Massachusetts Cannabis Control Commission

Independent Testing Laboratory

General Information:

License Number: IL281275

Original Issued Date: 09/13/2018

Issued Date: 10/08/2020

Expiration Date: 10/10/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: CDX Analytics, LLC

Phone Number: 978-619-2244 **Email Address:** boppenheim@cdxanalytics.com

Business Address 1: 39 Norman Street **Business Address 2:**

Business City: Salem **Business State:** MA **Business Zip Code:** 01970

Mailing Address 1: 39 Norman Street **Mailing Address 2:**

Mailing City: Salem **Mailing State:** MA **Mailing Zip Code:** 01970

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD: CDX Analytics, LLC

Department of Public Health RMD Registration Number: 002

Operational and Registration Status: Obtained Final Certificate of Registration and is open for business in Massachusetts

To your knowledge, is the existing RMD certificate of registration in good standing?: yes

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100 **Percentage Of Control:** 100

Role: Owner / Partner **Other Role:**

First Name: Brian **Last Name:** Strasnick **Suffix:** Ph. D.

Gender: Male **User Defined Gender:**

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: **Percentage Of Control:**

Role: Employee **Other Role:**

First Name: Eamon **Last Name:** Travers **Suffix:**

Gender: Male **User Defined Gender:**

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: **Percentage Of Control:**

Role: Employee **Other Role:**

First Name: Brianna **Last Name:** Cassidy **Suffix:** Ph. D.

Gender: Female **User Defined Gender:**

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Brian **Last Name:** Strasnick **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $100 **Percentage of Initial Capital:** 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 39 Norman Street

Establishment Address 2:

Establishment City: Salem **Establishment Zip Code:** 01970

Approximate square footage of the Establishment: 1600 **How many abutters does this property have?:** 191

Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning 6.28.18.pdf	pdf	5b34ead38d1e3843f1b00727	06/28/2018
Community Outreach Meeting Documentation	Community Outreach Meeting Documentation 7.3.18.pdf	pdf	5b3b8138a074053215dda801	07/03/2018
Certification of Host Community Agreement	Host Community Agreement Certification Form 7.3.18.pdf	pdf	5b3b8477c7cb5d31f7ff82a8	07/03/2018
Community Outreach Meeting Documentation	Community Outreach Meeting Documentation 7.18.18.pdf	pdf	5b4f99c1a18777320b0d8281	07/18/2018

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: $100

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact_FINAL_7.30.18.pdf	pdf	5b5f8e58065a6d348d6fc39a	07/30/2018

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: **Other Role:**

First Name: Brian **Last Name:** Strasnick **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: **Other Role:**

First Name: Eamon **Last Name:** Travers **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: **Other Role:**

First Name: Brianna **Last Name:** Cassidy **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload

				Date
Secretary of Commonwealth - Certificate of Good Standing	05312018110131-0001.pdf	pdf	5b1010d19eb86611ea7d4907	05/31/2018
Department of Revenue - Certificate of Good standing	COGS_Tax Compliance_Good Standing_06062018.pdf	pdf	5b17f88307462b5064379514	06/06/2018
Articles of Organization	CDX_Articles_8.9.18.pdf	pdf	5b6c59dd377423394139336e	08/09/2018
Articles of Organization	Withdrawal Notice 8.9.18.pdf	pdf	5b6c5f8703a477392d0a22f1	08/09/2018
Articles of Organization	CDX Letter to CCC FINAL 8-9-18.pdf	pdf	5b6c6024aa953e3937b592ec	08/09/2018
Bylaws	Operating Agreement 8.9.18.pdf	pdf	5b6c6c6418807b2d67c3f308	08/09/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	CDX - DOR Cert of Good Standing July 2020.pdf	pdf	5f5fc30c7b6e5024685515eb	09/14/2020
Department of Unemployment Assistance - Certificate of Good standing	CDX - DUA Certificate20200917.pdf	pdf	5f722b44d4713f079b924b19	09/28/2020
Secretary of Commonwealth - Certificate of Good Standing	CDX -MAsec.ofcomm. good standing20200914.pdf	pdf	5f722b5073481907b14c8539	09/28/2020

Massachusetts Business Identification Number: 001197301

Doing-Business-As Name:

DBA Registration City: Salem

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Business Plan 6.18.18.pdf	pdf	5b27d9255617f143c98bb026	06/18/2018
Plan for Liability Insurance	Proof of Insurance 6.19.18.pdf	pdf	5b290c655246fb5032ddeba3	06/19/2018
Proposed Timeline	CDX Proposed Timeline 7.18.18.pdf	pdf	5b4f9871b0153b3eaf4b3ff1	07/18/2018

LABORATORY CERTIFICATION

Certifying Body: Perry Johnson Laboratory Accreditation, Inc. **ISO 17025 Accreditation Certificate Number:** 90358

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Quality control and testing	SOP-105 Rev 0 Complaint Handling.pdf	pdf	5b085d371fc0413d614fea71	05/25/2018
Personnel policies including background checks	SOP-107 Rev 0 Management Responsibility.pdf	pdf	5b085e84a9bf2311b8c6e1ca	05/25/2018
Record Keeping procedures	SOP-113 Rev 0 Confiedntial and Privileged Information.pdf	pdf	5b085f2952bc563da3bfe6f4	05/25/2018
Quality control and testing	SOP-116 Rev 0 Environmental	pdf	5b085f3a11a2fe04237f78f5	05/25/2018

	Monitoring.pdf			
Transportation of marijuana	SOP-119 Rev 0 Sample Transport.pdf	pdf	5b085f464acea511a836997e	05/25/2018
Inventory procedures	SOP-128 Rev 0 Laboratory Waste Handling.pdf	pdf	5b085fb29a67bb11cc7e5064	05/25/2018
Quality control and testing	SOP-129 Rev 0 Laboratory Cleaning and Sanitizing.pdf	pdf	5b085fbcda8de63d8fd17402	05/25/2018
Qualifications and training	SOP-160 Rev 0 Training.pdf	pdf	5b085ff500caab11e09ca305	05/25/2018
Security plan	SOP-119 Rev 1 Sample Transport.pdf	pdf	5b34f92b480890506ed9bb2e	06/28/2018
Storage of marijuana	CDX Storage of Marijuana_AJC.pdf	pdf	5b4ca8fe85e0cc3ea5b904a5	07/16/2018
Personnel policies including background checks	SOP-120 Rev 0 Hiring.pdf	pdf	5b4cab60c0ef253ee143b78d	07/16/2018
Personnel policies including background checks	SOP-146 Rev 1 Dismissal of Laboratory Agents Policy.pdf	pdf	5b4cab7985e0cc3ea5b904ab	07/16/2018
Record Keeping procedures	SOP-101 Rev A Document and Record Control.pdf	pdf	5b4cabb65af6a93eb9cd878c	07/16/2018
Qualifications and training	SOP-160 Rev 0 Training.pdf	pdf	5b4cac24c7cb5d31f7ff8b22	07/16/2018
Transportation of marijuana	CDX Inventory procedures summary_AJC 7.17.18.pdf	pdf	5b4f8b0d228a4c3e9f188302	07/18/2018
Security plan	CDX Hours of Operations_7.18.18.pdf	pdf	5b4f8c075ed31d3ecdee95fc	07/18/2018
Qualifications and training	CDX Qualifications and Training 7.18.18.pdf	pdf	5b4f8eeda18777320b0d8277	07/18/2018
Diversity plan	Diversity Plan 7.18.18.pdf	pdf	5b4f8faaa074053215ddb332	07/18/2018
Record Keeping procedures	CDX Record Keeping Procedure_FINAL 7.18.18.pdf	pdf	5b4f900f5c57ce321fac590b	07/18/2018
Personnel policies including background checks	CDX Personnel Policies Summary 7.18.18.pdf	pdf	5b4f90d508716131e75c7a02	07/18/2018
Inventory procedures	CDX Inventory procedures summary_7.18.18.pdf	pdf	5b4f9177a208e331ed151881	07/18/2018
Storage of marijuana	CDX Storage of Marijuana_7.18.18.pdf	pdf	5b4f95565c57ce321fac590f	07/18/2018
Prevention of diversion	CDX Prevention of Diversion_7.18.18.pdf	pdf	5b4f961ca208e331ed151887	07/18/2018
Security plan	CDX Security Plan Updated_7.18.18.pdf	pdf	5b4f9752c7cb5d31f7ff8d9d	07/18/2018
Maintaining of financial records	CDX Maintaining of Financial Records 7.18.18.pdf	pdf	5b4fa8e408716131e75c7a12	07/18/2018

ATTESTATIONS

I certify that no additional entities or individuals meeting the requirement set forth in 935 CMR 500.101(1)(b)(1) or 935 CMR 500.101(2)(c)(1) have been omitted by the applicant from any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

I understand that the regulations stated above require an applicant for licensure to list all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

I certify that any entities who are required to be listed by the regulations above do not include any omitted individuals, who by themselves, would be required to be listed individually in any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.:

I Agree

Notification: I Understand

I certify that any changes in ownership or control, location, or name will be made pursuant to a separate process, as required under 935 CMR 500.104(1), and none of those changes have occurred in this application.: I Agree

I certify that to the best knowledge of any of the individuals listed within this application, there are no background events that have arisen since the issuance of the establishment's final license that would raise suitability issues in accordance with 935 CMR 500.801.: I Agree

I certify that all information contained within this renewal application is complete and true.: I Agree

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Please see attachments.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Please see attachment

HOURS OF OPERATION

Monday From: 8:00 AM	**Monday To:** 10:00 PM
Tuesday From: 8:00 AM	**Tuesday To:** 10:00 PM
Wednesday From: 8:00 AM	**Wednesday To:** 10:00 PM
Thursday From: 8:00 AM	**Thursday To:** 10:00 PM
Friday From: 8:00 AM	**Friday To:** 10:00 PM
Saturday From: 8:00 AM	**Saturday To:** 5:00 PM
Sunday From: Closed	**Sunday To:** Closed

CDX Analytics
Application of Intent

Plan to Remain Compliant with Local Zoning

The purpose of this plan is to outline how CDX Analytics ("CDX") is and will remain in compliance with local codes, ordinances and bylaws for the physical address of the Independent Testing Laboratory at 39 Norman Street, Salem, MA 01970, which shall include, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana.

39 Norman Street is located in the Central Development (B5) Zoning District and properly zoned pursuant to the Salem Zoning Ordinance Section 6.10 Marijuana Establishments. There are no other codes, ordinances, or bylaws relative to the Independent Testing Laboratory Facility.

In addition to CDX remaining compliant with existing Zoning Ordinances; CDX will continuously engage with City of Salem officials to remain up to date with local zoning ordinances to remain fully compliant.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Community Outreach Meeting Attestation Form

The applicant must complete each section of this form and initial each page before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant appear in italics. Please note that submission of information that is "misleading, incorrect, false, or fraudulent" is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

I, B [illegible] (*insert name*) attest as an authorized representative of CDX Analytics, LLC (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on June 29th, 2018 (*insert date*).

2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on June 22, 2018 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).

3. A copy of the meeting notice was also filed on June 21, 2018 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).

4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on June 21, 2018 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

5. Information was presented at the community outreach meeting including:
   a. The type(s) of Marijuana Establishment to be located at the proposed address;
   b. Information adequate to demonstrate that the location will be maintained securely;
   c. Steps to be taken by the Marijuana Establishment to prevent diversion to minors;
   d. A plan by the Marijuana Establishment to positively impact the community; and
   e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

Yard Sale

CTORY

onvenient guide to all the best garage sales!

AGE SALE

THIS!

RS - Sweet
Country Fair
OVER 30 PARTICIPANTS!
ain date 6/24. 141 Pine St.
Unique home decor!
n/sweetwilliamsf

ESTATE SALE.
Soup to Nuts!
Sat. 6/23, 9 am to 2 pm
EDGE ROAD
upscaletagsales.com

on Avenue ESTATE SALE
m-2pm & Sun June 24
maple, oak, & antique furni-
r, dryer, microwave, fine
r-plate, collectibles, vintage
ousehold items. Cash only.

ING ESTATE SALE Sat. 8
am to 4 pm, 5 Kelley Lane.
r, high end clothing ladies,
ssories, jewelry & more!!!!

BURYPORT:
Drive Sat 6/23
ehold,Furniture & Clothing

6 Olive Street 7am-noon.
ning sale - furniture,
s & collectibles,
ssories, much more

GARAGE SALE

YARD SALE

NEWTON, NH, 14 Zoe Lane
Multi-Family Yard Sale!
Saturday June 23
9am-3pm
Baby*Furniture*Tools*Home Decor*Building Materials*Small Appliances and more!

NORTH ANDOVER, 41 Summer St, 6/23 8-1
Books, golf set, clothing, dishware, martial arts gear, Beatles collector plates, music memorabilia

PEABODY, MA, 327 Lowell St
Fri & Sat, June 22 & 23, 8-3
Estate/Yard sale. Couch, recliner, kitchenware, tools, quilting items, picture frames, cookware, Christmas items and so much more.

PEABODY, MA - Sat. 8am-1pm
MULTI-FAMILY
TOOLS, ANVIL, PLOWS, BANDSAW, HOUSEHOLD ITEMS. 258 Lynnfield St.

ROCKPORT, North Road, Bearskin Neck
Sat. 6/23, 8:30AM GIANT NEIGHBORHOOD YARD SALE - artwork, linens, china, electronics, telescope, car seat, vintage items, household goods, etc. Something for everyone!

ROWLEY – TWO FAMILY YARD SALE
111 Leslie Rd, Sat. 6/23 8a to 1p
Clothes, sports gear, bikes, toys, books,

PUBLIC NOTICES

Take notice, they could affect you!

PUBLIC NOTICES

The North Shore Crossing Construction project located on Brimbal Avenue will be conducting a Fire-Flow and Pressure test starting Monday 6-25-18 at 9 am.

Carlco Construction Inc. Will be monitoring the test. Terry Dennehy will be answering questions if need 978-342-5445.

