



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR282961
Original Issued Date: 11/20/2020
Issued Date: 11/20/2020
Expiration Date: 11/20/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Cosmopolitan Dispensary, Inc.

Phone Number: 508-789-7421 Email Address: willflanagan@juno.com

Business Address 1: 82 Hartwell Street

Business Address 2:

Business City: Fall River

Business State: MA

Business Zip Code: 02720

Mailing Address 1: 60 Rock Street

Mailing Address 2:

Mailing City: Fall River

Mailing State: MA

Mailing Zip Code: 02720

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:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 47.5

Percentage Of Control: 47.5

Role: Owner / Partner

Other Role:

First Name: Sunny

Last Name: Aroustamian

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: Armenian

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 47.5 Percentage Of Control: 47.5

Role: Owner / Partner Other Role:

First Name: Gevorg Last Name: Saribekyan 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: Armenian

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 5 Percentage Of Control: 5

Role: Owner / Partner Other Role:

First Name: William Last Name: Flanagan 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: irish

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: Sunny Last Name: Aroustamian Suffix:

Types of Capital: Monetary/ Equity Other Type of Capital: Total Value of the Capital Provided: \$125000 Percentage of Initial Capital: 50

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Gevorg Last Name: Saribekyan Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$125000 Percentage of Initial Capital: 50

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: Gevorg Owner Last Name: Saribekyan Owner Suffix:

Entity Legal Name: Green Heart Ltd. Entity DBA:

Entity Description: retail store

Entity Phone: Entity Email: Entity Website: www.greenheartdispensary.com

720-999-8919 greenheartltd@gmail.com

Entity Address 1: 19005 E. Quincy Avenue

Entity Address 2:

Entity City: Aurora

Entity State: CO

Entity Zip Code: 80015

Entity Country: United States

Entity Mailing Address 1: 19005 E. Quincy Avenue

Entity Mailing Address 2:

Entity Mailing City: Aurora

Entity Mailing State: CO

Entity Mailing Zip Code:
80015

Entity Mailing Country: United
States

Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name:

Owner Last Name: Saribekyan

Owner Suffix:

Gevorg

Entity Legal Name: Trust Group LLC

Entity DBA: Trust Group

Entity Description: marijuana retail and cultivation center

Entity Phone:

Entity Email:

Entity Website: None

720-224-2224

trustenterprisellc@gmail.com

Entity Address 1: 6754 Highway 17

Entity Address 2:

Entity City: Moffat

Entity State: CO

Entity Zip Code: 81143

Entity Country: United States

Entity Mailing Address 1: 6754 Highway 17

Entity Mailing Address 2:

Entity Mailing City:

Entity Mailing State: CO

Entity Mailing Zip Code:
81143

Entity Mailing Country: United
States

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Sunny

Last Name: Aroustamian

Suffix:

Marijuana Establishment Name: Green World, LLC

Business Type: Marijuana Retailer

Marijuana Establishment City: Brockton

Marijuana Establishment State: MA

Individual 2

First Name: Gevorg

Last Name: Saribekyan

Suffix:

Marijuana Establishment Name: Green World, LLC

Business Type: Marijuana Retailer

Marijuana Establishment City: Brockton

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 82 Hartwell Street

Establishment Address 2:

Establishment City: Fall River

Establishment Zip Code: 02720

Approximate square footage of the establishment: 4200

How many abutters does this property have?: 9

Have all property abutters 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	CD - Zoning Compliance - 8.2020.pdf	pdf	5f399015cc687b07b2611971	08/16/2020
Certification of Host Community	Host Community Agreement - fully	pdf	5f516a8c91bd17247e2051b2	09/03/2020

Agreement	executed.pdf			
Community Outreach Meeting Documentation	comm att form - completed -9.11.2020 Supp.pdf	pdf	5f5ba6c0853a241c0ed8e0d1	09/11/2020

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.: \$

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	CD - Positive Impact Plan w Exhibits - 8.28.2020.pdf	pdf	5f51788e716d401bf8d4c320	09/03/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role:
 First Name: Sunny Last Name: Aroustamian Suffix:
 RMD Association: Not associated with an RMD
 Background Question: no

Individual Background Information 2

Role: Owner / Partner Other Role:
 First Name: Gevorg Last Name: Saribekyan Suffix:
 RMD Association: Not associated with an RMD
 Background Question: no

Individual Background Information 3

Role: Owner / Partner Other Role:
 First Name: William Last Name: Flanagan 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
Articles of Organization	Articles of Org - CDI.pdf	pdf	5f3ae9773595ff084fed40a0	08/17/2020
Bylaws	bylaws-CDI.pdf	pdf	5f3ae9ec5fa28707f458074e	08/17/2020
Secretary of Commonwealth - Certificate of Good Standing	CGS - CDI.pdf	pdf	5f517c195837b61c2f64739c	09/03/2020
Department of Revenue - Certificate of	8.25.20 Certificate of Good	pdf	5f517c2e0f99bf248957860a	09/03/2020

Good standing	Standing CD-DOR.pdf			
Department of Revenue - Certificate of Good standing	Affidavit for Cert of Good Standing - DUA.pdf	pdf	5f5ba6f1853a241c0ed8e0d5	09/11/2020

No documents uploaded

Massachusetts Business Identification Number: 001392318

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Cannabis Final - Business Plan.pdf	pdf	5f3aea5c87ec2b07e9c50602	08/17/2020
Plan for Liability Insurance	FINAL Liability Insurance Plan for CD - MA (9-11-20).pdf	pdf	5f5ba71abead71246fcd2521	09/11/2020
Proposed Timeline	CD - Proposed Timeline - 9.11.2020.pdf	pdf	5f5ba72291bd17247e20676e	09/11/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	CD Plan for Obtaining Marijuana 8.2020.pdf	pdf	5f3aeabf5330a107b966bce1	08/17/2020
Restricting Access to age 21 and older	CD POLICY Restricting Access To 21 And Older 8.2020.pdf	pdf	5f517cb37b6e50246854f969	09/03/2020
Prevention of diversion	CD POLICY To Prevent Diversion 8.2020.pdf	pdf	5f517cd85837b61c2f6473a0	09/03/2020
Storage of marijuana	CD POLICY Regarding Storage of Marijuana and Marijuana Product 8.2020.pdf	pdf	5f517cedbc3a3b1be23dc736	09/03/2020
Transportation of marijuana	CD POLICY Transportation 8.2020.pdf	pdf	5f517cfb716d401bf8d4c326	09/03/2020
Inventory procedures	CD POLICY Inventory Procedures 8.2020.pdf	pdf	5f517d094db2031be97096a7	09/03/2020
Quality control and testing	CD POLICY Quality Control and Testing 8.2020.pdf	pdf	5f517d30054242245dc8709b	09/03/2020
Dispensing procedures	CD POLICY Dispensing 8.2020.pdf	pdf	5f517d48bead71246fcd0f71	09/03/2020
Personnel policies including background checks	CD POLICY Personnel 8.2020.pdf	pdf	5f517d60bc3a3b1be23dc73a	09/03/2020
Record Keeping procedures	CD POLICY Record Keeping 8.2020.pdf	pdf	5f517d7b716d401bf8d4c32a	09/03/2020
Maintaining of financial records	CD POLICY Maintenance of Financial Records 8.2020.pdf	pdf	5f517d8811000e2447af8a5a	09/03/2020
Qualifications and training	CD - Qualifications and Training FINAL 8.2020.pdf	pdf	5f51801bddc8bc2494c6864e	09/03/2020
Energy Compliance Plan	CD POLICY Energy 8.2020_001.pdf	pdf	5f57b0aa91bd17247e2059bf	09/08/2020
Security plan	CD POLICY Security Plan FINAL 9.11.2020.pdf	pdf	5f5ba741781380244ebfa960	09/11/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

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

ADDITIONAL INFORMATION NOTIFICATION**Notification:****COMPLIANCE WITH POSITIVE IMPACT PLAN**

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 8:00 PM
Tuesday From: 8:00 AM	Tuesday To: 8:00 PM
Wednesday From: 8:00 AM	Wednesday To: 8:00 PM
Thursday From: 8:00 AM	Thursday To: 8:00 PM
Friday From: 8:00 AM	Friday To: 8:00 PM
Saturday From: 8:00 AM	Saturday To: 8:00 PM
Sunday From: 8:00 AM	Sunday To: 8:00 PM



COSMOPOLITAN DISPENSARY, INC.

PLAN TO
REMAIN COMPLIANT WITH LOCAL ZONING

Plan to Remain Compliant with Local Zoning

The address for Cosmopolitan Dispensary's ("CD") Marijuana Establishment is 82 Hartwell Street, Fall River, Massachusetts. The Dispensary complies with all Fall River's zoning requirements.

CD's two owners have extensive experience with state and local compliance. Co-owner Gevorg Saribekyan has extensive experience in the Colorado market for retail, manufacturers and cultivating establishments, and has a spotless record of compliance. Co-owner Sunny Aroustamian has prior experience in managing and operator a large-scale convention center/night club in Hyannis, Massachusetts. The oversight and responsibility of managing the dispensing of alcohol to large groups of people is similar to the requirements in CD's proposed marijuana retail establishment. Mr. Aroustamian also owns and operates motor vehicle sales, repair and autobody shops that also have local and state oversight and which licenses are subject to annual review. In addition, CD will hire and train a Compliance Manager whose sole responsibility will be training the remaining staff and overseeing the entire operation. The Compliance Manager will report directly to the Chief Executive Officer, Chief Operating Officer, and work beside the Security Director.

Both Gevorg and Sunny are also owners of Green World, LLC d//b/a Green Heart, a proposed marijuana retailer which currently has a provisional license issued by the CCC which is expected to be opened in December, 2020.

As Fall River has not adopted any specific licensing or zoning ordinances for marijuana operations CD has obtained a Letter of Non-Opposition from the mayor of Fall River.

CD'S operational plan is well positioned to ensure its operations will be compliant with the City's local requirements.

CD intends to abide by all local regulations and rules concerning its operation and any improvements or alterations to Comsopolitan's premises.

CD shall provide access to its premises and records at any time requested by local authorities.

In accordance with Fall River's Zoning Bylaws, the proposed property is located in Fall River's CBD Zone which allow retail use as of right. In compliance with 935 CMR 500.110(3), Cosmopolitan's property is *not* located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12.

Cosmopolitan Dispensary ("CD") will remain compliant at all times with the local zoning requirements set forth in the City of Fall River's Zoning Ordinance.

In accordance with the Zoning Ordinance, CD's proposed retail facility is located in an area that has been designated by the City of Brockton for the aforementioned uses.

As retail use is as of right in the CBD Zone in which CD's proposed facility is located no further zoning or planning board permits are required.

CD executed a Host Community Agreement with City of Fall River. CD will continue to work closely with Fall River's various municipal departments, boards, and officials to ensure that CD's Marijuana Establishment remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security. In addition, CD has retained Scott Rubin, Esq. to represent the Company and work in conjunction with CD and the city of Fall River to resolve any zoning issues.

Host Community Agreement Certification Form

Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. 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(2) and 501.400(2).

Certification

The parties listed below do certify that the applicant and municipality have executed a host community agreement on the specified date below pursuant to G.L. c. 94G § 3(d):

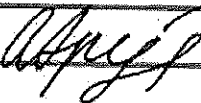
1. Name of applicant:

Cosmopolitan Dispensary, Inc.

2. Name of applicant's authorized representative:

Sunny Aroustamian

3. Signature of applicant's authorized representative:



4. Name of municipality:

City of Fall River

5. Name of municipality's contracting authority or authorized representative:

Mayor Paul Coogan



6. Signature of municipality's contracting authority or authorized representative:

Paul E. Conner

7. Email address of contracting authority or authorized representative of the municipality (*this email address may be used to send municipal notices pursuant to 935 CMR 500.102(1) and 501.102(1).*):

mayor@fallriverma.org

8. Host community agreement execution date:

10 July 2020

Community Outreach Meeting Attestation Form

Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. 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(2) and 501.400(2).

Attestation

I, the below indicated authorized representative of that the applicant, attest that the applicant has complied with the Community Outreach Meeting requirements of 935 CMR 500.101 and/or 935 CMR 501.101 as outlined below:

1. The Community Outreach Meeting was held on the following date(s): 8/13/2020
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



4. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was published in a newspaper of general circulation in the municipality at least 14 calendar days prior to the meeting. A copy of this publication notice is labeled and attached as "Attachment A."

- a. Date of publication:
- b. Name of publication:

5. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was filed with clerk of the municipality. A copy of this filed notice is labeled and attached as "Attachment B."

- a. Date notice filed:

6. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was mailed at least seven (7) calendar days prior to the community outreach meeting to abutters of the proposed address, and residents within 300 feet of the property line of the applicant's proposed location as they appear on the most recent applicable tax list, notwithstanding that the land of the abutter or resident is located in another municipality. A copy of this mailed notice is labeled and attached as "Attachment C." Please redact the name of any abutter or resident in this notice.

- a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
- a. The type(s) of ME or MTC 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 ME or MTC to prevent diversion to minors;
 - d. A plan by the ME or MTC to positively impact the community; and
 - e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



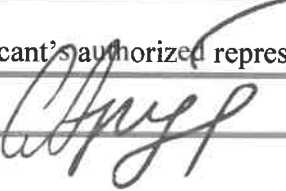
Name of applicant:

Cosmopolitan Dispensary, Inc.

