



## Massachusetts Cannabis Control Commission

### Marijuana Cultivator

#### General Information:

License Number: MC282135  
Original Issued Date: 11/23/2020  
Issued Date: 11/23/2020  
Expiration Date: 11/23/2021

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: dba EMJ LLC

Phone Number: 413-858-5352 Email Address: pocamep@gmail.com

Business Address 1: 205 West Cummington Rd Business Address 2: Cummington

Business City: Cummington Business State: MA Business Zip Code: 01026

Mailing Address 1: 205 West Cummington Rd Mailing Address 2:

Mailing City: Cummington Mailing State: MA Mailing Zip Code: 01026

### 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: 60 Percentage Of Control: 60

Role: Executive / Officer Other Role:

First Name: Edward Last Name: Stempniewicz Suffix:

Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)	
Specify Race or Ethnicity:	

#### Person with Direct or Indirect Authority 2

Percentage Of Ownership: 20	Percentage Of Control: 20	
Role: Manager	Other Role:	
First Name: Matthew	Last Name: Drawe	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: Worthington		

#### Person with Direct or Indirect Authority 3

Percentage Of Ownership: 20	Percentage Of Control: 20	
Role: Manager	Other Role:	
First Name: Joshua	Last Name: Drawe	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:		

### ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

#### Entity with Direct or Indirect Authority 1

Percentage of Control: 100	Percentage of Ownership: 100		
Entity Legal Name: dba EMJ LLC	Entity DBA: EMJ LLC	DBA City: Cummington	
Entity Description: Tier 1 Marijuana Cultivator.			
Foreign Subsidiary Narrative:			
Entity Phone: 413-858-5352	Entity Email: pocamep@gmail.com	Entity Website:	
Entity Address 1: 205 W Cummington Rd	Entity Address 2:		
Entity City: Cummington	Entity State: MA	Entity Zip Code: 01026	
Entity Mailing Address 1: 205 West Cummington Rd	Entity Mailing Address 2:		
Entity Mailing City: Cummington	Entity Mailing State: MA	Entity Mailing Zip Code: 01026	
Relationship Description: The Marijuana Establishment proposed will be owned and controlled by DBA EMJ LLC which will have complete and sole authority over all operations.			

### CLOSE ASSOCIATES AND MEMBERS

No records found

### CAPITAL RESOURCES - INDIVIDUALS

#### Individual Contributing Capital 1

First Name: Edward	Last Name: Stempniewicz	Suffix:	
Types of Capital: Monetary/Equity	Other Type of Capital:	Total Value of the Capital Provided: \$40000	Percentage of Initial Capital: 100
Capital Attestation: Yes			

### CAPITAL RESOURCES - ENTITIES

No records found

### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

### DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 205 W Cummington Rd

Establishment Address 2:

Establishment City: Cummington

Establishment Zip Code: 01026

Approximate square footage of the Establishment: 1500

How many abutters does this property have?: 5

Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: No

Cultivation Tier: Tier 01: up to 5,000 square feet

Cultivation Environment:

Indoor

### FEE QUESTIONS

Cultivation Tier: Tier 01: up to 5,000 square feet    Cultivation Environment: Indoor

### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host Community Agreement Certification Form.pdf	pdf	5cd2e5eb6375710a5b57f232	05/08/2019
Community Outreach Meeting Documentation	Community Outreach Meeting Attendance Sheet Redacted.pdf	pdf	5df01152160e3b57a3dd64b3	12/10/2019
Community Outreach Meeting Documentation	Published Outreach Meeting Public Notices.pdf	pdf	5e9f2a0eb3c49635509edb1c	04/21/2020
Community Outreach Meeting Documentation	Attachment C Copies of Notices Sent to Abutters.pdf	pdf	5e9f33b2d29ad93571599c6d	04/21/2020
Plan to Remain Compliant with Local Zoning	Host Community Information (Plan to Remain Compliant with Local Zoning).pdf	pdf	5e9f45b29a385038d9d8d859	04/21/2020
Community Outreach Meeting Documentation	Posted Outreach Meeting Notice Town of Cummington Attachment B.pdf	pdf	5ecd6eefddb8c72d5360c92f	05/26/2020
Community Outreach Meeting Documentation	Posted Outreach Meeting Notice Town of Cummington Attachment B.pdf	pdf	5efcd079bda1197ad793cf40	07/01/2020

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	PLAN TO POSITIVELY IMPACT AREAS OF	pdf	5f68dbb311982107a722f294	09/21/2020

Impact	DISPROPORTIONATE IMPACT (rev 3).pdf			
Other	The Gladys Allen Brigham Community Center, Inc. Letter.pdf	pdf	5f68dbcf7e8b3807d9e5d887	09/21/2020

### ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

### INDIVIDUAL BACKGROUND INFORMATION

#### Individual Background Information 1

Role: Executive / Officer Other Role: CEO  
 First Name: Edward Last Name: Stempniewicz Suffix:  
 RMD Association: Not associated with an RMD  
 Background Question: yes

#### Individual Background Information 2

Role: Manager Other Role:  
 First Name: Matthew Last Name: Drawe Suffix:  
 RMD Association: Not associated with an RMD  
 Background Question: no

#### Individual Background Information 3

Role: Manager Other Role:  
 First Name: Joshua Last Name: Drawe Suffix:  
 RMD Association: RMD Owner  
 Background Question: yes

### ENTITY BACKGROUND CHECK INFORMATION

No records found

### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	By Laws_compressed.pdf	pdf	5ce6eea5622b7c1357f6f061	05/23/2019
Secretary of Commonwealth - Certificate of Good Standing	DBA EMJ LLC Formation Affidavit.pdf	pdf	5eb856638caba634a8438c33	05/10/2020
Department of Revenue - Certificate of Good standing	DBA EMJ LLC Certificate of Good Standing Department of Revenue.pdf	pdf	5ebd3f0d0e32c52d2bdd1bf6	05/14/2020
Articles of Organization	Certificate of Organization.pdf	pdf	5f2479f6ca23a6644a587adb	07/31/2020

No documents uploaded

Massachusetts Business Identification Number: 001434567

Doing-Business-As Name: dba EMJ LLC

DBA Registration City: Cummington

### BUSINESS PLAN

Business Plan Documentation:



Document Category	Document Name	Type	ID	Upload Date
Business Plan	DBA EMJ Business Plan.pdf	pdf	5ce6ef4fc70e2b132b312cda	05/23/2019
Plan for Liability Insurance	DBA EMJLLC Business Plan (Plan to Obtain Liability Insurance).pdf	pdf	5dfba8d238abaf57497aa0ba	12/19/2019
Proposed Timeline	DBA EMJLLC Business Plan Proposed Timeline.pdf	pdf	5dfba8dbfe65bd5750701118	12/19/2019

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Quality control and testing	DBA EMJ LLC Operating Policies and Procedures(Quality Control and Testing Procedures).pdf	pdf	5dfbaa30d74bf6532e9ffa1c	12/19/2019
Record Keeping procedures	DBA EMJ LLC Operating Policies and Procedures (Record Keeping Procedures).pdf	pdf	5dfbaa40b7ff09534ba001a7	12/19/2019
Inventory procedures	DBA EMJLLC Operating Policies and Procedures (Inventory Procedures).pdf	pdf	5dfbaac3541f65570b946779	12/19/2019
Storage of marijuana	DBA EMJLLC Operating Policies and Procedures(Storage Plan).pdf	pdf	5dfbaaf538abaf57497aa0c4	12/19/2019
Transportation of marijuana	DBA EMJLLC Operating Policies and Procedures (Transportation Plan) rev.pdf	pdf	5ebd42bfddb8c72d5360ae2e	05/14/2020
Prevention of diversion	DBA EMJ LLC Operating Policies and Procedures (Prevention of Diversion Plan) rev.pdf	pdf	5ebd4817504715348b1e20f7	05/14/2020
Quality control and testing	DBA EMJ LLC Operating Policies and Procedures(Quality Control and Testing Procedures) rev.pdf	pdf	5ebd49165fa02a2d3651d644	05/14/2020
Personnel policies including background checks	DBA EMJ LLC Operating Policies and Procedures (Personnel Policies) rev.pdf	pdf	5ebd50e17d78332d19fc7e3b	05/14/2020
Maintaining of financial records	DBA EMJ LLC Operating Policies and Procedures (Maintenance of Financial Records Plan) rev.pdf	pdf	5ebd51ab5f1314349d5f8ed2	05/14/2020
Qualifications and training	DBA EMJ LLC Operating Policies and Procedures (Qualifications and Intended Trainings for Agents).pdf	pdf	5ebd528ace51fd2d12e5d921	05/14/2020
Policies and Procedures for cultivating.	DBA EMJ LLC Operating Policies and Procedures (Cultivation Plan) rev.pdf	pdf	5ebd53fc0f6f0d34840b3a23	05/14/2020
Security plan	DBA EMJLLC Operating Policies and Procedures (Security Plan) rev 1.pdf	pdf	5f247b8ba24e76648176ce2c	07/31/2020
Restricting Access to age 21 and older	DBA EMJ LLC Operating Policies and Procedures(Restricting Access to Individuals Under 21) rev 1.pdf	pdf	5f247c233935fc643b560059	07/31/2020
Diversity plan	PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT (rev 1).pdf	pdf	5f247fc0193ee2646b479674	07/31/2020
Diversity plan	Diversity Plan rev2.pdf	pdf	5f5fd2aa054242245dc88d31	09/14/2020

## ATTESTATIONS

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

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

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

Notification: I Understand

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

I 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: I Understand

## COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

## COMPLIANCE WITH DIVERSITY PLAN

No records found

## HOURS OF OPERATION


Monday From: 8:30 AM	Monday To: 5:00 PM
Tuesday From: 8:30 AM	Tuesday To: 5:00 PM
Wednesday From: 8:30 AM	Wednesday To: 5:00 PM
Thursday From: 8:30 AM	Thursday To: 5:00 PM
Friday From: 8:30 AM	Friday To: 5:00 PM
Saturday From: Closed	Saturday To: Closed
Sunday From: Closed	Sunday To: Closed

## Host Community Agreement Certification Form

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

### Applicant

I, EDWARD STEPNIWICZ, (insert name) certify as an authorized representative of EMJ LLC (insert name of applicant) that the applicant has executed a host community agreement with CUMMINGTON (insert name of host community) pursuant to G.L.c. 94G § 3(d) on APRIL 4, 2019 (insert date).



Signature of Authorized Representative of Applicant

### Host Community

I, Russell Z Sears Jr, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for Cummington (insert name of host community) to certify that the applicant and Cummington (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 4/4/19 (insert date).



Signature of Contracting Authority or  
Authorized Representative of Host Community



## Community Outreach Meeting

## Attendance Sheet

March 29, 2019

Name \_\_\_\_\_

Address

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A black and white photograph of a steam locomotive pulling a passenger train through a wooded area. The locomotive is dark and has a large smokestack. The train is moving from left to right. The background is filled with trees and foliage.



[REDACTED]

~~[REDACTED]~~

[REDACTED]

50 [REDACTED] 1961

[REDACTED]

1. [REDACTED]

11-10-02



# BUSINESS & SERVICE DIRECTORY

## TO LOCAL SERVICES

Call 586.1700  
Stop by 115 Conz St., Northampton, MA  
8am-5pm Visit [www.gazettenet.com](http://www.gazettenet.com)  
[classifieds@gazettenet.com](mailto:classifieds@gazettenet.com)

Reach over 50,000 homes for as little as \$205.32 for 5 weeks (30 publishing days) with the Gazette, Amherst Bulletin, Home Magazine, The Summit...and on the internet at [www.gazettenet.com](http://www.gazettenet.com). Lower contract rate \$186.02.

### Antiques

**ATTICS TO CELLARS** Buying Antiques, coins, jewelry, 1 piece or entire estate 586-3390 or 559-1681

### Carpentry

**RETIRED GENTLEMAN**, 50 yrs exp. Carpentry, drywall & decks. 478-1262 & 427-5179.

### Dry Wall

**B.R. INTERIORS**, Fine plastering, plaster veneer, drywall Bruce Roth. 585-9023

### Flooring

**A. DION & SON**, Floor Contractors. Installing, sanding, refinishing hardwood floors. (413) 584-6170

### Home Improvement

**AAREN'S HOME IMPROVEMENT**, Kitchens, baths, remodeling, decks, all home repairs. Lic./Ins. 667-5684.

**STRUCTURAL** post & beam sill timbers, sagging floors, termite damage, foundations, home garage, barn, repairs (413) 667-2149

### Antiques

## MERCHANDISE

## Apartment Unfurnished

## REAL ESTATE FOR RENT

**WOOD**, cut, splits delivered. Log length available. Stacking available (413) 695-5799

### Wood Splitting

**CUSTOM SEAT WEAVING**, Cane, Rush, Reed & Danish Cord, 40 yrs. Exp. 268-7798.

### Seat Weaving

**"I Call Does It All"** Lrg or sm. estate, basement & garage clean-outs, Fully Ins. Mark Battey, Owner. Wately (413) 584-5381

### Rubbish Removal

cards. (413) 586-8010. **ence**, Accepting all major credit combined professional expert-pricing and over 50 years of

### Painting

**A BETTER PRICE** Bob's Painting. No job too small. 529-2260. Inter-ior/exterior

**A BRUSH ABOVE**, All Tardy, Interior/Exterior. Free estimates. Visa/MC. 586-4150

**ASAP Painting NEW YEAR - NEW SAVINGS!** Now booking for winter interior painting, residential and commercial. Free estimates and winter discounts! Competitive

### Legals

#### NOTICE OF PUBLIC HEARING OF WESTHAMPTON BOARD OF HEALTH

Pursuant to MGL Ch 111 s 31, A public hearing will be held on Thursday, April 4th at 4:15 pm at the Board of Health office, Westhampton Town Hall Annex, 3 South Rd, Westhampton, MA, to hear comments on the following regulations:

(1) The Westhampton Board of Health or its designated agent shall witness for a fee, all septic systems inspections under its authority, and as required by 310 CMR 15:00. The Board or its agent may require a deep observation hole be dug and witnessed by the Board or its agent to determine or verify the estimated seasonal high ground water as it relates to the septic system's leaching components.

(2) The Westhampton Board of Health or its designated agent shall issue a permit for a fee, for construction of all new drinking water wells under its authority.

#### PUBLIC NOTICE

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for March 29th, 2019 at 7:00 PM at the Community House at 33 Main Street, Westhampton, MA 01026. The proposed Tier 1 Indoor Cannabis Cultivation and Marijuana Product Manufacturer Establishment by EMJ LLC is anticipated to be located in the cellar at 205 West Cummington Road, Cummington, MA 01026. There will be an opportunity for the public to ask questions.

### Legals

#### COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF THE LAND COURT COMPLAINT TO FORFEIT (Seal No. 177L)

TO ALL WHOM IT MAY CONCERN, and to the representatives:

Whereas, a complaint has been presented Cummington, in the County of Hampshire, in and concerning a certain said complaint in and concerning a certain bounded and described in said complaint Land consisting of 17.24 acres on Powe

Assessors Map 13, Lot 14, Hampshire 3929, page 309.