SN – 6/20, 6/21, 6/22/18

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT
PROBATE AND FAMILY COURT
Essex Probate and Family Court
36 Federal Street
Salem, MA 01970
(978) 744-1020
Docket No. ES18C0090CA
In the matter of:
Stone Chen Wang
Of: Salem, MA
NOTICE OF PETITION FOR CHANGE OF NAME

To all persons interested in petition described:

A petition has been presented by Stone C Wang requesting that: Stone Chen Wang be allowed to change his/her/their name as follows: Stone Ming Chen.

IF YOU DESIRE TO OBJECT THERETO, YOU OR YOUR ATTORNEY MUST FILE A WRITTEN APPEARANCE IN SAID COURT AT: **Salem** ON OR BEFORE TEN

PUBLIC NOTICES

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Friday, June 29th, 2018 at 5:30 pm at CDX Analytics, 39 Norman Street, Salem, MA 01970. The proposed Independent Testing Laboratory is located at 39 Norman Street, Salem, MA 01970. There will be an opportunity for the public to ask questions.

SN – 6/22/18

NOTICE OF PETITION FOR CHANGE OF NAME
Docket No. ES18C0179CA
Commonwealth of Massachusetts
The Trial Court
Probate and Family Court
Essex Probate and Family Court
36 Federal Street
Salem, MA 01970
(978) 744-1020
In the matter of: Jade Mengyue Gerety
Of: Salem, MA

To all persons interested in petition described:

A petition has been presented by Jade M Gerety requesting that: Jade Mengyue Gerety be allowed to change his/her/their name as follows: Jade Mengyue Delahey

IF YOU DESIRE TO OBJECT THERETO, YOU OR YOUR ATTORNEY MUST FILE A WRITTEN APPEARANCE IN SAID COURT AT: **Salem**

ON OR BEFORE TEN O'CLOCK

PUBLIC NOTICES

LEGAL NOTICE
CITY OF BEVERLY
BOARD OF HEALTH

On June 20, 2018, the Beverly Board of Health voted to amend its regulations entitled "Regulation for Noise Control" The amended regulation shall supersede previous versions of the regulation. The amended regulation will take effect on July 1, 2018. Copies of this amended regulation may be obtained from the City of Beverly Health Department web site at www.beverlypublichealth.org.

The Beverly Board of Health
Frank S. Carbone Jr., MD, Chairman
William J. Alpine Jr., Esq.
Susan M. Higgins
William T. Burke III, RS, CHO, Director of Public Health

SN - 6/22/18

INFORMAL PROBATE PUBLICATION NOTICE
Docket No. **ES18P1831EA**
Commonwealth of Massachusetts
The Trial Court
Probate and Family Court
Essex Division
Estate of: David Goldberg
Date of Death: January 28, 2018

To all persons interested in the above captioned estate, by Petition of Petitioner **Karen G. Meyer** of **Marblehead MA** and Petitioner **Robert J. Goldberg** of **Westborough MA**

B

Jonathan Capano

From: Jonathan Capano
Sent: Thursday, June 21, 2018 11:25 AM
To: 'mayor@salem.com'; 'sargeatlarge74@aol.com'; 'ddominguez@salem.com'; 'emilo@salem.com'; 'Rmccarthy@salem.com'; 'cmadore@salem.com'; 'lpeterson@salem.com'; 'tflynn@salem.com'; 'jturiel@salem.com'; 'bgerard@salem.com'; 'sdibble@salem.com'; 'tfurey@salem.com'; 'isimons@salem.com'; 'scahill@salem.com'; 'achiancola@salem.com'
Cc: Jim Smith; Sira Grant
Subject: Public Notice for Community Outreach Meeting
Attachments: Community Outreach Meeting Notice 6.21.18.docx

Good morning,

Attached please find the public notice for the community outreach meeting that will be held on Friday June 29th, 2018 at CDX Analytics, 39 Norman Street, Salem, MA 01970 at 5:30 pm. Pursuant to 935 CMR 500.101(1)(a), this notice has been mailed to all abutters within 300 feet of the property and will appear in the Salem News tomorrow June 22, 2018. If you have any questions please feel free to contact me.

Jonathan Capano
Summer Associate

Smith, Costello & Crawford
Public Policy Law Group.

50 Congress Street, Suite 420
Boston, MA 02109
O: 617-523-0600
www.publicpolicylaw.com

C

Community Outreach Public Meeting Notice

June 22, 2018

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Friday June 29, 2018 at 5:30 pm at CDX Analytics, 39 Norman Street, Salem, MA 01970. The proposed Independent Testing Laboratory is located at 39 Norman Street, Salem, MA 01970. There will be an opportunity for the public to ask questions.

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. Please note that submission of information that is "misleading, incorrect, false, or fraudulent" is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

Applicant

I, DR. BRIAN J. STRASNICK, (*insert name*) certify as an authorized representative of CDX Analytics (*insert name of applicant*) that the applicant has executed a host community agreement with City of Salem (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on JULY 3, 2018 (*insert date*).

Signature of Authorized Representative of Applicant

Host Community

I, Kimberley L. Driscoll, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for City of Salem (*insert name of host community*) to certify that the applicant and City of Salem (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on July 3, 2018 (*insert date*).

Signature of Contracting Authority or
Authorized Representative of Host Community

39 Norman St Salem, MA | (978) 619-2244 | info@cdxanalytics.com | www.cdxanalytics.com

Requested Additional Information: Community Outreach Meeting

Attached please find confirmation from a representative of the City of Salem that the email sent on 6/21/18 was received, evidence by the fact that the representative intended to attend the community outreach meeting. In addition, attached please find a copy of the notice stamped by the city clerk's office for posting on the "Official Bulletin Board" in compliance with local bylaws and relevant state statute and sufficient for their filing requirements.

This document is being submitted pursuant to 935 CMR 500.101(2)(b)(7)(a-d) which requires documentation that the applicant has conducted a community outreach meeting consistent with the CCC's guidance for License Applicant on Community Outreach within the six months prior to the application.

Jonathan Capano

From: Steve Dibble <sdibble@Salem.com>
Sent: Thursday, June 21, 2018 3:29 PM
To: Jonathan Capano
Subject: Re: Public Notice for Community Outreach Meeting

Hi Jonathan:
Thank you for the notice. I plan on attending.
Steve Dibble
Salem City Councillor

From: Jonathan Capano <jcapano@publicpolicylaw.com>
Sent: Thursday, June 21, 2018 11:24 AM
To: Mayor Kim Driscoll; Arthur Sargent; Domingo J. Dominguez; Elaine Milo; Robert McCarthy; Christine Madore; Lisa Peterson; Timothy Flynn; Josh Turiel; Beth Gerard; Steve Dibble; tfurey@salem.com; Ilene Simons; Sarah Cahill; Amanda Chiancola
Cc: Jim Smith; Sira Grant
Subject: Public Notice for Community Outreach Meeting

Good morning,

Attached please find the public notice for the community outreach meeting that will be held on Friday June 29th, 2018 at CDX Analytics, 39 Norman Street, Salem, MA 01970 at 5:30 pm. Pursuant to 935 CMR 500.101(1)(a), this notice has been mailed to all abutters within 300 feet of the property and will appear in the Salem News tomorrow June 22, 2018. If you have any questions please feel free to contact me.

Jonathan Capano
Summer Associate

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Community Outreach Public Meeting Notice

June 22, 2018

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CDX Analytics

Excellence in Service - Delivered with Integrity

September 8, 2020

Plan for Positive Impact

The War on Drugs has left lasting negative impacts on families and communities across the United States. As stated in the ACLU report, The War on Marijuana in Black and White, the War on Drugs, is a "failure." The report further stated that, "[The War on Drugs] has needlessly ensnared hundreds of thousands of people in the criminal justice system, had a staggeringly disproportionate impact on African-Americans, and comes at a tremendous human and financial cost. The price paid by those arrested and convicted of marijuana possession can be significant and linger for years, if not a lifetime." *ACLU, The War on Marijuana in Black and White, June 2013*.

The Cannabis Control Commission ("CCC") identified 29 cities and towns throughout the Commonwealth of Massachusetts that were disproportionately impacted by marijuana related crimes. Salem, although it is not a city listed on the Cannabis Control Commission's list of Disproportionately Impacted Communities, has not escaped the impacts of the War on Drugs. CDX, albeit removed from the retail and customer facing aspects of this industry, plans to have a positive impact on the City of Salem and its citizenry, as it has become and will be our home. We have also identified our neighboring city of Lynn as disproportionately impacted and have made arrangements to provide support here also.

1. ***MEDICAL LICENSING INITIATIVE – GREEN-IN-GROUP***

CDX Analytics has partnered with a number of licensee clients to support an initiative by "Green In Group" to provide monthly financial support for the cost of licensing for medical marijuana patients disproportionately affected by the war on drugs where generational PTSD impacts their lives. Licensing is provided by qualifying medical providers.

CDX Analytics' President & CEO, Dr. Brian Strasnick, Ph.D., J.D., F.A.A.E.T.S., B.C.E.T.S., B.C.F.T., is a Fellow of the American Academy of Experts in Traumatic Stress. This form of PTSD caused by the war on drugs in predominantly poorer communities of Massachusetts is no different than a diagnosis common to any other veteran, drug war veterans and their families alike. This program is available state-wide and is helping patients gain access to legal and properly tested marijuana for their treatment of PTSD caused by the war on drugs.

2. ***COMMUNITY OUTREACH – LYNN JOBS FAIR***

Due to the Covid-19 restrictions, we have had to postpone our planned jobs fair for Lynn. This was scheduled to take place on April 29th, 2020 in cooperation with Revolutionary Clinics and Apothka and was to be held in the Lynn Museum/Lynn Arts Centre at 590 Washington St, Lynn. We are working with our partners to re-schedule this as soon as it is possible.

3. ***PROVISION OF PARKING SPACES***

Recognizing the challenges that the City faces with parking, CDX has provided the use of our well-lit, camera-patrolled, elevated outdoor parking area after 5:00 p.m. on weekdays and all weekend. Making the parking lot public during the period in which the facility is typically closed has been extremely beneficial for both tourists and residents who can safely park and enjoy the Salem downtown area. Further, CDX has relinquished its exclusive access to seven (7) on-street parking spots to the City of Salem.

4. ***STEM LEADERSHIP***

CDX actively participates in Salem State University's outreach program in order to find and retain qualified candidates for employment at CDX through the Massachusetts Life Sciences Centre program. We are delighted to report that four (4) full-time members of our current scientific team have graduated to full-time status on our staff and we are actively interviewing for two more places available to us with plans to have them on payroll by September 25th, 2020.
The intellect and ability of CDX's team to impact young aspiring scientist will be an invaluable resource to the STEM programs in the Salem school system. Covid-19 has had a negative impact on our ability to provide these hours so we acknowledge that we must take a more pro-active approach in the provision of these hours to the public-school system in the coming academic year.

5. ***SPONSOR THE COMMUNITY BIKE SHARE PROGRAM***

In June 2006, the City of Salem established the Salem Bike Path Committee, which is a Committee dedicated to making Salem a bike-friendly community. The main goal of this Committee is to make Salem a more-desirable urban environment by creating safe and well-planned routes for cycling. Goals of the Committee are to assist in the expansion of the existing bike path throughout Salem and to our surrounding communities, encourage the Safe Routes to Schools Program, advocate for alternative forms of transportation to reduce traffic congestion advocate for bike safety, and encourage cycling both as a form of alternative transportation and as a form of exercise and better health.
CDX supports the community in each of these goals and has installed a bicycle rack, capable of holding ten (10) bicycles at our site. This is available to the public and to employees as part of the City's official bike share program.

CDX Analytics looks forward to continuing supporting the community and will present new initiatives as they present.
End

39 Norman St Salem, MA | (978) 619-2244 | info@cdxanalytics.com | www.cdxanalytics.com

Plan for Positive Impact

The War on Drugs has left lasting negative impacts on families and communities across the United States. As stated in the American Civil Liberties Union (ACLU) report, The War on Marijuana in Black and White, the War on Drugs has been a "failure," and "has needlessly ensnared hundreds of thousands of people in the criminal justice system, had a staggeringly disproportionate impact on African-Americans, and comes at a tremendous human and financial cost. The price paid by those arrested and convicted of marijuana possession can be significant and linger for years, if not a lifetime." *ACLU, The War on Marijuana in Black and White, June 2013*.

The Cannabis Control Commission ("CCC") identified 29 cities and towns throughout the Commonwealth of Massachusetts that were disproportionately impacted by marijuana related crimes; however, Salem, MA – CDX's host community – is not included as a Disproportionately Impacted Community. As such, CDX and its leadership will continue and expand its historic efforts to support and promote the City of Lynn, home to CDX's founder and CEO/President, Brian Strasnick.

In an effort to support the homeless community in Lynn, CDX will partner with My Brother's Table of Lynn, the largest soup kitchen serving the homeless and needy on the North Shore. Since its founding in 1982, My Brother's Table has provided over 3 million free meals and outreach to persons in need, with over 186,000 meals last year alone. CDX will conduct food pantry drives throughout the year in order to support My Brother's Table's efforts to ensure it has adequate food and supplies. As a condition of employment, CDX will ensure all employees participate in at least one volunteer day per year providing outreach and meals to the homeless and needy in Lynn.

To ensure a sustainable workforce pipeline of local talent, CDX will engage in two strategies specific to Lynn, MA. First, CDX will partner with North Shore Community College – Lynn Campus to provide for-credit laboratory internships to students pursuing Biotechnology and laboratory sciences degrees and certifications. Such internships will allow students based in a community disproportionately impacted to receive direct, hands-on training with CDX's internationally recognized team of scientists. Additionally, in partnership with relevant Lynn-based organizations (e.g. Lynn Chamber of Commerce, North Shore Community College), CDX will, at least annually, conduct or participate in a job fair(s) to identify and retain qualified candidates for employment at CDX. Lynn residency (along with Salem) will be a positive factor in hiring decisions in CDX's pursuit of hiring the most qualified candidates, complying with all relevant employment laws and other legal requirements.