Name of applicant's authorized representative:

Sunny Aroustamian

Signature of applicant's authorized representative:



Search

EVERYTHING YOU NEED. NEARBY.



Serving Fall River, Taunton And The Southcoast Region Of Bristol County

To advertise call 508.676.2517 • online HERALDNEWS.COM

Legal Notices

82 HARTWELL ST

LEGAL NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Retail Marijuana Establishment is scheduled for August 13, 2020 at 6:30 P.M. at BK's Tavern, 320 Airport Road, Fall River, MA 02720, Bancroft Hall, Second Floor. The proposed Retail Marijuana Establishment is anticipated to be located at 82 Hartwell Street, Fall River. There will be an opportunity for the public to ask questions.

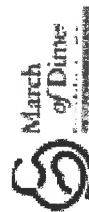
AD# 13904869
FRHN 08/03/2020

Your News
In Print
and
Online

WICKED
All about you. LOCAL

Half of pregnancies are unexpected
(But that's not the real surprise.)

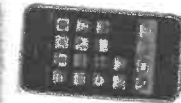
It's about time you can help
reduce the risk of a certain
serious birth defect. Simply
take a prenatal vitamin with
folic acid every day at least
if a healthy diet
whether or not you
plan a baby soon
the start. For more
information, contact the
March of Dimes at
1-800-4-A-CHILD
at www.marchofdimes.org



GREAT DEAL

Advertise items priced from \$78 to \$1,000...

4 LINES, 10 CONSECUTIVE DAYS - \$27.66



The Herald News

To place your ad:

CALL 508-676-2517 | FAX 508-676-2579

(Include name, address & telephone number with fax)

"Great Deal Ads" are for private party, non-commercial advertisers. Price must appear in ad. Deals may not be used for business opportunities, rentals, real estate, help wanted or yard sales ads. Free ads are not included in wickedlocalsearch.com. Limit 3 items per customer.

ATTACHMENT "B"

Silverstein & Creedon

ATTORNEYS AT LAW
LEGION COMMONS
71 LEGION PARKWAY, THIRD FLOOR
BROCKTON, MASSACHUSETTS 02301

DAVID SILVERSTEIN, ESQUIRE
1928 - 1985
RALPH SILVERSTEIN, ESQUIRE
SCOTT B. RUBIN, ESQUIRE
JACK O. SILVERSTEIN, ESQUIRE

TELEPHONE (508) 587-0142
FAX (508) 588-2667

JOHN F. CREEDON, ESQUIRE
JOHN T. MURPHY, ESQUIRE
BRIAN D. GRIFFIN, ESQUIRE

TELEPHONE (508) 584-4088
FAX (508) 584-7760

July 30, 2020

City of Fall River
One Government Center
Fall River, MA 02722

Re: A proposed Marijuana Retail License is anticipated to be located at 82 Hartwell Street, Fall River, MA 02721

Dear Sir/Madam:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for August 13, 2020 at 6:30 P.M. at BK's Tavern, 320 Airport Road, Fall River, MA 02720, Banquet Hall, Second Floor. The proposed Retail Marijuana Establishment is anticipated to be located at 82 Hartwell Street, Fall River, MA 02721. There will be an opportunity for the public to ask questions.

Very truly yours,



Scott Rubin, Esquire

SBR/jeb

RECEIVED
2020 AUG - 3 P 1:40
CITY CLERK
FALL RIVER, MA

Silverstein & Creedon

ATTORNEYS AT LAW
LEGION COMMONS
71 LEGION PARKWAY, THIRD FLOOR
BROCKTON, MASSACHUSETTS 02301

DAVID SILVERSTEIN, ESQUIRE
1928 – 1985
RALPH SILVERSTEIN, ESQUIRE
SCOTT B. RUBIN, ESQUIRE
JACK O. SILVERSTEIN, ESQUIRE

TELEPHONE (508) 587-0142
FAX (508) 588-2667

JOHN F. CREEDON, ESQUIRE
JOHN T. MURPHY, ESQUIRE
BRIAN D. GRIFFIN, ESQUIRE

TELEPHONE (508) 584-4088
FAX (508) 584-7760

July 30, 2020

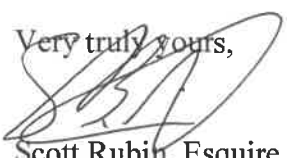
Notice: You are being notified of a public hearing as your property is within 300 feet of the following proposal.

RE: A proposed Marijuana Retail License is anticipated to be located at 82 Hartwell Street, Fall River, MA 02721

Dear Abutter:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for August 13, 2020 at 6:30 P.M. at BK's Tavern, 320 Airport Road, Fall River, MA 02720, Banquet Hall, Second Floor. The proposed Retail Marijuana Establishment is anticipated to be located at 82 Hartwell Street, Fall River. There will be an opportunity for the public to ask questions.

Very truly yours,



Scott Rubin, Esquire

SBR/jeb



City of Fall River
Massachusetts
Department of Financial Services
TREASURER • COLLECTOR • AUDITOR • ASSESSOR

Board of Assessors

PAUL E. COOGAN
Mayor

RICHARD A. GONSALVES, MAA, CHAIRMAN
NANCY L. HINOTE, MAA
RICHARD B. WOLFSON

DATE: July 14, 2020

William G. Kenney
City Planner
One Government Ctr
Fall River, MA 02722

RE: OWNERS NAME: 4M 6 RESNIK LLC

ASSESSOR'S PLOT & LOT: N-21-0003

Pursuant to the provisions of Chapter 808 of the Acts of 1975, this is to certify, with respect to the above-referenced property, that the attached list accurately and completely sets forth the names and the mailing addresses of the abutters, of the owners of land directly opposite on any public or private street or way, and of the abutters to the abutters within three-hundred feet of the property line as they appear on the most recent applicable tax list.

Sincerely,

Board of Assessors

Nella M. Raposo, MAA
Administrative Assistant to the Board of Assessors

NY-21-0003

LEADERSHIP BOARD

PLYMOUTH, MA 02860

~~C/O PROPERTY TAX~~

WALTHAM, MA 02451-2286

~~328 TREMONT ST~~

N-21-0006

FALL RIVER, MA 02721

1 GOVERNMENT-CTR

N-20-0001

STOUGHTON, MA 02072

225 KAUFMAN RD

N-20-0002

FALL RIVER, MA 02722

ADMIN. FINANCE DEPT.

SOUTH YARMOUTH, MA 02566

PO BOX 1514

FALL RIVER, MA 02722



COSMOPOLITAN DISPENSARY INC.

PLAN TO

POSITIVELY IMPACT

AN AREA OF DISPROPORTIONATE IMPACT

Introduction

Cosmopolitan Dispensary, Inc. (“CD”) proposed location is 82 Hartwell Street, Fall River, MA 02720. The entire City of Fall River is designated as an area of disproportionate impact per the most recent Massachusetts Cannabis Control Commission’s latest Guidance. One of our principals is the former City of Fall River mayor and current lawyer in Fall River and is intimately familiar with the city. Therefore, CD has unique knowledge of and connections to the community and understands its needs.

Impact Groups

CD intends to implement programs to assist past or present Fall River residents as well as Massachusetts residents who have prior marijuana convictions, and residents with parents or spouses who have prior marijuana convictions. As noted above, Fall River is an area of disproportionate impact and therefore this targeted group complies with the requirements of the Cannabis Control Law.

Goals

CD’s goals are as follows:

- a. to give hiring preferences to present and past Fall River residents and make the entry to the cannabis industry in Fall River more accessible;
- b. run at least two (2) fundraisers and/or make monetary donations within the City of Fall River to several Fall River based charities.

Programs

Green Heart has developed specific programs to employ its goals and positively impact the Fall River community. Programs include but will not be limited to:

1. Remain focused on hiring from the City of Fall River.
2. Hosting at least 2 career fairs throughout the year in Fall River to meet CD’s goals and to promote access to the cannabis industry. Monthly advertisement in local newspaper (The Herald News) promoting CD’s hiring practices. This includes hiring Fall River residents and those with prior marijuana convictions.
3. Conducting fundraisers and/or make monetary donations to the City of Fall River annually. Planned partnerships are with:
 - a. Community Assistance Project Inc.(CAP) CAP runs a non-profit providing free resources and support for the treatments, recovery and prevention of substance use disorder in Fall River. Minimum Annual Donation: \$1,500.00
 - b. Footlights Repertory. Footlights Repertory is a non-profit community children’s and adult theater organization which operates in Swansea and serves children and adults in the Greater Fall River and New Bedford areas. Footlights offers experiences in the theater arts for children ages 5 – 18

without discrimination. Minimum Annual Donation: \$750.00

Measurements:

Cosmopolitan Dispensary's CEO will measure this plan's goals bi-annually to ensure the organization is on track to meet its goals. CD is aware that an audit of the Plan's progress will be submitted to the CCC upon license renewal.

- a. CD will document its employment practices, including the number of such employees hired, retained and promoted that are past or present City of Fall River residents. CD's goal is to hire at least 15% of its employees from the City of Fall River. At the end of the calendar year, if CD has not met plan goals, it will donate \$1,500 to the Social Equity Training and Technical Assistance Fund and will continue to refine its plan in order to meet plan goals the following year.
- b. CD will provide documentation concerning fundraising activities, donations and volunteer hours for participation in the various fundraisers and programs it assists. CD will implement a matching program for employees who wish to donate their time or funds towards any charitable endeavor, particularly those organizations referenced above.

Acknowledgements:

CD acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

COMMUNITY ASSISTANCE PROJECT INC.
525 WHIPPLE STREET
FALL RIVER, MASSACHUSETTS 02724

August 12, 2020

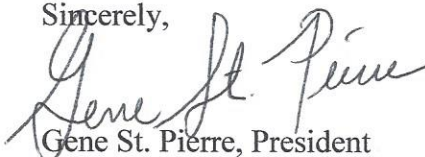
To Whom It May Concern:

The Community Assistance Project Inc. is a nonprofit organization providing free resources and support for the treatment, recovery and prevention of substance use disorder. Treatment and recovery services include treatment placement assistance, online support groups, as well as scholarships for treatment programs, and recovery coaching.

As a nonprofit the benevolence of the community allows us to provide a much needed service to the Community and we are honored to be considered for a donation from the Cosmopolitan Dispensary.

We at CAP wish you nothing but success in your future endeavors and look forward to hearing from you in the future.

Sincerely,

A handwritten signature in cursive script, reading "Gene St. Pierre".

Gene St. Pierre, President

IEN#813442138



Footlights Repertory Co., Inc.

Susan Nedar, President

11 Sidney Avenue, Swansea MA 02777

774.644.4539

August 12, 2020

Dear Friend,

In today's economy with the advent of the novel Coronavirus pandemic, many small businesses have been irreparably financially decimated. Among the hardest hit is the live entertainment industry, and particularly, the live theater industry. With Broadway going dark until 2021, professional theater is in dire straits. Professional theater though, has the benefit of multi-million-dollar investors to keep the industry afloat until times are better. Small community theaters, however, are not so lucky. The very lifeblood of small community theaters relies 100% upon ticket sales, and benevolent donations.

Footlights Repertory Co., Inc. is a 501(c)3 non-profit community children's and adult theater organization, incorporated in 2010, which operates in Swansea, MA and serves children and adults throughout the Greater Fall River and New Bedford areas.

The Footlights mission statement reads as follows: *"We exist to offer experiences in the theatre arts that educate, inspire and challenge young people from the ages of five to eighteen. We do this by instilling them with self-confidence, and showing them the value of discipline, hard work, and creativity. We lead by example, exemplifying our principles and work ethic. We are a grassroots organization, which does not discriminate against race, creed, sexual preference, or income level. No child is turned away, ever, for any reason."*

Footlights has been dark since January 2020, and has been unable to generate any coffer revenue, while continuing to incur expenses. Soon, if something doesn't change, we will have to close our doors for lack of funds.

How can you help?

Your generous, tax-deductible donation will go far in allowing Footlights to continue to provide safe, creative, and memorable experiences for the youth of our area. With your help, Footlights will survive the closing of Covid 2020, and be able to emerge ready to pick up where we left off; providing mentorship, leadership, and a safe place to be theater kids to children of the Greater Fall River area.

Footlights would happily, and graciously accept donations from Cosmopolitan Dispensary. Won't you please consider helping?

Thank you very sincerely,

Susan Nedar, President



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

(General Laws, Chapter 156D, Section 2.02; 950 CMR 113.16)

Identification Number: 001392318

ARTICLE I

The exact name of the corporation is:

COSMOPOLITAN DISPENSARY, INC.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:

TO SEEK A LICENSE FROM THE CANNABIS CONTROL COMMISSION TO OPERATE A REGISTERED MARIJUANA DISPENSARY.

ARTICLE III

State the total number of shares and par value, if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CNP	\$0.00000	200,000	\$0.00	0

G.L. C156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. C156D Section 6.21 and the comments thereto.

ARTICLE IV

If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the Business Entity must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.