If you desire to make any objection or setting forth clearly and specifically your



## MERCHANDISE

### Antiques

LOU FARRICK wants antiques, estates, furniture, toys Cash. 535-9783, 584-9486

### Fast Action Ads

Argenziano grey sofa (Wayfair) new in sealed box. \$225. 413-387-8501

BASKETCARDS Promo2, #60, #54, #319 1993 gold #316 \$12 **587-0801**

Bureau, 6 drawers, mirror \$85 413-527-7366

chandelier, bronze, French (looks antique) \$105. #413 256 8841

chandelier- 5 candle lights green \$30 413-527-2958 connie dragon

Raymour & Flannigan chair multi-color great cond. \$175 527-1714

VTG. X-COUNTRY SKIS/POLES/BOOTS Ladies 8 WAX \$40 413-549-6814

MENS JACKET New-grey, fleece lined, XXL \$35 (413) 297-3232

LEATHER HANDBAG Black, Like New \$45 (413) 297-3232

CHANDELIER 5 CANDLE LIGHTS LIGHT GREEN \$30 (413) 527-2958

DROP LEAF TABLE LAMP 23" HIGH VINTAGE \$30 (413) 527-8371

CARDS 3-Shaquille O'Neal '92 #1 draft; '93 #315 Gold; '92 #318 \$3 (413) 587-0801

VIOLIN older German make, playing condition. \$150 (413) 582-9162

OAK DRESSER 6 drawers, excellent condition. \$85 (413) 527-7366

HAND CROCHET LAP BLANKET/ pillows Red and Black \$20 (413) 636-3906

SLATE WANTED Old blackboards, Black/dark gray only. (413) 695-3347

MOTORCYCLE JACKET Blk leather, med-lg. Like New \$50 (413) 296-4291

Zeppelin stamp \$100 got stamps? Ron 413-896-3324 Stamps wanted

WORX JAWSAW New Condition \$75 (413) 584-4863

### Wanted To Buy

BASEBALL CARDS WANTED Buying pre-1980 baseball collections. Also similar era basketball, football and hockey cards. Call or text. (413) 695-8131

## REAL ESTATE FOR SALE

### Realtors/Brokers

## Legals

### BELCHERTOWN CONSERVATION COMMISSION LEGAL NOTICE

Pursuant to the authority of Massachusetts General Laws Chapter 131, Section 40 (Wetlands Protection Act) and the Belchertown Wetland Bylaw, the Belchertown Conservation Commission will hold a public hearing on Monday, March 25, 2019 at 7:00 PM at Lawrence Memorial Town Hall. The purpose of this meeting is to review a Notice of Intent for habitat restoration work, at Scarborough Brook Conservation Area on Gulf Rd., Map 408, Lot: various. Anyone interested in this matter should appear at the time and place designated.

March 16

25565

### BELCHERTOWN CONSERVATION COMMISSION LEGAL NOTICE

Pursuant to the authority of Massachusetts General Laws Chapter 131, Section 40 (Wetlands Protection Act) and the Belchertown Wetland Bylaw, the Belchertown Conservation Commission will hold a public hearing on Monday, March 25, 2019 at 7:00 PM at Lawrence Memorial Town Hall. The purpose of this meeting is to review a Request for Determination of Applicability for Solar Array Construction at 260 Ware Rd., Map 245, Lot 62. Anyone interested in this matter should appear at the time and place designated.

March 16

25555

### CITATION ON PETITION FOR FORMAL ADJUDICATION Commonwealth of Massachusetts The Trial Court Probate and Family Court Hampshire Probate and Family Court

33 King Street, Suite 3  
Northampton, MA 01060  
(413) 586-8500

Docket No. HS19P0104EA

Estate of Frank A. Smith  
Also Known as: Frank Austin Smith  
Date of Death: 6/16/2018

To all interested persons:

A Petition for Formal Probate of Will with Appointment of Personal Representative has been filed by: Geraldine M. Smith of Highland, MD requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The petitioner requests that: Geraldine M. Smith of Highland, MD

be appointed as Personal Representative(s) of said estate to serve Without Surety on the bond in an unsupervised administration.

#### IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceedings. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on 03/22/2019.

This is NOT a hearing date, but a

## Legals

### CITATION ON PETITION TO CHANGE NAME Commonwealth of Massachusetts

The Trial Court  
Probate and Family Court  
Hampshire Probate and  
Family Court  
33 King Street, Suite 3  
Northampton, MA 01060  
(413) 586-8500

Docket No. HS19C0027CA

In the matter of: Rachel Malke Young, a petition has been presented by Rachel Malke Young of Hadley, MA, requesting that the court enter a Decree changing their name to: Ray Malke Young.

#### IMPORTANT NOTICE

Any person may appear for purposes of objecting to the petition by filing an appearance at: Hampshire Probate and Family Court before 10:00 a.m. on the return day of 4/25/19. This is NOT a hearing date, but a deadline by which you must file a written appearance if you object to this proceeding.

WITNESS, Hon. Linda S. Fidnick, First Justice of this Court.

Date: March 13, 2019

Michael J. Carey  
Register of Probate

March 16

25496

## START HERE



THEN VISIT  
marketplace.  
gazettenet.com

## Legals

### NOTICE

The Northampton Department of Public Works, through the Water Division, is making available its Consumer Confidence Report (CCR) for calendar year 2018. The CCR reflects 2018 water quality monitoring, water treatment techniques, source water assessment, and other compliance programs required by the federal Safe Water Drinking Act (SDWA). The CCR complies with the consumer right-to-know provisions of the SDWA.

All customers will receive a copy of the CCR in the mail. If you would like a copy sent to you, please contact the Northampton Department of Public Works at 413-587-1570.

Copies are also available at City Hall, Forbes Library, Lilly Library, Department of Public Works at 125 Locust Street and local Post Offices.

The report can also be viewed online at <http://www.northampton.ma.gov/770/Water>  
Donna LaScala  
Director of Public Works

March 16

25467

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March 16, 21

25534

## Open House

The  
**Murphys**  
Realtors

**413-584-5700**

**44 Conz St. Northampton, MA**

**OPEN HOUSE**

**155 Prospect St., Northampton**

**NEW LISTING!**

Classic traditional design. Walk, walk, walk Everywhere! Downtown, Smith College, Childs Park! Charming natural woodwork, updated kitchen & baths, hardwood floors & more. Two car garage & off street parking. 3rd floor master studio office.  
**\$439,000**



Call or Text:  
J.P. Kwiecinski  
413-575-6009



ATTACHMENT C

To:

[REDACTED]

48 PACKARD ROAD  
CUMMINGTON MA 01026

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ATTACHMENT C

To:

[REDACTED]

278 EAST HARBOR RD  
CHESHIRE MA 01225

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ATTACHMENT C

To:

[REDACTED]

766 WASHINGTON ROAD  
HINSDALE MA 01235

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## ATTACHMENT C

To:

[REDACTED]

12400 ELMORE RD  
ANCHORAGE AK 99516

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ATTACHMENT C

To:

[REDACTED]  
[REDACTED]

P.O. BOX 205  
CUMMINGTON MA 01026

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ATTACHMENT C

To:

[REDACTED]

33 MAIN ST  
CUMMINGTON MA 01026

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## ATTACHMENT C

To:

[REDACTED]

[REDACTED]

47 WILBERT TERRACE  
FEEDING HILLS MA 01030

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ATTACHMENT C

To:

[REDACTED]

2 CHERRY ST  
NORTHAMPTON MA 01060

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ATTACHMENT C

To:

[REDACTED]

12 BROOKSIDE DR  
CAMBRIDGE NY 12816

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ATTACHMENT C

To:

[REDACTED]  
[REDACTED]

P.O. BOX 323  
CUMMINGTON MA 01026

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### Host Community Information (Plan to Remain Compliant with Local Zoning)

DBA EMJ LLC will operate out of the cellar of the home at 205 West Cummington Rd, Cummington MA. , Home based businesses that employ no more than three persons from the outside of, or in addition to, the resident family member, such as DBA EMJLLC, currently do not require a special permit and are allowed to operate by matter of right. The Town of Cummington Zoning By Laws Section 5 Use Regulation Schedule evidencing the “by right” operation of home based businesses is attached. There are currently no local licensing requirement restrictions for home based businesses that employ more than three persons from the outside of, or in addition to, the resident family member, such as DBA EMJ LLC to not operate an indoor cannabis cultivation operation. DBA EMJLLC will abide by all regulations of the Town of Cummington. Should a Special Permit be required in the future it will be obtained. Such permits for indoor cultivation for other indoor non home based entities have been issued and conversations with the zoning board have indicated that should the zoning by laws be amended requiring special permits for home based businesses as our proposed operation, there should be no difficulty in obtaining one. When special permits are required they have a duration of 5 years before renewal is required.

<b>Activity or Use</b> (All activities and uses are also subject to the Overlay District requirements of the Floodplain/Westfield River and Water Supply Protection Districts in Section 4-30 where applicable)	<b>District</b>	
	RR	V
<b><i>BUSINESS.</i></b>		
Auto, boat, or farm equipment sales, rental, service.	SPA	SPA
Bank, financial institutions.	SPA	SPA
Business or professional offices.	SPA	SPA
Funeral Home.	SPA	SPA
Restaurants, eating establishments.	SPA	SPA
Retail sales or services.	SPA	SPA
Wholesale without storage.	SPA	SPA
Home occupations that employ no more than three (3) persons from the outside of, or in addition to, the resident family members.	Y	Y
Motels or Hotels.	SPA	SPA
Other business uses which meet the intent and purpose of this By-Law.	SPA	SPA
The manufacture, storage or dumping of toxic, or hazardous waste materials.	N	N
Gravel bank, Quarry, etc.	SPA	SPA

- iii. Evidence of compliance with the Regulations of the Massachusetts Hazardous Waste Management Act 310, CMR 30, including obtaining an EPA identification number from the Mass. Department of Environmental Protection.
  - iv. Drainage recharge features and provisions to prevent loss of recharge.
  - v. Provisions to control soil erosion and sedimentation, soil compaction, and to prevent seepage from sewer pipes.
- 3) Additional procedures for Special Permit in the Water Supply Protection District.
- a) The Zoning Board of Appeals shall follow all Special Permit procedures in Section 5-C and specified in M.G.L. Chapter 40A.
  - b) In addition to the findings in Section 5-C, the Zoning Board of Appeals may grant the required Special Permit only upon finding that the proposed use meets the following standards:
    - i. In no way, during construction or thereafter, will it adversely affect the existing or potential quality or quantity of water that is available in the Water Supply Protection District, and;
    - ii. Be designed to avoid substantial disturbance of the soils, topography, drainage, vegetation and other water-related natural characteristics of the site to be developed.
  - c) The Zoning Board of Appeals shall not grant a Special Permit under this section unless the petitioner's application materials include, in the Board's opinion, sufficiently detailed, definite and credible information to support positive findings in relation to the standards given in Section 5-C.
- i. Non-Conforming Use.
- Non-conforming uses which were lawfully existing, begun or in receipt of a building or Special Permit prior to the first publication of notice of public hearing for this By-Law may be continued. Such non-conforming uses may be extended or altered, as specified in M.G.L. Ch. 40A, Sec. 6, provided that there is a finding by the Zoning Board of Appeals that such change does not increase the danger of surface or groundwater pollution from such use.

## SECTION 5. USE REGULATION SCHEDULE

### 5-10 General Requirements

1. No building or structure shall be erected or used and no land shall be used except as set forth in the Use Regulation Schedule or as otherwise exempted by statute.
2. All new buildings, structures or uses of land shall comply with the state sanitary code for year round use.

### 5-20 Use Regulation Schedule

Symbols employed in the Use Regulation Schedule shall mean the following:

Y	A permitted use.
N	An excluded or prohibited use.
SPA	A use permitted by Special Permit from the Board of Appeals, when acting as the Special Permit granting authority.
SPS	A use permitted by Special Permit from the Board of Selectmen, when acting as the Special Permit granting authority.

USE REGULATION SCHEDULE		
Activity or Use  (All activities and uses are also subject to the Overlay District requirements of the Floodplain/Westfield River and Water Supply Protection Districts in Section 4-30 where applicable)	District	
	RR	V
<b>AGRICULTURAL, INCLUDING RELATED STRUCTURES.</b>		
Agriculture including farms, raising livestock, woodlots & growing crops.	Y	Y
Floriculture.	Y	Y
Horticulture.	Y	Y
Roadside Stand.	Y	SPA
Greenhouse.	Y	SPA
Activity or Use  (All activities and uses are also subject to the Overlay District requirements of the Floodplain/Westfield River and Water Supply Protection Districts in Section 4-30 where applicable)	District	
	RR	V
<b>BUSINESS.</b>		
Auto, boat, or farm equipment sales, rental, service.	SPA	SPA
Bank, financial institutions.	SPA	SPA
Business or professional offices.	SPA	SPA
Funeral Home.	SPA	SPA
Restaurants, eating establishments.	SPA	SPA
Retail sales or services.	SPA	SPA
Wholesale without storage.	SPA	SPA
Home occupations that employ no more than three (3) persons from the outside of, or in addition to, the resident family	Y	Y

members.		
Motels or Hotels.	SPA	SPA
Other business uses which meet the intent and purpose of this By-Law.	SPA	SPA
The manufacture, storage or dumping of toxic, or hazardous waste materials.	N	N
Gravel bank, Quarry, etc.	SPA	SPA
Activity or Use (All activities and uses are also subject to the Overlay District requirements of the Floodplain/Westfield River and Water Supply Protection Districts in Section 4-30 where applicable)	District	
	RR	V
<b>INSTITUTIONAL</b>		
Educational uses exempted by M.G.L Ch.40A, Sec. 3.	Y	Y
Municipal uses.	Y	Y
Religious uses exempted by M.G.L.Ch. 40A, Sec. 3.	Y	Y
Nursing Home, hospital or similar use.	SPA	SPA
Private profit-making school.	SPA	SPA
Activity or Use (All activities and uses are also subject to the Overlay District requirements of the Floodplain/Westfield River and Water Supply Protection Districts in Section 4-30 where applicable)	District	
	RR	V
<b>RECREATION/OPEN SPACE</b>		
Cemetery.	SPA	SPA
Recreational facility such as golf course, ski area, camping area, riding stable, etc.	SPA	SPA
Conservation.	Y	Y
Activity or Use (All activities and uses are also subject to the Overlay District requirements of the Floodplain/Westfield River and Water Supply Protection Districts in Section 4-30 where applicable)	District	
	RR	V
<b>RESIDENTIAL</b>		
Single family.	Y	Y
Two family.	Y	Y
Mobile home permitted on a six (6) month basis.	SPS	SPS
Conversion of single family to two family.	SPA	SPA

<b>Activity or Use</b> (All activities and uses are also subject to the Overlay District requirements of the Floodplain/Westfield River and Water Supply Protection Districts in Section 4-30 where applicable)	<b>District</b>	
	RR	V
<b>MISCELLANEOUS</b>		
Accessory buildings to home occupations.	SPA	SPA
Accumulation of old metals, machinery, or other items used for legitimate purposes.	Y	Y
Accumulation of those items which may be hazardous, injurious or obnoxious to the neighborhood.	N	N
Harboring junk or old metal for sale.	SPS	SPS
Uses accessory to scientific research, development or related production.	SPA	SPA
Temporary mobile home on the site of a residence which has been destroyed by fire or other natural holocaust. Such mobile home shall not be permitted beyond twelve months while residence is being rebuilt. Any such mobile home shall be subject to the provisions of the state sanitary code.	Y	Y
Accessory structures to residential buildings.	SPA	SPA
Buildings accessory to residences.	Y	Y

## SECTION 6. DIMENSIONAL REGULATION SCHEDULE

### 6-10 General Requirements

1. The following Dimensional Regulations shall apply to all uses, including educational and religious uses exempted by M.G.L. Chapter 40A, Section 3.
2. In addition to the following Dimensional Regulations, any use which is held to be harmful to the general public or to abutters or their interests due to undue noise, odor, vibration, dust, smoke, water pollution, or for any other similar reason, may be required by the Zoning Enforcement Officer to have a Minimum Yard Setback of Five hundred (500) feet from all property lines.
3. A building or structure may be constructed within three hundred (300) feet or less of the closest bank of any stream, river or brook or flowing water, ONLY if the applicant for such building permit submits a registered sanitarian's proposal for a workable disposal system that will not leach into those waters.