Finally, CDX and its ownership group will continue their long history of philanthropic actives to programs within and throughout the City of Lynn, providing services in response to the community's needs. This includes charitable giving to organizations including, but not limited to North Shore Community College, Project Cope, and Girls, Inc. These commitments build off of CDX leadership's long history of directly supporting Lynn, including expansion of Lynn Community Health, supporting local sober living projects, and serving as foster parents to more than 15 Lynn newborns suffering from neonatal abstinence syndrome.

While not identified as a community disproportionately impacted, relative to Massachusetts, Salem has historically and disproportionately been impacted by a higher-than-state-average crime rate. Of particular interest to CDX is focusing efforts around "The Point" – a community located on the edge of Downtown Salem that is home to a significant minority immigrant population. The list of areas of disproportionate impact identified by the Commission is a living document and is therefore required to be re-evaluated periodically by the Commission. CDX believes that The Point is a neighborhood within Salem that should be considered or re-evaluated by the Commission. This neighborhood of Salem largely speaks English as a second language, experiences higher crime rates and disease burdens, and lower educational and employment opportunities as compared to their counterparts located within other neighborhoods of Salem. Consistent with the CCC's guidance document for Positive Impact Plans, CDX will focus its efforts around The Point, as a disproportionate number of neighborhood residents have past drug convictions and/or have parents or spouses who have drug convictions. Thanks to the dedicated leadership of the City's Administration, much progress has been made within The Point; however, the neighborhood remains a community disproportionately impacted by higher crime rates and lower educational and employment opportunities.

Specifically, as it relates to education, Salem Public Schools have seen significant decreases in enrollment over the last ten years due to students opting to attend schools within surrounding cities and towns, in part, due to the competitive nature of Science, Technology, Engineering, and Math or "STEM" learning within these surrounding communities. In response to these findings, and in partnership with the City of Salem, CDX has committed to providing a minimum of 150 volunteer hours to the City of Salem's public-school system and its STEM programs, including a those located within The Point.

CDX's ISO Certified laboratory is a state-of-the-art facility with instrumentation of the highest quality, with applications far beyond the cannabis industry. Led by Chief Science Officer Dr. Brianna Cassidy, the laboratory team is highly trained, motivated, educated, and has been nationally recognized for their work. The ability of this team to impact young aspiring students will be an invaluable resource to the STEM programs in the Salem school system. The relationship between CDX and the City's STEM programs has the potential to provide a unique opportunity for students.

Finally, CDX will participate in North Shore Community College – Lynn Campus and Salem State University's outreach programs in order to find and retain qualified candidates for employment. By implementing a local hiring preference for residents of Lynn and Salem and pairing this preference explicitly with CDX's STEM outreach, it is CDX's goal to build a long-term workforce pipeline of local talent through the Salem's STEM programming, North Shore Community College – Lynn Campus, and Salem State University, supporting and empowering local students to become members of the CDX science team.

Criminalization has had lasting effects, not only on the individuals arrested and incarcerated, but on their families and communities as well. CDX will help provide the STEM program leadership, motivation, and key educational tools to the youth of Lynn and Salem in order to inspire and achieve increased graduation rates, college enrollment, and ultimately, employment.

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

May 24, 2018

TO WHOM IT MAY CONCERN:

I hereby certify that a certificate of organization of a Limited Liability Company was filed in this office by

CDX ANALYTICS, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **November 13, 2015.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation or withdrawal; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **BRIAN J STRASNICK PHD, CRAIG S STRASNICK**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **BRIAN J STRASNICK PHD, CRAIG S STRASNICK, GRAY W RIFKIN ESQ., ALEXANDER J CAPANO ESQ.**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **GRAY W RIFKIN ESQ., ALEXANDER J CAPANO ESQ.**

In testimony of which,
I have hereunto affixed the
Great Seal of the Commonwealth
on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Processed By:NGM

Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L1867977856
Notice Date: May 30, 2018
Case ID: 0-000-370-540

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

CDX ANALYTICS LLC
39 NORMAN ST
SALEM MA 01970-3380

000030

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, CDX ANALYTICS LLC is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

This certificate doesn't certify that the taxpayer is compliant in taxes such as unemployment insurance administered by agencies other than the Department of Revenue, or taxes under any other provisions of law.

This is not a waiver of lien issued under Chapter 62C, section 52 of the Massachusetts General Laws.

What if I have questions?

If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- Review or update your account
- Contact us using e-message
- Sign up for e-billing to save paper
- Make payments or set up autopay

Edward W. Coyle, Jr., Chief
Collections Bureau

The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: $100.00

Secretary of the Commonwealth, Corporations Division
One Ashburton Place, 17th floor
Boston, MA 02108-1512
Telephone: (617) 727-9640

Certificate of Amendment
(General Laws, Chapter)

Identification Number: 001197301

The date of filing of the original certificate of organization: 11/13/2015

1.a. Exact name of the limited liability company: CDX ANALYTICS, LLC

1.b. The exact name of the limited liability company *as amended*, is: CDX ANALYTICS, LLC

2a. Location of its principal office:
No. and Street: 39 NORMAN STREET
City or Town: SALEM State: MA Zip: 01970 Country: USA

3. *As amended,* the general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:
LABORATORY QUALITY TESTING AND ALL OTHER BUSINESS ACTIVITIES LAWFUL IN THE COMMONWEALTH.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:
Name: BRIAN J. STRASNICK
No. and Street: 39 NORMAN STREET
39 NORMAN STREET
City or Town: SALEM State: MA Zip: 01970 Country: USA

6. The name and business address of each manager, if any:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	BRIAN J STRASNICK PHD	39 NORMAN STREET SALEM, MA 01970 USA

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record

any recordable instrument purporting to affect an interest in real property:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

9. Additional matters:

10. State the amendments to the certificate:
REMOVE A MANAGER

11. The amendment certificate shall be effective when filed unless a later effective date is specified:

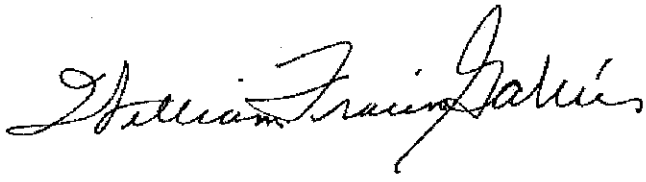
SIGNED UNDER THE PENALTIES OF PERJURY, this 8 Day of August, 2018,
/BRIAN J. STRASNICK/ **, Signature of Authorized Signatory.**

MA SOC Filing Number: 201826057140 Date: 8/8/2018 11:35:00 AM

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with me on:

August 08, 2018 11:35 AM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

CDX Analytics

Excellence in Service - Delivered with Integrity

NOTICE OF WITHDRAWAL FROM LIMITED LIABILITY COMPANY

To: The Members of CDX Analytics, LLC;

Massachusetts Secretary of State Company ID: 001197301

Craig S. Strasnick (the "Withdrawing Member") of 34 Blodgett Avenue, Swampscott, Massachusetts 01907, is a member in the management of CDX Analytics, LLC (the "Company") established in the Commonwealth of Massachusetts on the 13th day of November, 2015 for the purpose of laboratory testing and formed in accordance with the Operating Agreement (the "Operating Agreement").

Craig S. Strasnick desires to voluntarily withdraw from the Company. The date of the withdrawal will be by the 9th day of August, 2018.

With this document, the Withdrawing Member gives Dr. Brian J. Strasnick notice of withdrawal in writing by registered or certified mail at the company's main office located at 39 Norman Street, Salem, Massachusetts 01970, and does hereby transfer all of his right, title and interest in the Company to the remaining member.

The Operating Agreement provides that the exclusive jurisdiction for the enforcement of this matter is the courts of the Commonwealth of Massachusetts.

I, Craig S. Strasnick hereby withdraw as a member of this limited liability company and do hereby swear that the above-mentioned limited liability company has been notified of my resignation in writing.

Signature: _____

Date: 8.9.18

Witness: _____

Witness: _____

Smith, Costello
& Crawford
Public Policy Law Group.

August 9, 2018

Massachusetts Cannabis Control Commission
101 Federal Street, 13th Floor,
Boston, MA 02110
ATTN: Kyle Potvin, Director of Licensing

RE: CDX Analytics
Application #: ILN281275

Dear Mr. Potvin,

This memorandum serves to notify the Massachusetts Cannabis Control Commission of a change in the list of executives, managers, persons with direct or indirect authority, close associates and members, and capital contributors of 10% or more as required pursuant to 935 CMR 500.101(2)(b)(1) for application number ILN281275, CDX Analytics, LLC of Salem, MA.

Craig S. Strasnick (the "Withdrawing Member") of 34 Blodgett Avenue, Swampscott, Massachusetts 01907, is a member in the management of CDX Analytics, LLC (the "Company") established in the Commonwealth of Massachusetts on the 13th day of November, 2015 for the purpose of laboratory testing and formed in accordance with the Operating Agreement. Effective August 8, 2018, Mr. Strasnick has voluntarily withdrawn from the Company, and as such, has relinquished all rights, title, and claims, including all equity holdings.

The Withdrawing Member has been removed from the Company's Articles of Incorporation with the Massachusetts Secretary of State and will no longer be directly, or indirectly, involved with the financing, management, or operation of the Company. Such updated Articles have been provided within the Company's MassCIP application.

Attached hereto, find an executed Notice of Withdrawal from Limited Liability Company reflecting the above.

Sincerely,

James E. Smith, Esq.
Partner

OPERATING AGREEMENT
OF
CDX ANALYTICS, LLC

This Operating Agreement (the "Agreement") of CDX Analytics, LLC (the "Company"), effective as of August 9, 2018 (the "Effective Date"), is entered into by and between the Company and Brian J. Strasnick, as the single member of the Company (the "Member").

WHEREAS, the Company was formed as a limited liability company on November 13, 2015 by filing a certificate of organization ("Certificate of Organization") with the Secretary of the Commonwealth of Massachusetts pursuant to and in accordance with the Massachusetts Limited Liability Company Act, as amended from time to time (the "MLLCA"); and

WHEREAS, the Member agrees that the membership in and management of the Company shall be governed by the terms set forth in this Agreement.

NOW, THEREFORE, the Member and the Company agree as follows:

1. Name. The name of the Company is CDX Analytics, LLC.

2. General Character. The general character of the business of the Company is to engage in laboratory quality testing, and to engage in any activities directly or indirectly related or incidental thereto.

3. Powers. The Company shall have all the powers necessary or convenient to carry out the purposes for which it is organized, including the powers granted by the MLLCA.

4. Records Address. The address of the office in the Commonwealth at which the Company will maintain its records as required by the MLLCA shall be as set forth in the Certificate of Organization or subsequent filing with the Secretary of the Commonwealth. The Company may at any time change this address by making the appropriate filing with the Secretary of the Commonwealth.

5. Resident Agent. The name and street address of the Company's resident agent in the Commonwealth of Massachusetts shall be as set forth in the Certificate of Organization or subsequent filing with the Secretary of the Commonwealth. The Company may at any time change this information by making the appropriate filing with the Secretary of the Commonwealth.

6. Members.

a. Initial Member. The Member owns 100% of the membership interests of the Company. The name and the business, residence, or mailing address of the Member is as follows:

Brian J. Strasnick *72 Blodgett Avenue, Swampscott, Massachusetts 01907*

b. Additional Members. One or more additional members may be admitted to the Company with the written consent of the Member. Prior to the admission of any such additional members to the Company, the Member shall amend this Agreement or adopt a new operating agreement to

make such changes as the Member shall determine to reflect the fact that the Company shall have such additional members. Each additional member shall execute and deliver a supplement or counterpart to this Agreement, as necessary.

7. Management.

a. Authority; Powers and Duties of the Member. The Member shall have exclusive and complete authority and discretion to manage the operations and affairs of the Company and to make all decisions regarding the business of the Company. Any action taken by the Member shall constitute the act of and serve to bind the Company. Persons dealing with the Company are entitled to rely conclusively on the power and authority of the Member as set forth in this Agreement. The Member shall have all rights and powers of a manager under the MLLCA, and shall have such authority, rights and powers in the management of the Company to do any and all other acts and things necessary, proper, convenient or advisable to effectuate the purposes of this Agreement.

b. Election of Officers; Delegation of Authority. The Member may, from time to time, designate one or more officers with such titles as may be designated by the Member to act in the name of the Company with such authority as may be delegated to such officers by the Member (each such designated person, an "Officer"). Any such Officer shall act pursuant to authority delegated to such Officer until that Officer is removed by the Member. Any action taken by the Officer shall constitute the act of and serve to bind the Company. Persons dealing with the Company are entitled to rely conclusively on the power and authority of any Officer set forth in this Agreement and any instrument designating such Officer and the authority delegated to him or her.

8. Liability of Member; Indemnification.

a. Liability of Member. Except as otherwise required in the MLLCA, the debts, obligations and liabilities of the Company, whether arising in contract, tort or otherwise, shall be solely the debts, obligations and liabilities of the Company, and the Member shall not be personally liable for any such debt, obligation or liability of the Company solely by reason of being or acting as a member of the Company.

b. Indemnification. To the fullest extent permitted under the MLLCA, the Member (irrespective of the capacity in which it acts) shall be entitled to indemnification and advancement of expenses from the Company for and against any loss, damage, claim or expense (including attorneys' fees) whatsoever incurred by the Member relating to or arising out of any act or omission or alleged acts or omissions (whether or not constituting negligence or gross negligence) performed or omitted by the Member on behalf of the Company; provided, however, that any indemnity under this Section 8(b) shall be provided out of and to the extent of Company assets only, and neither the Member nor any other person shall have any personal liability on account thereof.

9. Term. The term of the Company shall be perpetual unless the Company is dissolved and terminated in accordance with Section 13.

10. Capital Contributions. The Member hereby agrees to contribute to the Company such cash, property, or services as determined by the Member from time to time, or loan funds to the Company, as the Member may determine in its sole and absolute discretion; provided, that absent such determination, Member is under no obligation whatsoever, either express or implied, to make any such contribution or loan to the Company.

