrangements is permissible under the current laws and regulations. The NJCBA is proud to have been an advocate for oversight of those arrangements. As the Cannabis Chamber of Commerce, we also make sure that technical resources are also available as we provide networking, webinars, and support other industry-wide activities for support of future license holders and ancillary businesses.

Public funding of cannabis investment is a little further away, but we are in talks with relevant state agencies about how we make that happen in the most effective way possible. Remember, there are those without starting blocks or running shoes that are 100-yards away from the finish line. What the NJCBA advocates for is an earned-assistance program, where potential recipients of state funds participate in classes to develop or enhance business skills to better protect the state’s investment. Plus, it demonstrates a willingness on the part of the applicant or participant to give, not just receive.

Thank you, Senate President, Chairman Stack, Vice Chair Pou, and members of the committee, for your time. I look forward to answering any questions you may have regarding the CannaBusiness Association and the evolving cannabis industry in New Jersey.

Edmund M. DeVeaux

President

New Jersey CannaBusiness Association

May 12, 2022

73x



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Trenton, NJ 08608-  
2002

609-393-7707  
www.njbia.org

To: Chairman Stack and Members of the Senate Judiciary Committee:

From: Raymond Cantor, Vice President of Government Affairs

Date: May 12, 2022

Re: NJBIA Testimony - Implementation of the "New Jersey Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act."

**Michele N. Siekerka,**  
Esq.  
President and CEO

**Christine Buteas**  
Chief Government  
Affairs Officer

**Raymond Cantor**  
Vice President

**Christopher Emigholz**  
Vice President

**Alexis Bailey**  
Director of  
Government Affairs

**Kyle Sullender**  
Director of Economic  
Policy Research

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On behalf of the New Jersey Business and Industry Association, thank you for the opportunity to testify on the implementation of the "New Jersey Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act." NJBIA has been active from the start in advocating for safe work practices in the advent of the legalization of adult-use recreational cannabis and we continue that advocacy today. While we continue to have concerns with the law as passed by the Legislature, we understand that the solutions to creating a safe work environment will come from the regulatory actions of the Cannabis Regulatory Commission, as well as the due diligence of the business community and their labor allies. As a reminder, please note the specific language in the current statute for which regulation does not exist.

(2) (a) In order to better ensure the protections for prospective employees and employees against refusals to hire or employ, or against being discharged or having any other adverse action taken by an employer, while simultaneously supporting the authority of employers to require employees undergo drug tests under the circumstances set forth in paragraph (1) of this subsection, as well as employer efforts to maintain a drug- and alcohol-free workplace or other drug- or alcohol workplace policy as described in paragraph (1) of subsection b. of this section, the commission, in consultation with the Police Training Commission established pursuant to section 5 of P.L.1961, c.56 (C.52:17B-70), shall prescribe standards in regulation for a Workplace Impairment Recognition Expert certification, to be issued to full- or parttime employees, or others contracted to perform services on behalf of an employer, based on education and training in detecting and identifying an employee's usage of, or impairment from, a cannabis item or other intoxicating substance, and for assisting in the investigation of workplace accidents. The commission's regulations shall also prescribe minimum curriculum courses of study for the certifications, as well as standards for the commission's approval and continuation of approval of non-profit and for-profit programs, organizations, or schools and their instructors to offer courses of study, and may include the use of a Police Training Commission approved school as that

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term is defined in section 2 of P.L.1961, c.56 (C.52:17B-67) if consented to by the Police Training Commission.

Attached are documents providing recommendations we submitted to the Commission to move us toward having the tools needed to ensure safe work environments and to meet the growing challenges resulting from the legalization of adult-use recreational cannabis.

Thank you for your consideration of our position and your efforts to help solve this safety problem.

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**Alexis Bailey**  
Director of  
Government Affairs

**Kyle Sullender**  
Director of Economic  
Policy Research

March 28, 2022

Mr. Christopher Riggs  
Chief Counsel  
NJ Cannabis Regulatory Commission  
Department of Health  
P. O. Box 360  
Trenton, NJ 08625-0360

Dear Christopher,

Thank you for taking the time this week to hear our concerns about worker safety provisions related to cannabis use. We strongly believe that the New Jersey Cannabis Regulatory Commission needs to act quickly to propose and adopt regulations providing for the certification of Workplace Impairment Recognition Experts (WIREs) and allowing employers greater flexibility to act against employees who cannot perform their job functions under federal law because they cannot pass a drug test for cannabis.

To emphasize the need for the Commission to act expeditiously, we are concerned with various safety sensitive positions such as heavy machinery operators in urban areas, chemical plant operators, nuclear power plant operators, airline employees, and many others whose actions can cause significant harm to themselves, others in the workplace, and to the community. While we understand the Commission is busy standing up a new industry, we cannot wait for an accident to happen before we act on workplace safety.

We are attaching two documents previously sent to the Commission detailing our policy concerns and regulatory recommendations. Our priorities are as follows:

- Allow for a wide variety of entities to provide training for WIREs, including businesses and private business associations. This policy will ensure that more WIREs are trained and deployed to address the needs of workplace safety;
- Allow for the use of national certification boards or other professional accreditations (*e.g.* medical review officers) to certify WIREs rather than relying on a narrow set of criteria specified by the State Police;
- Allow physical examinations by WIREs to be done virtually. This is consistent with the growing trend in the medical field and, combined with impairment detection technologies, can significantly reduce the cost to employers, speed detection of impairment, and ensure the protection of the workplace; and

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- Provide that an “adverse employment action” does not preclude employers from removal of certain employees who are prohibited from doing their assigned jobs because of their inability to pass a drug test for cannabis, as required by various federal laws. Currently, the law only addresses conflicts with federal contracts, not conflicts with general federal cannabis testing requirements for certain professions.

We would also ask that the Commission explicitly address the reliability of physical examination evidence derived by a WIRE and help ensure that courts will accept that evidence as a basis for taking an adverse employment action.

We are willing to provide you with any additional information you may want, including draft regulatory language if you believe it would expedite the process. Please let us know how we can be helpful in facilitating the adoption of regulations. We will also continue to engage legislators in trying to resolve these issues.

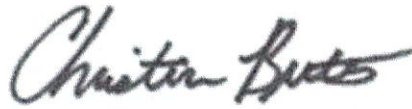
We are also requesting that the Commission provide the business community with guidance, in the form of FAQs or otherwise, so that there is certainty as to the state of the law pending regulations and providing employers with a path to protect the safety of their workplace. Currently, employers are uncertain as to the correct legal path to protect their workplaces from cannabis impaired employees. This problem will only be exacerbated once legal recreational cannabis becomes available. The questions we would like the Commission to address are as follows:

- Are the statutory limitations on relying solely on cannabis drug testing for taking an adverse employment action in effect even though the Commission has not set standards for WIRE certifications?
- If an employer suspects an employee of being impaired on cannabis, is it allowed to require a drug test be performed even though there are no certified WIREs to do the testing?
- Absent the use of a certified WIRE, can an employer use another person or method to perform the physical examination required by the law?
- If the drug test is positive for cannabis, but no physical examination by a certified WIRE is performed, can an employer take an adverse employment action against the employee?
- If an employee is suspected of being impaired, or if a drug test is positive for cannabis, can an employer remove the employee from engaging in their work functions? If they can, must the employees be paid for the time they were not allowed to work?