### 6-20 Dimensional Regulation Schedule

District	Minimum Lot	Minimum	Minimum Yard Setbacks
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## **Attachment B**

**To:**

TOWN OF CUMMINGTON  
33 MAIN ST  
CUMMINGTON MA 01026

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TOWN OF CUMMINGTON  
33 MAIN ST  
CUMMINGTON MA 01026

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## PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

DBA EMJ LLC will do everything it can to support areas of disproportionate impact, which the Cannabis Control Commission has identified as the following:

1. Past or present residents of the geographic “areas of disproportionate impact,” which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions are classified as areas of disproportionate impact.

With success and further need for employees, we will focus our recruiting effort to obtain personnel from the communities of Amherst, Greenfield, North Adams, and Pittsfield. The four closest communities identified by the Cannabis Commission as areas of disproportionate impact. It is our intention to positively impact areas of disproportionate impact.

Our enterprise will have 6 primary goals outlined below together with the programs to be used to implement them and the metrics to be utilized to measure success.

Goals:

- 1) The enterprise commits to attempting to maintain and staff operations that will be composed of a minimum of 25 to 50% of individuals from areas of disproportionate impact or other Massachusetts residents who have past drug convictions.

The facility where operations will begin is currently 100% powered by a solar pv array, The enterprise fully intends to try to reinvest profits to construct a fully self-sustaining, net zero, state of the art facility on land adjacent and owned by one of the principals. It is anticipated construction will begin in year 2, subject to receiving all relevant approvals and permits. Given the positive reaction we have received from local authorities we do not anticipate any difficulties in achieving this goal which would eliminate the current employee restrictions. We will attempt and believe we can increase employment significantly each year after the first year of operations with the staff consisting of 25 to 50% of what the Cannabis Commission considers disproportionately impacted.

Despite staffing restrictions at the onset of operations, in order meet the goals of positively affecting areas of disproportionate impact we intend to out source services such as marketing, tax preparation, accounting, web design, etc, when necessary and possible to individuals and enterprises from areas of disproportionate impact and to document all such accomplishments.

Profits will be reinvested in the operation. With expansion and diversification after 5 years employees could number as high as 98 while maintaining at least 25 to 50% of the workforce to individuals who fall under the Commission’s definition of disproportionately impacted.

- 2) Establish recruitment efforts at higher learning institutions and institutions with special programs that reach individuals from disproportionate impact areas. Upon licensure approval the applicant will contact the relevant institutions to establish relationships. Such as Berkshire Community College, Massachusetts College of Liberal Arts, Greenfield Community College, Holyoke Community College and others as needed. The goal is to develop 2 such relationships within the first year of operation..
- 3) Participate in or sponsor career fairs to attract future employees from disproportionate impact areas. The goal is to participate in 1 such fair in year one and increase such events as the need for employees arises.
- 4) Offer job skill assessments and provide guidance for interested parties from disproportionate impact areas to receive training relevant to establishment positions. At least 1 open house at the establishment will be held on an annual basis where we will offer mentoring, professional, and technical services for individuals and businesses facing systemic barriers. Such events will increase as the need arises.
- 5) Encourage employees to refer applications for employment from disproportionate impact areas. It is hoped that 10 to 25% of employees will be sourced in this manner. Bonuses will be offered to all employees and new hires that aid the enterprise to achieve its goals of achieving this plan for positive impact.
- 6) DBA EMJ LLC will establish a fund that will Implement a charitable giving program to local non profits and cultural events wherein it will set aside an amount equal to ten percent (10%) of the Company's annual profits that will be donated to organizations that provide services to past or present residents of areas of disproportionate impact and/or who help Massachusetts residents with past drug convictions. The Gladys Allen Brigham Community Center, Inc. has agreed to be the first such institution to be in this program.

#### Programs for Goal Achievement

- 1) Advertisements for employment, as the need arises, in the local newspapers of Pittsfield, North Adams, Greenfield and Amherst the closest communities of disproportionate impact to the site of operations.
- 2) Sponsor career fairs as the need arises for residents from Pittsfield, North Adams, Greenfield and Amherst, the closest communities of disproportionate impact to the site of operations. Such career fairs will be held at least once annually, or more often should the need arise, either in house or on line via a virtual platform.
- 3) Host in house events to promote the hiring of employees in order to achieve positive impact goals at least once a year Notification of such events will be advertised in appropriate media publications and on line, as necessary. Such events will be open to all wishing to attend with a

limit to 10 individuals per session. Should interest warrant, then several sessions will be scheduled.

- 4) Hold monthly meetings with employees on implementing effective strategies towards achieving positive impact goals.

#### Metrics

- 1) Maintain, count, and monitor employee records to ensure that the 25 to 50% goal of all employees are composed of from areas of disproportionate impact or other Massachusetts residents who have past drug convictions;.
- 2) Keep detailed records and results of relationships established with institutions with special programs that reach diverse people.
- 3) Maintain records of the results of job fairs attracting individuals from communities of disproportionate impact.
- 4) Document and count results of any new employees acquired through sponsored in house events.
- 5) Keep minutes of all internal meetings as to the effectiveness of past strategies towards meeting positive impact goals.
- 6) Maintain a detailed accounting of all contributions to local non-profits and local cultural events Identify and track the Company's overall financial support to all such organizations and events. Identify the amount of all donations made by the enterprise during the positive impact plan year, and to which organizations those donations went. Documentation of all such activities oriented to organizations that serve Areas of Disproportionate Impact, or residents with previous drug convictions, will be available for inspection by the Commission upon request.

All progress and success in implementing and meeting DBA EMJ LLC's Plan for Positive Impact will be documented one year from provisional licensure, and each year thereafter.

DBA EMJ LLC 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. Any actions taken, or programs instituted, by DBA EMJ LLC will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

# BYLAWS OF DBA EMJ LLC

Adopted as of 5/20/2019

## 1. BOARD OF DIRECTORS

- a. **Powers.** Subject to the provisions of any state law, federal law, the articles of inbusiness, and the bylaws, the Board of Directors will manage all business and affairs of the business. All business powers will be exercised by or under the direction of the Board of Directors.
- b. **Standard of Care.** Each Director must exercise business powers and perform business duties loyally, in good faith, in a manner such Director believes to be in the best interest of the business, and with reasonable care using the ordinary prudence that a person in similar position would use under comparable circumstances. Each Director may be held accountable and subject to disciplinary action by the business as permitted by state and federal law for failure to meet the necessary standard of care towards the business.
- c. **Number and Qualification.** The authorized number of Directors is . The number of Directors may be changed by an amendment to the articles of inbusiness or as permitted by law. Directors need not be unless otherwise required.
- d. **Election and Term of Directors.** The Board of Directors will be elected at each annual meeting Each Director, including a Director elected to fill a vacancy, will hold office until both the expiration of the elected term and until a successor has been elected and qualified.
- e. **Vacancies.** A vacancy in the Board of Directors exists when there are fewer Directors holding office than authorized as a result of death, removal, resignation
- f. **Resignation.** Any Director may resign effective upon giving written notice to the Secretary unless the notice specifies a later time for that resignation to become effective.
- g. **Removal**
  - i. Any Director unless otherwise restricted by law, or the bylaws.
  - ii. However, no Director may be removed without cause if the votes cast against the Director's removal would be sufficient to elect the Director under cumulative voting at an election of the entire Board of Directors.

- iii. No reduction of the authorized number of Directors may have the effect of removing any Director before the Director's term of office expires.

#### **h. Meetings**

- i. *Time and Place of Meetings.* Regular meetings of the Board of Directors will be held without notice at such time and place as may be determined by Board resolution. Absent such resolution, regular meetings will be held at the business's principal executive office. Special meetings may be held at any place designated in the notice of the meetings or, if not stated in the notice or there is no notice, at the business's principal executive office.
- ii. *Telephonic, Video or Electronic Transmission of Meetings.* Unless otherwise restricted by law, or the bylaws, members of the Board of Directors and any committee designated by the Board of Directors may participate in any meeting by means of conference telephone, video communication, or other electronic transmission methods so long as all Directors or committee members can hear each other and have the capacity to propose or object to specific actions proposed to be taken by the business.
- iii. *Special Meetings.* Special meetings of the Board of Directors may be held for any purpose at any time by the Chairman of the Board, the President, any Vice President, the Secretary, or any two Directors.
- iv. *Notice of Special Meetings.* Notice of the time and place for special meetings must be given at least four (4) days before the date set for the meeting. Notice may be given personally, by first-class mail, by telephone (including voice messaging system), by facsimile, by electronic mail, or by any other means as permitted by law. The notice need not specify the purpose of the meeting nor the place if the meeting is to be held at the principal executive office of the business.
- v. *Waiver of Notice.* Any deficiency in the notice of a Board meeting can be waived by attending the meeting without objecting at the commencement of the meeting, by written waiver before or after the meeting filed with the business records, or by an approval of the minutes of the meeting.

#### **i. Quorum and Voting**

- i. A majority of the total number of Directors constitute a quorum for the transaction of business at a Board meeting. The act of a majority of Directors present at any Board meeting where a quorum is present will be considered the act of the Board of Directors, except as may otherwise be provided by law.



- ii. If a quorum is not present at any meeting of the Board of Directors, the Directors present may adjourn the meeting without notice other than an announcement at the meeting until a quorum is present.
  - iii. A meeting where a quorum is initially present may continue to transact business notwithstanding the withdrawal of Directors if any action taken is approved by at least a majority of the number of Directors required to constitute a quorum for that meeting.
- j. **Directors Acting by Unanimous Written Consent without Meeting.** Unless otherwise restricted by the articles of inbusiness or these bylaws, any action required or permitted to be taken at any meeting of the Board of Directors, or of any committee thereof, may be taken without a meeting if all members of the Board or committee consent in writing or by electronic transmission. A record of the unanimous written consent must be filed with the business records. Notwithstanding the foregoing, a Board of Directors constituting less than the full number of authorized Directors may act by written consent according to procedures established herein to fill vacancies.
- k. **Fees and Compensation.** Unless otherwise provided by law or the articles of inbusiness, Directors and members of a Director's committee receive compensation for their services and receive reimbursement for expenses. The Board of Directors has the authority to fix the compensation and approve reimbursement of expenses, if any, by resolution. Any Director or committee member may serve the business in another capacity, for instance as an officer, employee, or otherwise, and may receive compensation for such services.
- l. **Committees.** The Board may appoint committees by resolution passed by a majority of the whole Board, committee membership and composition subject to rules and procedures as permitted by law. Each committee has such powers as may be expressly delegated to it by resolution of the Board except those powers expressly non-delegable by law.

## 2. OFFICERS

- a. **Principal Officers and Tenure.** The principal officers of the business will be a Chairman of the Board or a President or both, a Secretary who may also be called a Clerk, and a Treasurer who may also be called a Chief Financial Officer. The principal officers will be chosen by the Board of Directors and each will serve at the pleasure of the Board of Directors until a successor is duly appointed and qualified or until the officer's death, resignation, or removal as provided by these bylaws, subject to any contractual employment rights that may apply. One person may hold multiple officer positions.

- i. *Chairman of the Board.* The Chairman of the Board, if such an officer is elected, will
  - A. preside at all meetings of the Board of Directors;
  - B. exercise and perform such powers and duties as may from time to time be assigned by the Board of Directors or prescribed by the bylaws; and
  - C. exercise and perform such powers and duties prescribed to the President if no President exists.
- ii. *President/Chief Executive Officer.* Subject to the supervisory powers that may be given by the Board of Directors to the Chairman, if such an officer is elected, the President will
  - A. have general supervision, direction, control, and management of the business and affairs of the business;
  - B. preside at all meetings of the
  - C. preside at all meetings of the Board of Directors in the absence of the Chairman or where there is no such position; and
  - D. exercise and perform such powers and duties as may be prescribed by the Board of Directors or these bylaws.
- iii. *Secretary/Clerk.* The Secretary will
  - A. maintain at the principal executive office or such other place as the Board of Directors may determine, a book of minutes of all meetings of Directors, committees of Directors, and
  - B. give notice of all and Board of Director meetings as required by law and these bylaws;
  - C. maintain the business seal, if one exists, in safe custody; and
  - D. exercise and perform such powers and duties as may be prescribed by the Board of Directors or these bylaws.
- iv. *Treasurer/Chief Financial Officer.* The Treasurer will
  - A. maintain adequate and correct books and records of all business financial transactions including, but not limited to, accounts of its assets, liabilities, receipts, disbursements, gains, losses, capital, retained earnings, and



- B. deposit all moneys, drafts, checks, and other valuables in the name and to the credit of the business in the banks and depositories designated by the Board of Directors;
  - C. disburse business funds as instructed by the Board of Directors;
  - D. submit to the President and the Board of Directors, upon request, an account of all the Treasurer's transactions and of the financial condition of the business; and
  - E. exercise and perform such powers and duties as may be prescribed by the Board of Directors or these bylaws.
- b. **Subordinate Officers and Tenure.** The business may also have, at the discretion of the Board of Directors, one or more Vice Presidents and such other subordinate officers as may be appointed and removed by the President as the business of the business may require. Subordinate officers have such authority and will perform such duties as are provided in the bylaws or as the Board of Directors may determine from time to time. Additionally, in the absence or disability of the principal officer for which they assist and support, the subordinate officers will perform all the duties and have all the powers and restrictions of their principal officer.
- c. **Standard of Care.** Each principal and subordinate officer must exercise business powers and perform business duties loyally, in good faith, in a manner such officer believes to be in the best interest of the business, and with reasonable care using the ordinary prudence that a person in similar position would use under comparable circumstances. Each officer may be held accountable and subject to disciplinary action by the business as permitted by state and federal law for failure to meet the necessary standard of care towards the business.
- d. **Removal and Resignation**
  - i. *Principal Officer.* Subject to any contractual employment rights that the principal officer may have, any principal officer may be removed, with or without cause, by a majority of the Directors at the time in office at any regular or special meeting of the Board.
  - ii. *Subordinate Officer.* Subject to any contractual employment rights that a subordinate officer may have, any subordinate officer may be removed by the President, with or without cause, as the business of the business may require.