11. Tax Status; Income and Deductions.

a. Tax Status. As long as the Company has only one member, it is the intention of the Company and the Member that the Company be treated as a disregarded entity for federal and all relevant state tax purposes and neither the Company nor the Member shall take any action or make any election which is inconsistent with such tax treatment. All provisions of this Agreement are to be construed to preserve the Company's tax status as a disregarded entity.

b. Income and Deductions. All items of income, gain, loss, deduction, and credit of the Company (including, without limitation, items not subject to federal or state income tax) shall be treated for federal and all relevant state income tax purposes as items of income, gain, loss, deduction, and credit of the Member.

12. Distributions. Distributions shall be made to the Member at the times and in the amounts determined by the Member.

13. Dissolution; Liquidation.

a. The Company shall dissolve, and its affairs shall be wound up upon the first to occur of the following: (i) the written consent of the Member or (ii) any other event or circumstance giving rise to the dissolution of the Company under Section 43 of the MLLCA, unless the Company's existence is continued pursuant to the MLLCA.

b. Upon dissolution of the Company, the Company shall immediately commence to wind up its affairs and the Member shall promptly liquidate the business of the Company. During the period of the winding up of the affairs of the Company, the rights and obligations of the Member under this Agreement shall continue.

c. In the event of dissolution, the Company shall conduct only such activities as are necessary to wind up its affairs (including the sale of the assets of the Company in an orderly manner), and the assets of the Company shall be applied as follows: (i) first, to creditors, to the extent otherwise permitted by law, in satisfaction of liabilities of the Company (whether by payment or the making of reasonable provision for payment thereof); and (ii) second, to the Member.

d. Upon the completion of the winding up of the Company, the Member shall file a certificate of cancellation in accordance with the MLLCA.

14. Miscellaneous.

a. Amendments. Amendments to this Agreement may be made only with the written consent of the Member.

b. Governing Law. This Agreement and the rights and obligations of the parties hereunder shall be governed by and interpreted, construed and enforced in accordance with the laws of the Commonwealth of Massachusetts, without giving effect to principles of conflicts of law.

c. Severability. In the event that any provision of this Agreement shall be declared to be invalid, illegal or unenforceable, such provision shall survive to the extent it is not so declared, and the validity, legality and enforceability of the other provisions hereof shall not in any way be affected or impaired thereby, unless such action would substantially impair the benefits to any party of the remaining provisions of this Agreement.

d. No Third-Party Beneficiaries. Nothing in this Agreement, either express or implied, is intended to or shall confer upon any person other than the parties hereto, and their respective successors and permitted assigns, any rights, benefits or remedies of any nature whatsoever under or by reason of this Agreement.

IN WITNESS WHEREOF, the undersigned have executed this Agreement to be effective as of the date first written above.

~~MEMBER~~

Brian J. Strasnick

CDX Analytics, LLC, a Massachusetts limited liability company

By: _____

Brian J. Strasnick, President

CDX Analytics
Management and Operation Profile

Business Plan

“CDX Analytics’ core business is the testing and analysis of marijuana for all registered dispensaries and cultivation facilities to ensure compliance with the requirements of the Massachusetts DPH & CCC. In addition, CDX also offers a range of advisory services to our customers. CDX has strategically invested in state-of-the-instrumentation that is distinguished in producing all results required by DPH and CCC and is also proficient in the highest level of current marijuana research. Our facility allows us to ensure state compliance and push the envelope in product optimization. CDX prides itself on having skillful scientists including 3 PhD level scientists overseeing all aspects of the laboratory. CDX assures on time reporting, daily collection services to ensure all chain of custody procedures are followed and significant market advantage as the only Massachusetts laboratory that can test all analytes required by the MA DPH & CCC. In addition, CDX is ISO/IEC Accredited 17025:2005 for all analytes required by Massachusetts. We were first to achieve ISO 17025 validated method for detection of cyfluthrin down to 10ppb as required by Ma DPH. We also have validated quantitative-PCR for microbial detection in cannabis-infused products. Our laboratory has validated methods for testing: Potency, Pesticides, Residual Solvents, Heavy Metals, Microbiological, Water Content, Terpenes and Plant Sexting.

ACORD®

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
06/19/18

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER	CONTACT NAME:	
Benevento Insurance Agency Inc. 497 Humphrey Street Swampscott, MA 01907	PHONE (A/C, No, Ext): 781-599-3411	FAX (A/C, No): 781-581-7200
	E-MAIL ADDRESS:	

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A : MESA Underwriters	
INSURER B : Evanston Ins Co	
INSURER C :	
INSURER D :	
INSURER E :	
INSURER F :	

INSURED

CDX Analytics, LLC
39 Norman St
Salem, MA 01970

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	[X] COMMERCIAL GENERAL LIABILITY [ ] CLAIMS-MADE [X] OCCUR GEN'L AGGREGATE LIMIT APPLIES PER [X] POLICY [ ] PRO-JECT [ ] LOC [ ] OTHER			MP0020003004402	02/15/18	02/15/19	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG $	$ 1,000,000 $ 100,000 $ 5,000 $ 1,000,000 $ 2,000,000 $ $
	AUTOMOBILE LIABILITY [ ] ANY AUTO [ ] OWNED AUTOS ONLY [ ] SCHEDULED AUTOS [ ] HIRED AUTOS ONLY [ ] NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident) $	$ $ $ $ $
	[ ] UMBRELLA LIAB [ ] OCCUR [ ] EXCESS LIAB [ ] CLAIMS-MADE [ ] DED [ ] RETENTION $						EACH OCCURRENCE AGGREGATE $	$ $ $
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY Y / N ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? [ ] N / A (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below						[ ] PER STATUTE [ ] OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $ $ $
B	Professional Liability			EO870463	02/15/18	02/15/19	occurence aggregate	1,000,000 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Analytical testing lab

CERTIFICATE HOLDER

Cannabis Control Commission
101 Federal St, 13th Floor
Boston, MA 02110

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

CDXAnalytics

TM-006: Form Template Rev. A

TITLE:	FORM #:	REV:	EFFECTIVE DATE:
Document Approval Coversheet	FM-001	0	9/5/2017

Document Information			
Document Title:	**SOP-105 Complaint Handling**		
Document #:	**SOP-105**	**Revision:**	**0**
Description of Changes:	**Initial Release**		

DOCUMENT APPROVAL COVERSHEET

Document Review/Approval			
Name	**Title**	**Signature**	**Approval Date**
Eamon Travers	VP, Business Development/Quality Manager	Eamon Travers	09/05/17
Brianna Cassidy	Chief Science Officer/Technical Manager	Brianna Cassidy	9/5/17
Keith Dunn	Associate Scientist	Keith A Dunn	9/5/17

Quality Processing					
Training required?	☒ **Yes**	□ **No**	**If no, justification:**		
Processed by:	Keith A Dunn			**Date:**	9/5/2017
Effective Date:	9/5/2017				

SOP Number: **SOP-105**

SOP Title: **Complaint Handling**

	NAME	JOB TITLE	SIGNATURE	DATE
Author	**Keith Dunn**	**Associate Scientist**		9/5/17
Authoriser	**Eamon Travers**	**Quality manager**		09/05/17

Effective Date:	**09/05/2017**
Review Date:	**09/04/2018**

TRAINING: READ BY			
NAME	**JOB TITLE**	**SIGNATURE**	**DATE**

1. Purpose

The purpose of this document is to establish the Complaint Handling process and procedure relating to operations at CDX Analytics.

2. Scope

This procedure applies to all written, electronic, or verbal communications received from dispensaries regarding quality or reliability of CDX Analytics testing services.

This procedure also applies to information, of which CDX Analytics becomes aware, that reasonably suggests one of its test results:

- may have been incorrect and caused or contributed to a death or serious injury
- may have been incorrect and that the test result could be likely to cause or contribute to a death or serious injury if the malfunction were to recur.

3. Responsibility

- The President (or designee) has the responsibility for updating this document.
- It is the responsibility of the departments and individuals called out in the procedure to ensure that this procedure is followed as required.

4. Reference Documents

• QMS-001	Quality Manual
• SOP-107	Management Responsibility
• SOP-106	Corrective Action and Preventative Actions
• FM-005	Complaint-Inquiry Form

5. Tools and Materials Required

CDX Analytics utilizes a manual-based hardcopy system.

6. Definitions

Assignee – the individual or department responsible for the investigation of the complaint and/or execution of solutions with regards to the complaint.

Attachments – copies of customer correspondence, written or electronic notes regarding verbal communication with customers, reports, records of investigations or any completed forms.

CC Number – a sequential number assigned to a complaint for easy identification and tracking purposes.

Complaint means any written, electronic, or oral communication that alleges deficiencies related to the identity, quality, durability, reliability, safety, effectiveness, or performance of a testing procedure.

Correction - an action taken to resolve or correct an existing known problem or non-conformance.

Corrective Action - an action taken to prevent recurrence of an existing known problem or non-conformance that has not occurred yet.

Preventive Action - an action taken to prevent the occurrence of a potential problem.

Recipient – Any employee, representative or agent of CDX ANALYTICS, who receives a complaint from a customer regarding standard of service provided.

Serious injury means an injury or illness that:

- Is life-threatening,
- Results in permanent impairment of a body function or permanent damage to a body structure, or
- Necessitates medical or surgical intervention to preclude permanent impairment of a body function or permanent damage to a body structure.
- Permanent means irreversible impairment or damage to a body structure or function, excluding trivial impairment or damage.

7. Procedure

1.1 Recipient

Customer complaints, both verbal and written complaints must be recorded in a new file. The file will contain.

- A summary of the complaint received, A written copy or recorded copy of the complaint if possible
- Date complaint received, Recipient's name, department, phone number and extension.
- Type of Complaint (verbal, written or electronic).
- Customer Information
- Recipient must fill in the relevant sample product ID/lot number, name of the Registered Marijuana Dispensary (RMD) and contact name and phone number.

1.2 Customer Service

1. Complaints will be logged onto the customer complaint form, F-036
2. Make sure all information is documented
3. Assignment of a CC# (Customer Complaint number)
4. Complaint is brought to the attention of the President (or designee)

5. The President (or designee) will now take over the processing of the complaint and perform a CAPA, if applicable.
6. After the CAPA is completed, remedial actions will be taken as described in the CAPA.
7. Follow-ups will be completed by the President (or designee).

1.3 For complaints, the Complaint-Inquiry Form FM-005 shall be used for logging and tracking all investigations, and recording investigation results and conclusions.

Note: All investigations should be concluded within 30 days from the date the complaint was received.

A justification is required on the Customer Complaint Form for any complaint that does not require an investigation. Complaint will be closed with the appropriate approvals of the justification. The person that makes the decision whether an investigation is or is not required will sign and date the Customer Complaint Form. Summary of the investigation and its conclusions (in support of closure) will be recorded here.

When the complaint investigation concludes and records as a result of risk analysis that there is an issue with the test procedure that could lead to a potential laboratory deviation or incorrect test result, a corrective and/or preventive action (CAPA) is required.

Any corrective or preventative action required due to a complaint will be tracked using the CAPA system (SOP-106).
If a CAPA is issued, the CAPA number will be recorded on the Customer Complaint Form.
If risk analysis was conducted, a justification is required on the Customer Complaint Form for any complaint that does not require a corrective and/or preventive action.
The person that makes the decision whether a CAPA is or is not required will sign and date the Complaint Investigation form.

Once the investigation is complete, the Laboratory Director ensures that all the forms are complete and all other relevant information is in the complaint file.

The complaint file is then reviewed by the President (or designee) in preparation for closure.
All complaints should be closed within 90 days from the date that the complaint was received.

Note: Complaints may be kept open longer if additional information is still required, but only with documented approval from the President (or designee).

8. Tracking and Trending Reporting

8.2 A complaint trend analysis shall be performed by the President (or designee) on a periodic basis and reviewed by representatives from the various departments during the Product Quality meetings as necessary.

8.3 Results of complaint trend analysis shall be included in the scheduled Management Review meetings in accordance with the Management Review outlines in SOP-1010.

8.4 Corrective and/or Preventive actions initiated from these meetings shall be handled according the CAPA procedure SOP-1006.

9. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

CDXAnalytics

TM-006: Form Template Rev. A

TITLE:	FORM #:	REV:	EFFECTIVE DATE:
Document Approval Coversheet	FM-001	0	9/5/2017

Document Information			
Document Title:	**SOP-107 Management Responsibility**		
Document #:	**SOP-107**	**Revision:**	**0**
Description of Changes:	**Initial Release**		

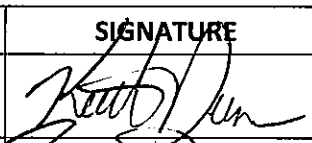
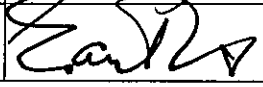
DOCUMENT APPROVAL COVERSHEET

Document Review/Approval			
Name	**Title**	**Signature**	**Approval Date**
Eamon Travers	VP, Business Development/Quality Manager	Eamon Travers	09/05/17
Brianna Cassidy	Chief Science Officer/Technical Manager	Brianna Cassidy	9/5/17
Keith Dunn	Associate Scientist	Keith A Dunn	9/5/17

Quality Processing					
Training required?	☒ Yes	☐ No	**If no, justification:**		
Processed by:	Keith A Dunn			**Date:**	9/5/2017
Effective Date:	9/5/2017				

SOP Number: **Sop-107**

SOP Title: **Management Responsibility**

	NAME	JOB TITLE	SIGNATURE	DATE
Author	**Keith Dunn**	**Document Control Associate**		9/5/17
Authoriser	**Eamon Travers**	**Quality manager**		09/05/17

Effective Date:	**09/05/2017**
Review Date:	**09/04/2018**

TRAINING: READ BY			
NAME	**JOB TITLE**	**SIGNATURE**	**DATE**

1. Purpose

The purpose of this document is to establish the Management Responsibility process and procedure, and to fulfill the requirements of ISO 13485.

2. Scope

This procedure applies to the Management Representative and CEO/President in their commitment to the development, implementation and maintenance of the Quality Management System (QMS).

