

**From:** [Matsick, Rob](#)  
**To:** [Gallagher, Robert](#)  
**Cc:** [Roma, Amy C.](#)  
**Subject:** [External\_Sender] Information re: License Transfer of License No. 37-30120-01 (held by CDL Nuclear Technologies)  
**Date:** Thursday, November 4, 2021 3:55:57 PM

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Robert,

Following up on our conversation from Wednesday regarding the license transfer application for License No. 37-30120-01 held by CDL Nuclear Technologies, attached is supporting evidence that the largest, controlling shareholder of the licensee post-closing, Excellere Capital Management II, LLC ("Excellere"), should be considered a "known entity." Excellere owns companies that are intensively regulated by federal and state agencies, through permits, registrations, and other ongoing regulatory commitments.

1. **Attachment 1** is a spreadsheet listing 93 Environmental Protection Agency ("EPA") pesticide registrations for **SePRO Corporation, a company majority-owned by Excellere** that specializes in plant protection and plant management products and services. Acquiring and maintaining these pesticide registrations is an intensive regulatory undertaking that involves detailed legal, administrative, and scientific processes and procedures. Please see the EPA's website (<https://www.epa.gov/pesticide-registration/about-pesticide-registration>) for more information. SePRO Corporation's website is here: <https://www.sepro.com/>.
2. **Attachment 2** is a list from AIS Healthcare of various pharmacy licenses and other permits from state regulators across the country and from the Drug Enforcement Administration ("DEA"). AIS Healthcare is majority-owned by Excellere and specializes in targeted drug delivery, infusion care and ophthalmic solutions. AIS Healthcare's website is here: <https://aiscaregroup.com/>.
3. **Attachments 3 and 4** are spreadsheets from **SCA Pharmaceuticals ("SCA Pharma") – majority-owned by Excellere** – that list a variety of different types of non-resident state permits allowing shipment of pharmaceutical products into the listed states. The spreadsheets also provide manufacturing and analytical lab permits held by SCA Pharma and regulated by the DEA. SCA Pharma's website is here: <https://scapharma.com/>.
4. Additionally, SCA Pharma is a Food and Drug Administration ("FDA")-registered Outsourcing Facility pursuant to Section 503B of the Federal Food, Drug and Cosmetic Act (21 U.S.C. 353b). SCA Pharma's FDA registration numbers are as follow:
  - **FDA – Little Rock, AR facility**  
Federal Identification number ("FEI"): 3010683157  
Data Universal Number System ("DUNS"): 037559301
  - **FDA – Windsor, CT Facility**

FEI: 3013736415

Let me know if you would like to discuss or require any further information to support your review.

Best regards,

Amy and Rob

**Amy Roma**

Partner and Global Energy Practice Area Leader

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If you would like to know more about how we are managing the impact of the COVID-19 pandemic on our firm then take a look at our brief [Q&A](#). If you would like to know more about how to handle the COVID-19 issues facing your business then take a look at our [information hub](#).

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