- e. **Vacancies in Office.** A vacancy in any office because of death, resignation, removal, disqualification, or any other cause must be filled in the manner described in the bylaws for regular appointments to such office.

### 3. INDEMNIFICATION

- a. **Directors and Officers.** The business will not indemnify its Directors and officers to the extent permitted by law, and the Directors' or officers' individual contracts against expenses (including attorneys' fees), judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with any proceeding arising by reason of the fact that such person is or was a Director or officer of the business.
- b. Irrespective of the foregoing, the business may not be required to indemnify any Director or officer in connection with any proceeding (or part thereof) initiated by the Directors or officers themselves unless
  - i. such indemnification is expressly required by law; or
  - ii. the proceeding was authorized by the Board of Directors.
- c. **Employees and Other Agents.** The business will not indemnify its employees and other agents to the extent permitted by law, , and any applicable individual contracts against expenses (including attorneys' fees), judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with any proceeding arising by reason of the fact that such person is or was an employee or agent of the business.
- d. Irrespective of the foregoing, the business may not be required to indemnify any employee or agent in connection with any proceeding (or part thereof) initiated by the employee or agent themselves unless
  - i. such indemnification is expressly required by law; or
  - ii. the proceeding was authorized by the Board of Directors.

### 4. GENERAL PROVISIONS

- a. **Fiscal Year.** The business's fiscal year is the twelve (12) consecutive months ending on the last day of December or as fixed by resolution of the Board of Directors and may be changed by the Board of Directors.
- b. **Checks, Drafts, and Evidence of Indebtedness.** All checks, drafts, and other payment of money, notes, or any form of indebtedness, issued in the name of or payable to the business, must be signed or endorsed by such person or persons in such manner as, from time to time, is determined by resolution of the Board of Directors.

- c. Executing Business Contracts and Instruments.** The Board of Directors, except as otherwise provided in the bylaws, may authorize any officer or agent to enter into any contract or execute any instrument in the name of or on behalf of the business. Such authority may be general or confined to specific instances. Unless so authorized or ratified by the Board of Directors or by an officer acting within proper agency power, no officer, agent, or employee has any power or authority to bind the business by any contract or engagement or to pledge its credit or render it liable for any purpose or to any amount.
- d. Conflicts of Interest.** The following conflict of interest policy is intended to supplement, but not replace, any applicable state and federal laws governing conflict of interest applicable to business's and is not intended as an exclusive statement of responsibilities. All Directors or officers have a duty to disclose the existence of any actual or potential conflict of interest, whether personal or financial in nature, and to disclose all relevant material facts to the Directors to enable them to consider whether a conflict exists and whether the proposed transaction or arrangement is in the best interests of the business. Upon disclosure of an actual or potential conflict of interest, and after the interested person has had a full opportunity to disclose the relevant facts, the interested person must leave the meeting and the remaining Board members will decide if a conflict of interest exists. Whenever the Board determines that a Director or officer has an actual or potential financial or personal interest in any matter coming before the Board of Directors, the Board must ensure the following:

  - i.** The financial or personal interest of such Director or officer is fully disclosed with all relevant material facts to the Board of Directors;
  - ii.** No interested Director or officer may vote or lobby on the matter or be counted in determining the existence of a quorum at the meeting of the Board of Directors at which such matter is voted upon;
  - iii.** Any transaction involving the Director's or officer's financial or personal interest must be duly approved by disinterested Directors in the best interest of the business;
  - iv.** Payment must be reasonable and must not exceed fair market value; and
  - v.** The minutes of meetings at which such votes are taken must include a record of such disclosures, abstention, and rationale for approval.
- e. Offices.** The registered office of the business is located at 205 W Cummington Rd, Cummington, MA 01026 or as otherwise designated by the Board of Directors. The Board of Directors may at any time and place establish offices as required where the business is qualified to do business.

- f. Governing Law.** The bylaws will be governed, construed, and interpreted by, through, and under the laws of Massachusetts.
- g. Business Seal.** The Board of Directors may adopt a business seal, which may be altered from time to time with majority Board approval. The seal may be used by causing it, or a facsimile thereof, to be impressed or affixed or reproduced in any other manner.

## **CERTIFICATION OF ADOPTION**

I, Edward Stempniewicz, hereby certify the following:

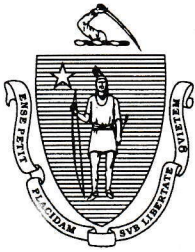
I am the Secretary of dba EMJ LLC, a Massachusetts business; and

The foregoing bylaws are a true and correct copy of the bylaws of the business as duly adopted by approval of the Board of Directors of the business by unanimous written consent on 5/20/2019.

Signed: 

Secretary: Edward Stempniewicz





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

William Francis Galvin  
Secretary of the  
Commonwealth

April 21, 2020

TO WHOM IT MAY CONCERN:

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

**DBA EMJ LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **April 16, 2020.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are:  
**EDWARD STEMPNIEWICZ**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **EDWARD STEMPNIEWICZ**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **EDWARD STEMPNIEWICZ**



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



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

mass.gov/dor

Letter ID: L1147079232  
Notice Date: May 12, 2020  
Case ID: 0-000-957-101



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



DBA EMJ LLC  
205 W CUMMINGTON RD # CUMMINGTON  
CUMMINGTON MA 01026-9723

### ***Why did I receive this notice?***

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

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

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

### ***What if I have questions?***

If you have questions, call us at (617) 887-6400 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](http://mass.gov/dor) to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



**The Commonwealth of Massachusetts**  
**William Francis Galvin**

Minimum Fee: \$500.00

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

**Certificate of Organization**

(General Laws, Chapter )

Identification Number: 001434567

1. The exact name of the limited liability company is: DBA EMJ LLC

**2a. Location of its principal office:**

No. and Street: 205 WEST CUMMINGTON RD  
 City or Town: CUMMINGTON State: MA Zip: 01026 Country: USA

**2b. Street address of the office in the Commonwealth at which the records will be maintained:**

No. and Street: 205 WEST CUMMINGTON RD  
205 WEST CUMMINGTON RD  
 City or Town: CUMMINGTON State: MA Zip: 01026 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:  
INDOOR AGRICULTURAL PLANT GROWING

**4. The latest date of dissolution, if specified:**

**5. Name and address of the Resident Agent:**

Name: EDWARD STEMPNIEWICZ  
 No. and Street: 205 WEST CUMMINGTON RD  
 City or Town: CUMMINGTON State: MA Zip: 01026 Country: USA

I, EDWARD STEMPNIEWICZ resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	EDWARD STEMPNIEWICZ	205 WEST CUMMINGTON RD CUMMINGTON, MA 01026 UNI

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

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

SOC SIGNATORY

EDWARD STEMPNIEWICZ

205 WEST CUMMINGTON RD  
CUMMINGTON, MA 01026 USA

**8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:**

<b>Title</b>	<b>Individual Name</b> First, Middle, Last, Suffix	<b>Address</b> (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	EDWARD STEMPNIEWICZ	205 WEST CUMMINGTON RD CUMMINGTON, MA 01026 USA

**9. Additional matters:**

**SIGNED UNDER THE PENALTIES OF PERJURY, this 16 Day of April, 2020,**  
**EDWARD STEMPNIEWICZ**

*(The certificate must be signed by the person forming the LLC.)*



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:

April 16, 2020 03:57 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*

# DBA EMJ LLC

# Business Plan

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## Executive Summary

DBA EMJ LLC (“EMJ”) hopes to penetrate the Cannabis cultivation Market In Massachusetts. The company will use 1500 square feet in a building located at 205 West Cummington Rd, Cummington, Massachusetts to start growing as soon as feasible.

EMJ will be formed as a limited liability company to be owned by Matthew Drawe, Joshua Drawe and Edward Stempniewicz.

We will offer a variety of cannabis products to retail distributors who have legal identification indicating that they are permitted to purchase marijuana products from a fully licensed Massachusetts marijuana cultivator. Two such distributors have already committed to purchase 100 % of production.

EMJ will Leverage its expertise to create a premium organic craft medicinal and recreational cannabis product for the market in the state of Massachusetts.

Our team is committed to the highest standards of safety, professionalism, and integrity. We will apply our greatest effort to achieve productivity and quality as set forth in our commitment to produce the best possible cannabis products we can by using the most responsible methods available.

## Main Goals

- To obtain all necessary governmental approvals to begin a successful cultivation operation.
- To be fully compliant with all state and local requirements necessary for the

implementation of a successful cannabis cultivation business.

## Mission

To grow the highest quality medicinal and recreational Cannabis product for the Massachusetts state market.

## Products and Services

The company plans within the first year of operation to have the ability to vegetate up to four hundred plants from seedling to finished product. EJM will dry and process all cannabis flowers into labeled inventoried vacuum sealed bags before delivery.

## Market Opportunities

The United States cannabis market totaled over 10.4 billion dollars in 2018. It is projected the overall cannabis Market sales in North America will reach 24 and 1/2 billion dollars by 2021 with a compound annual growth rate of almost 28%.

In 2008 Massachusetts voters decriminalized the possession of small amounts of marijuana. Massachusetts became the eighteenth state to legalize medical marijuana when voters passed a ballot in 2012. Recreational marijuana is legal in Massachusetts as of December 15, 2016, following a ballot initiative in November of that year. As of 2010 almost 10% of Massachusetts residents had used marijuana in the past month, and almost 16% had used marijuana within the past year. Besides recreational use, studies have shown cannabis to be useful in treating all of the following: Anxiety, Cancer/Chemotherapy, Chronic Pain, Crohn's Disease, IBD (Inflammatory Bowel Disease), Depression, Glaucoma, Hepatitis C, HIV/AIDS, Lou Gehrig's Disease, ALS (Amyotrophic lateral sclerosis), Multiple Sclerosis (MS), Parkinson's Disease (including Early-Onset), PTSD (Post-Traumatic Stress Disorder) and Rheumatoid Arthritis.

The state of Massachusetts is in the early stages of a legalized cannabis market. We would like to participate and profit from this market. Not only for us, but also for Cummington and the state of Massachusetts.

## Market Overview

The United States cannabis Market totaled 10.4 billion dollars in 2018. Forecasts by Arcview Market Research project the entire legal cannabis market in North America to reach 24.5 billion dollars in sales, a 28% annual growth rate by 20 21.

In 2018, 62% of Americans report supporting cannabis legalization, double what it was in 2000. more than 60% of the U. S. states have legalized cannabis in some form. 10 states ,including Massachusetts, have legalized the recreational use of cannabis. As of November 2018 there are 32 states that allow cannabis for medical use.

There are about 10,000 active licenses for cannabis businesses in the US, according to statistics. This includes cultivation, extraction and manufacturing , retail distribution and testing licenses. The industry employed 121,000 people in 2017 and 259,000 people in 2018. Is this trend continues, the number of workers in the industry could reach 500,000 by 2022.

## Cannabis Market in Massachusetts

Massachusetts was the first state to restrict cannabis use. Over 100 years later it was the eighteenth state to legalize medical marijuana. The recreational market has been legalized as well, meaning new businesses, investors, and dispensaries are looking to expand in the state. In 2008 Massachusetts voters decriminalized the possession of small amounts of marijuana. Massachusetts became the eighteenth state to legalize medical marijuana when voters passed a ballot in 2012. Recreational marijuana is legal in Massachusetts as of December 15, 2016,

following a ballot initiative in November of that year. As of 2010 almost 10% of Massachusetts residents over had used marijuana in the past month, and almost 16% had used marijuana. The Bay State cannabis market will likely reach around \$1.8 billion and it will take years to develop the cultivation infrastructure necessary to meet the demand. Based on Colorado's legal marijuana market, it is projected that the cannabis market in Massachusetts could be around \$1.8 billion.

Analysts from New Frontier Data project Massachusetts' legal cannabis industry could be worth \$450 million during the first year of retail sales, equating to as much as \$90 million in tax revenues, according to an outline of the report by Wicked Local. By 2020, the report says the state's industry could reach as much as \$1.2 billion in sales and \$240 million in taxes. Beau Whitney, a senior economist for New Frontier, said those figures "are assuming a relatively smooth rollout of the regulatory infrastructure and assumes demand will build over time through greater participation in a regulated space, and that people will feel comfortable with cannabis in their communities."

The Massachusetts recreational marijuana industry will eventually create the equivalent of nearly 20,000 full-time jobs, according to new projections released this week by cannabis technology company Weedmaps.

Using revenue and employment data from Colorado as benchmarks, Weedmaps predicted a mature Massachusetts marijuana sector would employ the equivalent of 19,300 full-time workers, both directly and indirectly.

State health officials, meanwhile, recently said the first two years of recreational sales should bring \$216 million in tax revenue.

Marketing and Sales Strategy



EMJ in principle has agreement with two retail dispensaries to purchase all production. Given the early stages of the industry and the lack of current local production in the market, it is not anticipated that there will be any difficulty in selling everything that is produced.

With growth marketing and advertising campaigns will include:

Meeting with dispensaries

Email marketing

Business events and conferences

Business and industry associations

Brand development

Website development with search engine optimization

Cannabis industry platforms and directories

Competition

According to the Cannabis Control Commission website only four indoor growing licenses have been issued. Given the market size, there is a shortage of supply. This translates into an almost guaranteed sale of all production from EMJ. In addition, given the higher-quality cannabis anticipated to be cultivated, as well as more dedicated personalized service EMJ will provide, we anticipate our products will have superior demand and price. All of the approved licenses are for larger operations. Smaller craft operations, regardless of the product line, always produce higher quality products. Smaller based operations always go out of their way to deliver superior client service. It is through this top-notch client service that we anticipate to secure a loyal share of the available market.

Startup Summary

Our vision is to become a stable and profitable marijuana cultivation company and also expand our

facilities through profits reinvested. Our mission is to establish an innovative marijuana growing brand with affordable prices to the residents of Massachusetts. The total investment required for the first year that the business starts operating is approximately \$40,000 provided from the personal savings of the owners. Initial investments would cover start-up costs and fixed expenses until profit stability is achieved during first year.

#### Pricing Benchmarks

According to the U.S. Cannabis Spot Index the price per pound of indoor grown Cannabis has been stable at \$1500 a pound throughout 2019. Anecdotal reports show a higher price in Massachusetts. In order to be conservative the price of \$1500 a pound has been used for all financial projections.

<https://reports.cannabisbenchmarks.com/>

Chart included as Exhibit 1

#### Financial Summary

EJM will finance the start up from the personal savings of the principals.

