



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR281981
Original Issued Date: 07/20/2020
Issued Date: 07/20/2020
Expiration Date: 07/20/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: DDM Sales, Inc.

Phone Number: 508-259-2140
Email Address: vishnupatel73@gmail.com

Business Address 1: 220 Pulaski Boulevard
Business City: Bellingham Business State: MA Business Zip Code: 02019
Business Address 2:
Mailing Address 1: 220 Pulaski Boulevard
Mailing City: Bellingham Mailing State: MA Mailing Zip Code: 02019
Mailing Address 2:

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Minority-Owned Business

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: 100 Percentage Of Control: 100
Role: Executive / Officer Other Role:
First Name: Vishnubhai Last Name: Patel Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Vishnubhai

Last Name: Patel

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$275000 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: 1 Lloyd Street

Establishment Address 2:

Establishment City: Blackstone

Establishment Zip Code: 01504

Approximate square footage of the establishment: 4000

How many abutters does this property have?: 30

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	Community Outreach Meeting Attestation Form and Attachments DDM Sales, Inc. - 02062020.pdf	pdf	5e3d90815b05c304785e6c1c	02/07/2020
Certification of Host Community Agreement	HCA Certification Form DDM Sales, Inc. - 02062020.pdf	pdf	5e3d910961c9e9045a7917e1	02/07/2020
Plan to Remain Compliant with Local Zoning	Plan for Compliance with local codes, ordinances, bylaws DDM Sales, Inc. 02072020.pdf	pdf	5e3dde8a61c9e9045a791991	02/07/2020
Plan to Remain Compliant with Local Zoning	Special Permit Recorded DDM Sales, Inc. 02112020.pdf	pdf	5e4301964fa2b004756a16d0	02/11/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Date generated: 03/25/2021

Page: 2 of 5

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact DDM Sales, Inc. 04232020.pdf	pdf	5ea2016f961ad539052c133e	04/23/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner **Other Role:** President and sole Director - Single Owner Corporation

First Name: Vishnubhai **Last Name:** Patel **Suffix:**

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	By-Laws DDM Sales, Inc.pdf	pdf	5cf6908841a4321320f276a0	06/04/2019
Secretary of Commonwealth - Certificate of Good Standing	COGS from SOC DDM Sales, Inc. 01302020.pdf	pdf	5e3318745b05c304785e5603	01/30/2020
Articles of Organization	1-Letter from DDM Sales, Inc. to Cannabis Control Commission 12302019.pdf	pdf	5e398ef44dd5bb0494104d65	02/04/2020
Articles of Organization	2-Letter resignation of treasurer and director DDM Sales, Inc. 12242019.pdf	pdf	5e398f155b05c304785e6208	02/04/2020
Articles of Organization	3-Letter Transfer of Equity Interest DDM Sales, Inc. 12302019.pdf	pdf	5e398f271c3b1d04a32b0bfd	02/04/2020
Articles of Organization	5-Statement of Change of Supplemental Info from Secretary of Commonwealth DDM Sales, Inc. 12302019.pdf	pdf	5e398f745a2369047f2241af	02/04/2020
Articles of Organization	4-Vote of DDM Sales, Inc. 12242019.pdf	pdf	5e398fb681ae16046bec7647	02/04/2020
Articles of Organization	Articles of Organization DDM Sales, Inc. 09212018.pdf	pdf	5e3992d17b9883042b37079a	02/04/2020
Secretary of Commonwealth - Certificate of Good Standing	Unemployment Assistance Affidavit - DDM Sales, Inc. 01302020.pdf	pdf	5e3993374dd5bb0494104d88	02/04/2020
Department of Revenue - Certificate of Good standing	COGS from DOR DDM Sales, Inc. 02202020.pdf	pdf	5e4ebccd4dd5bb0494107e57	02/20/2020