77x

- How can an employer best protect the safety of the workplace and the community when they believe an employee may be impaired on cannabis?

Thank you again for your willingness to listen and address our concerns.



Chrissy Buteas  
Chief Government Affairs Officer



Ray Cantor  
Vice President, Government Affairs

78X



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Director of  
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**Kyle Sullender**  
Director of Economic  
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October 6, 2021

Dianna Houenou, Chairwoman  
New Jersey Cannabis Regulatory Commission  
Department of Health  
P.O. Box 360  
Trenton, NJ 08625-0360

Dear Chairwoman Houenou,

On behalf of the New Jersey Business & Industry Association, whose member companies employ 1 million people in this state, I am writing concerning the New Jersey “Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act” (“Act”) and its requirement that an employer-mandated drug test include a “physical evaluation.” We have previously submitted comments concerning an employer’s right- to ensure a drug-free workplace and sought clarification on who can offer classes to certify Workplace Identification Recognition Experts (WIREs). This letter supplements those previous submissions.

We are requesting that the Commission consider two regulatory changes:

- Allow for the “physical examination” to be done virtually;
- Accept the training and certification programs of nationally recognized impairment testing organizations as entities who can certify WIREs or the equivalents thereof.

These two changes, which are consistent with the Act, will improve workplace safety, allow for the expeditious implementation of the physical examination requirements, and save employers both time and money.

Throughout the legislative and regulatory process surrounding the legalization of recreational cannabis, NJBIA has been seeking ways to protect workplace safety in the most effective and efficient manner. Because the Act was passed with the requirement to perform a “physical examination” by a certified WIRE, or equivalent, in order to take an adverse employment action for cannabis impairment while working, we have been working within those constraints. We believe that use of virtual examinations and new technologies are consistent with the provisions of the Act and should be explicitly allowed by the Commission when it adopts new regulations concerning drug testing and WIRE certifications.

While the Act requires that a “physical evaluation” be performed as part of a drug test, there is no requirement in the Act that this physical evaluation must be done in-person. Given the expansion and acceptance of telemedicine at both the state and

79x

federal levels, the Commission should interpret the Act's requirement for a physical evaluation as allowing these examinations to be done virtually. To disallow virtual examinations would set the Commission apart from all other health care entities that now recognize telemedicine as an acceptable means of evaluating a health condition.

Further, advances in impairment recognition technology can be used as an extremely effective supplement to virtual physical evaluation. In fact, such technology is currently being used in New Jersey and throughout the nation by major corporations exactly for this purpose and to keep workplaces safe. These technologies can be the first line of observation to make a "reasonable suspicion" determination before a drug test is administered. These technological testing protocols actually serve as deterrents to impairment on the job and are much more effective in impairment recognition than an examination by a Drug Recognition Expert.

It is easier to understand what these technologies involve by providing examples of some that are in use. One such technology will test an employee's ability to work through an acuity test. Employees will be required to take an acuity test when they begin their employment. This sets a baseline level. Later, at the start of a workday, or perhaps when returning from lunch or at a periodic time, the employee will be required to take and pass the same test before being allowed to begin work. This acuity test can be taken on a tablet, computer, or even on a smart phone. If an employee passes the test (within an acceptable range of the baseline), the employee can begin work. If the employee fails the test, they would be required to retake the test.

A second failure of the test may require the employee to undergo a virtual physical and psychological evaluation. The person performing the evaluation is often a certified Medical Review Officer (MRO). The MRO will ask a series of questions and gauge responses to determine if the failed test is the result of a drug impairment or, perhaps, another reason (*e.g.*, lack of sleep, illness, emotional stress). If impairment is suspected, the employee may be asked to be evaluated by a licensed and certified physician and may be subject to a drug test (*e.g.*, saliva, blood).

The MRO or physician may also require the employee undergo an ocular scan, with equipment onsite, that can accurately measure drug impairment, including from cannabis. It is our understanding that this virtual protocol is highly effective in deterring and detecting cannabis impairment. It is also consistent with the requirements in the Act.

We also want to bring to your attention that there are national associations actively engaged in drug and cannabis testing protocols and these organizations train professionals, such as MROs and physicians, to detect and respond to impairment. Trade organizations like the Drug and Alcohol Testing Industry Association (DATIA.org) can play a key role in the development, delivery, and compliance associated with the WIRE program. The Commission can review DATIA's program offerings and success rate, and under the Act, deem them as an approved private agency that can train WIREs or determine that their trained and certified professionals are the substantial equivalent of such certified professionals. The bottom line is that there

80x

already exists a network of trained and certified professionals who can step right into the roles as WIRES or substantial equivalents.

To summarize, we are asking the Commission in its rules or other relevant documents to specifically allow the use of virtual physical examinations and to allow for national associations with existing programs to be able to certify WIRES or deem their certified professionals the substantial equivalent.

We welcome the opportunity to discuss this matter further with your staff. Thank you for your continued consideration.

A handwritten signature in black ink, appearing to read "Ray. Cantor", with a long horizontal stroke extending to the right.

Raymond Cantor  
Vice President of Government Affairs  
New Jersey Business & Industry Association

81X



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**Nicole Sandelier**  
Director of Economic  
Policy Research

July 1, 2021

Dianna Houenou, Chair  
Cannabis Regulatory Commission  
New Jersey Department of Health  
P. O. Box 360  
Trenton, NJ 08625-0360

Dear Chairwoman Houenou,

On behalf of NJBIA, we thank you for taking the time to discuss our concerns about the workplace safety provisions in the "New Jersey Cannabis Regulatory, Enforcement Assistance, and Marketplace Modernization Act" ("Act") and for this opportunity to submit proposed regulatory language to begin to address those concerns.

We are asking for your consideration on four issues;

- Clarifying the definition of "adverse employment action" so that it does not preclude employers from removal of certain employees who are prohibited from doing their assigned jobs;
- Specifying that certain entities can act offer courses of study in order to certify Workplace Impairment Recognition Experts (WIREs);
- Clarification of the physical observations needed to be made by WIREs;
- Allowing certain other professionals to act as certified WIREs.

We are also asking the Commission to use its authority to address the issue of safety sensitive positions or to recommend legislative changes to do so.

We are providing draft regulatory language and justifications below.