ARTICLE V

The restrictions, if any, imposed by the Articles of Organization upon the transfer of shares of stock of any class are:

ARTICLE VI

Other lawful provisions, and if there are no provisions, this article may be left blank.

Note: The preceding six (6) articles are considered to be permanent and may be changed only by filing appropriate articles of amendment.

ARTICLE VII

The effective date of organization and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a *later* effective date is desired, specify such date, which may not be later than the *90th day* after the articles are received for filing.

Later Effective Date: Time:

ARTICLE VIII

The information contained in Article VIII is not a permanent part of the Articles of Organization.

a,b. The street address of the initial registered office of the corporation in the commonwealth and the name of the initial registered agent at the registered office:

Name: WILLIAM FLANAGAN
No. and Street: 7 MUNROE COURT
City or Town: FALL RIVER State: MA Zip: 02720 Country: USA

c. The names and street addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	SUNNY AROUSTAMIAN	40 CHILTON RD. BROCKTON, MA 02301 USA
TREASURER	SUNNY AROUSTAMIAN	40 CHILTON RD. BROCKTON, MA 02301 USA
SECRETARY	GEVORG SARIBEKYAN	3288 S. ANDES ST. AURORA, CO 80013 USA
DIRECTOR	SUNNY AROUSTAMIAN	40 CHILTON RD. BROCKTON, MA 02301 USA
DIRECTOR	GEVORG SARIBEKYAN	3288 S. ANDES ST. AURORA, CO 80013 USA
DIRECTOR	WILLIAM FLANAGAN	7 MUNROE COURT FALL RIVER, MA 02720 USA

d. The fiscal year end (i.e., tax year) of the corporation:
December

e. A brief description of the type of business in which the corporation intends to engage:

SEEK LICENSE TO OPERATE MARIJUANA DISPENSARY

f. The street address (post office boxes are not acceptable) of the principal office of the corporation:

No. and Street: 60 ROCK ST

City or Town:

FALL RIVER

State: MA

Zip: 02720

Country: USA

g. Street address where the records of the corporation required to be kept in the Commonwealth are located (*post office boxes are not acceptable*):

No. and Street:

60 ROCK ST.

City or Town:

FALL RIVER

State: MA

Zip: 02720

Country: USA

which is

☒ its principal office

☐ an office of its transfer agent

☐ an office of its secretary/assistant secretary

☐ its registered office

Signed this 10 Day of July, 2019 at 3:11:18 PM by the incorporator(s). (*If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.*)

WILLIAM FLANAGAN, DIRECTOR/REGISTERED AGENT

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:

July 10, 2019 03:09 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive, flowing style with a large initial 'W' and 'G'.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**BY-LAWS
OF
COSMOPOLITAN DISPENSARY, INC.**

**ARTICLE I
STOCKHOLDERS**

1. Annual Meeting

The Annual Meeting of Stockholders shall be on the third Tuesday in January in each year (or if that be a legal holiday in the place where the meeting is to be held, on the next succeeding full business day) at 11:00 A.M. unless a different hour is fixed by the Directors or the President and stated in the notice of the meeting. The purposes for which the annual meeting is to be held, in addition to those prescribed by law, by the Articles of Organization or by these By-Laws, may be specified by the Directors or the President. If no annual meeting is held in accordance with the foregoing provisions, a special meeting may be held in lieu thereof, and any action taken at such meeting shall have the same effect as if taken at the annual meeting.

2. Special Meeting

Special meetings of Stockholders may be called by the President or by the Directors. Upon written application of one or more Stockholders who hold at least ten (10%) percent of the capital stock entitled to vote at the meeting, special meetings shall be called by the Clerk, or in case of the death, absence, incapacity or refusal of the Clerk, by any other officer. The call for the meeting shall state the date, hour and place and the purpose of the meeting.

3. Place of Meeting

All meetings of Stockholders shall be held at the principal office of the Corporation unless a different place, (within the United States) is fixed by the Directors or the President and stated in the notice of meeting.

4. Notice of Meetings

A written notice of every meeting of Stockholders, stating the place, date and hour thereof, and the purposes for which the meeting is to be held, shall be given by the Clerk or by the person calling the meeting at least seven (7) days before the meeting to each Stockholder entitled to such notice, by leaving such notice with him or at his residence or usual place of business, or by mailing it postage prepaid and addressed to such Stockholder at his address as it appears upon the books of the Corporation. No notice need be given to any Stockholder if a written waiver of notice,

executed before or after the meeting by the Stockholder or his attorney thereunto authorized, is filed with the records of the meeting.

5. Quorum

The holders of a majority in interest of all stock issued, outstanding and entitled to vote at a meeting, shall constitute a quorum, but a lesser number may adjourn any meeting from time to time without further notice; except that, if two or more classes of stock are outstanding and entitled to vote as separate classes, then in the case of each such class, a quorum shall consist of the holders of a majority in interest of the stock of that class issued, outstanding and entitled to vote.

6. Voting and Proxies

Each Stockholder shall have one vote for each share of stock entitled to vote held by him of record according to the records of the Corporation, unless otherwise provided by the Articles of Organization. Stockholders may vote either in person or by written proxy dated not more than six (6) months before the meeting named therein. Proxies shall be filed with the Clerk of the meeting, or of any adjournment thereof, before being voted. Except as otherwise limited therein, proxies shall entitle the persons named therein to vote any adjournment of such meeting but shall not be valid after final adjournment of such meeting. A proxy with respect to stock held in the name of two (2) or more persons shall be valid if executed by one (1) of them unless at or prior to exercise of the proxy the corporation received a specific written notice to the contrary from any one of them. A proxy purporting to be executed by or on behalf of a stockholder shall be deemed valid unless challenged at or prior to its exercise.

7. Action at Meeting

When a quorum is present, the holders of a majority of the stock present or represented and voting on a matter, (or if there are two or more classes of stock entitled to vote as separate classes, then in the case of each such class, the holders of a majority of the stock of that class present or represented and voting on a matter) except where a larger vote is required by law, the Articles of Organization or these By-Laws, shall decide any matter to be voted on by the Stockholders. Any election by stockholders shall be determined by a plurality of the votes cast by the stockholders entitled to vote at the election. No ballot shall be required for such election unless requested by a stockholder present or represented at the meeting and entitled to vote in the election. The corporation shall not directly or indirectly vote any share of its stock.

8. Action Without Meeting

Any action to be taken by Stockholders may be taken without a meeting if all stockholders entitled to vote on the matter consent to the action by a writing filed with the records of the meetings of stockholders. Such consent shall be treated for all purposes as a vote at a meeting.

ARTICLE II
DIRECTORS

1. Powers

The business of the Corporation shall be managed by a Board of Directors who may exercise all the power of the corporation excepts otherwise provided by Law, by the Articles of Organization or by these By-Laws. In the event of a vacancy in the Board of Directors, the remaining Directors, except as otherwise provided by law, may exercise the powers of the full Board until the vacancy is filled.

2. Election

A Board of Directors of such number, not less than one (1), nor more than nine (9), as shall be fixed by the Stockholders, shall be elected by the Stockholders at the Annual Meeting.

3. Vacancies

Any vacancy in the Board of Directors, other than a vacancy resulting from the enlargement of the Board, may be filled by the Stockholders or, in the absence of stockholder action, by the Directors.

4. Enlargement of the Board

The number of the Board of Directors may be increased and one or more additional Directors elected at any special meeting of the stockholders or by the Directors by vote of a majority of the Directors then in office.

5. Tenure

Except as otherwise provided by law, by the Articles of Organization or by these By-Laws, Directors shall hold office until the next annual meeting of stockholders and thereafter until their successors are chosen and qualified. Any Director may resign by delivering his written resignation to the corporation at its principal office or to the President, Clerk or Secretary. Such resignation shall be effective upon receipt unless it is specified to be effective at some other time or upon the happening of some event.

6. Removal

A Director may be removed from office:

a. With or without cause by vote of a majority of stockholders entitled to vote in the election of Directors, provided that the Directors of a class elected by a particular class of stockholders may be removed only by the vote of the holders of a majority of the shares of such class, or

b. For cause by vote of a majority of the Directors then in office. A Director may be removed for the cause only after reasonable notice and opportunity to be heard before the body proposing to remove him.

7. Meetings

Regular meetings of the Directors may be held without call or without notice at such places and at such times as the Directors may from time to time determine, provided that any Director who is absent when such determination is made shall be given notice of the determination. A regular meeting of the Directors may be held without a call or notice at the same place as the Annual Meeting of Stockholders, or the Special Meeting in lieu thereof, following such meeting of Stockholders.

Special Meetings of the Directors may be held at any time and place designated in a call by the President, Treasurer or one (1) or more Directors.

8. Notice of Meetings

Notice of all Special Meetings of the Directors shall be given to each Director by the Secretary, or if there be no Secretary, by the Clerk or Assistant Clerk, or in case of the death, absence, incapacity or refusal of such persons, by the officer or one of the Directors calling the meeting. Notice shall be given to each Director in person or by telephone or by telegram sent to his business or home address at least twenty-four (24) hours in advance of the meeting, or by written notice mailed to his business or home address at least forty-eight (48) hours in advance of the meeting. Notice need not be given to any Director if a written waiver of notice, executed by him before or after the meetings, is filed with the records of the meeting or to any Director who attends the meeting without protesting prior thereto or at its commencement the lack of notice to him. A notice or waiver of notice of a Directors' meeting need not specify the purposes of the meeting.

9. Quorum

At any meeting of the Directors, a majority of the Directors then in office shall constitute a quorum. Less than a quorum may adjourn any meeting from time to time without further notice.

10. Action at Meeting

At any meeting of the Directors at which a quorum is present, the vote of a majority of those present, unless a different vote is specified by law, by the Articles of Organization, or by these By-Laws, shall be sufficient to decide such matter.

11. Action by Consent

Any action by the Directors may be taken without a meeting if a written consent thereto is signed by all the Directors and filed with the records of the Directors' meetings. Such consent shall be treated as a vote of the Directors for all purposes.

12. Committees

The Directors, may, by vote of a majority of the Directors then in office, elect from their number an executive or other committees and may by like vote delegate thereto some or all of their powers except those which by law, the Articles of Organization or these By-Laws they are prohibited from delegating. Except as the Directors may otherwise determine, any such committee may make rules for the conduct of its business, but unless otherwise provided by the Directors or in such rules, its business shall be conducted as nearly as may be in the same manner as is provided by these By-Laws for the Directors.

ARTICLE III
OFFICERS

1. Enumeration

The officers of the corporation shall consist of a President, a Treasurer, a Clerk and such other officers, including one or more Vice Presidents, Assistant Treasurers, Assistant Clerks and Secretary as the Directors may determine.

2. Election

The President, Treasurer and Clerk shall be elected annually by the Directors at their first meeting following the Annual Meeting of Stockholders. Other officers may be chosen by the Directors at such meeting or at any other meeting.

3. Qualification

The President may, but need not be, a Director. No officer need be a stockholder. Any two or more officers may be held by the same person. The Clerk shall be a resident of Massachusetts unless the corporation has a resident agent appointed for the purpose of service of process. Any officer may be required by the Directors to give bond for the faithful performance of his duties to the corporation in such amount and with such sureties as the Directors may determine.

4. Tenure

Except as otherwise provided by law, by the Articles of Organization or by these By-Laws, the President, Treasurer and Clerk shall hold office until the first meeting of the Directors following the annual meeting of stockholders and thereafter until his successor is chosen and qualified; and all other officers shall hold office until the first meeting of the Directors following the annual meeting of stockholders, unless a shorter term is specified in the vote choosing or appointing them. Any officer may resign by delivering his written resignation to the corporation at its principal office or to the President, Clerk or Secretary, and such resignation shall be effective upon receipt unless it is specified to be effective at some other time or upon the happening of some other event.

5. Removal

The Directors may remove any officer with or without cause by a vote of a majority of the entire number of Directors then in office, provided that an officer may be removed for cause only after reasonable notice and opportunity to be heard by the Board of Directors prior to action thereon.

6. President and Vice President

The President shall be the chief executive officer of the corporation and shall, subject to the direction of the Directors, have general supervision and control of its business. Unless otherwise provided by the Directors, he shall preside, when present, at all meetings of stockholders and of the Directors.

Any Vice President shall have such powers as the Directors may from time to time designate.

7. Treasurer and Assistant Treasurers

The Treasurer shall, subject to the direction of the Directors, have general charge of the financial affairs of the corporation and shall cause to be kept accurate books of account. He shall

have custody of all funds, securities, and valuable documents of the corporation, except as the Directors may otherwise provide.

Any Assistant Treasurer shall have such powers as the Directors may from time to time designate.

8. Clerk and Assistant Clerk

The Clerk shall keep a record of the meetings of Stockholders. Unless a Transfer Agent is appointed, the Clerk shall keep or cause to be kept in Massachusetts, at the principal office of the corporation or at his office the stock and transfer records of the corporation, in which are contained the names of all stockholders and the record address, and the amount of stock held by each.

In case a Secretary is not elected, the Clerk shall keep a record of the meetings of the Directors.