No documents uploaded

Massachusetts Business Identification Number: 001347142

Doing-Business-As Name: DDM CANNABIS

DBA Registration City: Blackstone

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Proposed Timeline - DDM Sales, Inc..pdf	pdf	5e47089802a6e7045352d29c	02/14/2020
Plan for Liability Insurance	Plan for Obtaining Liability Insurance - DDM Sales, Inc..pdf	pdf	5e4c4ddf5b05c304785e8b57	02/18/2020
Business Plan	Executive Summary DDM Sales, Inc..pdf	pdf	5e53e1b9d29b0704447d987c	02/24/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	LOI In Good Health (1).pdf	pdf	5d261ab40da60604f435c265	07/10/2019
Plan for obtaining marijuana or marijuana products	LOI In Good Health (2).pdf	pdf	5d261abb3e9601053bdb5c5f	07/10/2019
Plan for obtaining marijuana or marijuana products	Plan for Obtaining marijuana and marijuana products DDM Sales, Inc. 02102020.pdf	pdf	5e41f6701c3b1d04a32b1e42	02/10/2020
Restricting Access to age 21 and older	SOP Restricting Access to Age 21 and Older - DDM Sales, Inc..pdf	pdf	5e46f77561c9e9045a792d6e	02/14/2020
Prevention of diversion	SOP Anti-Diversion Policy- DDM Sales, Inc..pdf	pdf	5e46f8025a2369047f22618c	02/14/2020
Transportation of marijuana	SOP Transportation Manifest and Security - DDM Sales, Inc..pdf	pdf	5e46f8b27225f004696594f3	02/14/2020
Dispensing procedures	SOP Dispensing - DDM Sales, Inc..pdf	pdf	5e46f8d57b9883042b372780	02/14/2020
Record Keeping procedures	SOP Record Keeping Procedures - DDM Sales, Inc..pdf	pdf	5e46f97b5a2369047f226198	02/14/2020
Maintaining of financial records	SOP Maintaining of Financial Records - DDM Sales, Inc..pdf	pdf	5e46f99b813339048c3fd0b1	02/14/2020
Qualifications and training	SOP Positions and Qualifications - DDM Sales, Inc..pdf	pdf	5e46f9e51c3b1d04a32b2b5c	02/14/2020
Inventory procedures	SOP Inventory Reports - DDM Sales, Inc..pdf	pdf	5e46fa15813339048c3fd0b8	02/14/2020
Security plan	SOP Security Plan - DDM Sales, Inc..pdf	pdf	5e48072581ae16046bec97ee	02/15/2020
Storage of marijuana	SOP Storage Procedures - DDM Sales, Inc..pdf	pdf	5e48088c69dc9d0456db94f1	02/15/2020
Transportation of marijuana	SOP Transportation Manifest and Security - DDM Sales, Inc..pdf	pdf	5e480aae64339304b08ffc3b	02/15/2020
Quality control and testing	SOP Quality Control - DDM Sales, Inc..pdf	pdf	5e480b3dd29b0704447d7f26	02/15/2020
Diversity plan	Diversity Plan - DDM Sales, Inc. 04232020.pdf	pdf	5ea201e1961ad539052c1344	04/23/2020
Personnel policies including background checks	Personnel Policies DDM Sales, Inc. 04222020.pdf	pdf	5ea20252b014bf38e46d13f4	04/23/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

Date generated: 03/25/2021

Page: 4 of 5

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: 9:00 AM	Monday To: 10:00 PM
Tuesday From: 9:00 AM	Tuesday To: 10:00 PM
Wednesday From: 9:00 AM	Wednesday To: 10:00 PM
Thursday From: 9:00 AM	Thursday To: 10:00 PM
Friday From: 9:00 AM	Friday To: 10:00 PM
Saturday From: 9:00 AM	Saturday To: 10:00 PM
Sunday From: 10:00 AM	Sunday To: 9:00 PM

Community Outreach Meeting Attestation Form

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

I, Vishnubhai B. Patel, (*insert name*) attest as an authorized representative of DDM Sales, Inc. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on February 7, 2019 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on January 30, 2019 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on January 25, 2019 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on January 25, 2019 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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

ATTACHMENT A

MARIJUANA LEGAL NOTICE Notice of Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a proposed marijuana establishment is scheduled for Thursday, February 7, 2019 at 6 PM at the Millerville Men's Club, 8 Lloyd St., Blackstone, MA. The proposed marijuana retailer is anticipated to be operated by DDM Sales, Inc. and located at 1 Lloyd St., Blackstone, MA 01504. There will be an opportunity for the public to ask questions.

