



Curio Wellness Written Comments
HB0204 Hearing – Tuesday, February 18, 2025

Founded and based in Maryland, [Curio Wellness](https://www.curio-wellness.com) is a family-owned and operated cGMP certified cannabis company and trusted wellness partner. We're dedicated to increasing the accessibility of high-quality cannabis to the growing population of citizens who seek safe, effective, and reliable products. Available in over 90 dispensaries across Maryland, our focus on innovative and high-quality products and services has made Curio a market leader in Maryland. Moreover, as an organization, Curio knows that a diverse and inclusive workforce creates an optimum workplace that attracts and retains talented employees and loyal customers. In fact, this commitment to diversity has been present since inception with Curio's inaugural leadership team comprising a multi-racial group of men and women. As the company has grown, so has its focus on a diverse team of workers and leaders. Overall, 40% of the Curio Wellness workforce is female and 44% identifies as Black, Hispanic, Asian, American Indian or Alaska Native, or multi-racial. Among management, 39% are female and 27% identify as Black, Hispanic, or multi-racial.

We appreciate the efforts of the Maryland House and Senate over the last several years, crafting legislation of this nature is undoubtedly challenging, and we recognize the nuance and balance needed to address the plethora of industry-related stakeholders. Therefore, we'd like to share some concerns around the introduction of Wholesale license. While we fully support the growth and responsible regulation of our cannabis market, we believe that this proposal is premature and could potentially create more challenges than benefits, given the current state of the industry.

First and foremost, the cannabis market in our state is still in its early stages, and many of the businesses involved have made significant investments in infrastructure to support B2B distribution at a local level. These businesses have taken on considerable financial risk, developing supply chains, storage, and distribution networks that are tailored to a market that is still evolving. Additionally, internal distribution teams represent a strategic arm of the business and integral element of both customer relations and reputation management. Said plainly, these internal distribution teams are the public face of licensees at the B2B level.

Additionally, the absence of interstate commerce in cannabis means that our market is limited in scale. Without the ability to move products across state lines, many of the larger operational advantages that come with wholesale licenses are not as relevant or viable at this time. As an organization heavily

invested in federal policy, the State is acting far ahead of a need and existing law protects shelf space for our newest licensees, so any external threat remains to be seen. Thus, this further calls into question the necessity of expanding the scope of the market with wholesale licenses before addressing the immediate needs of existing businesses.

In our view, the focus of the regulatory body should remain on supporting and fully operationalizing the 100 conditional licenses that are currently in place. These businesses are still in the process of developing their operations, and many face obstacles that could be alleviated with more resources and attention from the regulatory side. By shifting the focus away from these businesses to pursue the introduction of wholesale licenses, we risk overextending the regulatory framework and failing to provide adequate support to those who are already working hard to make this industry a success in our state.

In conclusion, we strongly urge the committee to reconsider the introduction of wholesale licenses at this time. Let us first support the businesses already invested in this market, ensuring that they have the tools and resources necessary to succeed, before expanding the scope of the industry with additional licenses. This will help to create a more stable, sustainable market that can truly thrive in the long term.

To that end, in second half of 2024, we heard word of the Administration proposing a Wholesaler license to help ensure shelf space for Maryland operators in the event of federal reform, i.e. interstate commerce. As an organization heavily invested (time and resources) in federal policy, the State is ahead of a need and the Administration would be better served optimizing the existing program and the start-up of the more than 100 conditional social equity licenses that are currently navigating the process before adding more license types. Additionally, operators

For nearly nine years, Curio has done exactly what we said we would do in our application to obtain a cannabis license, here in Maryland. Not only have we remained steadfast in our promise to deliver high quality, safe and innovative cannabis products to Maryland's certified patient and adult use populations through constant research and development, but we have also maintained a constant drive to reinvest in our people, processes, and products. As Maryland advances its program, Curio Wellness would like to lend its experience as industry leader to help develop diverse, successful, and economically viable adult use and medical programs.

For more information, please contact:

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