From a total investment of \$40,000.00 EJM Expects to generate in gross revenues of \$455,400.00 in the first full year of operation and net income of \$156,304.00. Based upon a 400 plant rotation. Further improved profitability is anticipated by increasing business efficiencies from gaining operational experience and Industry knowledge. Please refer to the attached Balance Sheets, Cash Flows, and Income Statements for more information.

#### Sales Forecast

As there will be no construction necessary as the building to be used has sufficient electrical and plumbing in place to begin operations, it is assumed that it will take 30 days to obtain and set up the necessary equipment and supplies to begin growing after license approval. The first production ready to be delivered to retail dispensaries will be ready 4 months later and proceed monthly thereafter. Further

improved profitability is anticipated by increasing business efficiencies from gaining operational experience and Industry knowledge. Please refer to the attached Business Plan for more information.

EMJ will create more than just additional employment opportunities was in the local community but also tax revenues both on the federal and state level. The company also intends to contribute 3% of sales to be allocated to local Cummington Community programs.

### Operating Plan

EJM Proposes to operate a modest indoor cannabis growing facility.

Yields and quality of plants grown under artificial light mostly depend on:

1. The seed variety.
2. Where did the plants grow from seeds or clones
3. After how many days of growing the plants are put into flowering
4. The optimization of the climatic conditions of the grow room.

Our 1500 square foot Cultivation and processing area will include:

Mother room and cloning

Vegetative growth space

Flowering space

Drying and trim space

Curing space

Packaging space

### Growing Design

A. The enclosed cellar environment where growing will occur provides maximum control resulting in consistent cannabis quality and production.

B. Without natural light, this environment depends on intelligent grow lights which will replicate the parts of the sunlight spectrum that marijuana plants need at each stage of growth. Lighting is a key component in this integrated system.

- C. Air filtration and circulation systems will control heat buildup and eliminate exhaust odors.
  - D. Irrigation will be appropriate for growing.
  - E. Environmental computer-controlled systems to monitor all nutrients, lights, air circulation, an irrigation needs of the plants will be implemented
  - F. Dehumidification to optimize the growing environment will also be installed.
  - G. Computer-controlled CO2 injection and monitoring will be included.
- The company will use rolling benches and growing tables in order to maximize space efficiency.

#### Phases of Production

- Germination of seeds generating plants male / female or some feminized plants (10 weeks)
- 1st stage: taking and rooting clones (2 weeks)
- 2nd stage: clone / vegetation( 1 week)
- 3rd stage: vegetation ( 2 weeks)
- 4th stage: flowering ( 8 weeks)
- 5th stage: processing / trimming (3 days)
- 6th stage: drying and curing ( 11 days)
- Total elapsed time: approximately 15 weeks

#### Product Timeline and Production Schedule

After the growing stage starts sales are projected to begin after 15 weeks and they will significantly increase by the second year when full production will be continuous .

The company believes it will be able to vegetate up to 400 plants and flowers initially yielding 12.5 pounds of product monthly, together with 384 grams of marketable by products.

#### Security

The physical address of our cultivation facility will be 205 West Cummington Road in

Cummington, Massachusetts. This is a rural rarely traveled street. The location has numerous intrinsic security features and is easily converted to high-security use. The building does not a join any high use public areas and the cultivation area will not be visible from the street or near any high-traffic intersections with only one point of Ingress or egress. The road has practically no vehicular traffic. Vehicle access will be extremely limited. Unless known beforehand, it will be impossible to know cannabis cultivation is ongoing within the facility. Given the remoteness of the location, a sole entrance and exit point, as wells as continuous surveillance that will be able to monitor all activities, security is optimal.

A security lighting system will be installed to detect and recognize movement continuously around the protected area. As one of the principals lives above the cultivation area, the facility will have someone occupying the structure at all times. Routine regular inspections of all security systems, barriers, gates, doors, and locks will be performed on a regular basis with repairs done immediately when necessary. There' will be around the clock alarmed camera surveillance and electronic intrusion detection installed.

An alarm system will be installed with motion detectors covering entryways and exits, hallways, cultivation rooms, storage rooms, and windows to monitor both the interior and exterior side of all exterior windows and doors.

At a minimum, the system shall provide coverage of all facility entrances and exits, as well as exterior windows.

The cultivation facility will comply with all local fire code requirements and any additional security requirements mandated by local law enforcement.

#### Packaging and Labeling

EMJ Cannabis packages and labels shall not be made to be attractive to children.

All cannabis product label shall include the following information, prominently displayed in the clear and in a clear and legible font:

- a. Manufacture date and source.
- b. The statement “Schedule I Controlled Substance”
- c. The statement “Keep Out Of Reach of Children and Animals” in bold print.
- d. The statement “For medical use only,” when appropriate.
- e. The statement “The Intoxicating Effects Of This Product May Be Delayed By Up To Two Hours.”
- f. The statement “This Product May Impair The Ability To Drive Or Operate Machinery. Please Use Extreme Caution.
- g. For packages containing only dried flower, the net weight of cannabis in the package.
- h. A warning if nuts or other known allergens are used.
- i. List of pharmacologically active ingredients.
- j. Clear indication in bold type, that the product contains cannabis.
- k. Identification of the source and date of cultivation and manufacture.
- l. Any other requirements set by the Cannabis Control Commission.

#### Laboratory Testing Requirements

All cannabis goods will be tested to ensure they meet all of the testing requirements in effect at the time of testing before being transported to a retailer for sale.

#### Tracking

EMJ Intends to use a seed to sales tracking system for it’s cannabis cultivation business, which allows licensed operators to remain compliant while helping to identify key data points to streamline and optimize Inventory management at each phase of operation:

- a. Custom Compliance Focused Reporting.



- b. Track Waste, Destruction, and Account for Conversion and Moisture Loss
- c. Real-Time Product and Strain Recalls
- d. Easily Track Clones Back to Mothers
- e. Transport Manifest with all required information in order to transport product with ease.
- f. Compliance Focused Labels

The above system will allow the enterprise to monitor and analyze Harvest data in order to optimize yields and allow for more accurate forecasting capabilities.

### Organizational Structure

The founders of EJM bring decades of experience running successful self employed businesses as well as cultivating cannabis on a personal level. Additional personnel to be recruited will need to show experience in order to fill open positions in the company. We are quite aware of the rules and regulations governing the Cannabis industry which is why we decided to only recruit experienced and qualified employees as foundational staff of the company.

The organizational structure of the company will consist of the following:

Chief Executive Officer: Edward Stempniewicz

Head Cultivator General Manager: Joshua Drawe

Trimmers, Packagers .Maintenance , General Labor & Sales Representatives Manager: Matthew Drawe

### Transportation

EMJ shall staff all transport vehicles with a minimum of two EMJ Agent. At least one EMJ Agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana infused products (MIP).

Prior to leaving the origination location, an EMJ agent must weigh, inventory, and account for, on video, all marijuana to be transported.

Marijuana or MIPs must be packaged in sealed, labeled, and tamper-proof packaging prior to and during transportation.

In the case of an emergency stop, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.

An EMJ agent shall ensure that all delivery times and routes are randomized.

Each EMJ Agent shall carry his or her Commission-issued Program ID Card at all times when transporting marijuana or MIPs and shall produce it to Department representatives or law enforcement officials upon request.

Where videotaping is required when weighing, inventorying, and accounting of marijuana before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.

EMJ must document and report any unusual discrepancy in weight or inventory to the Department and local law enforcement within 24 hours.

EMJ shall report to the Commission and local law enforcement any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, within 24 hours.

EMJ shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

A vehicle used for transporting marijuana or MIPs must:

- Be owned by, leased or rented to EMJ or a third party contracted by the RMD for transportation of marijuana or MIPs (no vehicles owned by an individual may be used in the transportation of marijuana or MIPs);
- Be properly registered, inspected and insured in the Commonwealth of Massachusetts and documentation of such maintained as records of EMJ to be made available to the Commission upon request;
- Be equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana and MIPs;
- Contain a global positioning system (GPS) monitoring device that is:
  - not a mobile device that is easily removable;
  - attached to the vehicle at all times that the vehicle contains marijuana or MIPs;
  - monitored by EMJ during transport of marijuana or MIPs; and
  - inspected by the Commission prior to initial transportation of marijuana or MIPs, or after any alteration to the locked storage compartment.

During transit, EMJ shall ensure that:

- Marijuana or MIPs are transported in a secure, locked storage compartment that is part of the vehicle transporting the marijuana or MIPs;
- The storage compartment cannot be easily removed (for example, bolts, fittings, straps or other types of fasteners may not be easily accessible and not capable of being manipulated with commonly available tools);
- Marijuana or MIPs are not visible from outside the vehicle; and
- All product is transported in a vehicle that bears no markings indicating that the vehicle is being used to transport marijuana or MIPs and does not indicate the name of EMJ.
- 

Each EMJ Agent transporting marijuana or MIPs shall have access to a secure form of communication with personnel at the origination location at all times that the vehicle contains marijuana or MIPs.

Prior to, and immediately after leaving the origination location, the EMJ Agent shall use the secure form of communication to contact the origination location to test communications and GPS operability.

If communications fail while en route to a delivery, the Dispensary Agents transporting marijuana or MIPs must return to the origination location until the communication system is operational.

The EMJ Agents transporting marijuana or MIPs shall contact the origination location when stopping at and leaving any scheduled location.

The EMJ Agents transporting marijuana or MIPs shall communicate with the origination location regularly (at least every 30 minutes) throughout the trip.

A EMJ Agent at the origination location must log all official communications with Dispensary Agents transporting marijuana or MIPs.

If the GPS system fails while en route to a delivery, the EMJ Agents transporting marijuana or MIPs must return to the origination location until the GPS system is operational.

The origination location must have a Dispensary Agent assigned to monitoring the GPS unit and secure form of communication.

If EMJ contracts with an outside third party to transport or deliver marijuana, including a laboratory, the third-party contractor and its employees must comply with the Act, the Regulations, this guidance, and rules, regulations, policies and procedures of EMJ and consistent with state law.

Any employee of a third-party contractor who will transport, deliver or handle any marijuana product for an RMD must be registered as a Dispensary Agent of EMJ.

All employees of the third-party contractor who apply to become EMJ Agents, and the third-party contractors corporate entity must be in compliance with “Guidance for Registered Marijuana Dispensaries Regarding Background Checks”.

When transporting marijuana or MIPs, no other products, other than products sold by EMJ in compliance with 725.105(N)(7), may be transported or stored in that vehicle.

If the third-party contractor is transporting marijuana or MIPs for someone other than EMJ at a time, the marijuana or MIPs for each client shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each client.

Any vehicle transporting marijuana shall travel directly to the destination and shall not make any stops.

Within eight hours after arrival at the destination client, the destination client must re-weigh, re-inventory, and account for, on video, all marijuana and MIPs transported.

A manifest shall be filled out in duplicate with the original manifest remaining with the origination location and a copy kept with EMJ Agents during transportation, which shall be provided to the destination client upon arrival.

Prior to transport, the manifest shall be securely transmitted to the destination client by facsimile or email.

Upon arrival at the destination, a client Agent at the destination shall compare the manifest produced by the EMJ Agents transporting marijuana or MIPs to the copy transmitted by facsimile or email. This manifest must, at a minimum, include:

- EMJ name, address, and registration number;
- Names and registration numbers of the EMJ Agents transporting marijuana or MIPs;
- Name and registration number of EMJ Agent preparing the manifest;
- Destination Client name, address, and registration number;
- Description of the marijuana or MIPs being transported, including the weight and form or type of product;
- Mileage of transporting vehicle at departure from EMJ and mileage upon arrival at destination client, as well as mileage upon return to EMJ;
- Date and time of departure from EMJ and arrival at destination client for each delivery;
- Signature lines for the EMJ Agents transporting marijuana or MIPs;
- Signature line for the Client Agent who receives the marijuana or MIPs;
- Weight and inventory before departure and upon receipt (Re-weighing and re-inventorying to be completed by Client Agent at the destination within eight hours of receipt);
- Date and time that the delivered products were re-weighed and re-inventoried; and
- Name of Client Agent at the destination RMD that re-weighed and re-inventoried products.

If there is any Marijuana or MIPs left in the vehicle upon the completion of the home deliveries, the Dispensary Agents delivering Marijuana or MIPs must immediately return to the origination location and re-weigh, re-inventory, and account for, on video, all marijuana or MIPs

Destruction Transport

Manifests shall be filled out in duplicate form with the original remaining with EMJ and a copy sent with the EMJ Agents transporting marijuana or MIPs to the destruction or disposal site, which shall be produced to a representative of the destruction or disposal site for signature acknowledging receipt.

Prior to transport, the manifest shall be securely transmitted to the destruction or disposal site by facsimile or email.

At the destruction or disposal site, the two EMJ Agents transporting marijuana or MIPs must witness the destruction or disposal and sign the manifest. This manifest must, at a minimum, include:

- EMJ name, address, and registration number;
- Names and registration numbers of EMJ Agents transporting marijuana or MIPs;
- Name and registration number of EMJ Agent preparing the manifest;
- Destruction or disposal site name and address;
- Description of marijuana or MIPs being transported, including the weight and form or type of product;
- Mileage of transporting vehicle at departure from origination location and mileage upon arrival at destruction or disposal site, as well as mileage upon return to origination location;
- Date and time of departure from EMJ and arrival at destruction or disposal site;
- Date and time of destruction or disposal;
- Method of destruction or disposal; and
- Signature lines for the EMJ Agents transporting marijuana or MIPs.

#### Laboratory Testing Transport

The laboratory site must be the laboratory that is identified to the Department as the laboratory that has contracted with EMJ to perform testing on marijuana or MIPs.

Manifests shall be filled out in duplicate with the original remaining with EMJ and a copy sent with the EMJ Agents to the laboratory, which shall be produced to a laboratory employee, who must also be a registered Dispensary Agent of EMJ, for signature acknowledging receipt.

Prior to transport, the manifest shall be securely transmitted to the laboratory by facsimile or email.

This manifest must, at a minimum, include:

- EMJ name, address, and registration number;
- Names and registration numbers of EMJ Agents transporting marijuana or MIPs;
- Name and registration number of EMJ Agent preparing the manifest;



- Laboratory name and address;
- Detailed description of marijuana or MIPs samples being transported, including the weight and form or type of product;
- Mileage of transporting vehicle at departure from origination location and mileage upon arrival at laboratory, as well as mileage upon return to origination location;
- Date and time of departure from EMJ and arrival at laboratory for each delivery;
- Signature lines for the EMJ Agents transporting marijuana or MIPs; and
- Signature line for the laboratory Dispensary Agent at the laboratory who receives the marijuana or MIPs samples.

Prior to returning any marijuana or MIPs samples to EMJ, a laboratory Dispensary Agent must weigh and inventory the marijuana or MIPs samples to be transported and complete a manifest.