3. Responsibility

- The Management Representative is responsible for Quality Planning and conducting Management Review meetings. They are also responsible for summarizing Quality System data for the purpose of reviewing trends and relevant action items.
- The CEO/President is responsible for ensuring adequate resources and support for the proper implementation and management of the Quality Management System in compliance with all applicable regulations, including appointing a Management Representative. The CEO/President is also responsible for attending periodic Management Review meetings to assess the status of the Quality Management System and take appropriate action where applicable.

4. References

ISO 17025
QMS-001, Quality Manual
QMS-002, Quality Policy
QMS-003, Organizational Chart
QMS-004, Quality Objectives
SOP-101, Document & Record Control
SOP-160, Rev A Training
SOP-106, Corrective Action Preventive Action

5. Tools/Materials

N/A

6. Definitions

Management Representative – individual most responsible for the planning, management and implementation of the Quality Management System
QMS – Quality Management System

7. Procedure

7.1. Quality Policy

7.1.1. The CEO/President reviews the Quality Policy (QMS-002) during Management Review meetings to assure its continued applicability and accuracy and ensure that it is understood, implemented and maintained at all levels of the organization.

7.1.1. The CEO/President reviews the Quality Policy (QMS-002) during Management Review meetings to assure its continued applicability and accuracy and ensure that it is understood, implemented and maintained at all levels of the organization.

7.1.2. The Quality Policy is included in new employee training and training on the QMS. It is posted in prominent places throughout the facility as a visible reminder to maintain high standards within the organization.

7.2. **Organization**

7.2.1. Responsibility and Authority

7.2.1.1. CDX Analytics (CDX) has established and maintains an organizational structure to ensure that products are designed and produced in a safe and effective manner and in accordance with applicable regulations and standards.

7.2.1.2. Top management organizes the appropriate responsibility, authority and interrelationship of personnel who manage, perform, and assess work that affects quality, and provides the necessary independence, training and authority to perform these tasks. This is documented and maintained in the company's Organizational Chart (QMS-003).

7.2.1.3. Implementation of the Quality System and continuous improvement are the responsibility of all personnel. Improvement activities are established, as an output of Management Review meetings, to identify and implement any changes necessary to ensure and maintain the continued suitability and effectiveness of the Quality System.

7.2.2. Resources

7.2.2.1. The CEO/President provides adequate resources, including assignment of trained personnel and management for the performance of work and assessment activities such as internal quality audits.

7.2.2.2. The CEO/President appropriately staffs, trains, and equips personnel to ensure product is designed, procured, and produced in accordance with Quality System requirements. Refer to SOP-160 for employee training requirements.

7.2.3. Management Representative

7.2.3.1. The CEO/President will appoint a Management Representative for the Quality Management System.

7.2.3.2. The Management Representative is responsible for ensuring that the Quality System is effectively established, implemented, maintained, and meets the intent and requirements of all applicable regulatory requirements and standards.

7.2.3.3. Additionally, the Management Representative is responsible for promoting the awareness of regulatory and customer requirements throughout the organization; and are the primary liaisons for all third party and external inspections and audits.

7.2.3.4. All CDX employees are responsible for reporting on the performance of the Quality System to the Management Representative.

7.2.3.5. The Management Representative reports on the performance of the Quality System to the CEO/President for review.

7.3. Management Review

7.3.1. To ensure that the Quality System operates efficiently and effectively, Management Reviews of the QMS are performed biannually.

7.3.2. The Management Representative is responsible for scheduling and conducting Management Reviews and the CEO/President is required to attend.

7.3.3. Management Reviews are documented and meeting minutes are maintained.

7.3.4. Management Review agendas must include the following topics:

- Follow-up actions from previous meeting
- Quality policy
- Quality Objectives
- Changes that could affect the QMS
- Results of Audits (internal, external, and third parties)
- Product Conformity (Nonconformance Records)
- Process Performance
- Customer Feedback (Complaints/Inquiries)
- Risk Management (Clinical / Product Safety update)
- Corrective and Preventive Actions
- New or revised Regulatory Requirements
  NOTE: Current copies of applicable performance standards (ISO), regulations (US), and guidance documents shall be maintained by CDX.
- Recommendations for Improvement

7.3.5. Management Review Output must include a record of the following:

- Attendee signatures
- Date of review
- Agenda record of discussion items
- List of resulting action items and responsible parties

7.3.6. The results of the Management Review are documented and used to set Quality Objectives (refer to SOP-110, Quality Metrics) or initiate corrective and preventive action (refer to SOP-106, Corrective Action Preventive Action) as required to maintain the effectiveness of the Quality System and applicable products.

7.4. Quality planning

7.4.1. The Management Representative is responsible for establishing and documenting an annual Quality Plan, which includes proposed dates for key QMS processes.

7.4.2. The Quality Plan must include:

- Internal Audits
- Management Review meetings
- Supplier audits, as applicable
- Expected regulatory/third party audits, as applicable
- Expected product registrations, as applicable

7.4.3. The Quality Plan must be approved by the Management Representative and by the highest executive role within top management, as defined by the Organizational Chart (QMS-003).

8. Records

All records of Management Review, Quality planning and organizational documentation are maintained in accordance with SOP-101, Document and Record Control.

9. Attachments

N/A

10. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

CDXAnalytics

TM-006: Form Template Rev. A

TITLE:	FORM #:	REV:	EFFECTIVE DATE:
Document Approval Coversheet	FM-001	0	9/5/2017

Document Information			
Document Title:	**SOP-113 Confidential and Privileged Information**		
Document #:	**SOP-113**	**Revision:**	**0**
Description of Changes:	**Initial Release**		

DOCUMENT APPROVAL COVERSHEET

Document Review/Approval			
Name	**Title**	**Signature**	**Approval Date**
Eamon Travers	VP, Business Development/Quality Manager	Eamon Travers	09/05/17
Brianna Cassidy	Chief Science Officer/Technical Manager	Brianna Cassidy	9/5/17
Keith Dunn	Associate Scientist	Keith Dunn	9/5/17

Quality Processing					
Training required?	☒ **Yes**	□ **No**	**If no, justification:**		
Processed by:	Keith Dunn			**Date:**	9/5/2017
Effective Date:	9/5/2017				

SOP Number: **SOP-113**

SOP Title: **Confidential and Privileged Information**

	NAME	JOB TITLE	SIGNATURE	DATE
Author	**Keith Dunn**	**Associate Scientist**		9/5/17
Authoriser	**Eamon Travers**	**Quality manager**		09/05/17

Effective Date:	**09/05/2017**
Review Date:	**09/04/2018**

TRAINING: READ BY			
NAME	**JOB TITLE**	**SIGNATURE**	**DATE**

1. Purpose

To give instruction for proper management for the protection of CDX Analytics customer's confidential information and proprietary rights. Employees will unavoidably receive and handle personal and private information about clients, partners and our company. We want to make sure that this information is handled correctly.

2. Scope

All individuals, organizations, business entities and CDX Analytics staff with access to confidential and privileged customer information have an obligation to ensure the protection and appropriate business use of the information. Based on this policy and the objectives of CDX Analytics it is imperative that personnel comply to this standard operating procedure ensuring the confidentiality of the customer's information and the protection of electronic storage and transmission of results and the protection of back up records stored electronically.

3. Responsibility

It is the responsibility of all CDX Analytics staff to follow this SOP for the handling of a customer's privileged information and testing results.

4. Reference Documents

QMS

CDX Analytics Code of Conduct and Ethics Agreement Form

5. Reagents/Tools N/A

6. Definitions

Confidential information:

Any information obtained as an employee that relates to the activities of CDX Analytics or its customers. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Patents, formulas or new technologies
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

Privileged Information:

Any activity that CDX Analytics or our customers has specified in writing relating to processes, trade secrets, products or equipment.

Secure Devices: Company owned computers/laptops that have virus protection and a secure firewall installed.

Insecure Devices: Personal computers, Cell phones, or any other data devices that do not have proper virus and firewall protection.

7. Procedure

- Electronic information will be encrypted to safeguard databases.
- Employees will sign non-compete and/or non-disclosure agreements (NDAs).
- Senior management will give authorization to employees to access certain confidential information based on their needs.
- Any proprietary information received from a customer shall be used for that specific customer only, and shall be maintained in the customer's individual file for future reference.
- Confidential information will be locked or secured at all times.
- Shred confidential documents when they are no longer needed as soon as possible.
- Confidential information is only viewed on secure devices.
- Only disclose information to other employees when it's necessary and authorized.
- Keep confidential documents inside our company's premises unless it's absolutely necessary to move them.
- Store and lock paper documents.
- Confidential information will not be used for any personal benefit or profit.
- Confidential information will not be disclosed to anyone outside of our company.
- Confidential documents and files will not be replicated and stored on insecure devices.
- Every staff member must report any attempt by unauthorized third parties to acquire information to their immediate supervisor.
- Confidential information is stored in computers that are password protected to prohibit unauthorized access.
- Reports are stored and transmitted in PDF format to ensure that no changes can be made.
- Anti-virus software is installed to ensure technical security of documents.
- The Customer confidentiality and proprietary information agreements that the employees sign are enforced and a breach may result in termination.

8. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

CDXAnalytics

TM-006: Form Template Rev. A

TITLE:	FORM #:	REV:	EFFECTIVE DATE:
Document Approval Coversheet	FM-001	0	9/5/2017

Document Information			
Document Title:	**SOP-116 Environmental Monitoring**		
Document #:	**SOP-116**	**Revision:**	**0**
Description of Changes:	**Initial Release**		

DOCUMENT APPROVAL COVERSHEET

Document Review/Approval			
Name	**Title**	**Signature**	**Approval Date**
Eamon Travers	VP, Business Development/Quality Manager	Eamon Travers	09/05/17
Brianna Cassidy	Chief Science Officer/Technical Manager	Brianna Cassidy	9/5/17
Keith Dunn	Associate Scientist	Keith Dunn	9/5/17

Quality Processing					
Training required?	☒ Yes	☐ No	**If no, justification:**		
Processed by:	Keith Dunn			**Date:**	9/5/2017
Effective Date:	9/5/2017				

SOP Number: **SOP-116**

SOP Title: **Environmental Monitoring**

	NAME	JOB TITLE	SIGNATURE	DATE
Author	**Keith Dunn**	**Associate Scientist**	Keith Dunn	9/5/17
Authoriser	**Brianna Cassidy**	**Chief Science Officer**	Brianna Cassidy	9/5/17

Effective Date:	**09/05/2017**
Review Date:	**09/04/2018**

TRAINING: READ BY			
NAME	**JOB TITLE**	**SIGNATURE**	**DATE**

1. Purpose

This document establishes the procedure for the environmental monitoring of the CDX analytics Laboratory.

2. Scope

Monitoring the CDX Laboratory for temperature and humidity is critical from a quality perspective to provide a constant, regulated state of control for equipment and samples for proper laboratory operations. The operating temperature range for the CDX Lab is 20 - 25c. The operating humidity range is 40 - 60%.

3. Responsibility

It is the responsibility of the CDX Analytics laboratory staff to follow this procedure to monitor the temperature and humidity in the lab.

4. Reference Documents

Environmental Monitoring Chart folder

5. Reagents/Tools

Fisher Scientific Thermo-Hydro Traceable meter, serial# 160740406

6. Definitions

N/A

7. Procedure

a. During the week the meter is observed at regular intervals (glanced at in passing during regular lab functions at least twice a day) by the CDX lab staff. If a reading outside of the ranges for temperature and humidity are found the Chief Science Officer will be immediately informed and appropriate steps taken.

b. Upon completion of two months of daily records showing no deviations from parameters the frequency of monitoring will reduce to once per week.

8. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

CDXAnalytics

TM-006: Form Template Rev. A

TITLE:	FORM #:	REV:	EFFECTIVE DATE:
Document Approval Coversheet	FM-001	0	9/5/2017

Document Information			
Document Title:	**SOP-129 Laboratory Cleaning and Sanitizing**		
Document #:	**SOP-129**	**Revision:**	**0**
Description of Changes:	**Initial Release**		

DOCUMENT APPROVAL COVERSHEET

Document Review/Approval			
Name	**Title**	**Signature**	**Approval Date**
Eamon Travers	VP, Business Development/Quality Manager		09/05/17
Brianna Cassidy	Chief Science Officer/Technical Manager		9/5/17
Keith Dunn	Associate Scientist		9/5/17

Quality Processing					
Training required?	☒ **Yes**	□ **No**	**If no, justification:**		
Processed by:				**Date:**	9/5/2017
Effective Date:	9/5/2017				

SOP Number: SOP-129

SOP Title: Laboratory Cleaning and Sanitizing Procedure

	NAME	JOB TITLE	SIGNATURE	DATE
Author	Keith Dunn	Associate Scientist	Keith Dunn	9/5/17
Authoriser	Brianna Cassidy	Chief Science Officer	Brianna Cassidy	9/5/17

Effective Date:	09/05/2017
Review Date:	09/04/2018

TRAINING: READ BY			
NAME	JOB TITLE	SIGNATURE	DATE

1. **Purpose:**

To standardize and define the process by which the CDX Analytics lab is cleaned, disinfected, and maintained to insure a suitable environment exists for the aseptic preparation, processing, and analysis of marijuana samples with no cross contamination.

2. **Scope:**

All bench work areas, including laminar air flow hoods, biological safety cabinet, and sink shall be cleaned and disinfected daily, in accordance with the following procedure. Cleaning should occur at the end of the day to allow for drying overnight and preferably not during analytical testing time. Cleaning personnel shall clean only the floors and will not touch laboratory equipment or anything on benches. Cleaning personnel will sweep the floor with a dry mop and then mop with cleaning solution (preparation below).

3. **Responsibility**

It is the responsibility of the Analytical Chemist and Laboratory personnel to perform all cleaning and sanitizing of the CDX Laboratory in accordance with this procedure except for the floor as mentioned above. All laboratory visitors will follow the proper gloving and hand cleaning rules.