#### **Adverse Employment Action**

Proposed definition: Adverse employment action shall not include removal of employees from safety-sensitive duties as required by State or federal law following receipt of a positive test result for cannabis metabolites related to adult recreational use. In addition, an employer's decision to suspend or remove the employee because of the employee's inability to perform safety-sensitive duties following a positive test result shall not constitute an adverse employment action.

Rationale: The proposed language is limited to adult recreational cannabis use to ensure that medical cannabis patients receive the entitlement to engage in the interactive process and/or receive reasonable accommodations as required by State and federal law. As noted below, it will ensure that recreational users are not afforded greater rights than patients.

The enabling legislation specifically states the recreational cannabis law cannot be interpreted to "amend or affect in any way any State or federal law pertaining to

82x

employment matters...” (see section 53 of P.L.2021, c.16 (C.24: 6I-55)). In other words, on its face, the rights created to use (or not use) recreational cannabis cannot change employers’ obligations to remove employees from safety-sensitive duties after a positive test as required by other laws.

As one example, CDL holders are prohibited from engaging in safety-sensitive duties under existing Department of Transportation regulations following a positive drug test. (49 C.F.R. § 382.215; see also 49 C.F.R. § 382.501(a) (“no driver shall perform safety-sensitive functions, including driving a commercial motor vehicle, if the driver has engaged in conduct prohibited by . . . [the] controlled substances rule of another DOT agency”)).

Once removed, the employee may only return to safety-sensitive duties if the individual completes a return-to-work process, which the *employer has no affirmative obligation to make available to the employee*. (49 C.F.R. § 40.289; see also *Malouf v. Dayton Bd. of Educ.*, No. 3:07-CV-141, 2007 WL 2713778, at \*1 (S.D. Ohio Sept. 14, 2007) (rejecting the plaintiff’s argument that he has a right to return to work if he should complete counseling and concluding that counseling is only required if the employer wants the employee to return to the safety sensitive position)).

Obligations and prohibitions also arise in other industries. Railway employers have similar provisions, although the regulations contemplate due process procedures and the impact of collective bargaining agreements. (49 C.F.R. § 219 et seq. There are also provisions requiring removal of employees from safety sensitive duties following a positive drug test in the airline industry. 14 C.F.R. § 120 et. Seq).

These requirements, and resultant action by an employer relate only to a prohibition on allowing employees to continue their duties. That is unrelated to what the employee does (or doesn’t do) at home. However, an employer should not be obligated to hold an employee on active payroll when they are legally prohibited from performing their duties due to recreational use. Nor should an employer be obligated to create a position for those who can no longer perform their safety-sensitive duties due to recreational cannabis use. Without including these clarifiers, however, that is the obligation.

It’s worth noting even individuals who use cannabis because of a disability do not have an inherent right to creation of a new position as a reasonable accommodation. The Americans with Disabilities Act, as amended, and New Jersey Law Against Discrimination require accommodations for those who are using cannabis in connection with a disability. Employers offering accommodations to disabled employees generally should consider moving the employee into another position for which they qualify – assuming one exists. To date, however, there is no legal obligation to *create* a job that isn’t otherwise available. Thus, without adding a clarifying provision, medical users will be afforded less rights than those using cannabis for recreational purposes, which seems inconsistent with the Jake Honig Compassionate Use Medical Cannabis Act.

#### **Approval of Certain Organizations to Offer Courses of Study for WIRE Certification**

Proposed regulation: Upon the submission of documentation demonstrating that it meets the standards established by the Commission for being able to provide courses of study for the certification of Workplace Impairment Recognition Experts, the Commission shall approve any such qualifying program, organization, or school, whether such entity

83X

operates as a for profit or as a nonprofit. For the purposes of providing courses of study under this paragraph, an organization includes a business entity or association.

Rationale: Under the Act, an employer's ability to enforce a drug-free workplace or to ensure an employee is not impaired on the job from using a cannabis item, rests largely with being able to engage a WIRE to perform a physical evaluation of an employee to determine the employee's state of impairment. The certification of WIREs is a new construct, the certified position does not currently exist in the workplace. Thus, in order to allow an employer to provide for a safe workplace it is imperative that as many WIREs as possible be certified and available. In order to implement this policy, it will be necessary to ensure that a sufficient number of programs, organizations, and schools are approved to provide courses of study for WIRE certification.

The law provides very broad language as to which entities may be approved to provide certification classes. The entities can be either nonprofits or for-profits. The entities can be either "programs, organizations, or schools." "Organization" is commonly defined as "an organized body of people with a particular purpose, especially a business, society, or association." Thus, the amendment we are seeking merely clarifies that both business entities and associations may be approved to provide certified courses of study.

Allowing both businesses and associations to be approved as providers of courses of study is consistent with the intent of the legislation to expand the availability of WIREs and to employ them in the workplace. Businesses have a direct interest in ensuring that they have access to sufficient WIREs to do impairment testing. Businesses may want to be able to certify their own employees as WIREs so they are available onsite as needed. Similarly, associations, especially trade and other business associations, have an interest in ensuring their member companies have adequate access to WIREs. Where a particular business may not have the resources to provide WIRE training, they may want to take the opportunity to have their employees have access to courses of certification provided by an association of which they are a member or which they have access.

Thus, specifically including both businesses and associations as entities that can be approved to provide courses of study to certify WIREs is both consistent with the plain language of the statute and consistent with its intent.

#### **Clarification of WIRE Physical Observation**

Proposed Regulation: A Workplace Impairment Recognition Expert's physical examination of an employee to determine impairment does not need to include the actual observation of the employee engaged in an employment activity, but need only be based on a determination of impairment due to use of a cannabis product at the time of the physical examination, so long as the physical examination was reasonably related in time to the employee engaging in an employment activity. The employer may use the results of that physical examination, and a drug test, together with knowledge that the employee was engaged in an employment activity prior to the drug test and examination as the basis for determining an appropriate employment action concerning the employee.

Rationale: The Act requires that for an employer to take a disciplinary action against an employee for being impaired on the job by using a cannabis product, that the determination of impairment must be made through the use of a drug test that is scientifically reliable and

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a “physical examination” to be conducted by a WIRE. Some concerns have been expressed that a WIRE may not be present to actually see the employee performing job functions. However, the statute does not require that the WIRE observe the employee engaged in work activities, but only that the WIRE perform a physical examination of the employee to determine impairment. Observation of the employee performing work activities may be made by other persons, which may be the basis for suspicion of impairment that could lead to the drug testing and WIRE examination.

As a practical matter, a WIRE may not be on site or available to observe an employee engaged in a work activity. What matters is the physical examination to determine impairment. The fact that the employee was observed by others, while on the job site combined with the drug test and WIRE examination, is sufficient for an employer to take action.

### **Alternative Certifications**

Proposed Regulation: Medical Review Officers (MROs) who are certified by a Medical Review Officer Certification Council may act as a Workplace Impairment Recognition Expert so long as they maintain their MRO certification.