The returning manifest must, at a minimum, include:

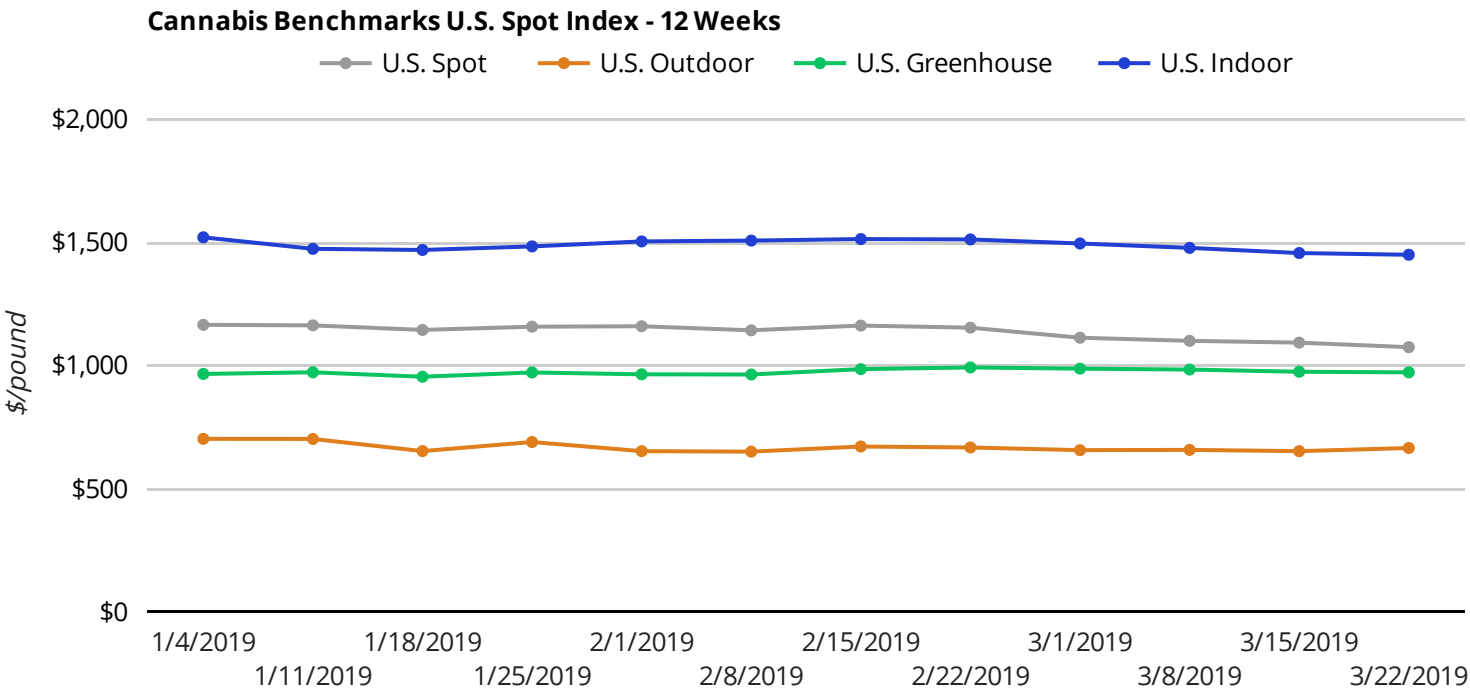
- EMJ name, address, and registration number;
- Name and registration numbers of Dispensary Agents transporting marijuana or MIPs;
- Name and registration number of Dispensary Agent preparing the manifest;
- Laboratory name and address;
- Description of marijuana or MIPs samples being transported, including the weight and form or type of product;
- Mileage of transporting vehicle at departure from laboratory and mileage upon return to origination location;
- Date and time of departure from laboratory and arrival at EMJ for each delivery;
- Signature lines for the Dispensary Agents transporting marijuana or MIPs; and
- Signature line for the EMJ Agent who receives the marijuana or MIPs samples at EMJ.





# U.S. Cannabis Spot Index

**Green Market Report**  
Cultivating the industry's financial news into one source.

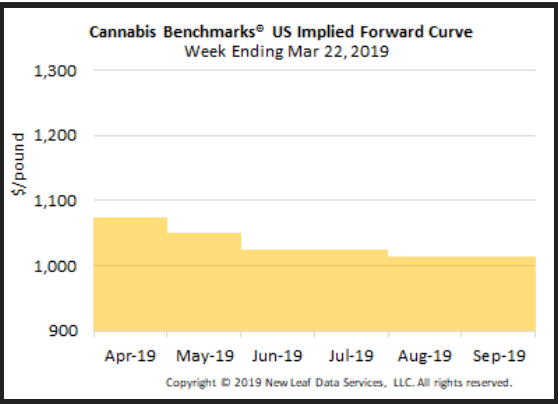
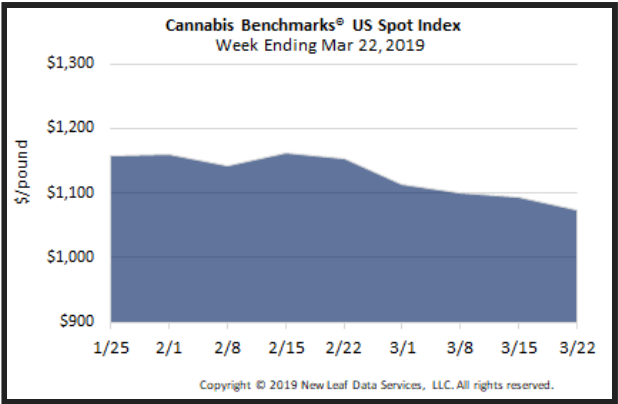


MARCH 22, 2019

U.S. Cannabis Spot Index — March 22, 2019



U.S. Cannabis Spot Index — Published March 22, 2019





# DBA EMJ LLC

## Balance Sheet

### ASSETS

1. CURRENT ASSETS	Year 1	Year 2	Year 3	Year 4	Year 5
CASH	15,000	86,205	246,554	424,618	622,225
ACCOUNTS RECEIVABLE					
INVENTORY					
PREPAID EXPENSES					
SHORT TERM INVESTMENTS					
<b>TOTAL CURRENT ASSETS</b>	<b>15,000</b>	<b>86,205</b>	<b>246,554</b>	<b>424,618</b>	<b>622,225</b>
2. LONG TERM FIXED ASSETS					
LONG-TERM INVESTMENTS	-				
PROPERTY, PLANT, AND EQUIPMENT	25,000	40,000	40,000	40,000	40,000
(LESS ACCUMULATED DEPRECIATION)	-	(4,000)	(8,000)	(12,000)	(16,000)
INTANGIBLE ASSETS					
<b>TOTAL FIXED ASSETS</b>	<b>25,000</b>	<b>36,000</b>	<b>32,000</b>	<b>28,000</b>	<b>24,000</b>
3. OTHERS					
DEFERRED INCOME TAX					
OTHER					
<b>TOTAL OTHER ASSETS</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>TOTAL (1+2+3)</b>	<b>40,000</b>	<b>122,205</b>	<b>278,554</b>	<b>452,618</b>	<b>646,225</b>

### LIABILITIES AND OWNER'S EQUITY

1. CURRENT LIABILITIES					
ACCOUNTS PAYABLE					
SHORT-TERM LOANS					
INCOME TAXES PAYABLE					
ACCRUED SALARIES AND WAGES					
UNEARNED REVENUE					
CURRENT PORTION OF LONG-TERM DEBT					
<b>TOTAL CURRENT LIABILITIES</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
2. LONG-TERM LIABILITIES					
LONG-TERM DEBT					
DEFERRED INCOME TAX					
OTHER					
<b>TOTAL LONG-TERM LIABILITIES</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
3. OWNER'S EQUITY					
OWNER'S INVESTMENT	40,000	40,000	40,000	40,000	40,000
RETAINED EARNINGS		82,205	238,554	412,618	606,225
OTHER					
<b>TOTAL OWNER'S EQUITY</b>	<b>40,000</b>	<b>122,205</b>	<b>278,554</b>	<b>452,618</b>	<b>646,225</b>
<b>TOTAL (1+2+3)</b>	<b>40,000</b>	<b>122,205</b>	<b>278,554</b>	<b>452,618</b>	<b>646,225</b>

### FINANCIAL RATIOS

DEBT RATIO (TOTAL LIABILITIES / TOTAL ASSETS)	0.00	0.00	0.00	0.00	0.00
CURRENT RATIO (CURRENT ASSETS / CURRENT LIABILITIES)					
WORKING CAPITAL (CURRENT ASSETS - CURRENT LIABILITIES)	15,000	86,205	246,554	424,618	622,225
ASSETS-TO-EQUITY RATIO (TOTAL ASSETS / OWNER'S EQUITY)	1.00	1.00	1.00	1.00	1.00
DEBT-TO-EQUITY RATIO (TOTAL LIABILITIES / OWNER'S EQUITY)	0.00	0.00	0.00	0.00	0.00



DBA EMJ LLC					
Profit and Loss Statement					
Years Ending:					
Revenue	Year 1	Year 2	Year 3	Year 4	Year 5
Sales revenue	₹ 265,650	₹ 455,400	₹ 500,940	₹ 551,034	₹ 606,137
(Less sales returns and allowances)					
Service revenue					
Interest revenue					
Other revenue					
<b>Total Revenues</b>	<b>₹ 265,650</b>	<b>₹ 455,400</b>	<b>₹ 500,940</b>	<b>₹ 551,034</b>	<b>₹ 606,137</b>
Expenses	2016	2015	2015	2015	2015
Advertising					
Bad debt					
Commissions					
Cost of goods sold	₹ 79,769	₹ 136,620	₹ 150,282	₹ 165,310	₹ 181,841
Depreciation	₹ 5,000	₹ 5,000	₹ 5,000	₹ 5,000	₹ 5,000
Employee benefits					
Equipment Maintenance	₹ 1,753	₹ 3,006	₹ 3,306	₹ 3,637	₹ 4,001
Insurance	₹ 1,000	₹ 1,000	₹ 1,000	₹ 1,000	₹ 1,000
Interest expense					
Growing Solutions	₹ 3,985	₹ 6,831	₹ 7,514	₹ 8,265	₹ 9,092
Trimming and Packaging	₹ 266	₹ 455	₹ 501	₹ 551	₹ 606
Payroll taxes					
Rent	₹ 24,000	₹ 24,000	₹ 24,000	₹ 24,000	₹ 24,000
Laboratory Testing	₹ 2,818	₹ 4,831	₹ 5,314	₹ 5,846	₹ 6,431
Salaries and wages					
Software Srevices for Inventory and Security	₹ 2,896	₹ 4,964	₹ 5,461	₹ 6,006	₹ 6,607
Transport	₹ 425	₹ 729	₹ 802	₹ 882	₹ 970
Utilities	₹ 19,923	₹ 34,155	₹ 37,571	₹ 41,328	₹ 45,460
Web hosting and domains					
Community Impact Payments	₹ 7,970	₹ 13,662	₹ 15,028	₹ 16,531	₹ 18,184
<b>Total Expenses</b>	<b>₹ 149,805</b>	<b>₹ 235,253</b>	<b>₹ 255,779</b>	<b>₹ 278,356</b>	<b>₹ 303,192</b>
<b>Net Income Before Taxes</b>	<b>₹ 115,845</b>	<b>₹ 220,147</b>	<b>₹ 245,161</b>	<b>₹ 272,678</b>	<b>₹ 302,945</b>
<b>Income tax expense</b>	<b>₹ 33,595</b>	<b>₹ 63,843</b>	<b>₹ 71,097</b>	<b>₹ 79,077</b>	<b>₹ 87,854</b>
<b>Net Income</b>	<b>₹ 82,250</b>	<b>₹ 156,304</b>	<b>₹ 174,064</b>	<b>₹ 193,601</b>	<b>₹ 215,091</b>

**Assumptions:**

Harvestable production begins after 5 months in Year 1

Production consists of 12.5 pounds of marijuana and 384 grams of saleable by products

Revenue increases 10 % by year beginning in year 3 due to improved production expertise and efficiencies.



DBA EMJ LLC												
CASH FLOW STATEMENT												
CASH FLOW STATEMENT AS ON END YEAR 1				YEAR 2		YEAR 3		YEAR 4		YEAR 5		
OPENING BALANCE OF CASH AT BEGINNING OF THE YEAR ₹ 40,000				₹ 86,205		₹ 246,554		₹ 424,618		₹ 622,225		
CASH FLOW OPERATIONS												
CASH RECEIVED FROM:												
Net Income	₹	82,250		₹	156,304	₹	174,064	₹	193,601	₹	215,091	
Depreciation	₹	4,000	₹ 86,250	₹	4,000	₹ 160,304	₹ 4,000	₹ 178,064	₹ 4,000	₹ 197,601	₹ 4,000	₹ 219,091
			₹ 0		₹ 0		₹ 0		₹ 0		₹ 0	
NET CASH FLOW OPERATIONS			₹ 86,250	₹ 160,304		₹ 178,064		₹ 197,601		₹ 219,091		
CASH FLOW INVESTMENT ACTIVITY												
			₹ 0		₹ 0		₹ 0		₹ 0		₹ 0	
CASH PAID FOR												
Equipment Purchased	₹	40,000										
	₹	-	₹ 40,000	₹	-	₹ 0	₹ -	₹ 0	₹ -	₹ 0	₹ -	
NET CASH FLOW INVESTING ACTIVITY			₹ -40,000	₹ 0		₹ 0		₹ 0		₹ 0		
CASH FLOW FINANCIAL ACTIVITY												
CASH RECEIVED FROM:												
STOCK ISSUANCE			₹ 0	₹	-	₹ 0	₹ -	₹ 0	₹ -	₹ 0	₹ -	
BORROWINGS	₹	-	₹ 0	₹	-	₹ 0	₹ -	₹ 0	₹ -	₹ 0	₹ -	
CASH PAID FOR												
REPURCHASE OF TREASURY STOCK												
LOANS REPAYMENTS												
DIVIDENDS FROM SECURITIES			₹ 0		₹ 0		₹ 0		₹ 0		₹ 0	
NET CASH FLOW FINANCIAL ACTIVITIES			₹ 0	₹ 0		₹ 0		₹ 0		₹ 0		
NET CASH FLOW			₹ 46,250	₹ 160,304		₹ 178,064		₹ 197,601		₹ 219,091		
CLOSING BALANCE OF CASH AT THE END OF THE YEAR			₹ 86,250									

## DbA EMJLLC Business Plan (Plan to Obtain Liability Insurance)

DbA EMJ LLC has had talks with several insurers for general and product liability coverage in compliance with the requirements of 935 CMR 500.105(10). Upon a grant of the license from the Cannabis Commission, and prior to the commencement of operations, DbA EMJ LLC will obtain and maintain a general liability insurance policy and product liability policy. This policy will be a general liability insurance policy with no less than \$ 1,000,000 per occurrence and \$2,000,000 in aggregate, annually. The deductible for each policy shall be no higher than \$5,000 per occurrence.