4. **Referenced Document:**

- SOP-118 Glassware Cleaning
- SOP-111 CDX Laboratory Cross Contamination Prevention
- SOP-127 Laboratory Visitors

5. **Reagents/Tools:**

a) Plastic bucket
b) Mop
c) Clorox Disinfecting Wipes
d) Clorox Germicidal Bleach
e) Bleach-Rite disinfecting spray (10% Bleach)
f) Dry Mop

6. **Procedure:**

a) Prepare an adequate quantity of cleaning solutions.
b) Carefully mix the cleaning solutions as per the chart below:

Water	**Suitable Detergent**	**Bleach**
1 liter	Clorox Germicidal Bleach	10-20 mL
5 liters		50-100 mL
10 liters		100-200 mL

c) Laboratory floor will be swept with a dry mop and then mopped with the cleaning solution prepared above. Allow the mop to soak in solution, for approximately five minutes prior to the start of floor cleaning.

d) The Analytical Chemist or laboratory personnel will ensure that the benches, sink, hoods, biological safety cabinet, and door handles are cleaned with Clorox Disinfecting Wipes or Bleach-Rite disinfecting spray daily.
   1. All surfaces that can be safely sprayed with the Bleach-Rite disinfecting spray will be spayed and wiped dry with paper towels.
   2. Any other surfaces will be wiped down with Clorox Disinfecting wipes.

e) Empty floor trash bins daily. Laboratory personnel will leave bins outside of door to lab overnight and cleaning technician will replace bag.
f) Laboratory personnel will clean glassware following the Glassware Cleaning Procedure.
g) Nitrile gloves will be worn when working in the laboratory to limit any exposure to the samples or the analyst.
h) Nitrile gloves will be changed between different stations and gloved hands are not to come in contact with door handles.
i) Hands will be washed outside of lab before entering and will also be washed inside the lab before exiting.

7.

Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

CDXAnalytics

TM-006: Form Template Rev. A

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Document Information			
Document Title:	**SOP-160 Rev A Training**		
Document #:	**SOP-160**	**Revision:**	**0**
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DOCUMENT APPROVAL COVERSHEET

Document Review/Approval			
Name	**Title**	**Signature**	**Approval Date**
Eamon Travers	VP, Business Development/Quality Manager	Eamon Travers	09/08/17
Brianna Cassidy	Chief Science Officer/Technical Manager	Brianna Cassidy	9/5/17
Keith Dunn	Associate Scientist	Keith V Dunn	9/5/17

Quality Processing					
Training required?	☒ **Yes**	☐ **No**	**If no, justification:**		
Processed by:	Keith V Dunn			**Date:**	9/5/2017
Effective Date:	9/5/2017				

SOP Number: SOP-160

SOP Title: Training

	NAME	JOB TITLE	SIGNATURE	DATE
Author	Keith Dunn	Associate Scientist		9/5/17
Authoriser	Eamon Travers	Quality manager		09/05/17.

Effective Date:	9/05/2017
Review Date:	9/04/2018

TRAINING: READ BY

NAME	JOB TITLE	SIGNATURE	DATE

1. Purpose

The purpose of this procedure is to establish the CDX Analytics (CDX) Quality Management System (QMS) training process in accordance with the requirements of ISO17025.

2. Scope

This procedure applies to all employees of CDX participating in processes which affect CDX products or which are a component of the QMS.

3. Responsibility

- Department Managers are responsible for ensuring that their employees are adequately trained on applicable processes, prior to performing or creating records within those processes.
- The Quality Manager, or Training Administrator, is responsible for maintenance of training requirements.
- The Document Control Administrator, or Training Administrator, is responsible for maintenance of employee training records.
- Human Resources is responsible for maintaining all employee files inclusive of signed job descriptions and records regarding education, experience and background, as required (i.e. resumes, diplomas, etc.).

4. Reference Documents

ISO 17025 General requirements for the competence of testing and calibration laboratories
SOP-101, Document & Record Control
FM-001, Document Approval Coversheet
FM-004, Training Record Form
RD-003, Training Requirements Matrix

5. Tools and Materials Required

N/A

6. Definitions

Employee Training File – A compilation of all the training records for an employee. This is inclusive of training records for all training types.
Employee Training Record – Evidence of a training activity, inclusive of any type of training (new employee, re-training, external, etc.)
Job Description – A list of the qualifications and responsibilities for a job role. This document is inclusive of the QMS processes for which an employee will either participate in or manage.
Live Training – Training conducted in-person by a Qualified Trainer.
QMS – Quality Management System

Qualified Trainer – Personnel with the necessary skills, training or experience to train others in a given process. A qualified trainer may either be the process owner or they may be designated by management through evidence of their qualifications.
Self-Training – Training conducted by an employee without direct supervision of a manager or qualified trainer. This training is inclusive of document review and acknowledgement of understanding.
Trainee – The individual attending or receiving training.
Training Requirements Matrix – Reference document which defines the required QMS training for each job role; inclusive of procedures and Quality controlled documentation.

7. Procedure

1.1. Employee Selection

1.1.1. All employees are selected for hire based on a combination of the appropriate education, skills, experience and ability to perform job requirements as detailed in the job description.

1.1.2. Upon hire, each employee will acknowledge job responsibilities by signing their associated job description. Signed job descriptions will be maintained by Human Resources.

1.2. Types of Training

1.2.1. New Employee Training

1.2.1.1. New employees must complete required training based on their role as defined on the Training Requirements Matrix (RD-003).

1.2.1.2. New employee training may include a combination of self-training, on-the-job training and live training.

1.2.1.3. Training on an applicable process must be completed prior to an employee's independent participation in that process.

1.2.2. On-the-Job Training

1.2.2.1. Hands on application of a process with supervision from a manager, process owner or qualified trainer may be required. This scenario is considered on-the-job training and a record of it must be completed and filed as evidence.

1.2.3. Re-training

1.2.3.1. Instances of nonconformity, corrective action or ongoing periodic training may be required. These events must be documented with a training record indicating the reason for re-training, as applicable.

1.2.4. Revision Training

1.2.4.1. If a process is revised, and the extent of the revision requires training as indicated on the Document Approval Coversheet (FM-001), all employees who are required to train on the applicable process must train on the revision to that process. The extent of the training must minimally include the process changes.

1.2.5. External Training

1.2.5.1. Employees may receive external training to strengthen their qualifications. This training may take the form of certifications, seminars, courses, workshops,

consultants, etc. Records of the training must be included in the employee's training file as evidence of program completion.

1.3. Training Requirements

1.3.1. Training requirements for each job role are defined in the Training Requirements Matrix (RD-003). This document includes a list of all QMS processes matrixed against the roles required to train on each process.

1.3.2. Quality is responsible for maintenance of the Training Requirements Matrix with input from department managers.

1.4. Training Records

1.4.1. All training events must be documented with a training record. All internal training must be recorded using FM-004, Training Record Form.

1.4.2. Training records must include:

- Name of trainee
- Trainee title
- Date of training
- Signature of trainee
- Training content (i.e. document #, revision, description, etc.)
- Name & Signature of Qualified Trainer, as applicable

1.5. Training Exemption

Based on qualifications from prior training, education and/or experience, employees may be exempt from specific training requirements, whereby the requirements are redundant. In this instance a training exemption record must be completed and signed by the applicable department manager and submitted to the Quality Manager (or Training Administrator) for inclusion in the employee's training file.

1.6. Qualified Trainers

1.6.1. All training events, with the exception of self-training, must be conducted by a Qualified Trainer.

1.6.2. Qualified Trainers may include a department manager or process owner.

1.6.3. Additional Qualified Trainers may be identified for a given process. Documentation to evidence qualification must be completed by the existing process owner or manager and included in the associated employee's training file.

8. Records

8.2 All training records will be maintained in accordance with SOP 101, Document & Record Control.

9. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

SOP Number: **SOP-120**

SOP Title: **Hiring**

	NAME	JOB TITLE	SIGNATURE	DATE
Author	**Keith Dunn**	**Document Control Associate**		
Authoriser	**Eamon Travers**	**Quality manager**		

Effective Date:	**09/05/2017**
Review Date:	**09/04/2018**

TRAINING: READ BY			
NAME	**JOB TITLE**	**SIGNATURE**	**DATE**

1. Purpose

CDX Analytics believes that hiring qualified individuals to fill positions at the company contributes to the overall strategic success of the company. Each employee, while employed, is hired to make significant contributions to the company.

2. Scope

When Hiring the most qualified candidates for positions in CDX the following hiring process will be followed.

3. Responsibility

It is the responsibility of the VP of Business to determine the need of hiring an employee by initiating a Personnel Requisition. The HR department is now responsible going forward with the Requisition.

4. Reference Documents

New Hire Checklist

5. Definitions

N/A

6. Procedure

a) A **Personnel Requisition** is initiated by the VP of Business Development.

b) Personnel requisitions should indicate the following:

1. Position title.
2. Position's hours/shifts
3. Exempt or nonexempt status of the position
4. Reason for the opening
5. Essential job functions and qualifications (or a current job description may be attached).
6. Any special recruitment advertising instructions.

c) **Job postings**

All regular exempt and nonexempt job openings are posted on CDX Analytics website and bulletin boards for existing employees to review. Jobs will remain posted until the position is filled. Job postings are updated every week.

d) **Recruitment advertising**

Positions are advertised externally based on need and budget requirements. The HR department is responsible for placing all recruitment advertising.

e) **Interview Process**

The VP Human Resources and the Hiring Manager or Head of Laboratory will screen applications and resumes prior to scheduling interviews. Initial interviews are generally conducted by the VP Human Resources and in some cases, will be accompanied by the Hiring Manager.

Team interviews may be conducted as needed for some positions. If a team interview is conducted, a structured interview process is recommended. Interview questions will be carried out by the team, comprising an appropriate selection of the following: The President/CEO, the VP Human Resources, the Head of Laboratory and the VP Business Development. After the team completes the interview process, the candidate's attributes are discussed and scored. The P resident/CEO has the final authority to make the hiring decision.

All applications and resumes of applicants not selected must be forwarded to the HR department for retention. The HR department will notify applicants who are not selected for positions.

f) **Reference checks, criminal background checks, and drug and alcohol testing**

After a decision, has been made to hire a candidate, an offer will be made to that individual contingent on satisfactory completion of reference checks, driving record checks and criminal background checks.

Reference Checks

The HR department will check two references for all candidates. A note of each reference check must be entered into the employee's file. If deemed necessary, the candidate may be asked to complete a pre-employment drug and alcohol screen.

Driving Record Check

The driving record check is carried out where the employee will have driving duties for the company or where the employee is specifically hired as a driver for the company.

Criminal Background Check

Criminal background checks are required for employees who will be registered with the Department of Public Health. Note: All drivers must also undergo a criminal background check.

g) **Job Offers**

If the HR department receives satisfactory results from the reference checks, criminal background check, and the drug and alcohol screen (where completed), it will notify the candidate to confirm the job offer.

h) **Initial start date and orientation**

On an employee's start date, the employee will complete required paperwork including the Employee Handbook receipt page and an orientation with the HR department. The new employee's manager is responsible for providing orientation for the new employee although this can be carried out by the HR Manager also.

The employee's manager will complete the New-Hire Checklist with new employees and review department policies and procedures.

7. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

SOP Number: **SOP-146**

SOP Title: **Dismissal of Laboratory Agents Policy**

	NAME	JOB TITLE	SIGNATURE	DATE
Author	**Keith Dunn**	**Associate Scientist**		
Authoriser	**Eamon Travers**	**Quality Manager**		

Effective Date:	**09/05/2017**
Review Date:	**09/04/2018**

TRAINING: READ BY			
NAME	**JOB TITLE**	**SIGNATURE**	**DATE**

1. Purpose

This document establishes the policy for the dismissal of a laboratory agent who has diverted marijuana or marijuana infused products, or who knowingly engages in unsafe practices in the operation of the laboratory.

2. Scope

This policy applies to all full-time and part-time laboratory agents of CDX Analytics. A laboratory agent who is found to have diverted, stolen, or ingested marijuana or marijuana infused products will have their employment immediately terminated and will be dismissed and shall be reported to law enforcement officials. A laboratory agent who knowingly engages in unsafe conduct in the laboratory also will have their employment terminated and will be dismissed. The MDPH will also be contacted and said laboratory agent will be reported.

3. Responsibility

It is the responsibility of the CDX Analytics staff to report to the VP of Business Development any observations of a suspicious action or conduct within the laboratory. It is the responsibility of the CDX Analytics VP of Business Development to follow this SOP for the handling of an employee's termination due to unsafe laboratory practice or the diverting of marijuana or marijuana infused products.

4. Reference Documents N/A

5. Reagents/Tools N/A

6. Definitions N/A

7. Procedure

a. All marijuana and marijuana infused products received in the CDX Laboratory are logged in and are inventoried. There is only a small amount of an individual marijuana sample not used in the analysis and this is destroyed in an MDPH acceptable manor. A CDX Analytics employee who is found to have diverted marijuana or marijuana infused product will be reported to the VP of Business Development by the person observing said suspicious action.

b. The VP of Business Development will determine if an incident of diversion has occurred by investigating the issue.

c. If the VP of Business Development finds that an occurrence of theft or diversion of marijuana or marijuana infused product has been committed he/she will call the Salem Police, report the said employee's actions and will terminate him/her immediately.

d. If an employee of CDX Analytics is observed to be knowingly performing an unsafe laboratory practice the observer will report it to the VP of Business Development.

e. The VP of Business Development will determine if said employee "knowingly" performed the unsafe practice. If it is found that the accused employee did know the practice was unsafe and committed it anyway his/her employment will be terminated.

8. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason
07/13/2018	Eamon Travers	VP of Business Development / Quality Manager	1	3	To re-name "Dispensary Agents" to "Laboratory Agents" as per revision to CMR 725.000 and publication of CMR500.000

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

SOP Number: **SOP-101**

SOP Title: **Document and Record Control**

	NAME	JOB TITLE	SIGNATURE	DATE
Author	**Keith Dunn**	**Associate Scientist**		
Authoriser	**Eamon Travers**	**Quality manager**		

Effective Date:	**9/3/2017**
Review Date:	**9/3/2018**

TRAINING: READ BY			
NAME	**JOB TITLE**	**SIGNATURE**	**DATE**

1. Purpose

The purpose of this document is to define the control of CDX Analytics (CDX) QMS controlled documents and records, including good documentation practices (GDP).