Any Assistant Clerk shall have such powers as the Directors may from time to time designate. In the absence of the Clerk from any meeting of stockholders, an Assistant Clerk, if one be elected, otherwise a Temporary Clerk designated by the person presiding at the meeting, shall perform the duties of the Clerk.

9. Secretary and Assistant Secretaries

If a Secretary is elected, he shall keep a record of the meetings of the Directors and in his absence, an Assistant Secretary, if one be elected, otherwise a Temporary Secretary designated by the person presiding at the meeting, shall keep a record of the meetings of the Directors.

Any Assistant Secretary shall have such powers as the Directors may from time to time designate.

10. Other Powers and Duties

Each officer shall subject to these By-Laws, have in addition to the duties and powers specifically set forth in these By-Laws, such duties and powers as are customarily incident to this office, and such duties and powers as the Directors may from time to time designate.

ARTICLE IV
CAPITAL STOCK

1. The capital stock of the Corporation shall be two hundred thousand (200,000) shares of Common Stock without par value, which said stock may be issued from time to time by the Board of Directors of the Corporation.

2. Any Stockholder, including the heirs, assigns, executors or administrators of a deceased stockholder, desiring to sell or transfer such stock owned by him or them shall first offer it to the corporation through the Board of Directors, in the manner following:

He shall notify the Directors of his desire to sell or transfer by notice in writing, which notice shall contain the price at which he is willing to sell or transfer and the name of one arbitrator. The directors shall within thirty (30) days thereafter either accept the offer, or by notice to him in writing name a second arbitrator; and these two (2) shall name a third. It shall then be the duty of the arbitrators to ascertain the value of the stock, and if any arbitrator shall neglect or refuse to appear at any meeting appointed by the arbitrators, a majority may act in the absence of such arbitrator.

After the acceptance of the offer or the report of the arbitrators as to the value of the stock, the Directors shall have thirty (30) days in which to purchase the same at such valuation, but if at the expiration of thirty (30) days, the corporation shall not have exercised the right so to purchase, the owner of the stock shall be at liberty to dispose of the same in any manner he may see fit.

No shares of stock shall be sold or transferred on the books of the corporation until these provisions have been complied with, but the Board of Directors may in any particular instance waive the requirement.

ARTICLE V STOCK CERTIFICATES AND TRANSFER

1. The certificates of stock shall be of such form and notice as the Directors may determine.
2. Each certificate of stock shall be signed by the President and Treasurer and sealed with the seal of the corporation, and shall express on the face its number, date of issue, the number of shares for each and the name of the person to whom it is issued.
3. Stock in this corporation may be transferred by delivery of the certificate representing it duly endorsed or with a written assignment or a power of attorney to sell, assign or transfer the same, signed by the owner thereof; but no transfer shall be complete as against the Corporation until it has been recorded in the books of the Corporation so as to exhibit the names and residences of the parties, the number of the certificate and of the shares, and the date of the transfer. Upon such transfer and record, and the surrender of the certificate, the word "CANCELLED" shall be stamped or written upon the face of such certificate, and a new certificate shall be issued to the Transferee.

4. Shares of Stock in the Corporation shall be non-assessable.

ARTICLE VI
MISCELLANEOUS PROVISIONS

1. Fiscal Year

Except as from time to time otherwise determined by the Directors, the fiscal year of the Corporation shall be the twelve months ending the last day of December.

2. Seal

The seal of the Corporation shall, subject to alteration by the Directors, bear its name, the word "Massachusetts", and the year of its incorporation.

3. Execution of Instruments

All deeds, leases, transfers, contracts, bonds, notes and other obligations authorized to be executed by an officer of the Corporation in its behalf shall be signed by the President or the Treasurer except as the Directors may generally or in particular cases otherwise determine.

4. Voting of Securities

Except as the Directors may otherwise designate, the President or Treasurer may waive notice of, and appoint any person or persons to act as proxy or attorney in fact for this corporation (with or without power of substitution) at any meeting of stockholders or shareholders of any other corporation or organization, the securities of which may be held by this Corporation.

5. Corporate Records

The original, or attested copies, of the Articles of Organization, By-Laws and records of all meeting of the incorporators and stockholders, and the stock and transfer records, which shall contain the names of all stockholders and the record address and the amount of stock held by each, shall be kept in Massachusetts at the principal office of the Corporation, or at an office of its transfer agent or of the Clerk. Said copies and records need not all be kept in the same office. They shall be available at all reasonable times to the inspection of any stockholder for any purpose but not to secure a list of stockholders for the purpose of selling said list or copies thereof or of using the same for a purpose other than in the interest of the applicant, as a stockholder, relative to the affairs of the Corporation.

6. Articles of Organization

All references in these By-Laws to the Articles of Organization of the Corporation are as amended and in effect from time to time.

7. Amendments

These By-Laws may at any time be amended by vote of the stockholders, provided that notice of the substance of the proposed amendment is stated in the notice of the meeting, or may be amended by vote of a majority of the Directors then in office, except that no amendment may be made by the Directors then in office, except that no amendment may be made by the Directors which changes the date of the annual meeting of stockholders or which alters the provisions of these By-Laws. No change in the date of the annual meeting may be made within sixty (60) days before the date of the meeting of stockholders next following the making, amending or repealing by the Directors of any By-Law, notice thereof stating the substance of such change shall be given to all stockholders entitled to vote on amending the By-Laws.



The Commonwealth of Massachusetts
Secretary of the Commonwealth
State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

Date: August 26, 2020

To Whom It May Concern :

I hereby certify that according to the records of this office,

COSMOPOLITAN DISPENSARY, INC.

is a domestic corporation organized on **July 10, 2019** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

Certificate Number: 20080478110

Verify this Certificate at: <http://corp.sec.state.ma.us/CorpWeb/Certificates/Verify.aspx>

Processed by: NMa



Commonwealth of Massachusetts
Department of Revenue
Geoffrey E. Snyder, Commissioner

mass.gov/dor

Letter ID: L0918722112
Notice Date: August 25, 2020
Case ID: 0-000-959-233



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



COSMOPOLITAN DISPENSARY, INC.
82 HARTWELL ST
FALL RIVER MA 02721-3025

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, COSMOPOLITAN DISPENSARY, INC. 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) 887-6400 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

AFFIDAVIT

COSMOPOLITAN DISPENSARY, INC.

I, Sunny Aroustamian, hereby state under oath depose and state as follows:

1. I contacted the corporation's accountant who advised the Department of Unemployment Assistance advised a certificate of good standing is unavailable until such time as an entity registers with the Department of Unemployment and generates a tax liability and makes payments.
2. To date Cosmopolitan Dispensary, Inc. has no present employees and therefore is unable to obtain a certificate of good standing at this time.

Signed, under the pains and penalties of perjury this 11th day of September, 2020.

Sunny Aroustamian



COSMOPOLITAN DISPENSARY INC.

PRESENTATION BY
WILLIAM A. FLANAGAN, ESQ.

EXECUTIVE SUMMARY

Cosmopolitan Dispensary Inc. will be located at 82 Hartwell Street Fall River, MA. We secured a lease of the facility for 3 years with the option to purchase the location during the lease term. The facility is well positioned and it matches the ideal picture of a community dispensary. Before taking over the facility, it was used as a school and office space; and remains in good condition. Cosmopolitan Dispensary Inc. will be a full service retail dispensary of marijuana upon licensure from the Cannabis Control Commission. Customers can expect first class treatment during their visit to our store and we will be outstanding community partners.

OUR PRODUCTS

Our goal at Cosmopolitan is to become one of the premier dispensaries in the Commonwealth of Massachusetts. In order to achieve this goal it is vital that we have the best quality of cannabis and cannabis infused products for sale. We will purchase our products from licensed area growers and manufactures. Our products will include:

- a. Dissolving Tablets
- b. Tinctures
- c. Nasal Sprays
- d. Oils
- e. Waxes
- f. Shatter
- g. Resin
- h. Creams
- i. Solves
- j. Lotion
- k. Dermal Patches
- l. Baked Goods
- m. Chocolates
- n. Candies
- o. Sodas
- p. Coffee
- q. Teas
- r. Capsules
- s. Butters
- t. Mints

- u. Gums
- v. Moon Rocks
- w. Dabs
- x. Oral Spray
- y. Vapes
- z. Syrups

VISION STATEMENT

Our vision is to become the top rated marijuana dispensary in the whole Commonwealth of Massachusetts and also amongst the top 5 leading marijuana dispensary stores in the United States of America. It is also our mission to become a strong community partner assisting the community in improving the quality of life for its residents.

BUSINESS STRUCTURE

Cosmopolitan is a business that will be built on a solid foundation. From the outset, we have decided to recruit only qualified people to our organization. We are quite aware of the rules and regulations governing the cannabis industry, which is why we decided to recruit experienced and qualified people to be the foundation of the organization. We hope to leverage on their expertise to build our business brand as a premiere marijuana dispensary. When hiring, we will look for applicants that are not just qualified and experienced, but honest, customer centric and willing to put in the hours it takes to help us build a prosperous business. We are also dedicated to establishing a local hiring preference and working with the City to fill the employment needs of the company. The business is not seeking any outside funding and will be fully funded by the Executive Officers of the Corporation.

MARKET ANALYSIS

Massachusetts Market

From January 2019 thru May 2019 Massachusetts adult-use marijuana sales approached \$140 million. Average monthly sales were just under \$23 million, with May sales of \$34 million through May 29. The state's total aggregate of \$139 million comes from sales of more than 3 million units of cannabis products, with average per-unit spending of \$44. As seen in other markets, raw flower comprised just under half of all dollar sales, with concentrates and infused products – both edibles and nonedible products (i.e. topical) – collectively accounting for just over 50% of sales. Raw and infused pre-rolls, kief and shake/trim each represented less than 1% each of dollar sales. Massachusetts was the first on the Eastern seaboard to legalize recreational use, and its retailers were expected to benefit from out-of-state traffic from population-dense New England

neighbors in addition to sales to local residents. Analysts with Crain's New York estimate that up to 50% of adult-use sales in Massachusetts may be coming from New Yorkers. The recently released Marijuana Business Factbook estimates 2019 recreational sales in Massachusetts will be in the range of \$450 million-\$500 million.

Market Trends

The market trend in the retail industry of which the marijuana dispensary business falls under is directly influenced by a country's healthcare reform policies. The fact that the cannabis industry is highly regulated means that any entrepreneur who wants to run a marijuana dispensary business must be ready to play by the book or they will be booted out of business. Several other factors influence market trends in the industry and it is normal to see bigger marijuana dispensary operations weather the storm whenever there are major shakes in the industry. In essence, the easiest way to build a solid and highly profitable medical marijuana dispensary business is to engage in opening various outlets in key cities around the country. Undoubtedly, the industry will continue to grow and become more profitable due to the aging baby-boomer generation in the United States which is projected to drive increasing demand for marijuana and prescription drugs. Marijuana dispensary stores are now making use of technology to effectively manage their business by plugging financial leakages which happens to be one of the biggest challenges that retail businesses faces. The use of technology, i.e. CRM software is very effective in helping retail businesses manage their clientele base.

Our Target Market

Cosmopolitan is in business to service a wide range of customers. Generally, those who need marijuana range from those suffering from severe pain, insomnia, anxiety, glaucoma, HIV/AIDS, epilepsy, nausea, cancer, and any other ailment that the physician deems the use of marijuana is fit for. Our staff will be trained to effectively service our customers within the rules governing the industry. Our customers can be categorized into the following categories;

- Households
- Corporate Executives
- Recreational Users
- Elderly
- Athletes
- Baby Boomers

Our Competitive Advantage

In every business there is competition, however, we believe we possess several strengths that will allow us to remain visible and on the business radar at all times. The cannabis industry is known to be highly competitive in the United States and in most parts of the world. In this industry, most of the competitive

dynamics center around the quality of cannabis dispensed, the service offered, the location of the dispensary , discounts offered for the products, and the branding of the business play a significant role. Even though competition is stiff especially from the big, well-backed enterprises, smaller enterprises can still get their fair share of the market if they stay true to the competitive dynamics. It is through top notch customer service that they can secure a fair share of the available market. Our location is well positioned and visible, with ample parking and visible security. Our management staff will be groomed in retail and all of our employees are trained to provide customized customer service to all of our clients.

LOCATION DEMOGRAPHIC

Fall River is a city in Bristol County, Massachusetts, United States. The City of Fall River's population was 88,857 at the 2010 census, making it the tenth-largest city in the state. According to the United States Census Bureau, the city has a total area of 40.2 square miles, of which 33.1 square miles is land and 7.1 square miles is water. According to the United States Census of 2010, the population of Fall River is 88,857. The largest racial groups within the city were 87.2% White, 3.5% African American, 2.5% Asian, 0.2% Native American, and 7.4% Hispanic or Latino. The median family income is \$49,692.

ORGANIZATION

CHIEF EXECUTIVE OFFICER

William A. Flanagan was born and raised in the City of Fall River. He is a graduate of the University of Massachusetts Dartmouth as well as Roger Williams Law School. His business the Law Office of William A. Flanagan is located within Fall River, MA. After graduating from Law School Attorney Flanagan went on to serve as an Assistant District Attorney of Bristol County as well as an Assistant City Solicitor of Taunton, MA. He is also formerly the Mayor of Fall River and intimately knows the strengths as well as the weaknesses of the urban community.