AD#13767587
MDN 1/30/19

ATTACHMENT B

Notice of Community Outreach Meeting Regarding Proposal by DDM Sales, Inc.

Notice is hereby given that DDM Sales, Inc. will host a Community Outreach Meeting regarding the proposed retail Marijuana Establishment to be located at 1 Lloyd Street, Blackstone, MA 01504. This meeting will take place at the Millerville Men's Club, 8 Lloyd Street, Blackstone, MA 01504 on Thursday, February 7, 2019 at 6:00pm.

Information presented at the community outreach hearing will include, but not be limited to:

1. The type(s) of Adult-use Marijuana Establishment to be located at the proposed address;
2. Information regarding security measures for the proposed Establishment;
3. Steps to be taken by the Establishment to prevent diversion to minors;
4. A plan by the Establishment to positively impact the community; and
5. Information demonstrating that the location will not constitute a nuisance to the community by noise, odor, dust, glare, fumes, vibration, heat, glare, or other conditions likely to cause nuisance.

Members of the community are welcome and encouraged to ask questions.

This letter meets the notice requirement set forth by the Commonwealth of Massachusetts Cannabis Control Commission.

Thank you,

DDM SALES, INC.
By: Vishnubhai B. Patel
Its: President

[REDACTED]
[REDACTED]
[REDACTED]

Notice of Community Outreach Meeting Regarding Proposal by DDM Sales, Inc.

Notice is hereby given that DDM Sales, Inc. will host a Community Outreach Meeting regarding the proposed retail Marijuana Establishment to be located at 1 Lloyd Street, Blackstone, MA 01504. This meeting will take place at the Millerville Men's Club, 8 Lloyd Street, Blackstone, MA 01504 on Thursday, February 7, 2019 at 6:00pm.

Information presented at the community outreach hearing will include, but not be limited to:

1. The type(s) of Adult-use Marijuana Establishment to be located at the proposed address;
2. Information regarding security measures for the proposed Establishment;
3. Steps to be taken by the Establishment to prevent diversion to minors;
4. A plan by the Establishment to positively impact the community; and
5. Information demonstrating that the location will not constitute a nuisance to the community by noise, odor, dust, glare, fumes, vibration, heat, glare, or other conditions likely to cause nuisance.

Members of the community are welcome and encouraged to ask questions.

This letter meets the notice requirement set forth by the Commonwealth of Massachusetts Cannabis Control Commission.

Thank you,

DDM SALES, INC.
By: Vishnubhai B. Patel
Its: President

Blackstone Enlightener

ATTACHMENT D

PSRST STD
U.S. POSTAGE
PAID
Blackstone, MA
Permit #11
EGRWSS

POSTAL PATRON
Blackstone, MA 01504



Celebrating 25 years!

Volume 25, Issue 9

Blackstone's Hometown Newspaper Since 1993

FEBRUARY 2019

INSIDE

**SPECIAL
TOWN
MEETING**
February 26,
7 PM at BMR
High

~ Letters
...page 8

~ Windows on
the Past
...page 15

The last day
to file
Nomination
papers for
the April 1,
2019 Town
Election is
Monday,
February 11,
2019 (5:00pm)
MGL 53 §7

Animal Arts Celebrates 10th Anniversary



Kimberly Giguere of Blackstone, owner of Animal Arts Professional Dog Grooming at 7 Main Street, Blackstone MA is celebrating her 10th year in business on February 1, 2019. She is very grateful to her clients for her growing business and enjoys her community involvement.

Kimberly has been grooming since 1993. She and her staff not only have a love for dogs and pampering each and every one of them, but they also have a love for the work they provide. The girls at Animal Arts aim to please the customer but always do what's best for their little furry, four legged friends. Stop in today!



