



Wes Moore, Governor - Aruna Miller, Lt. Governor - William Tilburg, Acting Director

September 29, 2023

ELECTRONIC RETURN RECEIPT REQUESTED

Samuel Tappa
Curaleaf Holdings, Inc.
5300 Westview Dr., Ste. 400
Frederick, MD 21703
samuel.tappa@curaleaf.com

LETTER OF NON-COMPLIANCE

In Re: Curaleaf Holdings, Inc.
Case No.: 23-00364
License Nos.:

DA-23-00005
DA-23-00015
DA-23-00018
DA-23-00030
GA-23-00001
PA-23-00001

Dear Mr. Tappa,

The Maryland Cannabis Administration (the "Administration" or "MCA") has conducted an investigation of Curaleaf Holdings, Inc. ("Respondent"), which holds six Maryland cannabis licenses, to ensure compliance with the Cannabis Reform Act (the "Act"), codified at Alcoholic Beverages and Cannabis Article, §36-501, *et seq.* and Code of Maryland Regulations (COMAR) 14.17 and 10.26. The enclosed report indicates that the listed licensee was not in compliance with the Act or regulations.

Plan of Correction

You need to take immediate action to correct each violation listed in the Report, Section I COMAR violation(s). Please note that this corrective plan of action is not considered to be an admission of a COMAR violation and is required as a result of receiving this notice. However, if the Administration receives additional complaints against you or decides to pursue formal disciplinary action against your license as a result of other suspected violations of applicable statutes or regulations, the investigatory report that prompted this letter may be taken into

consideration in determining an appropriate sanction (i.e. probation, reprimand, suspension, revocation or fine).

It is required that the licensee submit a written Plan of Correction (POC) to the Administration within 10 days from the date of this letter. Please use the template attached to this letter. The Plan of Correction should clearly answer the following questions for each deficiency:

1. How are you going to correct the deficiency?
2. What is the date when you will have each deficient practice corrected?
3. How are you going to prevent the deficient practice from reoccurring?
4. Who will be responsible for ensuring the deficiency does not reoccur?

The POC must include a plan to submit corrected capitalization tables for each licensee beginning in 2020 or when Curaleaf acquired the license, whichever is earlier. The POC must also address how the license DA-23-00030 (formerly D-18-00034) was acquired prior to regulatory approval for the transfer being granted by MCA's predecessor agency, the Maryland Medical Cannabis Commission.

Failure to correct the violation(s) or submit an acceptable POC by the due date may result in the Administration taking disciplinary action against the licensee without further notice. Penalties may include, but are not limited to, a monetary fine, reprimand, and/or license suspension.

If the POC includes corrective action items that are not completed when the POC is submitted, a follow-up completion report will be required to document that all violations have been corrected.

Submit the POC or any questions regarding the same via email to MCA Regulatory and Compliance Specialist, [REDACTED], [REDACTED].

Regards,

[REDACTED]

Regulatory and Compliance Specialist

Enclosures

cc: Licensee File
[REDACTED], AAG, Administrative Prosecutor

REQUESTED PLAN OF CORRECTION FORMAT

Deficiency	Corrective Action	Date to be completed	Plan for ongoing compliance	Responsible individual
1. See below				
2.				
3.				

Name of Authorized Individual

Contact Information

Signature of Authorized Individual

10/6/23
Date POC submitted to MCA

Deficiency #1:

- Deficiency: PTC shareholder reporting on Annual Cap Table Disclosure Requirement
- Corrective Action: Include required information on 5%+ shareholders of Curaleaf Holdings, Inc. within report
- Date Completed: Re-submitted reports for review by _____
- Plan For Ongoing Compliance: will include the required information on 5%+ shareholders of Curaleaf Holdings, Inc.
- Responsible Individual: _____, VP Licensing, Curaleaf, Inc.

Deficiency #2:

- Deficiency: "date acquired" incorrect in 2022 and 2023 annual Cap Table Disclosure Report for MI Health, LLC
- Corrective Action: 2022 and 2023 reports corrected to include the correct date
- Date Completed: Re-submitted reports for review by _____
- Plan For Ongoing Compliance: will include the correct date on all future reports
- Responsible Individual: _____, VP Licensing, Curaleaf, Inc.