CHIEF OPERATING OFFICER

Gevorg Saribekyan is a very experienced operator of a marijuana business. Mr. Saribekyan started Green Leaf, LLC when the business license was first made available for marijuana entrepreneurs in Colorado. In fact, Green Leaf was one of the very first licensed marijuana businesses permitted to legally operate in the State of Colorado. Green Leaf's recreational marijuana center is located in Arapaho County, Colorado and Green Leaf's optional premises cultivation facility is located in Denver, Colorado. After more than five years of operations in the one of the most competitive and highly regulated marijuana market in the United States, Green Leaf had a spotless record of compliance with both the local enforcement authorities in Arapahoe County and in the City and the County of Denver, as well as with the Marijuana Enforcement Division of the Department of Revenue for the State of Colorado ("MED").

CHIEF FINANCIAL OFFICER

Sunny Aroustamian is an experienced operator in a wide range of business enterprises located in Brockton, Massachusetts. These include motor vehicle sales, service and financing, and automobile washing and detailing facilities. Mr. Aroustamian has been through the demanding approval process to obtain the necessary licenses issued by the City of Brockton, as well as the background and financial checks by the Commonwealth of Massachusetts to hold a financial lending license. Mr. Aroustamian has prior experience managing an exceptionally busy convention center in Hyannis and has a spotless record as a business owner and community leader in the City of Brockton.

TRAINING

As a first step towards educating employees and as part of a boarder new-hire training program, we will provide to all new employees orientation training that will include relevant state and Federal laws. This training will provide foundational coverage of Federal and State-level laws and regulations related to marijuana dispensation.

Given the evolving nature of laws governing the growth and distribution of Cannabis, the company will update training material on an annual basis ensuring that all updates have company-wide distribution.

The training described above will be part of a larger framework of training and related company systems and structures that will enable an effective training program. The part of this larger framework that specifically relates to law and regulations will include: (i) establishing company standards, policies, principles, and guidelines; (ii) annual training credit requirements and/or annual refresher courses provided by the company or an outside provider; (iii) assignment of a Compliance Officer and Training Coordinator; and (iv) establishing a budget for training.

SECURITY

We will hire security officers on a full and part time basis to ensure that the dispensary meets the strict safety standards required by the Cannabis industry. We would also prefer to hire Veterans and retired law enforcement to full these positions.

Also the facility will have a fully alarmed and video surveillance system to monitor individuals coming into the property. We will install an alarm system that will monitor perimeter doors, windows and will include motion detection in all common corridors. We will install holdup buttons at strategic locations in order to notify law enforcement in the event of an emergency. We will provide training to authorized staff on how to use hold-up buttons. The system will include duress alarm codes to notify law enforcement that the user is disarming under duress. We also will install two phone lines and one cellular transmitter for the alarm. We will have the alarm monitored by a third party central station. The system will be programmed to

communicate power loss and we will provide a battery backup system for the alarm with the minimum battery power to maintain an active system for four hours in case of power loss.

GROWTH

It is the wish of any business to become so successful that there is a good succession plan to act upon. More often than not, having a good succession plan will help you know the direction your business is headed. As such, the future of a business lies in the number of loyal customers, the capacity and competence of the employees, their investment strategy and the business structure. If all of these factors are missing from a business, then it won't be long before the business closes shop. One of our major goals in starting The Cosmopolitan is to build a business that will survive off its own cash flow without the need for injecting finances from external sources once the business is officially up and running. We know that one of the ways of gaining approval and winning customers over is to sell our product better than what is currently obtainable in the market. The Cosmopolitan will make sure the correct foundation, structures and processes are put in place to ensure that our staff and community are well taken of. Our company's corporate culture is designed to drive our business to greater heights. As a matter of fact, profit-sharing arrangement will be made available to all our management staff and it will be based on their performance for a period of three years or more. We know that with this policy, we will be able to successfully hire and retain the best hands we can get in the industry; they will be more committed to help us build the business of our dreams.

FINANCIAL FORECAST

One of the true marks of an effective entrepreneur is being able to forecast sales based on the magnitude of work that has been put into the business. It is important to state that our sales forecast is based on the data gathered during our feasibility studies, market survey, and also some of the assumptions readily available in the field. Below are the sales projections that we were able to come up with for the first three years of operations:

YEAR 1 - \$2,000,000 - \$3,500,000

YEAR 2 - \$3,500,000 - \$5,000,000

YEAR 3 - \$5,000,000 - \$10,500,000

It is also noted that Cosmopolitan will contribute to the City of Fall River 3.00% of its sales pursuant to a Host Community Agreement as well as \$50,000.00 in an annual license fee. In addition we know and understand the importance of community thus it is vitally important that Cosmopolitan contribute to the overall quality of life and make both an economic impact and a social impact as well.

MARKETING

The marketing and sales strategy of Cosmopolitan will be based on generating long-term personalized relationships with our dispensary customers. In order to achieve that, we will provide the highest quality of marijuana and infused products. We will also utilize our large social media platform to brand our dispensary.

In Summary, we will adopt the following sales and marketing approach to win customers over:

Leverage on the internet to promote our business.

Engage in direct marketing to consumer utilizing our existing social media network.

Leverage on the internet and the social media platforms like; Instagram, Facebook, Twitter, YouTube, Google + et al to promote our brand.

Leverage word of mouth marketing (referrals).

Attend cannabis industry related exhibitions/expos.

Support the community by sponsoring relevant community programs.

CONCLUSION

Cosmopolitan Dispensary Inc. has the knowledge and expertise to be successful in one of the fastest growing industries in modern times. It is our mission to grow our business from the ground up and be outstanding community partners. We are motivated about the opportunity that has been presented and look forward to locating in your community!



COSMOPOLITAN DISPENSARY INC.

PLAN FOR LIABILITY INSURANCE

I. Insurance

No later than at the commencement of operations Cosmopolitan Dispensary, Inc. will have and maintain a policies of insurance requiring the following coverage and limits: general liability and products liability of no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and such deductible on this policy shall be no higher than \$5,000 per occurrence. 935 CMR 500.101(1); 935 CMR 500.105(10).



COSMOPOLITAN DISPENSARY INC.

POLICY CONCERNING
RESTRICTION OF ACCESS TO PERSONS
AGED 21 AND OLDER

Restricting Access to 21 and Over

As per 935 CMR 500.140 (2) On-premises Verification of Identification for Adult Use Only Locations, upon entry into CD's retail premises by an individual, a CD agent shall immediately inspect the individual's proof of identification and determine the person's age. No one shall *not* be admitted to the premises unless the retailer has verified that the person is 21 years of age or older by an individual's proof of identification.

Cosmopolitan Dispensary's ("CD's") retail store's layout is designed to enable access to consumers with a verified and valid, government-issued photo ID or in possession of a Program ID Card demonstrating the individual is a registered qualifying patient with the Medical Use of Marijuana Program.

Upon entry into the premises of CD's retail marijuana establishment by an individual, a CD security agent will immediately inspect the individual's proof of identification and determine the individual's age, in accordance with 935 CMR 500.140(2).

CD will stop all persons entering the store to determine whether that person may legally enter the premises. All persons must first be verified in the Entry Room. The Entry Room is physically separated from the Store by a closed, and locked door.

Any persons who cannot provide the required legal proof that they are aged **21 years or older** shall be DENIED ENTRY and politely turned away, with an explanation that the law requires all persons entering CD be **21 years or older**.

In the event CD discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(l).

Furthermore, CD will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), CD will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21.

CD will not engage in any advertising, marketing and branding via television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data.

CD will not manufacture or sell any edible products that resemble a realistic or fictional human, animal or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b).

In accordance with 935 CMR 500.105(4)(a)(5), any marketing, advertising and branding materials for public viewing will include a warning stating, "For use only by adults 21 years of

age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana.”

Pursuant to 935 CMR 500.105(6)(b), CD’s packaging for any cannabis or cannabis products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors.

CD’s website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

CD will contract with a third-party security company for provision of trained security personnel.

CD’s security personnel will require verification that the individual desiring to enter CD are aged **21 years or older**.

CD’s security personnel will use the electronic card reader to verify the identification offered by the individual desiring to enter CD.

CD’s security personnel will use the Blacklight to examine and verify the identification offered by the individual desiring to enter CD. The Blacklight will often illuminate evidence that the identification has been altered. In the event that an offered identification displays obvious signs of tampering CD staff shall not honor the identification. CD staff shall DENY ENTRY and politely turn that person away, with an explanation that the law requires all persons entering CD to provide acceptable proof that the individual is **21 years or older**.

Customers are only to be allowed entry into the door exiting the Entry Room once they have satisfactorily proved that they are **21 years or older**.

Further, CD Staff shall DENY ENTRY and shall REFUSE to sell cannabis products to a consumer if, in the opinion of the Staff, and based on the information available to the agent at that time, the consumer or the public would be placed at risk.

Clearly intoxicated or impaired persons shall be DENIED ENTRY.



COSMOPOLITAN DISPENSARY INC.

POLICY CONCERNING
QUALITY CONTROL AND TESTING

Quality Control and Testing

Cosmopolitan Dispensary does not sell any marijuana and marijuana products unless that marijuana or marijuana product has passed testing, and Cosmopolitan Dispensary keeps a record of test results for each batch of marijuana and marijuana products.

Cosmopolitan Dispensary inspects all marijuana and marijuana products for any sign of contamination. Any marijuana that appears contaminated is REJECTED by Cosmopolitan Dispensary and RETURNED to the vendor – regardless of testing results. Cosmopolitan Dispensary understands that vendors can cheat on the tests, and accordingly, Cosmopolitan Dispensary's first line of defense is a visual inspection.

Cosmopolitan Dispensary only purchase from trusted vendors, and from vendors who strictly comply with the regulations pertaining to testing of marijuana and marijuana product.

Cosmopolitan Dispensary ensures that all marijuana product, including marijuana, offered for sale or otherwise marketed for adult use has been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Cosmopolitan Dispensary maintains a Test Log for all marijuana product, including marijuana, offered for sale or otherwise marketed for adult use by Cosmopolitan Dispensary.

The Test Log and Cosmopolitan Dispensary's policy describes the acceptable contaminant levels established in the DPH protocols identified in 935 CMR 500.160(1).

Cosmopolitan Dispensary's policy requires that the Commission is notified within seventy-two (72) hours of any laboratory testing results indicating that contamination cannot be remediated, and Cosmopolitan Dispensary requires disposing of the contaminated marijuana product.

Cosmopolitan Dispensary's policy recognizes that the notification to the Commission must come from Cosmopolitan Dispensary AND from both the Independent Testing Laboratory, separately and directly. Cosmopolitan Dispensary understands that the notification from Cosmopolitan Dispensary must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Cosmopolitan Dispensary maintains all test records and the Test Log for no less than one (1) year.

In addition, GHGW establishes the additional policies and procedures concerning Quality Control and Testing Procedures:

To the extent Cosmopolitan Dispensary receives marijuana product requiring further processing and packaging Cosmopolitan Dispensary shall only utilize the leaves and flowers of the female marijuana plant to be processed accordingly in a safe and sanitary manner in that all product shall be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area as applicable to CD's operations

Cosmopolitan Dispensary requires all agents whose job includes contact with marijuana be compliant with the requirements for food handlers specified in 105 CMR 300.000.

Cosmopolitan Dispensary's policy requires any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including:

- Maintaining adequate personal cleanliness; and
- Washing hands appropriately.

Cosmopolitan Dispensary supervisors shall ensure all agents are properly trained and monitored for compliance with all such requirements.

Cosmopolitan Dispensary's dispensary shall have hand-washing facilities located in production areas and where good sanitary practices require employees to wash and sanitize their hands. CD will work with the local board of health and CCC for proper placement of such facilities.

Cosmopolitan Dispensary's policy requires it shall always provide sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.

Cosmopolitan Dispensary's waste disposal policy requires all litter and waste shall be properly removed in appropriate bins who are located so as to minimize the development of odor and the potential for the waste attracting and harboring pests.

Cosmopolitan Dispensary's facility shall be constructed in such a manner that they may be adequately kept clean and in good repair, this includes all flooring, walls, and ceilings.

Cosmopolitan Dispensary's policy requires all contact surfaces, shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination. Cosmopolitan Dispensary will maintain a log ensuring proper opening and closing procedures and daily maintenance to ensure all such surfaces are properly maintained and cleaned.

Cosmopolitan Dispensary's policy maintains that all toxic items shall be identified, held, stored and disposed of in a manner that protects against contamination of marijuana.

Cosmopolitan Dispensary's proposed location has sufficient water supply for necessary operations but hereby establishes a policy that the water supply shall be maintained such that it will always be

sufficient for operations.

Cosmopolitan Dispensary's policy ensures that the plumbing equipment will be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment. Cosmopolitan Dispensary will maintain a maintenance log of inspections and repairs completed to the plumbing service to ensure the system is maintained as required.

Cosmopolitan Dispensary's policy requires it provide and maintain for its employees adequate and readily accessible toilet facilities. Such facilities are part of the proposed location's final plans.

Cosmopolitan Dispensary's policy requires the storage and transportation of finished products to be held and maintained under conditions that protect them against physical, chemical, and microbial contamination.