Rationale: The law clearly recognized the existence of and need for trained experts who could act as WIREs without having to go through the yet to be established certification process. This is especially important in the beginning days of cannabis legalization where the need for WIREs will exist immediately but the process to certify WIREs will take weeks, if not months. The statute provides:

Any person who demonstrates to the commission’s satisfaction that the person has successfully completed a Drug Recognition Expert program provided by a Police Training

Commission approved school, or another program or course conducted by any federal, State, or **other public or private agency, the requirements of which are *substantially equivalent*** to the requirements established by the commission pursuant to subparagraph (a) of this paragraph for a Workplace Impairment Recognition Expert certification, may, at the discretion of the commission, be issued this certification, subject to subsequent continuation of certification approval by the commission. (Section 48 of P.L.2021, c.16 (C.24:6I-52)(emphasis added)

MROs clearly meet the “substantially equivalent” criteria to be certified as a WIRE. MROs are trained health care professionals who can do all the tasks required of a WIRE to recognize cannabis impairment. A summary of their qualifications can be found here: <https://www.mrocc.org/MROComp.pdf>. A link to the MRO Certification Council can be found here: [Medical Review Officer | Certification | MROCC](#).

Given the fact that MROs are trained medical professionals, physicians, who have particular training in drug and alcohol testing and impairment recognition, they should immediately, by regulation, be deemed as certified WIREs under the Act.

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### **Safety-sensitive Positions**

There are certain safety-sensitive positions, because of the potential of harm to the workplace or public, that deserve greater protections from the possibility of an impaired employee than do other positions. Some of these positions will be covered by the change to the definition of "adverse employment action" as addressed above. Many others will not. This issue was not directly addressed by the Act but because of the potential for substantial harm to others, we urge the Commission to use whatever authority it may have to adopt regulations to allow employers to enforce zero tolerance drug testing for these safety sensitive positions.

If the Commission believes it cannot fully rectify the issue of safety-sensitive positions, we would encourage the Commission to make recommendations to the Legislature concerning this issue. here is already pending legislation that allows for more expansive cannabis drug testing for these positions. We ask the Commission to support that or similar legislation.

### **Federal Contracts**

Proposed Regulation: An employer does not need to prove on a case-by-case basis that the limitations in section 48 of P.L. 2021, c.16 (C.24:61:52) will have an adverse impact on an employer subject to the requirements of a federal contract but may make a determination based on the language of the contract and applicable federal law, that such an adverse impact would occur. An employer does not need to obtain pre-approval from the Commission to revise their employee prohibitions consistent with federal law, rules, or regulations.

Rationale: The Act clearly intended to provide employers with more flexibility to require drug testing for an employee's usage of cannabis and to take adverse employment actions as a result of a positive drug test where the employer's federal contract would require such actions be taken in order to be in compliance with that contract. In order to have that flexibility, the Act requires the employer demonstrate that the Act's limitations on such drug testing would "result in a provable adverse impact" on the employer under the federal contract. This determination of "provable adverse impact" can easily be determined based on the contract language itself together with a reading of the federal law, rules, and regulations.

In order to avoid any such adverse impact, it is necessary that the employer have the ability to make such a determination and act accordingly. The employer should not be required to apply to the Commission for pre-approval nor should it be required to act in violation of the contract and wait for an adverse reaction to occur. An employer is capable of making this determination on its own given the contract language and the applicable federal laws subject to justifying their actions should it be challenged. In order to avoid confusion, the Commission should be clear in its regulations concerning employer rights under federal contracts.

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NJBIA thanks you again for the opportunity to work with the Commission on these important regulatory additions and we are available to meet with you again to discuss our proposal.

87x



**State of New Jersey**  
**CANNABIS REGULATORY COMMISSION**  
P.O. BOX 216  
TRENTON, N.J. 08625-0216

PHILLIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

DIANNA HOUENOU, *Chair*  
SAMUEL DELGADO, *Vice Chair*  
KRISTA NASH, *Commissioner*  
MARIA DEL CID-KOSSO, *Commissioner*  
CHARLES BARKER, *Commissioner*  
JEFF BROWN, *Executive Director*

May 11, 2022

Dear Honorable Members of the Senate Judiciary Committee:

Thank you for inviting the Cannabis Regulatory Commission to speak during the Committee's hearing concerning cannabis issues in New Jersey. Though I am regrettably unable to attend the hearing, the Commission will be represented by our Executive Director Jeff Brown and Director of the Office of Diversity and Inclusion Wesley McWhite III.

Upon my appointment as Chair in November 2020, I described my vision for the CRC: a Commission that prioritizes equity and integrity in its approach to regulating the medicinal and personal-use cannabis markets. I committed to using my experience and position to build a cannabis industry that protects patient access, reflects the diversity of the state, and is open and accessible to anyone who wishes to participate.

I am proud that the Commission's work thus far reflects those commitments and establishes the foundation for an industry with responsible operators who take safety and public health seriously.

We at the Commission remain committed to working with our partners, including the Legislature, to make New Jersey a leader in building an accessible and equitable regulated cannabis market.

Please do not hesitate to contact me at (609) 414-2760 or [Dianna.Houenou@crc.nj.gov](mailto:Dianna.Houenou@crc.nj.gov) should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be "DH" followed by a horizontal line.

Dianna Houenou  
Chair  
New Jersey Cannabis Regulatory Commission

88X



May 12, 2022

We at Acreage Holdings want to thank Senate President Scutari, Chairman Stack, and the members of the Senate Judiciary Committee for this opportunity to discuss the State's implementation of personal-use cannabis program. Acreage applauds the Cannabis Regulatory Commission's successful implementation of personal-use cannabis pursuant to the resounding support of New Jersey voters.

The Cannabis Regulatory Commission (CRC) approved Acreage's certification to expand into the personal-use market place with a cannabis cultivator, cannabis manufacturer and two dispensary licenses. We continue to serve medicinal patients in all three dispensaries with patients receiving exclusive access to our Atlantic City location. From April 21, 2022 through May 8, 2022, we have served approximately 4,200 patients and 11,000 personal-use customers.

We applaud New Jersey for being a thought-leader on cannabis policy. Not only has the state legalized medical and personal-use cannabis, but the state is also demonstrating its desire to have a sustainable and equitable adult-use cannabis marketplace. Additionally, the CRC has appropriately encouraged the Alternative Treatment Centers to engage in meaningful and substantive social equity work to ensure that the cannabis industry does its part in remedying the harms of the War on Drugs.

The CRC instituted necessary policies and procedures to ensure patients continue having access to their medicine, while permitting customers to gain access to the recreational market. Due to these policies, we have been able to keep our patients from waiting in any lines for longer than 5 – 10 minutes.

Again, we thank the Legislature and the CRC for ushering in cannabis reform in the State of New Jersey. Acreage looks forward to continuing its open and productive dialogue with the Commission and the Legislature as the market evolves.