Book signing and talk with author Dick Ryan

Come and meet Blackstone poet and author Richard A. Ryan as he gives live readings and signs his book, *Our Universe Our Faith*, a collection of poems and other works, at the Blackstone Public Library on Saturday, February 9th, from noon - 2:00 p.m. Ryan, a

Author Ryan continued on page 3

NOTICE

CANNABIS DISPENSARY MEETING

Everyone is invited to a
Community Outreach
Meeting Regarding a
Proposed Adult-Use
Cannabis Dispensary to be
Located at 1 Lloyd Street,
Blackstone, Massachusetts.

Date: February 7, 2019

Time: 6:00 PM

Place: Millerville Mens Club
8 Lloyd Street
Blackstone, MA 01504

Presented by:

DDM Sales, Inc.

C/O Ryan Law Office &

5 Point Management Group

181 Main Street, Blackstone, MA 01504

www.ryanlawoffice.com

www.5pointmanagementgroup.com



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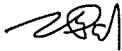
508-883-9000

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, Vishnubhai B. Patel, (*insert name*) certify as an authorized representative of DDM Sales, Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with Town of Blackstone, Massachusetts (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on March 6, 2019 (*insert date*).



Signature of Authorized Representative of Applicant

Host Community

I, Daniel P. Keefe, Chairman - Board of Selectmen, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Blackstone, Massachusetts (*insert name of host community*) to certify that the applicant and Town of Blackstone, Massachusetts (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on March 6, 2019 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

Plan for Compliance With Local Codes, Ordinances, and Bylaws

Pursuant to 935 CMR 500.101(1)(a)(10), DDM Sales, Inc. has developed the following plan to ensure that the Marijuana Establishment is or will be compliant with local codes, ordinances, and bylaws for its proposed adult-use dispensary at 1 Lloyd Street, Blackstone, Massachusetts:

The proposed dispensary is located in the R-1 zoning district. DDM Sales, Inc. obtained a Special Permit from the Town of Blackstone Zoning Board of Appeals. Said Special Permit was granted on March 20, 2019 allowing DDM Sales, Inc. to engage in the retail sale of adult-use cannabis and related products. A copy of the Special Permit has been uploaded as part of the application of DDM Sales, Inc.

DDM Sales, Inc. obtained a building permit from the Town of Blackstone on September 10, 2019. Note that DDM Sales, Inc. has not commenced building and will not do so unless and until it receives a provisional license from the Cannabis Control Commission and approval of its architect plans. The purpose of securing the building permit was to preserve its rights under Zoning Bylaws and to demonstrate that DDM Sales, Inc. is in compliance with all local codes, ordinances, and bylaws by the Town of Blackstone.

DDM Sales, Inc. has retained a local attorney who regularly engages in zoning, planning, and local licensing. This attorney shall be tasked with the ongoing job of identifying local licensing requirements for the adult use of marijuana and to ensure that the proposed dispensary at 1 Lloyd Street, Blackstone, MA shall remain in compliance with all local codes, ordinances, and bylaws.

DDM Sales, Inc. and the local attorney will continuously monitor local licensing issues and will cooperate with the host community in order to remain in compliance with all local codes, ordinances, and bylaws.

The proposed dispensary is located more than 500 feet from the nearest school.

Worcester South District Registry of Deeds Electronically Recorded Document

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Recording Information

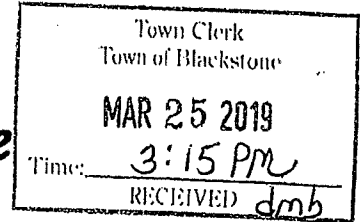
Document Number	: 33007
Document Type	: DECN
Recorded Date	: April 16, 2019
Recorded Time	: 01:58:36 PM
Recorded Book and Page	: 60277 / 251
Number of Pages(including cover sheet)	: 6
Receipt Number	: 1139068
Recording Fee	: \$75.00

Worcester South District Registry of Deeds
Kathryn A. Toomey, Register
90 Front St
Worcester, MA 01608
(508) 798-7717



