

SETTLEMENT AGREEMENT

Effective this 17 day December 2019, the State of Maine Department of Administrative and Financial Services ("DAFS") and David M. Brown, of Monticello, Maine (collectively "the Parties") enter in this Settlement Agreement.

WHEREAS, the Petitioner Appellant in this matter was a registered caregiver and a registered caregiver assistant pursuant to the Maine Medical Use of Marijuana Act, and on September 3, 2019, Scott Lever, Deputy Director for the Office of Marijuana Policy at DAFS sent Mr. Brown a letter notifying him that DAFS was revoking his registry identification ("ID") cards effective three (3) days after the date of the letter; and

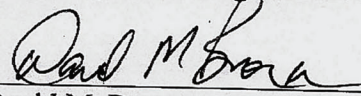
WHEREAS, revocation is subject to an informal hearing pursuant to 22 M.R.S. §2430-F and then potentially to judicial review pursuant to 5 MRS Chapter 375 and M.R.Civ.P. 80C, and Mr. Brown exercised his right to request an informal hearing in this matter.

NOW THEREFORE, as the Parties wish to settle this matter in consideration of the mutual promises set forth herein rather than continue the appeals process, the parties agree as follows:

1. OMP, DAFS hereby rescinds the revocation of Mr. Brown's registry ID cards (CGR25280, CGI5236, CGI5237, CGI5238, CGI5239, CGI5240, CGE2098, CGE2099, CGE1744) once this agreement is signed. Instead, Mr. Brown's registry ID cards are suspended from September 6, 2019 to March 6, 2021.
2. The suspension of Mr. Brown's registry ID cards is based on Mr. Brown's conduct in exceeding the allowable plant count on March 21, 2019 and April 11, 2019. Mr. Brown has permanently disposed of all marijuana plants and harvested marijuana he had possession or control of as a caregiver or assistant.
3. During the suspension, Mr. Brown will not participate in the Maine Medical Use of Marijuana Program, including having or holding any direct or indirect financial interest in a business, caregiver or dispensary registered under this program.
4. During the suspension, Mr. Brown will not participate in the Adult Use Marijuana Program, including applying for an adult use individual identification card or an adult use marijuana establishment license under the Marijuana Legalization Act.

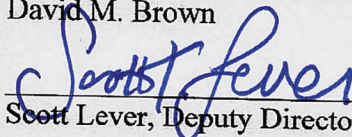
5. During the suspension, Mr. Brown will not participate in the Adult Use Marijuana Program, including having or holding any direct or indirect financial interest in an adult use marijuana establishment.
6. After the period of suspension ends on March 6, 2021, Mr. Brown's suspended registry ID cards will not be automatically reinstated, and he will have to apply anew for registry ID cards.
7. After March 6, 2021, this suspension will not be considered a bar to Mr. Brown's participation in either the Maine Medical Marijuana Program or the Adult Use of Marijuana Program.
8. DAFS reserves the right to take any appropriate action if Mr. Brown is found engaging in conduct not authorized by, or in violation of, law.
9. This Settlement Agreement sets forth the entire agreement of the Parties, and any amendment hereof shall be in writing. Representations that are not contained in the Agreement or subsequent written amendment shall have no effect. The parties agree that once this agreement is signed the informal hearing is no longer necessary.
10. The Parties acknowledge that this Agreement and its reduction to final written form is the result of good faith negotiations between the Parties; said Parties and their respective counsel have carefully reviewed and examined this Agreement before execution by said Parties; any statute or rule of construction that ambiguities are to be resolved against the drafting party shall not be employed in the interpretation of this Agreement.
11. This Settlement Agreement shall be governed by the laws of the State of Maine.
12. The signatory for DAFS represents that he is duly authorized and empowered to execute this Settlement Agreement on behalf of DAFS, and that his signature is enough to legally bind DAFS to the terms of the Settlement Agreement.

IN WITNESS WHEREOF, the duly authorized representatives of DAFS, and Glenn Peterson have signed this Agreement below:



David M. Brown

Date: 12/17/2019



Scott Lever, Deputy Director, OMP, DAFS

Date: 12/19/2019