## DBA EMJ LLC Business Plan (Quality Control and Testing Procedures)

DBA EMJ LLC is committed to producing only the safest of products. A robust testing plan will ensure the company's products are produced in accordance with good manufacturing practice and held to rigorous testing standards. Product testing will include analyses for potency, terpenes, heavy metals, solvents, pesticides, microbial contamination and shelf-life. Tests will be performed on-site and by an independent third-party quality assurance laboratory. The Quality Assurance personnel may perform any test he or she deems necessary at any time and will establish the company's testing requirements and sample size required for in-process and finished products. No Less than 2% of each batch will undergo testing. appropriate frequency needed to accomplish the goal of the testing:

- In process cannabis: potency testing to determine optimal harvest dates
- Finished cannabis: potency and terpene analysis prior to extraction and contaminant testing if the cannabis is suspected to be contaminated
- Extracted cannabis: potency and terpene testing to determine proper run times for each strain cultivated
- Decarboxylation process: potency and terpene monitoring to ensure full decarboxylation • Separated cannabinoids: testing for identity, potency, contaminants, residuals, and metals prior to formulation
- Excipient and component: analysis for identity and purity
- Finished products: a full suite of testing prior to release

DBA EMJ LLC marijuana cultivation operating procedures are intended to cover the requirements set forth to ensure agent, product & public safety; produce consistent, predictable yields based on accepted science; and create transparent, compliant & efficient operations. Our extensive procedures include, but are not limited to: CO2 Systems; Crop/Supply Management; Disease Management; Environmental Controls; Pest Management; Fertilizer/Soil/Media Management; Spray/Feeding Protocols; Nutrient Prep Form; Hygiene/Sanitation; Infected Handler Guidelines; Security/Limited Access Areas; Monitoring/Record Keeping; Inventory Management/ Storage; Procedure Variances; Quality Assurance; and Water Quality. No non-organic pesticides or nutrients will be used and cultivation will be consistent with DPH guidance on US DOA 7 CFR, Part 205 Organic Requirements. DBA EMJ LLC's cultivation process will use best practices to prevent contamination, including but not limited to mold, fungus, bacterial diseases, rot, pests, non-organic pesticides, mildew, and other contaminants identified as posing potential harm. The soil used for cultivation will meet the US Agency for Toxic Substances and Disease Registry's Environmental Media Evaluation Guidelines for residential soil levels. Waste disposed of to minimize odor/pests. All phases of cultivation (strain selection, seed germination, grow mediums and organic nutrient selection, establishment of lighting grow cycle, harvesting, drying, and curing) will take place in designated, locked, limited access areas that are monitored by a surveillance system. All of DBA EMJ LLC's soils/solids will be sampled/analyzed prior to use, when the new soils/solids are received from a different source, and annually. Proper sampling collection steps will be followed including use of disposable gloves, clean sampling area, appropriate tools and containers, no cross contamination and

time records kept for each sample. Representative samples will be collected and maintained for review with duplicate samples collected at least annually and 1 for every 20 samples. All logbooks and chain of custody forms will be available for review. DBA EMJ LLC will create and maintain cultivation and sampling diagrams for review. DBA EMJ LLC will have a sufficient plumbing system and water supply and JH's water will be derived from a private well and records of analysis will be maintained and available for review. Best Management Practice, Good Agricultural Practice, and Good Handling Practice will be used DBA EMJ LLC will adopt USDA Organic Standards and FDA standards to create a holistic marijuana crop management system

DBA EMJ LLC will adhere to all applicable state and local laws pertaining to the quality control (QC) and testing of our marijuana products. DBA EMJ LLC will use an authorized independent testing laboratory to perform testing. DBA EMJ LLC's cultivation agents will implement testing throughout the cultivation process. When DBA EMJ LLC first begins cultivating from seed, agents will examine all plants twice a day to ensure all suspect male plants are promptly disposed of. During ongoing operations, agents will examine plants once a day for signs of contamination, e.g. mildew, mold, pests. Any plant with signs of contamination will be immediately isolated and disposed of. The Cultivation Director will examine plants on an ongoing basis for any signs of poor health e.g., discoloration. Harvested will undergo visual inspection for signs of contamination before it is packaged for sale. Each batch that passes testing requirements is packaged in airtight bags for transport to customers.

## DBA EMJ LLC Business Plan (Record Keeping Procedures)

Records of DBA EMJ LLC will be available for inspection by the Cannabis Commission, upon request. The records of DBA EMJ LLC shall be maintained in accordance with generally accepted accounting principles. DBA EMJ LLC will maintain and make all records that are required and are subject to inspection including, but not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following: (a) Written operating procedures as required by 935 CMR 500.105(1); (b) Inventory records as required by 935 CMR 500.105(8); (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e); (d) The following personnel records: 1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions; 2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with DBA EMJ LLC and shall include, at a minimum, the following: a. all materials submitted to the Cannabis Commission pursuant to 935 CMR 500.030(2); b. documentation of verification of references; c. the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision; d. 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; e. documentation of periodic performance evaluations; f. a record of any disciplinary action taken; and g. notice of completed responsible vendor and eight-hour related duty training. 3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions; 4. Personnel policies and procedures; and 5. All background check reports obtained in accordance with 935 CMR 500.030. (e) Business records, which shall include manual or computerized records of: 1. Assets and liabilities; 2. Monetary transactions; 3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; 4. Sales records including the quantity, form, and cost of marijuana products; and 5. 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 DBA EMJ LLC, including members of the nonprofit corporation, if any. (f) Waste disposal records as required under 935 CMR 500.105(12); and (g) Following closure of DBA EMJ LLC, all records will be kept for at least two years at the expense of DBA EMJ LLC and in a form and location acceptable to the Cannabis Commission.



## DBA EMJ LLC Business Plan (Quality Control and Testing Procedures)

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DBA EMJ LLC will adhere to all applicable state and local laws pertaining to the quality control (QC) and testing of our marijuana products. DBA EMJ LLC will use an authorized independent testing laboratory to perform testing. DBA EMJ LLC's cultivation agents will implement testing throughout the cultivation process. When DBA EMJ LLC first begins cultivating from seed, agents will examine all plants twice a day to ensure all suspect male plants are promptly disposed of. During ongoing operations, agents will examine plants once a day for signs of contamination, e.g. mildew, mold, pests. Any plant with signs of contamination will be immediately isolated and disposed of. The Cultivation Director will examine plants on an ongoing basis for any signs of poor health e.g., discoloration. Harvested plants will undergo visual inspection for signs of contamination before it is packaged for sale. Each batch that passes testing requirements is packaged in airtight bags for transport to customers.

DBA EMJ LLC will have high standards for cultivation, processing and handling all marijuana and waste products. All growing surfaces, containers, floors, and cultivation tools will be properly sanitized for the prevention of molds and diseases. All air will be filtered to remove harmful pathogens, insects and rogue pollen. All grow media will be tested prior to use in compliance with Department of Health testing protocols. All nutrients will be tested prior to use. All nutrients will be compliant with organic growing standards. The Growers will carefully monitor the plants throughout the grow cycle. Any plant material found with an infection or affliction will be promptly destroyed. All marijuana products will be created following a standard operating procedures, ensuring quality and consistency. We will have an in-house equipment which will enable us to perform continuous monitoring for quality control and testing. Equipment will include: -High performance liquid chromatology machine: used to test cannabinoid profile - Ultraviolet light: used to test for mold/mildew or pathogens - High-powered light microscope: used to test for mold/mildew or pathogens We will enter into a contractual arrangement with an independent, accredited laboratory for purposes of testing all our marijuana. All our marijuana will be independently tested for its cannabinoid profile and for contaminants as specified by Massachusetts Department of Health, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of non-organic pesticides.

As per regulation:

- DBA EMJ LLC will ensure that only the leaves and flowers of the female marijuana plant are processed accordingly in a safe and sanitary manner as prescribed below:

- 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. 935 CMR 500.105(3) (required for cultivators, product manufacturers, microbusiness, and craft marijuana cooperatives)
- All agents whose job includes contact with marijuana is subject to the requirements for food handlers specified in 105 CMR 300.000.
- 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. 935 CMR 500.105(3)
- Hand-washing facilities shall be located in production areas and where good sanitary practices require employees to wash and sanitize their hands. 935 CMR 500.105(3)
- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations. 935 CMR 500.105(3)
- Litter and waste shall be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests. 935 CMR 500.105(12). 935 CMR 500.105(3)
- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair. 935 CMR 500.105(3) 10
- All contact surfaces, shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination. 935 CMR 500.105(3).
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana. 935 CMR 500.105(3)
- The establishment shall provide its employees with adequate, readily accessible toilet facilities. 935 CMR 500.105(3)
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination. 935 CMR 500.105(3)
- No marijuana may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratory. 935 CMR 500.140(9)
- The establishment shall notify the Commission within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary. 935 CMR 500.160(2)

## DBA EMJ LLC Business Plan (Personnel Policies)

DBA EMJ LLC's personnel policies are designed for the operation of a registered operation in full compliance with state law and regulations. Each staff member will be supplied with a unique alarm code for entry and egress and all keys and security codes will be kept secure and inaccessible to any unauthorized person. The general manager is assigned responsibility for the personnel policy and procedure documentation, maintenance, implementation and training. Reports of emergencies and incidents may come from outside parties, customers, other employees, news sources, direct observation or other sources. The primary objective for all employees is to determine if the problem being reported is an incident. In most instances, the problem being reported will not constitute an incident as defined within the protocol. However, the protocol can be a good guideline for dealing with other minor issues. No set of protocols will address every circumstance; all employees must in good faith take all necessary and responsible actions.

DBA EMJ LLC is committed to safety, professional development, compliance, equitable compensation & healthcare benefits. Personnel records will be kept for at least 1 yr. following termination. To strengthen the local community, recruiting locally is a priority. All staff will receive training on confidentiality, internal security policies, emergency procedures and will complete training specific to their job functions. Employees will receive, at minimum, 8 hours of ongoing training annually. Any staff member who engages in unsafe practices will be dismissed and such activities will be reported to law enforcement. All employees will conform to sanitary & good hygienic practices. DBA EMJ LLC will provide equal opportunities regardless of race, religion, ethnicity, sexual orientation or other factors resulting in discrimination. Personnel policies include; safety, harassment, work hours, job reviews, maintaining an alcohol, tobacco, and drug free workplace, compensation, benefits, vacation/holidays/leaves, training/professional development, record keeping, agent registration, compliance, security, standards of conduct, and confidentiality.

DBA EMJ LLC's personnel policies are designed to create an exceptional work force with strong values in safety and compliance. Personnel policies are provided and explained to all employees upon the initial hire with on going training throughout the year as warranted.

New employees will receive an employee handbook, in paper and electronic form, outlining detailed personnel policies.

DBA EMJ LLC's personnel policies mandate: regulation compliance, safe standards of conduct, attendance and punctuality, appropriate dress and personal hygiene, protection of confidential information, strict adherence of workplace security and safety policies, e.g .• security protocols, emergency protocols, and zero tolerance weapon policy,

Every 6 months, each staff member will be given comprehensive employee reviews which form a basis for compensation increases and/or position advancement. All personnel policies will adhere to all Massachusetts and federal laws.

All records of DBA EMJ LLC will be available for inspection by the Commission, upon request. The records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records that will be maintained include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

(a) Written operating procedures as required by 935 CMR 500.105(1);

(b) Inventory records as required by 935 CMR 500.105(8);

(c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);

(d) The following personnel records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions; 935 CMR: CANNABIS CONTROL COMMISSION 500.105: continued

2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:

a. all materials submitted to the Commission pursuant to 935 CMR 500.030(2);

b. documentation of verification of references;

c. the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision

d. 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;

e. documentation of periodic performance evaluations;

f. a record of any disciplinary action taken; and

g. notice of completed responsible vendor and eight-hour related duty training.

3. The DBA EMJ LLC staffing plan will document accessible business hours and safe cultivation conditions;

4. Personnel policies and procedures; and

5. All background check reports obtained in accordance with 935 CMR 500.030.

(e) Business records, which shall include manual or computerized records of:

1. Assets and liabilities;

2. Monetary transactions;

3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

4. Sales records including the quantity, form, and cost of marijuana products; and



5. 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 DBA EMJ LLC

(f) Waste disposal records as required under 935 CMR 500.105(12); and

(g) Following closure of DBA EMJ LLC, all records WILL be kept for at least two years at the expense of DBA EMJ LLC and in a form and location acceptable to the Commission.

DBA EMJ LLC will process its marijuana products in a safe and sanitary manner. We will process the leaves and flowers of the female marijuana plant only, which shall be:

1. Well cured and generally free of seeds and stems;
2. Free of dirt, sand, debris, and other foreign matter;
3. Free of contamination by mold, rot, other fungus, and bacterial diseases;
4. Prepared and handled on food-grade stainless steel tables; and
5. Packaged in a secure area.

DBA EMJ LLC will maintain a policy for the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor. 935 CMR 500.105(1)

## DBA EMJ LLC Business Plan (Maintenance of Financial Records Plan)

DBA EMJ LLC will maintain a transparent and fully accountable set of facility-related records for internal and external audits, as well as review by the Cannabis Commission. All physical documents, such as transaction records, inventory records, security records, audit records, business records, and financial records will be stored electronically in redundant and geographically dispersed data centers to provide the maximum level of security and compliance with all state and federal document storage and confidentiality rules. This method of storage ensures that all records are adequately protected from loss, damage, or unauthorized use.

The following business records shall be maintained:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts;
- Sales records; and
- Salary and wages paid to each employee. 935 CMR 500.105(9)

## DBA EMJ LLC Business Plan (Qualifications and Intended Trainings for Agents)

DBA EMJ LLC will have continuous programs for all staff in order to maintain the highest standards for the qualification and training for all employees and principals through in house and outside programs.

DBA EMJ LLC 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 individual staff member, and at a minimum will include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually. All staff 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. All new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within 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. DBA EMJ LLC will maintain records of responsible vendor training program compliance for four years and make them available to inspection by any applicable licensing authority upon request during normal business hours.

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 to be included in a responsible vendor training program. bags for transport to customers.

All employees, as warranted by their position will be trained , but not be limited to provisions for: a. security; b. prevention of diversion; c. storage of marijuana; d. transportation of marijuana, e. inventory procedures; f. procedures for quality control and testing of product for potential contaminants, g. personnel policies; h. dispensing procedures; i. record-keeping procedures; j. maintenance of financial records; and k. diversity plans to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of DBA EMJ LLC.