2. Scope

This procedure applies to hard copy and electronic copy controlled QMS documents which define CDX's Quality System processes and all records which result from these processes. It also applies to the personnel responsible for creation, review, approval and processing of Quality controlled documentation and records.

3. Responsibility

- Document Control Administrator (or Quality designee)- Responsible for fulfilling all document number requests, reviewing all approved documentation for formatting/completeness and processing all controlled documentation for release. The Document Control Administrator is also responsible for managing all records of document control activities and for reviewing all QMS records for adherence to the requirements of this procedure.
- Process Owner – The Process Owner (or Document Author) is responsible for review and approval of all documentation which defines their process. Process Owners are also responsible for review of records generated by their process for completeness and adherence to procedure. Generally, a process owner is a department manager (or their designee) and is the author of that department's associated process documentation.
- Quality Manager – The Quality Manager is responsible for management of the document and record control process and all personnel participating in document and record control activities.

4. References

ISO 17025 General requirements for the competence of testing and calibration laboratories
TM-001 Master Document List
SOP-115 Document Change Control
FM-001: Document Approval Coversheet
RD-002: Document Approval Matrix
TM-003: Procedural Template
TM-006: Form Template

5. Tools/Materials

N/A

6. Definitions

Controlled Document – Any QMS document which defines a process, record criteria or product specifications which is reviewed, approved and controlled for the purpose of producing repeatable and consistent results/records. These documents are revision controlled.

Controlled Master Record – The original document record which includes its hard copy signature approvals and is denoted by a red "Controlled Document" stamp. Controlled master documents are stored and maintained by Quality.
Data: Any output of a process reported via a QMS record. Data may be trended to determine the process performance.
Document: Any written, printed, or electronic record. Documents include, but are not limited to the following examples: forms, templates, specifications, procedures, and work instructions.
Document Review: A step where all document (quality record) entries are checked for completeness and accuracy, after the work has been performed, by someone other than the person that completed the work and/or record.
Documentation System: A methodical process through which documents are created, approved, revised, released, and controlled. It is used to ensure control, uniformity, and quality of day to day operations by maintaining a traceable record of document creation and revision.
Obsolete Document – Any controlled document which is no longer in use; inclusive of previous document revisions and document numbers which have been obsoleted from the QMS entirely.
Original Documentation: Any document or record which contains live approval signatures or a red "Controlled Document" stamp.
QMS: Quality Management System
Quality Record: The documented proof of adherence to a QMS process; including product manufacturing processes. Examples include, but are not limited to: logs, completed forms, audit records, etc. *NOTE: All Quality Records are legal documents and must be treated as such.*
Significant Figures: (significant digits) The digit(s) of a number that carry meaning contributing to its precision. This includes all digits except leading and trailing zeros where they serve merely as placeholders to indicate the scale of the number; and bogus digits introduced, for example, by calculations carried out to greater accuracy than that of the original data, or measurements reported to a greater precision than the equipment supports.

7. Procedure

7.1 Document Control

7.1.1 GENERAL

7.1.1.1 CDX utilizes 4 levels of documentation as identified in Figure 1 of section 9 "Attachments."

7.1.1.2 The types of documents controlled are identified in Table 1 of section 9 "Attachments."

7.1.1.3 All documents released into the CDX documentation system must meet the standards for release, including numbering, titles, filename conventions, and format as defined below.

- Numbering: A method of assigning numeric designations based upon family group prefix (identified in Table 1 of section 9 "Attachments") and a consecutive number. Document numbers are assigned as the next consecutive number in the associated document type as listed on the Master Document List.
- Titles: Document titles are to be concise descriptions of the document contents.

- Filename: All documents submitted for release are to have unique filenames.
- Format: Where applicable, documents must be drafted on associated controlled templates.

Examples of Document numbering, titles, and filenames.

Document Number: *SOP-101*

- SOP is the abbreviation for Standard Operating Procedure which is the document type and the 101 indicates the document number assigned to this file.

Document Filename: *Product Identification and Traceability*

- Product Identification and Traceability is the filename of the electronic document which clearly explains the purpose and content of the document.

7.1.2 DOCUMENT CHANGES

7.1.2.1 Document changes are revision controlled using a sequential numericalcharacter to designate each revision.
Note: Exceptions to this requirement include dynamic records, such as logs, which are maintained on controlled templates and controlled by Quality using date of last update.

7.1.2.2 Changes to controlled documents are reviewed and approved in accordance with the requirements of RD-002: Document Approval Matrix. Note: If the document author and required reviewer are the same, one additional appropriate, unbiased reviewer must approve the document.

7.1.2.3 Unless designated otherwise, document changes are reviewed/approved by the same personnel or function as in the original review or approval.

7.1.2.4 All controlled document creation and changes must be accompanied by FM-001: Document Approval Coversheet. Document approval is defined by a hardcopy signature on the Document Approval Coversheet.

7.1.2.5 All new documents and changes to existing documents are processed in accordance with SOP-115 Document Change Control

7.1.2.6 A document becomes effective on the date of release by the Document Control Administrator.

7.1.3 DOCUMENT TYPES

7.1.3.1 Controlled documents are classified and numbered according to document type, corresponding with their general function and scope within the QMS.

7.1.3.2 The controlled document types, as listed in Table 1, are defined as follows:

- **Form:** A document with defined fields which becomes a record once complete.
- **Label:** A document which identifies a product or its intended use. These are inclusive of printed packaging materials, instructions for use and identifiers used for product traceability purposes.

- **Marketing Material:** Any materials used to promote the sale or distribution of a marketed product. These materials can be in print, electronic or video graphic format.
- **Quality Manual:** The document which provides an overview of the Quality Management System and how it operates.
- **Reference Document:** A document which controls specifications or data to supplement a process.
- **Standard Operating Procedure:** A document which defines the requirements of a process and step-by-step instructions for conducting the process for the purpose of achieving standardized, consistent results.
- **Template:** A document which defines the format for creation of a new controlled document or record.
- **Work Instruction:** A document which defines a detailed sequence of steps for the purpose of executing a task or activity. This document is more detailed than a standard operating procedure.

7.1.4 Documentation Storage and Retention:

7.1.4.1 All controlled master records are stored by Quality in hardcopy and controlled electronic versions are maintained at point of use.

7.2 Record Control

7.2.1 CONTROL OF QUALITY RECORDS

7.2.1.1 All Quality Records must be stored in a manner to minimize deterioration and to prevent loss.

7.2.1.2 All Quality Records must be stored in a manner to allow for timely review and/or retrieval (if needed).

7.2.1.3 The Document Control Administrator (or Quality assigned designee) is responsible for the control and storage of records.

7.2.1.4 The minimum retention period for a Quality Record is defined in Table 2 in Section 9 “Attachments.”

7.2.2 DESTROYING RECORDS

7.2.2.1 Once a record has exceeded the required retention time listed in Table 2, the record may be destroyed (shredded).

7.2.2.2 Documents dispositioned as “Confidential” must be shredded before they are discarded or recycled.

7.2.3 REVIEWING DOCUMENTS

7.2.3.1 Individuals may not review their own work. Any review steps must be performed by an unbiased second person who has been trained on the process and/or procedures.

7.2.3.2 Documentation reviewers are responsible for checking all information written on the data-forms for completeness and accuracy in accordance with the associated procedure.

7.2.4 GOOD DOCUMENTATION PRACTICES (GDP)

7.2.4.1 Use of Controlled Data Forms

All Quality Records must be created using the controlled procedure and document revision (Form, Template, etc.) current on the day of use.

7.2.5 Ink – acceptable types and colors:

- Indelible black or blue ink only (roller ball pen)
- No felt tipped pens, gel pens, pencil, or markers are allowed on quality records or controlled documentation.
- Indelible red ink may only be used by Manufacturing and Document Control on controlled documents for the purpose of redlining document changes.
  - All redlined documents must be initialed and dated by the person authorizing the change to the document.
- The use of highlighters on original documentation is prohibited.
  - Photocopies may be highlighted as desired.

7.2.6 DOCUMENT ENTRIES

- All record entries must be concurrent with the work being performed.
- All entries must be clear and legible.
- No write-overs (correcting an error by writing over the original incorrect information) are allowed.
- If one employee begins an operation and another employee completes that operation, both employees must be identified in the appropriate place of the batch record paperwork by initial or signature and date.

Repeated entries:

- Use of “ditto” marks vertical lines and arrows for the purpose of completing fields is not permitted on quality records or controlled documentation. All fields must be complete. If a field does not apply, it must be completed with “N/A.”

7.2.7 NUMBER SEQUENCES

- When entering a group of consecutive numbers or items on a data form (1, 2, 3, 4, 5), the items may be listed in series (1-5) if space does not permit a record of each individual item.

  Note: This does not apply to log records where itemized data points are required for each product serial number. Examples include but are not limited to: inspection records, shipping records and nonconformance records, where applicable.

7.2.8 DATA ENTRIES

- Significant Figures:
  - When recording numerical data and there is a specification listed, the number of significant figures recorded (degree of accuracy) must match the degree of accuracy of the specification.

- When recording data from an instrument with an analog readout, record one additional digit (degree of accuracy) than the smallest unit on the instrument.
- When recording data from an instrument with a digital readout, record all the digits displayed. The instrument is designed to report only significant figures.
  NOTE: If the degree of accuracy of the data from an instrument (analog or digital) does not match the degree of accuracy of a specification, ensure that the correct instrument is being used and/or that the sensitivity of the instrument is set to the appropriate range (if applicable).

- Units of Measure:
  - When recording data, the unit of measure (ea, W, V, mL, g, Hz, etc.) must be also recorded if it is not hard-coded on the data form (if applicable).

7.2.9 DATE AND TIME ENTRIES

The acceptable date format, except where indicated by procedure, is ***month/day/year***.

Example: March 06, 2010 may be represented as any of the following:

- March 06, 2010
- March 6, 2010
- 3/6/10
- 03/06/10
- 03/06/2010
- 06Mar10

- Acceptable time formats (12 hour clock). For example, 12:00 noon must be written as 12:00 p.m.

7.2.10 BLANK FIELDS

- Blank lines and spaces in documents must be marked “N/A” and initialed/dated.
- Unused checkboxes for questions, steps, or sections that have multiple choices do not need to be marked with an N/A as long as a minimum of one choice is selected.
- If an entire question, step, or section is unused it must be marked with an N/A and initialed and dated.
- If a blank space is marked “N/A”, a comment is not necessary when the procedure specifies it is not applicable. (For example, when using a multi-product form).

7.2.11 CORRECTIONS TO ENTRY ERRORS

- Draw a single line through the error, initial the correction, and enter the date the entry was corrected. For large scale corrections (i.e. entire document sections) a justification must be provided with the initials and date.
  NOTE: The original entry must be clearly visible through the single cross-out line.
- Individuals must make corrections to their own original entries whenever possible. They then must route the document to the original reviewers, or designee(s), to initial and date next to the original signature(s). A supervisor or manager may make corrections to a record if the original individual is not available.
- Missing information – When a step is missed, add in the correct/missing information along with a comment stating that the info/step was missed and then initial and date.
- A comment is required with a correction when the reason for an entry error correction cannot be easily verified.
- Correction fluid ("white-out") may not be used on any controlled records or documentation.

7.2.12 TRANSCRIPTION

- If a record is illegible, the information may be transcribed to a clean document if the original is attached. A documented explanation must accompany the new document to indicate the reason for the transcription.

7.2.13 ADDITIONAL ENTRIES TO EXISTING RECORDS

- Any new entry to an existing record/document must be initialed and dated by the person making the new entry along with a documented justification for the entry.
- If the entry occurs after the record/document has been reviewed, the record/document must be routed to the original reviewer(s), or designee(s), to be initialed and dated next to the review signature.

8. Records

All quality records are maintained in accordance with section 7.2 of this procedure. Records of document control activities are processed and maintained in accordance with SOP-115: Document Change Control.