Respectfully,

Bryan A. Murray  
EVP, Government Relations  
Acreage Holdings, Inc.

89x



*May 12, 2022, Testimony Before the Senate Judiciary Committee, Stacey Udell, CPA*

## **Stop Taxing Cannabis Businesses Owners Like Drug Dealers**

Thank you, Honorable Chairman Stack and members of the committee, for providing the NJ Society of CPAs the opportunity to testify today. Since its legalization, the cannabis industry has generated tremendous interest amongst many of our clients. So much interest in fact that one of our largest and most active committees is now our Cannabis Interest Group.

We've been working with clients who are interested in the cannabis industry for some time now and have identified an obscure tax provision that presents a significant barrier to success in the industry, particularly for small businesses. Believe it or not, NJ taxes cannabis business owners like they're drug dealers, including those who operate in the medicinal space.

What needs to be done is to "decouple" cannabis businesses from Internal Revenue Code Section 280E. While it sounds complicated, it's actually not, and **no federal changes are necessary**. In a nutshell, Section 280E prohibits any company illegally engaged in drug trafficking from deducting business expenses on personal or corporate income tax returns. Deducting business expenses is an integral part of operating a business and is critical for a company to be profitable.

Since cannabis is still illegal on a federal level, this makes sense for federal taxes, but it's irrational and unfair in New Jersey where it's legal. We believe it's also insulting to treat these business owners like drug dealers.



As of 2020, the most recent year for which statistics are available, many states that have legalized cannabis have decoupled from 280E. And New York recently passed legislation specifically decoupling cannabis from 280E, something they're promoting as an advantage over NJ.

Because the federal government doesn't allow cannabis businesses to deduct business expenses, there is already a tremendous barrier to market entry. Preventing business expense deductions on a state level will only compound this problem.

If lawmakers want a prosperous cannabis industry, with small businesses participating and thriving, then NJ needs to decouple from 280E. It's time to stop treating cannabis businesses like drug traffickers.

Thank you for the opportunity to testify and I'd be pleased to answer any questions you may have.

91x



**Jim Miller**  
Co-Founder CMMNJ

pot4ms@yahoo.com

[www.cmmnj.org](http://www.cmmnj.org)

92x

My name is Jim Miller. I am a co-founder of the Coalition for Medical Marijuana NJ, and a current Board member. I have been an advocate for medical cannabis issues in NJ since the Florio administration. I was not invited to speak today, but I have some thoughts that otherwise might not be covered today that I want brought to your attention.

My specialized focus as an advocate, and patient, is to see senate bill S342 posted for the informational hearing that it was denied last session as S3420. This Singleton/Gopal bill would allow registered NJ medical cannabis patients to grow up to 4 mature plants and 4 immature plants. Legislative leadership made it clear to key members of the majority party's senate membership last session that no cannabis home-grow bills of any kind were to be posted for informational hearings. That was last year. This is a new session.

Currently, legalization's architect, Sen. Scutari, says that he wants the new adult legalization law to be "up and running" before having hearings on adult non-patient home-grow. That makes sense to me. Ironically, the same thing was said to patients 12 years ago after home-grow provisions that had been passed on the full floor of the senate (22-16) were unceremoniously dropped from the assembly's companion bill, 10 minutes before the Assembly Health Committee's vote. That vote led to New Jersey being the first state out of 14 with medical marijuana laws that did not include patient home cultivation provisions. It was a last-minute surprise attack with no public testimony allowed. There was no legislative homework to show us and no explanation then, nor since. I am calling on leadership to realize that the NJ's medical marijuana program HAS in fact been "up and running" for over a decade now. It is time for Senate Health Committee Chairman Joe Vitale to be able to post S342 for a hearing when Sen. Singleton and Sen. Gopal ask him to do so, with leadership's blessing.

Please, either justify NJ's medical marijuana patient home-grow outlier status, or do something about it. Have there been negative consequences in states with patient home-grow laws that could not be remedied with "clean-up" bills? You must know that NJ patients will be allowed to grow their medicine, and soon, so why prolong patients' agony? A good start towards having well informed opinions in the senate on this issue, by definition, would be to have informational hearings.

93x



**New Jersey Cannabis Trade Association (NJCTA)**

May 12, 2022

**VIA ELECTRONIC MAIL**

Honorable Nicholas P. Scutari  
1514 East Saint Georges Avenue, 2nd Floor  
Linden, New Jersey 07036

**Re: The New Jersey Cannabis Trade Association**

Senator Scutari:

The New Jersey Cannabis Trade Association (“NJCTA”) represents ten (10) of the licensed Alternative Treatment Centers (“ATCs”)<sup>1</sup> in New Jersey’s Medicinal Cannabis Program. Put simply, our mission is to serve as a resource for the discussion and implementation of thoughtful and responsible cannabis policy in New Jersey, as well as to serve as a singular voice before the Executive Branch, Legislature, and CRC on matters of pressing concern to the industry. We applaud the Senate for holding oversight hearings concerning the implementation of adult-use cannabis in New Jersey, and share a few thoughts from the vantage points of our members.

**Background on the NJCTA**

By way of background, the NJCTA was formed amidst the crisis surrounding the Covid-19 Pandemic. Given the gravity of the situation facing New Jersey’s growing medical marijuana patient population, the NJCTA was created in order to provide a unified and streamlined voice for the ATCs in its interactions with the New Jersey Department of Health (“DOH”) in connection with much needed regulatory waivers to allow ATCs and patients to adapt to the growing health crisis. We are proud of the efforts undertaken by each of the ATCs in adapting to a quickly evolving regulatory environment, and, most of all, of ensuring that the registered patient population continued to be served throughout. Since then, the NJCTA offers itself as a resource to the State and as a working group for feedback, information, and/or marketplace development.

Our mission is to aid in creating a legal cannabis marketplace that works for everyone. We want to foster an industry that is not only safe, accessible, and affordable, but also equitable and

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<sup>1</sup> The ten (10) licensed ATCs that comprise NJCTA’s membership include iAnthus, Acreage, Ascend, Breakwater, Columbia Care, Curaleaf, Harmony Foundation, Justice Cannabis Co., TerrAscend, and Verano. Moreover, NJCTA is committed to expanding as an Association along with the industry itself and has admitted several new members recently awarded licenses stemming from the 2019 RFA round.