As warranted by their position all authorized staff involved to process marijuana will be trained do so in a safe and sanitary manner. DBA EMJ LLC shall train it's staff to: Process the leaves and flowers of the female marijuana plant only, which shall be: 1. Well cured and generally free of seeds and stems; 2. Free

of dirt, sand, debris, and other foreign matter; 3. Free of contamination by mold, rot, other fungus, and bacterial diseases; 4. Prepared and handled on food-grade stainless steel tables; and 5. Packaged in a secure area. DBA EMJ LLC will comply with the following sanitary requirements: 1. Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000

All DBA EMJ LLC staff working in direct contact with preparation of marijuana or nonedible marijuana products shall be trained to: Conform to sanitary practices while on duty, including: a. Maintaining adequate personal cleanliness; and b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated. 3. Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the facilities production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices; 4. There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations; 5. Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12); 6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair; 7. There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned; 8. Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition; 9. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable; 10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products; 11. DBA EMJ LLC's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs; 12. Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the establishment. Plumbing shall properly convey sewage and liquid disposable waste from the establishment. There shall be no cross connections between the potable and waste water lines; 13. DBA EMJ LLC shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair; 14. Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and 15. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers. 16. All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to (c) All Marijuana Establishments, including those that develop or process edible marijuana products, shall comply with sanitary requirements. All edible products shall be

prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000:  
Minimum Sanitation Standards for Food Establishments.



## DBA EMJ LLC Operating Policies and Procedures (Restricting Access to Individuals Under 21)

As per regulation DBA EMJ LLC affirms the following:

- All employees and registered agents will be 21 years of age or older. 935 CMR 500.029 or 500.030.
- All visitors to our enterprise must be 21 years of age or older. 935 CMR 500.002
- Despite the fact the growing facility will be locating in the cellar of a residential address, access to any part of the premises where cannabis operations exist will only be accessible through separate locked entry and exit points that can only be opened by authorized personnel ensuring no one can access these areas except accompanied by authorized employees who will strictly prohibit access to all individuals under 21.

## PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

DBA EMJ LLC will do everything it can to support areas of disproportionate impact, which the Cannabis Control Commission has identified as the following:

1. Past or present residents of the geographic “areas of disproportionate impact,” which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions are classified as areas of disproportionate impact.

Although dba EMJ LLC, will not be located in a geographic area of disproportionate impact, it is located in a rural and lower income area of the state. We will positively impact the community and its constituents by trying to create economic opportunity for diverse companies and individuals, and providing a wellness focused consumer product and experience consistent with our mission.

Our operation initially will be small and limited to the employment of the principals, but with growth and success we plan to create economic opportunity for individuals and companies, specifically people from communities most harmed by cannabis prohibition. The enterprise will begin operations with one of the principals having had suffered from the result of previous drug convictions thus enabling it to immediately allowing him entry to the commercial adult use cannabis industry. With success and further need for employees, we will focus our recruiting effort to obtain personnel from the communities of Amherst, Greenfield, North Adams, and Pittsfield. The four closest communities identified by the Cannabis Commission as areas of disproportionate impact. It is our intention to positively impact areas of disproportionate impact.

Our enterprise will have 6 primary goals outlined below together with the programs to be used to implement them and the metrics to be utilized to measure success.

Goals:

- 1) The applicant starts operations with a staff of three. 33% of our workforce already consists of individuals that fall under the Commission’s definition of disproportionately impacted. The enterprise commits to attempting to maintain and staff operations that will be composed of a minimum of 25 to 50% of individuals from areas of disproportionate impact or other Massachusetts residents who have past drug convictions.

Our enterprise begins as a home-based business and as such is limited to 3 employees from the outside, or in addition to, resident family members by local zoning regulations. Currently 2 of the principals are not family residents. Our goal within the first year of operations is to increase staffing by 1 who will come from a disproportionately impacted group increasing participation from that group to 50%. We are already in discussion with individuals fitting the Cannabis Commission's guidance for diversity who are deeply interested in joining our operations should we receive license approval such that meeting our initial goal of adding one individual towards achieving our goals should not be a problem.

The facility where operations will begin is currently 100% powered by a solar pv array, The enterprise fully intends to try to reinvest profits to construct a fully self-sustaining, net zero, state of the art facility on land adjacent and owned by one of the principals. It is anticipated construction will begin in year 2, subject to receiving all relevant approvals and permits. Given the positive reaction we have received from local authorities we do not anticipate any difficulties in achieving this goal which would eliminate the current employee restrictions. We will attempt and believe we can increase employment significantly each year after the first year of operations with the staff consisting of 25 to 50% of what the Cannabis Commission considers disproportionately impacted.

Despite staffing restrictions at the onset of operations, in order meet the goals of positively affecting areas of disproportionate impact we intend to out source services such as marketing, tax preparation, accounting, web design, etc, when necessary and possible to individuals and enterprises from areas of disproportionate impact and to document all such accomplishments.

Profits will be reinvested in the operation. With expansion and diversification after 5 years employees could number as high as 98 while maintaining at least 25 to 50% of the workforce to individuals who fall under the Commission's definition of disproportionately impacted.

- 2) Establish recruitment efforts at higher learning institutions and institutions with special programs that reach individuals from disproportionate impact areas. Upon licensure approval the applicant will contact the relevant institutions to establish relationships. The goal is to develop 2 such relationships within the first year of operation growing to 10 by year 5.
- 3) Participate in or sponsor career fairs to attract future employees from disproportionate impact areas. The goal is to participate in 1 such fair in year one and increase such events as the need for employees arises.
- 4) Offer job skill assessments and provide guidance for interested parties from disproportionate impact areas to receive training relevant to establishment positions. Open houses at the establishment will be held on an annual basis where we will offer mentoring, professional, and technical services for individuals and businesses facing systemic barriers.
- 5) Encourage employees to refer applications for employment from disproportionate impact areas; Bonuses will be offered to all employees and new hires that aid the enterprise to achieve its goals of achieving this plan for positive impact.
- 6) DBA EMJ LLC will establish a fund that will Implement a charitable giving program to local non profits and cultural events wherein it will set aside an amount equal to ten percent (10%) of the Company's annual profits that will be donated to organizations that provide services to past or present residents of areas of disproportionate impact and/or who help Massachusetts residents with past drug convictions.

## Programs for Goal Achievement

- 1) Advertisements for employment, as the need arises, in the local newspapers of Pittsfield, North Adams, Greenfield and Amherst the closest communities of disproportionate impact to the site of operations.
- 2) Sponsor career fairs as the need arises for residents from Pittsfield, North Adams, Greenfield and Amherst, the closest communities of disproportionate impact to the site of operations.
- 3) Host in house events to promote the hiring of employees in order to achieve positive impact goals at least once a year.
- 4) Hold monthly meetings with employees on implementing effective strategies towards achieving positive impact goals.

## Metrics

- 1) Maintain, count, and monitor employee records to ensure that the 25 to 50% goal of all employees are composed of from areas of disproportionate impact or other Massachusetts residents who have past drug convictions;.
- 2) Keep detailed records and results of relationships established with institutions with special programs that reach diverse people.
- 3) Maintain records of the results of job fairs attracting individuals from communities of disproportionate impact.
- 4) Document and count results of any new employees acquired through sponsored in house events.
- 5) Keep minutes of all internal meetings as to the effectiveness of past strategies towards meeting positive impact goals.
- 6) Maintain a detailed accounting of all contributions to local non-profits and local cultural events Identify and track the Company's overall financial support to all such organizations and events. Identify the amount of all donations made by the enterprise during the positive impact plan year,

and to which organizations those donations went. Documentation of all such activities oriented to organizations that serve Areas of Disproportionate Impact, or residents with previous drug convictions, will be available for inspection by the Commission upon request.

All progress and success in implementing and meeting DBA EMJ LLC's Plan for Positive Impact will be documented one year from provisional licensure, and each year thereafter.

DBA EMJ LLC 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. Any actions taken, or programs instituted, by DBA EMJ LLC will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

## Diversity Plan

DBA EMJ LLC believes in establishing and maintaining a vibrant policy of inclusivity and diversity. Diversity in our employment pool is fundamental to the integrity of our enterprise's commitment to its community. We are committed to establishing equity in our operations for diverse populations, which the Commission has identified as the following demographics:

1. Minorities;
2. Women;
3. Veterans;
4. People with disabilities; and
5. People of all gender identities and sexual orientations especially the LGBTQ+ community.

### GOALS

- Recruit, maintain and hire a diverse group of employees that encourage and value inclusiveness among the workforce.
- Our goal is to achieve a workforce that can be clearly viewed as consisting of 50% females, minorities, veterans, people with disabilities, individuals who are LGBTQ and/or identify as a non-traditional sexual identity, We intend to target each of these demographics indiscriminately. We will nonetheless, attempt to maintain and achieve the following percentages over the long run: females (10%) ,minorities(10%) , veterans (10%) , people with disabilities (10%) , individuals who are LGBTQ and/or identify as a non-traditional sexual identity (10%)
- Structure the work environment such that it is a secure, accepting, pleasant, encouraging respectful, and supportive place to work that results in personal and company fulfillment and success. Our goal is to achieve a greater than 80% retention rate and 90% employment satisfaction rating from all participants in our enterprise as it relates to inclusion, safety and work place.
- DBA EMJ LLC will include our suppliers and subcontractors into our diversity plan by endeavoring with every opportunity to utilize businesses owned by or which employs a substantial amount of individuals which are minorities, women, veterans, persons with disabilities and individuals who are people of all gender identities and sexual orientations especially the LGBTQ+ community. It is our goal to have 50% of our suppliers, and subcontractors that match the criteria described above.

### PROGRAMS

- Establish relationships, as needed, with the following institutions in order to fulfill desired required recruiting goals:

MassHire Holyoke Career Center

850 High St

Holyoke, MA 01040



Western Mass Employment Collaborative  
23 Midstate Drive  
Suite 202  
Auburn, MA 01501

Community Foundation of Western Massachusetts  
333 Bridge St  
Springfield, MA 01103

Opportunity Services  
1 Federal Street Building 101  
Springfield, MA 01105

Valley Educational Associates  
62 Main Street  
Hatfield, MA 01038

Viability  
5 Franklin Street  
Northampton, MA 01060

Work Without Limits  
333 South Street  
Shrewsbury, MA 01545

Community Options  
442 State Street  
Belchertown, MA

Holyoke Community College  
303 Homestead Ave  
Holyoke, MA 01040

- Advertise recruiting requirements, as needed and with increasing frequency with successful operations, in local publications and internet based sites. It is anticipated that these advertisements will occur quarterly after the first year of operations. We will create job descriptions that appeal to and attract diverse candidates. All of our job advertisements will unambiguously promote our hiring priorities and encourage candidates who will meet our goals to apply.
- Offer job skill assessments and provide guidance for interested parties to receive training relevant to establishment positions. All such assessments will attempt to ascertain, promote and reinforce to the employee the enterprise's diversity goals through:
  - 1. Demonstrated commitment to diversity and ability to work in a diverse environment.
  - 2. Demonstrated commitment and sensitivity to the importance of diversity in the attainment of organizational goals and objectives.
  - 3. Evidence of active commitment to diversity and inclusion.
  - 4. Demonstrated ability to advocate for diversity education and initiatives,

- 5. Evidence of knowledge/understanding of diversity and equity issues.
- 6. Knowledge/understanding of how to engage others in thinking about, discussing, and learning about diversity
- 7. Knowledge/understanding of leadership strategies to promote diversity.
  
- Participate in career fairs in underrepresented and minority communities. The goal is to sponsor 1 such fairs in year One and 5 by the fifth year as the need for employees arises, including events sponsored by the Massachusetts Cannabis Business Association (MassCBA).
  
- Attend community group meetings in and around Cummington including local communities of disproportionate impact such as Pittsfield, North Adams, Greenfield and/or Springfield, at least twice annually, to introduce DBA EMJ LLC and seek aid in achieving our goals to attract and maintain a diverse workforce interested with employment in the cannabis industry.
  
- A locked suggestion box, in order to ensure anonymity, soliciting suggestions for improved workplace operations and environment.
  
- Semi annual cultural sensitivity seminars for all employees. These seminars will discuss in-depth cultural awareness and understanding of the impact of cultural and diversity differences. Attempt to provide the necessary foundation and tools to become culturally competent/ Provide a better understanding of the cultural challenges facing multicultural and diverse workplaces Offer the opportunity to enhance cultural sensitivity and competence. And provide an atmosphere to reduce cross-cultural misunderstanding and encourage positive cross-cultural working relationships.
  
- Annual employee reviews and surveys to obtain feedback as to how to improve work place environment and operations.
  
- Strictly adhere to a Non-Discrimination Policy. This policy will include instructions for responding to complaints, discipline for non-compliance and evaluations in order to determine if policy changes are warranted.
  
- Request exit surveys and interviews with all leaving employees in order to ascertain their reason for leaving and obtain feedback as to how to improve inclusivity, safety and the workplace environment.
  
- Seeking and working with ancillary businesses providing needed services that are owned, managed and/or utilizing minority groups; women, veterans, people with disabilities, and/or

people of all gender identities especially the LGBTQ+ community. Prior to using an ancillary service, the enterprise will request information from the entity being considered in order to see if they will help achieve Diversity Plan goals. When utilizing services from suppliers and contractors we will expressly promote the priorities outlined in this plan.

- Encourage employees from diverse groups to refer applications for employment; Bonuses will be offered to all employees and new hires that aid the enterprise to achieve its goals of achieving its diversity plan.

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## METRICS

- Maintain, count, and monitor employee records as to progress in achieving the 50% goal that all employees are: minorities; women; veterans; people with disabilities; people of all gender identities and sexual orientations especially the LGBTQ+ community; or have had past drug convictions.
- Keep detailed records and results of relationships established with institutions with special programs that reach diverse people.
- Maintain records of the results of job fairs and community events held in communities of disproportionate impact and others, as concerns diversity and employment goals.
- Document and count results of any new employees acquired through sponsored in house events.
- Keep minutes of all internal meetings as to the effectiveness of past strategies towards meeting diversity plan goals
- Analyze and document employee suggestions and surveys as to achieving enterprise goals for diversity and improved workplace environment and operations.
- Keep detailed records of subcontractor services used and their diversity background.
- Maintain records of all results from advertisement efforts made in achieving diversity goals.
- Keep detailed records and results of relationships established with institutions with special programs that reach diverse people.

- Maintain records of the results of job fairs held in communities of disproportionate impact.
- Document and count results of any new employees acquired through sponsored in house events.
- Keep minutes of all internal meetings as to the effectiveness of past strategies towards meeting positive impact goals
- Periodically, the management of the enterprise will evaluate the workplace environment through observations, employee meetings and conversations with individual employees in order to maintain the workplace as one of inclusion. All such instances will be documented.
- DBA EMJ LLC will regularly and continuously monitor the implementation of its goals and as necessary revise its policies and procedures so as to best accomplish the goals set out in this Diversity Plan.
- Tracking of all employee and management training on diversity, inclusion and diversity hiring.
- Job satisfaction data derived from annual surveys and exit interviews.

DBA EMJ LLC will keep a continuous and inclusive evaluation of this plan to monitor that it is meeting all goals. An annual report will be issued which delineates the plan, data collected, whether the goals have been accomplished and if any changes are necessary. Quarterly, management will convene to discuss the report and implement changes as necessary. Two months before license renewal, and annually thereafter, the enterprise will issue a comprehensive report on this Diversity Plan and its Goals and Programs which will outline the metrics and whether goals have been accomplished. This report will be made available to the Commission.

DBA EMJ LLC acknowledges and is aware, and will adhere to 1) 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.