9. Attachments

FIGURE 1:

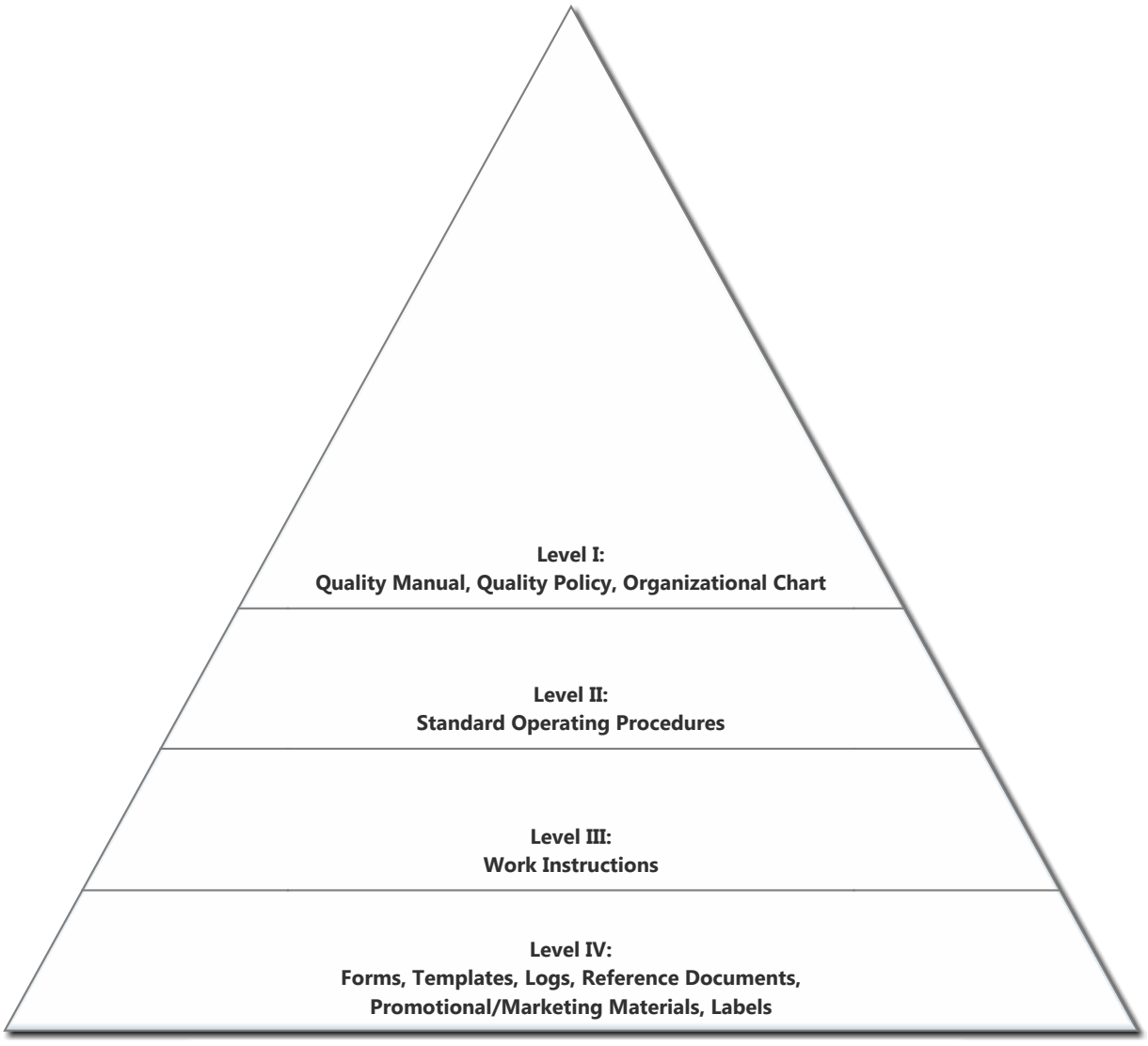

TABLE 1:

Document Prefix	**Document Type**
FM	Form
LA	Label
MM	Marketing Material
QMS	Level I Quality Management Documents
RD	Reference Document
SOP	Standard Operating Procedure
TM	Template
WI	Work Instruction

TABLE 2:

RECORD TYPE	MINIMUM RETENTION REQUIREMENT
QMS Process Document (Quality Manual, SOP, WI, Form, etc.)	Indefinite
Employee Training Records	Indefinite
Post Market Records (CAPA, Complaint)	Indefinite
Audit Records	Indefinite
Supplier Management Records	Indefinite (for current suppliers)
Analysis Records (Requisition forms, Data results, etc.)	7 years from the date of analysis
General Laboratory Records (Instrumentation, Production records for analysis materials, etc.)	7 years from the last date of use

10. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

SOP Number: **SOP-160**

SOP Title: **Training**

	NAME	JOB TITLE	SIGNATURE	DATE
Author	**Keith Dunn**	**Associate Scientist**		
Authoriser	**Eamon Travers**	**Quality manager**		

Effective Date:	**9/05/2017**
Review Date:	**9/04/2018**

TRAINING: READ BY			
NAME	**JOB TITLE**	**SIGNATURE**	**DATE**

1. Purpose

The purpose of this procedure is to establish the CDX Analytics (CDX) Quality Management System (QMS) training process in accordance with the requirements of ISO17025.

2. Scope

This procedure applies to all employees of CDX participating in processes which affect CDX products or which are a component of the QMS.

3. Responsibility

- Department Managers are responsible for ensuring that their employees are adequately trained on applicable processes, prior to performing or creating records within those processes.
- The Quality Manager, or Training Administrator, is responsible for maintenance of training requirements.
- The Document Control Administrator, or Training Administrator, is responsible for maintenance of employee training records.
- Human Resources is responsible for maintaining all employee files inclusive of signed job descriptions and records regarding education, experience and background, as required (i.e. resumes, diplomas, etc.).

4. Reference Documents

ISO 17025 General requirements for the competence of testing and calibration laboratories
SOP-101, Document & Record Control
FM-001, Document Approval Coversheet
FM-004, Training Record Form
RD-003, Training Requirements Matrix

5. Tools and Materials Required

N/A

6. Definitions

Employee Training File – A compilation of all the training records for an employee. This is inclusive of training records for all training types.
Employee Training Record – Evidence of a training activity, inclusive of any type of training (new employee, re-training, external, etc.)
Job Description – A list of the qualifications and responsibilities for a job role. This document is inclusive of the QMS processes for which an employee will either participate in or manage.
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Self-Training – Training conducted by an employee without direct supervision of a manager or qualified trainer. This training is inclusive of document review and acknowledgement of understanding.
Trainee – The individual attending or receiving training.
Training Requirements Matrix – Reference document which defines the required QMS training for each job role; inclusive of procedures and Quality controlled documentation.

7. Procedure

1.1. Employee Selection

1.1.1. All employees are selected for hire based on a combination of the appropriate education, skills, experience and ability to perform job requirements as detailed in the job description.

1.1.2. Upon hire, each employee will acknowledge job responsibilities by signing their associated job description. Signed job descriptions will be maintained by Human Resources.

1.2. Types of Training

1.2.1. New Employee Training

1.2.1.1. New employees must complete required training based on their role as defined on the Training Requirements Matrix (RD-003).

1.2.1.2. New employee training may include a combination of self-training, on-the-job training and live training.

1.2.1.3. Training on an applicable process must be completed prior to an employee's independent participation in that process.

1.2.2. On-the-Job Training

1.2.2.1. Hands on application of a process with supervision from a manager, process owner or qualified trainer may be required. This scenario is considered on-the-job training and a record of it must be completed and filed as evidence.

1.2.3. Re-training

1.2.3.1. Instances of nonconformity, corrective action or ongoing periodic training may be required. These events must be documented with a training record indicating the reason for re-training, as applicable.

1.2.4. Revision Training

1.2.4.1. If a process is revised, and the extent of the revision requires training as indicated on the Document Approval Coversheet (FM-001), all employees who are required to train on the applicable process must train on the revision to that process. The extent of the training must minimally include the process changes.

1.2.5. External Training

1.2.5.1. Employees may receive external training to strengthen their qualifications. This training may take the form of certifications, seminars, courses, workshops,

consultants, etc. Records of the training must be included in the employee's training file as evidence of program completion.

1.3. Training Requirements

1.3.1. Training requirements for each job role are defined in the Training Requirements Matrix (RD-003). This document includes a list of all QMS processes matrixed against the roles required to train on each process.

1.3.2. Quality is responsible for maintenance of the Training Requirements Matrix with input from department managers.

1.4. Training Records

1.4.1. All training events must be documented with a training record. All internal training must be recorded using FM-004, Training Record Form.

1.4.2. Training records must include:

- Name of trainee
- Trainee title
- Date of training
- Signature of trainee
- Training content (i.e. document #, revision, description, etc.)
- Name & Signature of Qualified Trainer, as applicable

1.5. Training Exemption

Based on qualifications from prior training, education and/or experience, employees may be exempt from specific training requirements, whereby the requirements are redundant. In this instance a training exemption record must be completed and signed by the applicable department manager and submitted to the Quality Manager (or Training Administrator) for inclusion in the employee's training file.

1.6. Qualified Trainers

1.6.1. All training events, with the exception of self-training, must be conducted by a Qualified Trainer.

1.6.2. Qualified Trainers may include a department manager or process owner.

1.6.3. Additional Qualified Trainers may be identified for a given process. Documentation to evidence qualification must be completed by the existing process owner or manager and included in the associated employee's training file.

8. Records

8.2 All training records will be maintained in accordance with SOP 101, Document & Record Control.

9. Change History

Date	By	Job Title	Rev. No.	Change Control Form No.	Reason

ALL OBSOLETE REVISIONS MUST BE REMOVED FROM FOLDER "QUALITY REFERENCE' AND PLACED INTO "OBSOLETE FOLDER". FILE NAME TO BE AMENDED TO INCLUDE DATE OF CHANGE

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Qualifications and Training

Pursuant to 935 CMR 500.105(2)(a), CDX Analytics, LLC ("CDX") ensures all agents complete training prior to preforming job functions. Training is tailored to the role and responsibilities of the job function. Agents are trained for one week prior to assuming responsibilities as an agent. At a minimum, staff shall receive eight hours of on-going training annually in accordance with 935 CMR 500.105(2). New agents will receive employee orientation prior to beginning work with CDX. Each department managed will provide orientation for agents assigned to their department. Orientation will include a summary overview of all the training modules.

In accordance with 935 CMR 500.105(2), all current owners, managers, and employees of CDX that are involved in the handling of marijuana will successfully complete the Responsible Vendor Training Program, and once CDX is designated as a responsible vendor, CDX will require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. CDX will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID and key state and local laws.

Training records will be retained by CDX for at least one year after agents' termination. Agents will have continuous quality training and a minimum of 8 hours annual on-going training.

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DIVERSITY PLAN

CDX Analytics, LLC ("CDX") will continue to ensure equal opportunity for all employees. CDX knows that a diverse workforce enhances our company's work environment and overall final product. In accordance with 935 CMR 500.101(2) (e) (8), CDX is committed to promoting racial and gender equity, including veterans, LGBTQ, persons with disabilities, and other communities in the makeup of its workforce.

CDX's diversity plan is to ensure that we are inclusive and continuously fostering a discrimination-free work environment in order to deliver opportunities for all employees to use their individual background and talents to support the goals of CDX. CDX is committed to achieving this goal through their Human Resources Department and the ongoing development of policies to ensure that we are a diverse and inclusive company.

CDX is committed to recruiting and hiring a diverse group of employees while promoting equity among all individuals. To achieve this, CDX will participate in job fairs, engage with community groups for recruitment, as well as encourage the diverse networks our staff already possesses. CDX plans to participate in Salem State University's outreach program in order to find and retain qualified candidates for employment at CDX. CDX plans to participate within events such as the Massachusetts Cannabis Business Association's ("MassCBA") Equity and Opportunity: A Job Fair & CORI Sealing Clinic for a New Economy on Wednesday, July 25th, 2018 from 5:00 pm - 8:00 pm at The Reggie Lewis Track and Athletic Center. This event is intended to help facilitate recruiting by over 14 of Massachusetts's leading cannabis companies, representing over 200 jobs.

In order for CDX to operate as a world-class Independent Testing Laboratory, the team of scientist must be highly trained and qualified for their positions. The advanced degrees required for employment as a part of the CDX laboratory staff creates a narrowed pool of candidates to choose from. CDX's plan to find qualified candidates include actively participating in college and university outreach programs in order to facilitate a pipeline of diverse and talented applicants for future employment.

Pursuant to and consistent with its signed Host Community Agreement, CDX will also implement a plan that will make jobs available to local, qualified residents of the City of Salem and its surrounding communities; such residency will be a positive factor in hiring decisions in CDX's pursuit of hiring the most qualified candidates and complying with all employment laws and other legal requirements.

CDX will conduct continuous and regular evaluations of the implementations of our goals to ensure recruitment policies are reflective in our applicant pool in order to ensure our work place environment is reflective of our goals. CDX will draw feedback from employees and is willing to modify policies plan in order to further accomplish our goals.

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Record Keeping Procedures

CDX Analytics, LLC (CDX) records will be available to the Cannabis Control Commission ("CCC') upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection, in addition to written operating procedures as required by 935 CMR 500.105(1), inventory records as required by 935 CMR 500.105(7) and seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(7)(e).

Personnel records will also be maintained, in accordance with 935 CMR 500.105(9)(d), including but not limited to, job descriptions for each employee, organizational charts, staffing plans, personnel policies and procedures, and background checks obtained in accordance with 935 CMR 500.030. Personnel records will be maintained for at least 12 months after termination of the individual's affiliation with CDX, in accordance with 935 CMR 500.105(9)(d)(2). Additionally, business will be maintained in accordance with 935 CMR 500.104(9)(e) as well as waste disposal records pursuant to 935 CMR 500.104(9)(f), as required under 935 CMR 500.105(12).

Following the closure of the CDX, all records will be kept for at least two years at the expense of CDX and in a form and location acceptable to the Commission, pursuant to 935 CMR 500.105(9)(g).

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Personnel Policies

It is CDX Analytics, LLC ("CDX") policy to provide equal opportunity in all areas of employment, including recruitment, hiring, training and development, promotions, transfers, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment, in accordance with applicable federal, state, and local laws. CDX has made reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable law.

Management is primarily responsible for seeing that equal employment opportunity policies are implemented, but all members of the staff share the responsibility for ensuring that, by their personal actions, the policies are effective and applied uniformly to everyone. Any employee, including managers, determined by CDX to be involved in discriminatory practices are subject to immediate disciplinary action and may be terminated. CDX strives to maintain a work environment that is free from discrimination, intimidation, hostility, or other offenses that might interfere with work performance. In keeping with this desire, we will not tolerate any unlawful harassment of employees by anyone, including any manager, co-worker, vendor or clients.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of CDX that are involved in the handling of marijuana will successfully complete Responsible Vendor Training Program, and once CDX is designated a responsible vendor CDX will require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually. Those not handling marijuana may participate voluntarily. CDX will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID and key state and local laws.

All CDX employees will be duly registered as marijuana establishment agents and shall complete a background check in accordance with 935 CMR 500.030(1). All marijuana establishment agents will complete a training course administered by CDX and complete a Responsible Vendor Program in compliance with 935 CMR 500.105(2)(b). Employees will be required to receive a minimum of eight hours of on-going training annually pursuant to 935 CMR 500.105(2)(a).

Maintaining of Financial Records

CDX Analytics, LLC's ("CDX") policy is to maintain financial records in accordance with 935 CMR 500.105(9)(e). The records will include manual or computerized records of assets and liabilities, monetary transactions; books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices and vouchers; and salary and wages paid to each employee, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with the Independent Testing Laboratory.

Following any closure of CDX, all records will be kept for at least two years at the expense of CDX and in a form and location acceptable to the Commission, in accordance with 935 CMR 500.105(9)(g). Financial records shall be kept for a minimum of three years from the date of the filed tax return, in accordance with 830 CMR 62C.25.1(7) and 935 CMR 500.140(6)(e).