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## **New Jersey Cannabis Trade Association (NJCTA)**

just. We briefly highlight two programs initiated over the last few months that we hope to build on in the years to come. First, we have [partnered](#), and continue to partner, with Mercer County Community College to provide scholarships in connection with its Medical Cannabis Training Program, one of the State’s premier cannabis education courses designed to train individuals for entry-level positions in the industry. These scholarships provides more than just financial backing, as NJCTA members both volunteer their time and guarantee to scholarship recipients who successfully complete the program an interview with an ATC close to where that student resides. Secondly, we provided a social equity sponsorship program with New Jersey Cannabis Insider (“NJCI”), whereby NJCTA not only sponsored 20 social equity applicants to obtain access to NJCI’s publication and attend NJCI’s events, but more so, provided a several part webinar series wherein social equity applicants received first-hand insight from NJCTA’s membership associated with everything that goes into running a cannabis business. This webinar series addressed everything from corporate and location considerations; dispensary, cultivation, and manufacturing plans; the importance of engagement at the local level; and principles of regulatory compliance, just to name a few.

Though our organization is young, we are simultaneously proud of how far we have come, as well as cognizant of how much farther we need to go. We will continue to engage with relevant stakeholders in New Jersey’s medical cannabis industry to ensure that our member ATCs remain responsive to the needs of a developing marketplace. Again, it is our goal not only to utilize NJCTA as an efficient and meaningful clearinghouse of regulatory questions and concerns, but more so, to serve as a thought leader and knowledge center for the State as a whole. In that regard, we seek to continue our dialogue with government and all other relevant stakeholders,<sup>2</sup> to ensure our marketplace is one that is safe, accessible, affordable, and both patient-focused while flexible enough to scale with larger state demand. We look forward to the challenge and opportunity of working together.

### **Adult-Use Implementation and the Dual Status of Expanded ATCs**

Expanded ATCs are governed by two statutes: (1) the Jake Honig Law; and (2) CREAMMA. While CREAMMA has sought to harmonize some of those distinctions by, among other things, providing for the class of Expanded ATC licenses – which many of our members

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<sup>2</sup> By way of just one example, NJCTA is in regular dialogue with the Executive Director for the Coalition of Medical Marijuana, New Jersey (“CMMNJ”), Ken Wolski. NJCTA and CMMNJ have been meeting on a weekly basis following the commencement of adult-use sales, whereby both sides meet, discuss, and troubleshoot any issues associated with the commencement of adult use sales here in New Jersey.

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## New Jersey Cannabis Trade Association (NJCTA)

either already are, or hopefully will soon be, beneficiaries of –the fiction of a dual supply chain nevertheless persists. Indeed, one need only walk down the aisles of any grow room to see that there is no such thing as a medicinal cannabis verse adult use cannabis plant; there is merely one plant that becomes governed by different statutory and regulatory provisions at different times for a multitude of different reasons.

This dual supply chain – and dual regulatory oversight – creates certain complicated and/or contradictory principles. The first of which involves employees. For instance, the Jake Honig Law identifies:

A person who has been convicted of a crime of the first, second, or third degree under which New Jersey law or of a crime involving any controlled dangerous substance or controlled substance analog . . . shall not be issued a permit to operate as a medical cannabis cultivator, medical cannabis manufacturer, medical cannabis dispensary, or clinical registrant, or be a director, officer, or employee of a medical cannabis cultivator, medical cannabis manufacturer, medical cannabis dispensary, or clinical registrant.

N.J.S.A. 24:6I-7

In contrast, CREAMMA recognizes the necessity of remedying, at least in part, the harm caused by the war on drugs, and recognizes that most prior convictions should not be deemed disqualifying, except those involving fraud, deceit, or embezzlement. N.J.S.A. 24:6I-37. Thus, ATCs are simultaneously asked, on the one hand, to “make a good faith effort to recruit or employ persons” who may have had cannabis related convictions, while on other, being directed to consider some of those very same convictions as disqualifying. See N.J.A.C. 17:30-9.4(e).

Second, whereas the Social Equity Excise Fee (the “Cultivator Tax”) effectively requires Expanded ATCs to designate product at the top of the supply chain as either adult-use or medical, doing so, in certain instances, runs the risk of violating an Expanded ATC’s justifiable obligation to ensure adequate patient access to specific strains and products. While Expanded ATCs have the ability to maintain – and over the last several weeks have proven their ability to comply with – the requirements of a Minimum Adequate Supply,<sup>3</sup> patient choice is more than just the quantum of

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<sup>3</sup> The Final Agency Decisions for Expanded ATCs identified that “[t]he ATCH must maintain a Minimum Adequate Supply of medicinal cannabis for patients, plus a Reasonable Minimum Reserve.” “Minimum Adequate Supply” is calculated as follows: [(current patients enrolled at the ATC)/patients enrolled at the ATC 3 months prior)] X (average purchases over the preceding three <https://www.njcannabistrade.org/>)



## New Jersey Cannabis Trade Association (NJCTA)

cannabis on hand, and oftentimes is focused on specific strains or products. In the NJCTA's dedicated weekly meetings with the Coalition for Medical Marijuana of New Jersey ("CMMNJ"), the NJCTA received feedback that there were instances of specific products being available on adult-use menus, but not medical. The reason for this oftentimes results from the fact that allotted products or strains for the medical market has sold out – a simple function of supply and demand – though the very same products remain available in adult-use inventory – again determined by supply and demand. ATCs, not wanting patients to be effected by this, have simply moved that inventory at the point of sale from medical over to adult-use.

Nevertheless, because the Cultivator Tax is assessed on a monthly basis at the time of transfer from a Class I Cultivator to any other licensee in the supply chain (as opposed to the point of sale), a tax is oftentimes levied on what ends up being a medical product. The central point on the dual-supply chain issue is that there should not be a dual-supply chain, and instead, merely adult-use consumers or medical consumers that purchase a selected product. To be clear, NJCTA recognizes the core importance of directing tax revenues to social equity programs and those affected most by the war on drugs; the NJCTA simply highlights that making this determination at the cultivation level, as opposed to retail, fails to align with protecting patient access and patient choice.<sup>4</sup> Simply put, there is no such thing as a medical cannabis plant verse an adult-use cannabis plant; instead, it is the same plant providing holistic or wellness benefits for both populations, with the only complication being the methodology by which taxation attaches to it.

Third, we highlight issues that have arisen in connection with third-party lab testing, and the need for clarity and consistent in the implementation of another state's lab testing rules. As you are aware, N.J.S.A. 24:6I-19(e) identifies that "[u]ntil such time as the commission establishes the standards required by this section [governing cannabis testing], a licensed laboratory shall utilize the testing standards established by another state with a medical cannabis program, which state shall be designated by the commission." The CRC passed Resolution 2021-9 on June 1, 2021, which was amended on January 7, 2022 by Resolution 2022-7 relating to batch sizes<sup>5</sup> (both Resolution 2021-9 and Resolution 2022-7 collectively referred to as the "Resolution"), which adopted Maryland's testing standards.

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(3) months at the ATC). "Reasonable Minimum Reserve" is the three-month reserve calculated by determining the average purchases over the last three (3) months and multiplying it by three (3).

<sup>4</sup> Indeed, medical ATCs are permitted by the CRC to adopt the packaging and labeling conventions identified under the adult-use cannabis rules.