COSMOPOLITAN DISPENSARY INC.

POLICY CONCERNING
PERSONNEL POLICIES INCLUDING
BACKGROUND CHECKS

Personnel Policies, Including Background Checks

Overview

Cosmopolitan Dispensary (“CD”) will only hire Staff (a/k/a “Agents” and/or “Employees”) who comply with background regulations disseminated by the Commission.

Agent Personnel Records

CD will maintain employee records for each agent for at least twelve (12) months after termination of the agent’s affiliation with CD and records will include, but not limited to:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- The job description or employment contract that includes descriptions of the agent’s duties, authority, responsibilities, qualifications, and supervision;
- Required training, including training regarding privacy and confidentiality requirements, and the signed statement of the person indicating the date, time, and place the agent received said training;
- Performance evaluations;
- Records of any disciplinary action taken;
- Background investigation, including CORI reports;
- Documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident.

CD’s personnel records will be kept in a secure location to maintain confidentiality. Personnel records will only be accessible to the agent’s manager or members of CD’s executive management team.

CD policy requires the IMMEDIATE DISMISSAL any Staff member who:

1. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
2. Engaged in unsafe practices with regard to operation of Cosmopolitan Dispensary, which shall be reported to the Commission; or
3. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

CD policy requires that it obtain certification as a Responsible Vendor.

CD requires all Staff take and complete a Responsible Vendor Training under 935 CMR 500.105(2)(b). At a minimum, CD Staff shall receive eight hours of on-going training annually.

CD policy requires that all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.

CD will maintain records of responsible vendor training program compliance for four (4) years and can make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Job Descriptions

Chief Executive Officer: The CEO shall provide overall leadership and vision for Cosmopolitan Dispensary. The CEO will work with and support the executive management team and employees to assure that CD sets reasonable business and community

benchmarks, in order to achieve its goals and fulfill its mission. CEO duties will include the following:

- Work as the team leader with other executives and employees to review CD's business and community objectives, and implement plans to achieve those objectives;
- Lead CD's interactions with state regulators and municipal officials;
- With the Chief Compliance Officer (CCO), oversee compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- With the CCO, oversee compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Develop, oversee and execute a staffing plan and certain hiring protocols;
- Develop and implement personnel policies and procedures;
- Develop protocols to attract, hire, advance, discipline and terminate employees and volunteers as needed to support CD's operations;
- Ensure compliance with all workplace policy laws and requirements;
- With the CCO, oversee ongoing compliance with the provisions of 935 CMR 500.101(2)(e)(8);
- With the CCO, oversee operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Work with the executive management team and the COO to implement a plan to prevent the diversion of product in accordance with the applicable regulations, including 935 CMR 500.101 and 935 CMR 500.105;
- Work with the executive management team and the COO to implement a diversity plan that promotes equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations;
- Work with CD's HR Manager and department managers, ensure the Diversity Plan and Community Initiatives; and
- Work with CD's HR Manager and department managers to implement CD's Plan to Positively Impact Areas of Disproportionate Impact.

Chief Operating Officer: The COO shall operate and be responsible for the maintenance, staffing and ongoing operation of the retail facility. COO duties shall include:

- Work with the CEO to manage financial reporting and budgeting;
- Oversee policies and procedures relating to the retail facility;
- Work with the Compliance Officer to oversee background check process on all employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Coordinate all staff work hours, assignments and collaborations;

- Develop plan to meet the demands of the business;
- Manage CD's human resources team;
- Manage payroll administration;
- Supervise accounting and payables functions
- Oversee tax preparation and auditing in conjunction with CEO and Certified Tax Accountant; and
- Ensure quality control and testing of marijuana flower in compliance with 935 CMR 500.160.

Chief Compliance Officer: The CCO's duties shall include:

- With the CEO, uphold company and facility compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- With the CEO, facilitate CD's interactions with state regulators and municipal officials;
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Prepare and amend as needed a CD plan to assure ongoing compliance with the provisions of 935 CMR 500.101 et seq.;
- Prepare and amend as needed a set of detailed written operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Keep and maintain all CD records, making them available for inspection by the Commission, upon its request, in accordance with 935 CMR 500.105(9);
- In collaboration with the CSO, implement and administer background checks and suitability determinations on all CD employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Review background checks prior to any employee start date, and before any employee is granted access to any CD facility in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.100;
- Register each employee with DCJIS pursuant to 803 CMR 2.04 to determine suitability.

To further ensure employee suitability, the CCO shall:

- Review any and all conditions, offenses, and violations occurring in Massachusetts or any other state, whether under state law or under the laws of the United States, or the law of any military, territorial or Native American tribal authority, or any other jurisdiction.
- Review any and all criminal disqualifying conditions, offenses, and violations, including the crimes of attempt, accessory, conspiracy, and solicitation.
- Where applicable, review all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.
- Not consider juvenile dispositions as a factor for determining suitability.

Director of Security: Under the supervision of the CEO, the Director of Security will be responsible for the development and overall management of the Security Policies and Procedures for CD, while implementing, administering, and revising the policies as needed.

CD's Director of Security will also:

- Ensure compliance with all provisions of 935 CMR 500.110;
- Train and supervise security agents;
- Provide staffing, shift change and general oversight of security operations;
- Review and ensure proper maintenance of all security apparatus, including
- physical, human and technological security methods and equipment;
- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team—follow up with security agent if needed;
- Provide training specific for Security Agents prior to commencing job functions;
- Maintain frequent contact with state inspectors and local law enforcement authorities;
- Maintain lists of agents authorized to access designated areas of the CD facility, including cash and product storage vaults, the surveillance and network equipment room, and other highly sensitive areas of the CD facility;
- Lead a management team to ensure policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of CD agents and assets;
- Maintain all security-related records, incident reports and other reports written by security agents; and
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times.

Security Agent: Security Agents will monitor CD's security systems including alarms, video surveillance, and motion detectors. Security Agents will ensure only authorized people are permitted access to the CD facility. Security Agents will verify appropriate ID cards and other forms of identification. Security Agents will also perform the following duties and other duties as needed:

- Respond and investigate security situations and alarm calls, and clearly document the incident and details surrounding the incident in a written report for the Director of Security;
- Oversee the entrance to the facility;
- Escort CD agents from the facility during non-business hours and perform security checks at designated intervals;
- Verify credentials of each person seeking access to the CD facility;
- Investigate, communicate, and provide leadership in the event of an emergency such as an intrusion, fire, or other threat that endangers customers, authorized visitors, and CD agents;
- Answer routine inquiries;
- Log entries, and maintain visitor log; and
- Escort authorized visitors in CD's restricted access areas.

Human Resources (“HR”) Manager: CD’s HR Manager will support the executive management team. The HR Manager will implement all personnel policies and procedures for CD, including hiring processes. The Human Resources Manager will also:

- Oversee hiring and release of CD agents;
- Ensure compliance with any and all workplace policy laws and requirements;
- Review and revise CD personnel policies and procedures in consultation with the executive management team and department managers;
- Handle any and all agent discipline as needed;
- Develop training schedules and policies for CD agents under the supervision of the executive management team and department managers;
- Be responsible for additional human resources tasks decided by CD’s executive management team;
- Oversee CD’s Diversity Plan and Community Initiatives;
- Oversee CD’s Plan to Positively Impact Areas of Disproportionate Impact;
- Comply with State anti-discrimination statutes and Equal Employment Opportunity Commission (EEOC) requirements;
- Working with the Chief Compliance Officer, employ reporting of criminal convictions (and termination if necessary);
- Comply with the State and Federal Family Leave Act;
- Comply with Workplace Safety Laws;
- Instate Workers’ Compensation;
- Working with the Chief Compliance Officer, employ the Background Check process for all employees;
- Comply with State and Federal Minimum Wage Requirements; and
- Comply with any other applicable local, state, or federal employment laws, rules, or regulations.

Inventory Manager: The Inventory Manager will oversee CD’s inventory on a day-to-day basis. Additional duties include, but are not limited to:

- Overseeing weekly and monthly inventory counts and waste disposal requirements;
- Performing a yearly comprehensive inventory together with the executive management team;
- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Implementing inventory controls to track and account for dispensary inventory;
- Maintaining documents with each day’s beginning, acquisitions, sales, disposal, and ending inventory;
- Implementing procedures and notification policies for proper disposal; and
- Storing, labeling, tracking, and reporting of inventory.

Inventory Associate: Inventory Associates support the Inventory Manager during CD’s daily operations. Responsibilities will include:

- Ensuring all products are properly stored, labeled, and recorded in CD inventory system;

- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Ensuring waste is properly stored;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal and ending inventory; and
- Coordinating the waste disposal schedule and ensuring CD's policies and ensuring that procedures for waste disposal are followed.

Retail Manager: Manages all CD Member Services Agents and oversees day-to-day operations of CD's retail facility. Other responsibilities and duties will include:

- Training retail staff;
- Reporting any incidents and complaints to the executive team;
- Working with bookkeeping to ensure precise data flow;
- Ensuring customer satisfaction through feedback tools; and
- Implementing inventory tracking.

Retail Agent: Ensures that each CD customer is treated with respect while at a CD facility.

Responsible for making sure that each customer receives the appropriate amount of individualized attention in order to address their specific needs and questions. Job responsibilities include:

- Being knowledgeable about the various products that CD offers;
- Understanding and acknowledging individual customer goals;
- Maintaining a clean, safe, healthy, and productive environment so that customers have a positive experience;
- Answering customer questions related to products including flowers, concentrates, tinctures, and edibles;
- Enforcing and executing compliance with Commission regulations and CD policies and procedures;
- Setting up product displays based on CD policies and procedures;
- Understanding sales transactions using CD systems;
- Participating in ongoing education and professional development; and
- Reconciling cash from daily sales transactions, sales reports, and other forms of day-to-day task management.

CD will follow 935 CMR 500.030(2) regarding agent personnel records during the application process, including any requirements and other information required by the Commission, and in compliance with state and federal laws related to all HR-related activities.

Standards of Conduct

CD will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, gender expression, or any other trait or characteristic protected by any applicable federal, state, or local law or ordinance.

All CD managers and employees will be expected to maintain the highest degree of professional behavior and standards.

Workplace Attire

CD's new hire training and the onboarding process will discuss specific workplace attire for each role. The HR Manager and department managers will ensure compliance with all requirements related to workplace attire.

At-Will Employment

CD's policy is to support is at-will unless otherwise stated, as consistent with In the Commonwealth of Massachusetts.

Violence and Weapons

Weapons are not allowed on site by employees, customers, or visitors. In the case of a violent event or threat, law enforcement will be contacted immediately. Any employee found carrying a weapon on the premises of a CD facility will be immediately terminated.

Hours of Operation

Monday: 8am-8pm

Tuesday: 8am-8pm

Wednesday: 8am-8pm

Thursday: 8am-8pm

Friday: 8am-8pm

Saturday: 8am-8pm

Sunday: 8am-8pm

Personnel Policies and Procedures

Standard Employment Practices

CD believes that it can attract a better workforce and increase employee retention by employing workplace satisfaction by offering highly competitive wage and benefits packages and developing a culture that values a proper work-life balance. CD is committed to hiring a management team that works one on one with their subordinates to foster a work ethic that focuses on the mission of the company and spirit of the adult-use marijuana program in Massachusetts.

Investigations

The HR Manager, working with the Compliance Officer, will create and implement policies and procedures to investigate any complaints or concerns identified or raised internally or externally in order to stay compliant with 935 CMR 500.000 et seq.

Compliance with Law and Regulation

CD's written policies shall adhere to applicable federal and state laws, including but not limited to the Family and Medical Leave Act, the Consolidated Omnibus Budget Reconciliation Act, the

Equal Employment Opportunity Act, the Employee Retirement Income Security Act, the Americans with Disabilities Act, 935 CMR 500.000 et. seq., and with laws pertaining to holidays, work hours, personal time, paid time off, confidentiality and workplace safety. The executive management team oversees company compliance, and the CEO shall implement company policies and procedures.

Job Classifications

Positions at CD are categorized by rank and department. CD's executive management team will be responsible for the overall success of the company's mission. The CEO shall be responsible for implementing CD's vision and mission. The entire executive management team will work closely together to ensure that each CD department executes its functions and responsibilities in a proper and professional manner. Job classification will consist of three tiers: Executive Management, Management, and Non-Management Employee.

Work Schedules

Work schedules will be either part-time, full-time, or salaried, depending on the specific position. Schedules will be set according to the needs of each department and will be determined by the respective department manager and the executive manager to whom they report. It will be the department manager's responsibility to develop and implement a work schedule that provides necessary duty and personnel coverage while not exceeding each role's requirements for full execution of CD day-to-day operations. The department manager must also make sure that adequate coverage occurs on a daily basis and does not lead to abuse or unnecessary use of overtime.

Performance Reviews

Performance reviews will be conducted by executive or department managers. Reviews will be conducted at three-month intervals for new employees during the first year. After the initial three-month period, reviews will occur at six-month intervals. Employees under review will receive a written summary of their performance. Reviews must be kept in each employee's employment file. Performance reviews must highlight both positive performance factors as well as areas that need improvement. CD may use scoring systems to determine an employee's overall performance.

