

## *SETTLEMENT AGREEMENT*

Effective August 7, 2025, the State of Maine Department of Administrative and Financial Services (“DAFS”) and Robert Russell Dunham of Hartland, Maine (collectively “the Parties”) enter in this Settlement Agreement.

Mr. Dunham was a registered caregiver pursuant to the Maine Medical Use of Cannabis Act, and on June 27, 2025, Elisa C. Ellis, Director of Licensing for the Office of Cannabis Policy at DAFS sent Mr. Dunham a Notice of Revocation and Denial of Registry Identification Cards, notifying him that DAFS was revoking his registry identification (“ID”) cards (CGR26995 & RIC20631) and denying his application to be a registered caregiver. On July 7, 2025 A revised Notice was sent to Mr. Dunham, which separated the matters involving him from that involving his wife, Jennifer M. Dunham.

Such actions are subject to an administrative hearing pursuant to 22 M.R.S. §2430-I (9) and then potentially to judicial review pursuant to 5 M.R.S. Chapter 375 and M.R.Civ.P. 80C, and Mr. Dunham exercised his right to request a hearing on 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. OCP, DAFS hereby rescinds the revocations and suspends Mr. Dunham’s registered caregiver card (CGR26995) from June 30, 2025 to March 30, 2026.
2. OCP hereby reinstates Mr. Dunham’s assistant card (RIC 20631), effective August 7, 2025, or when Mr. Dunham signs this agreement, whichever is later.
3. The suspension of Mr. Dunham’s caregiver registration (CGR26995) is based on Mr. Dunham’s conduct as stated in the July 7, 2025 letter including operating a registered caregiver store at 109 College Avenue in Waterville after local authorizations to continue operating that caregiver store had been denied, and failure to keep up current certificates from the Maine Revenue Services.
4. During the suspension, Mr. Dunham will not participate in the Maine Medical Use of Cannabis Program, including having or holding any direct or indirect financial interest in a business, caregiver or dispensary registered under this program except that Mr. Dunham

may continue to be an assistant to currently registered caregivers and dispensaries as long as Mr. Dunham informs OCP who he is working for. Allowing medical cannabis to be grown on any property in which he has or holds any ownership interest during this period of suspension would violate this agreement,.

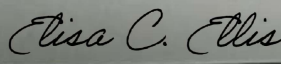
5. During the suspension, Mr. Dunham will not participate in the Adult Use Cannabis Program, including applying for an adult use individual identification card or an adult use cannabis establishment license under the Cannabis Legalization Act; and having or holding any direct or indirect financial interest in an adult use cannabis establishment. Allowing adult use cannabis to be grown on any property in which he has or holds any ownership interest during this period of suspension would violate this agreement, except that he may grow his own personal adult use cannabis plants in accordance with 28-B M.R.S. § 1502.
6. After the period of suspension ends on March 30, 2026, Mr. Dunham will have to apply anew for a caregiver registry ID card and will also be eligible to apply for other participation in the Maine Medical Cannabis Program and the Adult Use Cannabis Program.
7. After March 30, 2026, this suspension will not be considered a bar to Mr. Dunham's participation in the Maine Medical Cannabis Program as a registered caregiver. In addition, this suspension will not be a bar to application but will be considered as part of his background if he applies for a dispensary registration certificate.
8. Mr. Dunham agrees to take corrective action as outlined below, in addition to complying with all other requirements of program participation when he participates in the Maine Medical Cannabis Program after March 30, 2026:
  - a. Mr. Dunham shall not conduct any caregiver activities at 109 College Avenue, Waterville, Maine.
  - b. Mr. Dunham shall stay current with any Maine State Revenue certificates or accounts for his business.
9. Wind-down plan: Mr. Dunham has transferred any authorized harvested cannabis or products or plants to another registered caregiver.
10. DAFS reserves the right to take any appropriate action if Mr. Dunham is found engaging in conduct not authorized by, or in violation of, the law or this Settlement Agreement.

11. 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.
12. 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.
13. This Settlement Agreement shall be governed by the laws of the State of Maine.
14. The signatory for DAFS represents that she is duly authorized and empowered to execute this Settlement Agreement on behalf of DAFS, and that her signature is enough to legally bind DAFS to the terms of the Settlement Agreement.
15. Mr. Dunham represents that he is duly authorized and empowered to execute this Settlement Agreement on his behalf, and his signature is enough to legally bind himself, including any ownership interest he has in medical Cannabis plants or harvested Cannabis due to having been a registered caregiver, to the terms of the Settlement Agreement.

**IN WITNESS WHEREOF**, the duly authorized representative of DAFS, and Mr. Dunham have signed this Agreement below:

  
Robert Russell Dunham

Date: 8/4/2025

  
Elisa C. Ellis, Esq., Director of Licensing, OCP, DAFS

Date: 08/06/2025