<sup>5</sup> Resolution 2022-7 amended Resolution 2021-9 to identify that sampling for testing cannabis would change from a 10-pound to a 100-pound batch.

<https://www.njcannabistrade.org/>

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## New Jersey Cannabis Trade Association (NJCTA)

In particular, the Resolution identified as follows:

**The [CRC] designates the testing standards set by the State of Maryland, located in Title 10, Subtitle 62 of the Code of Maryland Regulations (COMAR) as reflected in Appendix A of this [R]esolution, to serve as the [CRC's] Interim Testing Standards adopted pursuant to N.J.S.A. 24:6I-19(e). The Interim Testing Standards shall not include provisions in Title 10, Subtitle 62 of the Maryland Code of Regulations pertaining to the licensing or registration of Independent Testing Laboratories. Licensed laboratories shall also comply with the "Maryland Cannabis Commission's Technical Authority for Medical Cannabis Testing," attached as Appendix B. . .**

(Emphasis added.)

However, as ATCs have begun opting-in to third-party lab testing, there have been inconsistencies associated with the implementation of the Resolution. For instance, though the Resolution adopted the Technical Authority for Medical Cannabis Testing ("Technical Authority"), it adopted the Technical Authority without reference to its subsequent amendments, interpretations, and guidance issued by the Maryland Medical Cannabis Commission ("MMCC"). To this day there exists confusion among the CRC, third-party testing labs, and ATCs themselves as to specific issues and interpretations of Maryland testing rules and guidance. While the NJCTA recognizes that it is not the job of the Senate to legislate the knitty-gritty of testing implementation, we nevertheless highlight the impracticality of adopting out-of-state rules, but not out-of-state amendments of those rules; especially when the net effect is the potential for more product being destroyed by virtue of gaps in interpretation. We highlight this issue in conjunction with the importance of all stakeholders remaining engaged and in dialogue with one another on emerging issues of novel regulatory implementation.

Finally, we briefly note the continued application of the penalty of 280E on New Jersey cannabis companies, including ATCs. As you are no doubt-aware, 280E disallows deductions or credits to any businesses deemed to be "trafficking in controlled substances." The NJCTA emphasizes that cannabis – whether medicinal or otherwise – is certainly not a "controlled substances," nor could the ATCs be considered the very same criminal enterprises that 280E seeks to target. The practical effect of 280E on ATCs is to disallow the very same expenses that serve as the tools of reinvestment into our communities, i.e., costs and expenses associated with hiring a larger and more robust workforce (wages/payroll), increasing its commercial footprint and operations (office space/leasing), and relying on in-state New Jersey vendors and contractors. By

<https://www.njcannabistrade.org/>

5



**New Jersey Cannabis Trade Association (NJCTA)**

continuing to disallow ordinary business expenses, the law as it stands is simply incentivizing withholding investment in the very same areas that keep the wealth of businesses in their surrounding communities.

**Conclusion**

The NJCTA collectively thanks you for everything you have done – and continue to do – to ensure that the New Jersey cannabis marketplace is one that is safe, affordable, and accessible to all. We would also be happy to propose any language regarding any of the preceding issues, but understand that the purpose of the immediate hearing is more fact finding than anything else. We thank you for the opportunity to share our thoughts about the current roll-out of adult-use, and look forward to additional discussion and input moving forward.

Respectfully submitted,

*NEW JERSEY CANNABIS TRADE ASSOCIATION*

99x

[DATE]

The Honorable Chuck Schumer  
Senate Majority Leader  
U.S. Senate  
Washington, DC 20510

The Honorable Nancy Pelosi  
Speaker of the House  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Mitch McConnell  
Senate Minority Leader  
U.S. Senate  
Washington, DC 20510

The Honorable Kevin McCarthy  
House Minority Leader  
U.S. House of Representatives  
Washington, DC 20515

Dear Leader Schumer, Leader McConnell, Speaker Pelosi, and Leader McCarthy,

We write to request that the final conferenced American competitiveness, jobs, and innovation package retain the text of the *Secure and Fair Enforcement Banking Act (SAFE Banking Act) of 2021* included in the House of Representatives' *American COMPETES Act of 2022*. The House has now passed the *SAFE Banking Act* six times, including most recently as an amendment to its version of the bipartisan competition bill, and we ask you to ensure that the text of that amendment remains in the final conferenced version of the bill to be considered by both the House and the Senate.

The *SAFE Banking Act*, as included in the House-passed *America COMPETES Act*, would allow banks, credit unions, and other financial institutions to offer banking services to legally-operating cannabis businesses without fear of punishment by federal regulators. Currently, thirty-seven states and the District of Columbia have legalized marijuana for medical use, and eighteen states and the District of Columbia allow adult recreational use. As a result, the cannabis industry has become a powerful job creator and a significant generator of tax revenue. However, financial institutions are often reluctant to transact with cannabis-related businesses, even in states that have some form of legalized cannabis, due to legal and regulatory risks arising from inconsistent federal and state laws. Allowing cannabis businesses operating legally and in compliance with state law to access financial services without federal reprisal would address public safety and compliance challenges, helping communities reduce cash-motivated crimes. Law enforcement organizations have publicly testified before Congress about these cash-related safety risks, including theft, robbery, and serious violence perpetrated against employees responsible for conducting what should be routine business operations.<sup>1</sup> The same law enforcement organizations also have testified about the importance of moving these large

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<sup>1</sup> Testimony from Maj. Neill Franklin (Ret.), Baltimore City & Maryland State Police Departments on behalf of the Law Enforcement Action Partnership (LEAP). February 13, 2019. <https://financialservices.house.gov/uploadedfiles/hhrg-116-ba15-wstate-franklinm-20190213.pdf>

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amounts of cash in the cannabis industry into the banking system, where accounts are monitored in accordance with existing federal anti-money laundering laws and the Bank Secrecy Act. Enacting the *SAFE Banking Act* via the jobs and competitiveness legislation before us would support a rapidly growing industry that creates jobs, fosters innovation, supports small businesses, and raises revenue in states that have chosen to legalize cannabis, while reducing safety risks to industry employees and the public alike.

The House of Representatives already added the *SAFE Banking Act* as an amendment to the *America COMPETES Act* by a bipartisan vote of 262-168, and on February 4, 2022, passed the amended *America COMPETES Act* by a bipartisan vote of 222 to 210. The standalone legislation on which the amendment is based previously passed the House of Representatives 321-101, garnering the support of more than three-quarters of the chamber and a majority of the members of each party. The bill's list of co-sponsors is also bipartisan in both the House and the Senate. Given the demonstrated broad support for this measure, we ask you to ensure that the text of the *SAFE Banking Act* remain in the forthcoming final conferenced version of the jobs and competitiveness bill when it comes to the House and Senate for final votes. This will help cannabis-related businesses, support innovation, create jobs, and strengthen public safety in our communities. We look forward to working with you on this important issue.