Advancement & Compensation

Employee participation in training and bi-annual performance evaluations will be required for any promotions or pay increases. Compensation shall be negotiated on an individual basis. CD shall determine compensation based on the prevailing wage in the marketplace. Compensation shall account for skill, experience, education, work history and other lawful criteria as determined by CD. The CEO and the executive management team shall determine compensation rates. CD shall at all times comply with applicable state and federal law in determining employee compensation.

Mandatory Meetings and Community Service Days

Each month, CD will conduct mandatory, repeating company-wide meetings. Certain personnel, such as housekeeping staff, may not be required to attend every meeting. Department managers

will determine employee attendance. Department managers will also schedule and conduct mandatory weekly meetings. Department managers will provide agendas for all meetings and will report in writing to their executive manager on the results and progress of each meeting.

Breaks

CD employees will be allowed to take daily breaks, including lunch breaks, according to the laws of the Commonwealth.

Leave Policies

CD leave policies will comply with all applicable state and federal statutes. All full-time employees will receive two 40-hour weeks of paid vacation annually. Leave must be requested at least two weeks in advance and approved by the CEO or designee. CD anticipates observing all national holidays, and will elect on an annual basis whether to observe state holidays.

Disciplinary Policy

CD has adopted a disciplinary policy designed to provide a graduated series of corrective actions. This policy, called the “Steps” policy, is intended to improve employee performance, promote the maintenance of a cohesive and productive workplace, and prevent recurring adverse behaviors. In addressing disciplinary matters, CD shall apply the steps described below:

Step 1: Individual Advice and Counsel

A member of the executive management team shall individually discuss the subject conduct with the employee. The executive shall identify the offending conduct, and clearly outline company expectations for resolution.

Step 2: Written Warning

Within seven (7) days of the discussion described in Step 1, the executive will prepare a document characterizing the discussion, and will provide a copy of the document to the employee. The employee will sign the document, a copy of which CD will maintain in the personnel file.

Step 3: Final Written Warning

Should the offending conduct persist or reoccur, a member of the executive management team will prepare a document characterizing the offending conduct and will provide a copy of the document to the employee. The document may include witness statements or reference other evidence. The document will state “Final Warning” in prominent text. The employee will sign the document, a copy of which CD will maintain in the personnel file. If the executive finds the offending conduct problematic, disruptive and/or harmful, or implicants the health or safety of other employees, the executive may recommend to the CEO that the employee be removed from the workplace. The CEO shall act on any such recommendation within forty-eight (48) hours.

Step 4: Termination of Employment

The last step is termination of employment. CD reserves the right terminate if, notwithstanding the steps set forth above, employee conduct fails to comport with CD policies and procedures. CD reserves the right to terminate without prior notice or

disciplinary action. The CEO must approve termination in writing, a copy of which CD will maintain in the personnel file.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling. Nor should anything outlined in this policy should be read or understood as modifying or changing the employment-at-will relationship between CD and its employees.

Conduct Issues Not Subject to Progressive Discipline

Illegal behavior is not subject to progressive discipline and may be reported to local law enforcement. Examples of behavior that are not subject to progressive discipline and may be grounds for immediate termination include: theft, intoxication at work, fighting and other acts of violence.

Documentation

Any employee subject to progressive discipline will receive copies of all relevant documentation related to the progressive discipline process, including all PIPs. The employee will be asked to sign copies of this documentation to indicate their receipt and understanding of the corrective action outlined in these documents. Copies will also be placed in the employee's official personnel file.

Separation of Employment

A separating employee may contact the CEO or other supervising authority to schedule an exit interview. CD reserves the right to refuse any such interview. The interview, if any, shall occur on or after the employee's last day of work.

Return of Property

At the time of separation, CD employees must return all company property, examples of which can include cell phones, keys and key cards, identification cards, computers and/or laptops and uniforms. Failure to return certain items may result in deductions from that employee's final paycheck. All separating employees must also sign a Wage Deduction Authorization Agreement, which allows CD to deduct the costs of such items from their final paycheck.

Termination of Benefits

An employee separating from CD is eligible to receive benefits as long as the appropriate procedures are followed as outlined in this document. The employee must give two (2) weeks' notice. The employee must work those final two work weeks in full. Any accrued vacation time will be paid in the last paycheck. Accrued sick leave will also be paid out in the last paycheck.

Health Insurance

Health insurance terminates on the last day of the month of employment, unless employee requests immediate termination of benefits. CD shall provide information about employee rights under the Consolidated Omnibus Budget Reconciliation Act (COBRA) relative to the continuation of health insurance coverage.

Agent Background Checks

In addition to completing the Commission's agent registration process, all agents hired to work for CD will undergo an extensive, detailed background investigation process before being allowed access inside CD or prior to beginning work duties, performed in accordance with 935 CMR 500.101(1).

Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800.

Upon adverse determination, CD will provide each applicant with a copy of their background screening report and a pre-adverse determination letter. This report and letter will provide the applicant with a copy of their right to dispute the contents of the report and will include who to contact CD to do so. Applicants will also have the opportunity to provide a supplemental statement.

As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by CD or the Commission.



COSMOPOLITAN DISPENSARY INC.

POLICY CONCERNING
RECORD KEEPING PROCEDURES

Record Keeping Procedures

Cosmopolitan Dispensary's ("CD") policies and procedures for recordkeeping and record retention

will comply with all CCC regulations to safeguard and maintain vital documents. Upon request or by audit, the Company will provide written records to the CCC. Under supervision of the Chief Compliance Officer, working with the HR Manager and Inventory Manager, CD will file records in a secure, limited access area.

CD will employ a quarterly review of all retained records to ensure compliance. This review will include corporate, employee and business documents.

Under direct supervision of the Chief Compliance Officer, the procedures will also be kept current and internally inspected by the executive management team as a part of Cosmopolitan Dispensary's overall facility maintenance, conducted annually.

Corporate Records

Corporate records are defined as records that require, at a minimum, regularly scheduled annual reviews, updates, and renewals. These records include the Cannabis Control Commission's annual compliance requirements for marijuana establishment registration, agent registration, and employee background check documentation. Cosmopolitan Dispensary will comply with all corporate governance requirements: Secretary of State filings and annual reports. CD will ensure its business operations with policies for general liability, directors & officers (D&O), product liability, workers compensation, employer professional liability and umbrella coverage. Cosmopolitan Dispensary's host community local compliance will include any and all variances, as-built drawings, site plan approvals, special permits and certificate of occupancy.

CD will maintain all records required in any section of 935 CMR 500.000, in addition to the following: Written operating procedures as required by 935 CMR 500.105(1); inventory records as required by 935 CMR 500.105(8); and seed-to-sale tracking records for all cannabis products as required by 935 CMR 500.105(8)(e).

Personnel Records

CD will maintain detailed personnel records, which will include the following:

- Job descriptions for each employee and volunteer position, along with organizational charts consistent with the job descriptions;
- A personnel record for each CD Staff member. These records will be maintained by CD for at least twelve (12) months after termination of the individual's affiliation with CD and shall include, at a minimum, the following:
 - all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision for that position;
 - documentation of periodic, regular performance evaluations;
 - documentation of verification of references;
 - documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;

- a record of any disciplinary action taken; and
- notice of completed responsible vendor and eight (8) hour related duty training.

CD maintains a staffing plan that demonstrates accessible business hours and safe working conditions.

CD maintains personnel policies and procedures; and all background check reports obtained in accordance with 935 CMR 500.030.

Business Records

CD will maintain detailed Business Records, which shall include electronic or hard copies of, at a minimum:

- Salary and wages paid to each employee, any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with any CD vendors, including members, if any;
- Assets and liabilities;
- Books of accounts, which shall include ledgers, journals, and supporting documents, invoices, checks, agreements, and vouchers;
- Monetary transactions;
- Sales records including the quantity, form, and cost of cannabis products; and
- Waste disposal records as required under 935 CMR 500.105(12).

Handling and Testing of Marijuana Records

CD will maintain the results of all cannabis testing a minimum of one (1) year.

Inventory Records

CD's record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.

Seed-to-Sale Tracking Records

- CD will use seed to sale software to maintain real-time inventory. CD's seed-to-sale inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of all cannabis and cannabis-related products ready for dispensing; as well as all damaged, defective, expired, or contaminated cannabis and cannabis products awaiting disposal.
- Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

Incident Reporting Records

- Within ten (10) calendar days, CD will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a). CD will do this by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any),

confirmation that the Police Department and Commission were notified within twenty-four (24) hours of discovering the breach, along with any other relevant information.

Visitor Records

All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times. A visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be accompanying the visitor.

Security Records

- CD will make a current list of authorized agents and service personnel that have access to the surveillance room available to the Commission upon request.
- CD will make available for immediate viewing by the Commission upon request all twenty-four (24) hour recordings from all video cameras that are kept for a minimum of ninety (90) calendar days.

Transportation Records

CD will retain all shipping manifests for no less than one (1) year. These records will be made available to the Commission upon request.

Agent Training Records

Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and location where they were trained, the topics discussed and the name(s) and title(s) of the presenter(s).

Records Closure Policy

In the event CD closes its operations, all records will be kept for at least two (2) years at CD's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, the Company will communicate with the CCC during the closure process and accommodate any additional requests the CCC or other agencies may have.

Policies and Procedures Records

Written Operating Policies and Procedures: Policies and Procedures related to the Company's operations will be updated on an ongoing basis as needed and undergo an annual review by the executive management team. Policies and Procedures include the following:

- A list of all executives of the Company, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on the Company's website;
- Description of the various strains of marijuana to be cultivated, sold, or processed, as applicable, as well as the form(s) in which marijuana will be dispensed;
- A staffing records and staffing plan in compliance with 935 CMR 500.105(9);

- A description of the Company's hours of operation and after-hours contact information, which will be provided to the CCC, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000;
- Policies and procedures for the handling of cash on Company premises including but not limited to storage, collection frequency and transport to financial institution(s);
- Storage of marijuana in compliance with 935 CMR 500.105(11);
- Agent security policies, including crime prevention and personal safety techniques;50 Security measures in compliance with 935 CMR 500.110;
- Policies and procedures to prevent the diversion of marijuana to individuals younger than twenty-one (21) years old;
- Policies for an alcohol, smoke, and drug-free workplace;
- Quality control plans, including product testing for contaminants in compliance with 935 CMR 500.160;
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- A plan describing how confidential information will be maintained; and
- Policy for the immediate dismissal of any dispensary agent who has:
 - Been convicted, entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority;
 - Diverted marijuana, which will be reported the Police Department and to the CCC; or
 - Engaged in unsafe practices with regard to Company operations, which will be reported to the CCC.

Record Retention

As a retailer, CD will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.

Personnel Policies, Including Background Checks

CD will maintain personnel records as a separate category of records due to the sensitivity and importance of information concerning agents, including registration status and background check records. CD will keep, at a minimum, the following personnel records:

- A staffing plan that shows accessible business hours and safe conditions;
- A personnel record for each marijuana establishment agent;
- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- Written personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

For more detailed information about CD's personnel policies, including procedures related to background checks, please refer to the section titled *Personnel Policies Including Background Checks*.

CD only hires Staff who comport with the background regulations promulgated by the Commission.

CD policy requires the IMMEDIATE DISMISSAL any Staff member who: 1. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission; 2. Engaged in unsafe practices with regard to operation of CD, which shall be reported to the Commission; or 3. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

CD policy requires that CD obtain certification as a Responsible Vendor.

CD requires that all Staff take and complete a Responsible Vendor Training under 935 CMR 500.105(2)(b). At a minimum, CD Staff shall receive eight (8) hours of on-going training annually.

CD policy requires that all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.

CD maintains records of responsible vendor training program compliance for four (4) years and can make these records available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.



COSMOPOLITAN DISPENSARY INC.

POLICY CONCERNING
MAINTENANCE OF FINANCIAL RECORDS

Maintenance of Financial Records

Cosmopolitan Dispensary (“CD”) maintains all records onsite, available for inspection by the Commission, upon request.

CD’s records are maintained in accordance with generally accepted accounting principles.

Cosmopolitan Dispensary maintains all Business Records required in any section of 935 CMR 500.000, in addition to the following which shall include manual or computerized records of:

Written business records, available for inspection, and in accordance with generally accepted accounting principles, which 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;
- Sales records including the quantity, form, and cost of marijuana products; and
- Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with CD, including members of the nonprofit corporation, if any.

Cash management will be developed within the Security Plan and shall remain confidential to CD’s management and staff. Frequency and timing of cash deposits to be made to financial institutions shall be randomized for security purposes.

Seed to sale tracking systems as approved by the Commission shall be implemented which will support CD’s payment of state and local sales tax and other obligations.

CD’s confidential information will be kept in a secure location, separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.

All sales recording requirements under 935 CMR 500.140(6) are followed, including:

- Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
- Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
- Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
- Adopting separate accounting practices at the point-of-sale for cannabis and cannabis product sales, and non-cannabis sales; and

- Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.

Additional written business records will be kept, including, but not limited to, records of:

- Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16); and
- Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.



COSMOPOLITAN DISPENSARY INC.

POLICY CONCERNING
QUALIFICATIONS AND TRAINING

Qualifications and Training

Cosmopolitan Dispensary (“CD”) only hires Staff who comport with CD’S background check. CD’s staff meet minimum age requirements of being twenty-one (21) years of age or older and have completed and shall maintain Responsible Vendor Training Program certification, all as promulgated by the Commission under 935 CMR 500.105(2)(b).

CD requires that all Staff shall, at a minimum, receive eight (8) hours of on-going training each year.

CD policy requires that all new employees involved in the handling and sale of cannabis for adult use shall successfully complete a Responsible Vendor Program within ninety (90) days of hire.

CD maintains records of responsible vendor training program compliance for four (4) years and can make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

All CD staff will have a working knowledge of the related cannabis law, rules and regulations, including local regulations. Managers (assistant and supervisor level) will be responsible for ensuring all CD Staff follow such obligations.

CD will employ a Compliance Officer who will oversee hiring and training of all Staff and will conduct periodic compliance checks to ensure Staff has retained such knowledge.

Managers and the Compliance Officer are expected to have some post high school education. Staff are expected to have attained a high school diploma or its equivalent.

In accordance with 935 CMR 500.030, CD candidates for employment as a marijuana establishment agent cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

CD will also ensure that all of its employees are suitable for registration consistent with the provisions of 935 CMR 500.802.

Marijuana Establishment Agent Training

(a) Marijuana Establishments shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight (8) hours of on-going training annually.

Responsible Vendor Training

1. On or after July 1, 2019, all current owners, managers and employees of a Marijuana Establishment that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a “responsible vendor.”
2. Once a licensee is designated a “responsible vendor,” all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within ninety (90) days of hire.
3. After initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall successfully complete the program once every year thereafter to maintain designation as a “responsible vendor.”
4. Administrative employees who do not handle or sell marijuana may take the “responsible vendor” program on a voluntary basis.
5. Marijuana establishments must maintain records of responsible vendor training program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Certification Training Program Standards

- a. No owner or employee of a responsible vendor program shall have an interest in a licensed Marijuana Establishment;
- b. Program providers shall submit their programs to the Commission every two years for approval as a responsible vendor program;
- c. The program shall include at least two (2) hours of instruction time;
- d. The program shall be taught in a real-time, interactive classroom setting where the instructor is able to verify the identification of each individual attending the program and certify completion of the program by the individual identified;
- e. The program provider shall maintain its training records at its principal place of business during the applicable year and for the following three (3) years;
- f. The provider shall make the records available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours;
- g. The program shall provide written documentation of attendance and successful passage of a test on the knowledge of the required curriculum for each attendee;
- h. Attendees who can speak and write English must successfully pass a written test with a score of 70% or better;
- i. Attendees who cannot speak or write English may be offered a verbal test, provided that the same questions are given as are on the written test and the results of the verbal test are documented with a passing score of 70% or better; and
- j. Program providers shall solicit effectiveness evaluations from individuals who have completed their program. Certification Training Class Core Curriculum.
 - a. Discussion concerning marijuana’s effect on the human body. Training shall include:
 - i. Marijuana’s physical effects based on type of marijuana product;
 - ii. The amount of time to feel impairment;
 - iii. Visible signs of impairment; and
 - iv. Recognizing the signs of impairment.
 - b. Diversion prevention and prevention of sales to minors, including best practices;

- c. Compliance with all tracking requirements; and
- d. Acceptable forms of identification. Training shall include:
 - i. How to check identification;
 - ii. Spotting false identification;
 - iii. Medical registration cards issued by the DPH;
 - iv. Provisions for confiscating fraudulent identifications; and
 - v. Common mistakes made in verification.
- e. Other key state laws and rules affecting owners, managers, and employees, which shall include:
 - i. Local and state licensing and enforcement;
 - ii. Incident and notification requirements;
 - iii. Administrative and criminal liability;
 - iv. License sanctions and court sanctions;
 - v. Waste disposal;
 - vi. Health and safety standards;
 - vii. Patrons prohibited from bringing marijuana onto licensed premises;
 - viii. Permitted hours of sale;
 - ix. Conduct of establishment;
 - x. Permitting inspections by state and local licensing and enforcement authorities;
 - xi. Licensee responsibilities for activities occurring within licensed premises;
 - xii. Maintenance of records;
 - xiii. Privacy issues; and
 - xix. Prohibited purchases and practices.
- f. Such other areas of training determined by the Commission to be included in a responsible vendor training program.



COSMOPOLITAN DISPENSARY INC.

POLICY CONCERNING
ENERGY COMPLIANCE

Policy on Energy Compliance

Overview

Cosmopolitan Dispensary (“CD”) will employ various strategies to reduce energy consumption where available and in compliance with CCC regulations.

CD’s proposed location of 82 Hartwell Street, Fall River is a portion of a prior school building constructed in 1920 according to the City’s assessor’s database. CD plans to complete a build out of the existing space for its proposed retail use and as a result will be hiring design and construction professionals along with any necessary architect and engineers to identifying energy-use reduction opportunities (such as natural lighting and energy efficiency measures). Once these measures are identified, CD devise a plan for implementation of such opportunities that are cost effective during the construction phase;

After construction is complete, CD will employ a Compliance Officer to review energy consumption on a quarterly basis. CD’s Compliance Officer will report such findings in monthly team meetings with management and staff and discuss existing energy usage and ways to reduce energy usage. Managers and staff will be trained to report to the Compliance Officer any strategies developed to reduce energy usage and the Compliance Officer and the Management shall be responsible to approve and implement such strategies.

In the event the facility requires any further upgrades, renovations or expansions, CD will hire the necessary design, construction and engineering professionals to identify potential energy savings opportunities and implement such opportunities as available and cost effective. CD policy requires CD to identify and document any renewable or alternative energy opportunities as part of any upgrades, renovations or expansions.

In the event of an equipment failure requiring replacement, CD policy requires a review by CD’s Compliance Officer and management to identify and document potential energy savings available prior to replacement. CD will maintain documentation energy savings was considered and information justifying the final decision concerning such replacement.

Within the first 12 months of operation and no less than annually thereafter, CD will document its consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable and its consideration of energy supply decisions and regularly (no less than annually) evaluate renewable options;

CD’s Compliance Officer shall conduct an ongoing review of CD’s energy demand and report to management any inefficiencies in current energy usage identified and to research solutions to reduce electric demand (such as lighting schedules, active load management, and energy storage); The Compliance Officer shall implement a method of energy monitoring and reporting

to management and in consultation with management to implement such adjustments to operations based on such compiled data; The Compliance Office shall review and implement procedures for participation in load curtailment, energy storage, or other active demand management programs (as applicable). As part of such reviews and reporting, the Compliance Officer shall communicate with existing and proposed utilities to identify and implement any available energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. The Compliance Officer shall provide a quarterly report to management regarding his/her research of available programs.



COSMOPOLITAN DISPENSARY INC.

DIVERSITY PLAN

Introduction

Cosmopolitan Dispensary's ("CD") proposed location is 82 Hartwell Street, Fall River, MA 02301. The entire City of Fall River is designated as an area of disproportionate impact per the most recent Massachusetts Cannabis Control Commission's latest guidelines. In addition, one of Cosmopolitan Dispensary's co-owners is a resident of, the former mayor of and has an existing business in Fall River. Therefore, CD has unique knowledge of the community and understands its needs and concerns.

Cosmopolitan Dispensary believes in creating and sustaining a robust policy of inclusivity and diversity. CD recognizes that workforce diversity plays a vital part of its commitment to its community. Cosmopolitan Dispensary is dedicated to creating a diverse culture. CD's diversity plan is designed to promote equity among minorities, women, veterans, people with disabilities, and LGBTQ+ people. CD will make every effort to employ and advance in employment qualified and diverse people at all levels within the company.

Impact Groups

Cosmopolitan Dispensary intends to hire those individuals who meet the criteria set forth in the Commission's requirements for diversity, namely:

- Minorities (15%);
- Women (20%);
- Veterans (10%);
- People with disabilities (5%); and
- LGBTQ+ (5%).

Goals

Cosmopolitan Dispensary's Diversity Plan will promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations. To achieve this vision, CD designed specific, measurable goals that involve a sustained and concerted effort to:

- Hire employees who are represented in the demographics listed above; and
- Provide tools and training that help ensure the success of these employees.

Within the first year, Cosmopolitan Dispensary intends to reserve no less than one-fifth (1/5) or 20 percent of its workforce, full or part time, for candidates who meet the above criteria with an overall goal to reach 50% within 2 years. Cosmopolitan Dispensary will employ best efforts and practices to purchase products and other supplies from businesses operated and owned by minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations. CD expects to establish an additional market for marijuana-related supplies, including consumer containers and packaging, point of sale systems, security services and products, as well as construction and renovation related to Cosmopolitan Dispensary's initial build out of its location.

Programs

Diversity Recruitment and Sourcing

Cosmopolitan Dispensary will build and maintain a workforce that is inclusive and diverse by actively recruiting members of underrepresented and minority communities. Cosmopolitan Dispensary's recruitment efforts will maintain the number of qualified diverse applicants by:

- Employee (peer-to-peer for employment) referral program from diverse groups;
- Participating in no less than 2 career fairs in and around the City of Brockton;
- Advertising employment opportunities monthly in a range of publications, such as bilingual media,
- Diverse networking groups that reflect minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations
- Posting open jobs on online public boards;
- Updating recruiters and employment agencies that work with diverse candidates;
- Using social media and online platforms such as Zip Recruiter to reach online career and job websites; and
- Developing relationships with housing, transportation, and other programs designed to improve employment opportunities for diverse people in the community and surrounding areas.

In addition, Cosmopolitan Dispensary will work closely with Fall River's Veterans Agent to identify interested veterans seeking employment in the cannabis industry. CD will also work with established recruiters who specialize in or are familiar with qualified candidates who are women, minorities, people with disabilities and/or people of all gender identities and sexual orientations.

CD will also need to hire specialized talent. As mentioned earlier, CD will rely on employment agencies, internet (websites and advertisement), and local advertisers, to the extent such methods comply with the law and are intended to target only adults, whether this is for security or specialized material or methods specific to the cannabis industry.

CD expects to train its talent on a rolling basis, so that there will always be staff training for management positions. This will enable the business to be prepared for the inevitable employee turnover that affects every business, regardless of industry. Cosmopolitan Dispensary will also provide management training for employees seeking advancement through education credits or benefits.

Employee Retention, Training and Development

Cosmopolitan Dispensary will maintain a diverse and inclusive workforce by mentoring, training, and creating robust professional development programs that recruit, encourage, and promote a diverse workplace.

Awareness of Diversity Plan goals and Cosmopolitan Dispensary's efforts to create a workplace culture with zero tolerance for harassment, or retaliation is crucial to Cosmopolitan Dispensary's success.

Cosmopolitan Dispensary's diversity awareness training will emphasize its zero-tolerance commitment of harassment along with CD's strict adherence to take corrective action should any issues, concerns, or complaints arise. All Cosmopolitan Dispensary employees will be required to complete the diversity awareness training program during their new employee orientation.

CD's new hires will complete a general orientation program and be able to describe, discuss, and respect the tenets outlined in the Diversity Plan. Established employees will take additional diversity training tailored to their specific job functions. CD will also require all Cosmopolitan Dispensary employees and management to complete ongoing diversity training on an annual basis. This will enable all levels of CD management and staff to stay up-to-date on best practices and policies and foster a deep understanding and compliance with CD's Diversity Plan.

Cosmopolitan Dispensary will share information to the company and vendors related to its Diversity Plan by:

- Implementing mandatory diversity training programs for all CD employees;
- Communicating CD's zero-tolerance policies for harassment, and bullying;
- Holding bi-monthly managerial meetings during CD's first year to evaluate the Diversity Plan; over time move to quarterly with successful adoption and adherence to program;
- Employing an effective communications strategy to employees consisting of electronic and print media to support diversity initiatives.

CD also plans to work with the Human Resources Manager and Chief Executive Officer to design an employee retention plan that offers promotions through industry training and education. Furthermore, CD will ensure that all employees have access to opportunities for promotion by communicating opportunities, training programs, and clearly-defined job descriptions.

Measurements

CD will implement a program lead by the CEO and implemented by the Human Resources Manager together with Cosmopolitan Dispensary's respective department managers.

Cosmopolitan Dispensary will develop and implement equitable policies, programs, statements, and internal and external communication procedures in support of the goals of its Diversity Plan. Cosmopolitan Dispensary will help identify problematic areas for such equity, such as:

- Receiving, reviewing, and resolving any complaints of noncompliance with regards to this plan;
- Designing reporting systems that measure effectiveness of programs that support

- the Diversity Plan and present to the Commission as requested;
- Working with CD management solve any issues related to diversity and inclusion;
- Auditing CD's internal and external job postings to ensure all information complies with CD's diversity policies and procedures;

The progress and success of this plan shall be documented upon renewal and each year thereafter.

CD will adhere to the requirements set forth in 935 CMR 500.105(4) concerning the permitting and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments.

In furtherance of this diversity plan CD will not take any action, or institute any programs in violation of the Commission's regulations with respect to limitations on ownership, control or other applicable laws.