Sincerely,

Jacky Rosen  
United States Senator

Jeff Merkley  
United States Senator

Cynthia Lummis  
United States Senator

Gary C. Peters  
United States Senator

CC:

All Senate and House members of the Conference Committee

101x

**From:** [ols-committee-aide@web.njleg.org](mailto:ols-committee-aide@web.njleg.org)  
**To:** [OLSaideSJU](#)  
**Subject:** Hearing remarks.  
**Date:** Thursday, May 12, 2022 3:12:57 AM

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How long should a resident of New Jersey be put in jail for growing marijuana in their home? Its still illegal. Four months? A year? Longer. I was arrested as a teen for marijuana, when the cop was arresting me, he said "if you don't like it, change the law". Unfortunately our marijuana laws are written by people who don't use it, for people who do. The CRC is overpaid and useless, reinventing the wheel at the expense of the very people effected by prohibition for decades. Should out of state corporations, and rich people with big cannabis investments be allowed to legally grow and we the people who voted it in can not? Should we be forced to consume inorganic moldy unsafe marijuana to please the state? Does any of that sound right? We voted to give corporations more rights than we the people? Sounds fair. In the Garden State? When drunks can brew gallons of swill in their basements legally? Why are we still being treated differently? I don't intend to give NJ one dime for tax in marijuana. 70% of the tax on weed is going to catch all social equity programs, the other 30% back to the general fund. 100% will be squandered. This should go to alleviating the absurd taxes and fees NJ can barely explain. Bleeding the working class dry at every opportunity, while you sit in your state offices, living like kings. It costs me \$30+ in tolls to drive to my in-laws in south jersey and back. Our beaches need badges. Our gas. The bridges and tunnels. The port authority should NEVER turn a profit. Tax relief. You control these things. **DO SOMETHING WITH THE MONEY THAT HELPS EVERY ONE IN Nj.** Where is the equity if you're giving the bulk of money raised to a select few, or sticking it in your general fund? Also, no edibles for people is downright monstrous, when my father had cancer that was all he could consume. Thanks for no help. You're all what makes this state a worse place to live.

102x

**From:** [ols-committee-aide@web.nileg.org](mailto:ols-committee-aide@web.nileg.org)  
**To:** [OLSaideSJU](#)  
**Subject:** I STILL AM SICK AND CAN NOT AFFORD!!  
**Date:** Thursday, May 12, 2022 7:30:56 AM

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**I was hit by a bus when I was 19. I'm now 34. I started with pain management and got hooked on opiates. I was playing with fire. Cannabis has saved my life and allowed me off the opiates. The problem is I live on my own can barley afford what is needed to help my pain. I need edibles and hash rosin. Which none of the nj dispensaries have hash rosin. The pain killers are free with my insurance. ALLOWING US TO GROW WOULD HELP ME SIGNIFICANTLY!! But you are be very GREEDY!! THE MEDICAL PROGRAM HAS BEEN OPEN FOR 13 YEARS AND WE STILL CANT GROW!! AND MOST TOWNS BANNED IT!! THIS ISNT LEGALIZATION!! SCRUTARI IS A WALL!!**

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**From:**  
**Sent:** Thursday, May 12, 2022 1:50 PM  
**To:**  
**Subject:** rwa: Sen. Scutari Special Session Testimony 05/11/2022

----- Forwarded message -----

From: \_\_\_\_\_ <om>  
Date: Thu, May 12, 2022 at 1:33 PM  
Subject: Sen. Scutari Special Session Testimony 05/11/2022  
To: NJ Leg <[OLSAideACD@njleg.org](mailto:OLSAideACD@njleg.org)>

Good afternoon. Thank you for this opportunity. My name is Michael Brennan. I am a grateful 64 year-old proud father of three young men, all S. Jerseyan born and raised. I'm very grateful to be here.

Permanently disabled since 1998. Surgeries have left me with a 2 rods/10 screws each securing the Cervical spine (ACDF-C3/C7) together with a Harrington rod at L5/S1. Chronic Myelopathy, Chronic Pain and Musculoskeletal Spasticity, physically and emotionally affect every part of my daily life.

I have been a Therapeutic Cannabis patient in the NJMMP since 2013. As well as several years volunteering to serve the Board of Directors of the Coalition for Medical Marijuana of New Jersey in Trenton. My anecdotal study of Therapeutic Cannabis for Chronic Pain came at the suggestion of a very kind Neurologist. Noting that I would be a good candidate for Medical Marijuana, and I began my research in 2006.

On a recent television ad for the AARP exemplified; "Medication will not work if you cannot afford it." Many NJMMP Patients, myself included, are financially dependent on benefits of Social Security Disability Insurance. Monthly SSDI benefits provide only an average of \$1,290. However, the NJ cannabis pricing is a very expensive \$250 - \$400/ounce or \$750 - \$1200 monthly for a 3 ounce recommendation. Thus leaving a difficult choice for a disabled patient's family budget and severely under treated serious medical conditions. This has fueled misconceptions affecting low patient enrollment of only 130,000 NJMMP patient population as well as the very low amount of Practitioners enrolled. Comparatively New Jersey's population of 9,000,000 citizens.

Many patients enrolled in medical access programs have grown to rely on cannabis products to treat their medical conditions. Just as conventional medicines are readily available in a variety of strengths and potencies in order to meet individual patients' needs, medicinal cannabis products should also be available to patients in varying potencies and formulations. Prohibiting patients from accessing affordable products at legal dispensaries will only push these patients to seek out similar products in the unregulated illicit market. This scenario is not in the best interests of either patients or public health.

Does Home Cultivation significantly exacerbate illicit cannabis sales, as the Senate Leadership has asserted? It is very improbable, when major Legacy Market suppliers continue breaking the law, with or without Home Cultivation's privileges.

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Whenever there's overregulation, no matter what, a healthy Legacy Market persists. Illicit cannabis mitigation efforts have not worked. A needed paradigm shift away from attempting to eliminate the Legacy Market for one that ensures patients' access to therapeutic cannabis.

In New Jersey, cannabis is legal for adult use, while the criminalization of home cultivation continues still. Growing a solitary plant risks penalties of 3-5 years in prison and a \$25,000 fine.

The leadership's repeating blatant misconceptions suggest to the legislature allowing the untenable situation to continue. This places the balance in favor of profits over patients that must change. Following the CMMNJ pragmatic suggestions implement a legal, regulated and decriminalized Home Cultivation legislation for the patient population of New Jersey.

Thank you,  
Michael D. Brennan

--  
Michael Brennan, Trustee  
Coalition for Medical Marijuana--New Jersey, Inc.  
99 E 2nd Street, #B3  
Moorestown, NJ 08057  
1-856-266-5226  
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