Town of Blackstone

Zoning Board of Appeals



15 St. Paul Street Blackstone, Massachusetts 01504

Tel. (508)883-1500 Fax (508)883-4953

The Blackstone Zoning Board of Appeals has **APPROVED** the Petition for Special Permit for Applicant Joshua Realty, LLC, 77 Elm Street, Blackstone, MA 01504 and additional Applicant DDM Sales, Inc., 220 Pulaski Blvd, Bellingham, MA 02019, for the address of 1 Lloyd Street, Blackstone, MA 01504. This is an application for special permit for the operation of an adult-use cannabis dispensary under §123-11 and §123-10(A) of the Zoning By-Laws Intensity of Use Regulations and Intensity of Use Schedule.

A copy of this decision was filed in the office of the Town Clerk of Blackstone on 3/25/19.

Any person aggrieved by this decision of the Board of Appeals may appeal said decision pursuant to Massachusetts General Law Chapter 40A, Section 17, by bringing an action within twenty (20) days after the decision has been filed in the office of the Town Clerk. Notice of the action with a copy of the complaint shall be given to the Town Clerk within twenty (20) days.

No variance or special permit, or any extension, modification or renewal thereof shall take effect until a copy of the decision bearing the certification of the Town Clerk that 20 days have elapsed and no appeal has been filed or that if such an appeal has been filed that it has been denied or dismissed, is recorded in the Registry of Deeds for the county of the district in which the land is located and is indexed in the grantor index under the name of the recording or registering shall be paid by the owner or applicant.

To the Petitioner: After the 20 days have gone by from the above date, check with the Town Clerk's office and obtain a certified copy of the Board's Decision. Be sure that the variance or special permit is recorded at the Registry with your deed. The variance or special permit is not valid until recorded. A copy of the receipt from the Registry of Deeds must be filed with the Building Department when you apply for a building permit for the proposed construction.

M.G.L c 40A. Section 10 Variances States:

If the rights authorized by a variance are not exercised within one year of the date of grant of such variance, such variance shall lapse; provided, however, that the permit granting authority in its discretion and upon written application by the grantee of such rights may extend the time for exercise of such rights for a period not to exceed six months; and provide, further, that the application for such extension is filed with such permit granting authority prior to the expiration of such one year period.

Property: 1 Lloyd Street, Blackstone, MA 01504
Address:

**TOWN OF BLACKSTONE
ZONING BOARD OF APPEALS**

**DECISION OF THE ZONING BOARD OF APPEALS PETITION FOR SPECIAL
PERMIT UNDER THE ZONING BY-LAW FOR: 1 Lloyd Street A.P. 1, Lot 69**

The application was filed with the office of the Blackstone Town Clerk on February 26, 2019 by the petitioner for property located at 1 Lloyd Street, Blackstone, MA 01504 which is located in the R-1 district.

The petitioner is seeking to use the current building located at the aforementioned address for the retail sale of adult-use cannabis and related products. The applicant is applying for a Special Permit under section §123-11 Intensity of Use Schedule and §123-10(A) of the Zoning By-Laws. Presently, the property consists of a single, commercial style building. The petitioner wishes to continue using the property commercially.

Notice of the application was published in the Milford Daily News twice. The first notice was on March 6, 2019, allowing for a minimum of 14 days prior to the hearing, and the second notice was on March 13, 2019, allowing for a minimum of 7 days prior to the hearing. A public hearing in accordance with said notice was held on March 20, 2019 at 7 p.m. in the Blackstone Municipal Center Meeting Room. Notice of the hearing was provided to the petitioners, abutters, and appropriate town boards.

Present were: Chairman – Paul Marvelle
Vice Chairman – Marc Gregoire
Members – John Therrien, Gary Jolicoeur and Jim Pitler
Alternates – Joe Belrose and Jeannine Castonguay

The public hearing was called to order by Member John Therrien.

The application and supporting information was read into the record by Chairman Paul Marvelle.

Attorney Christopher Ryan, of Ryan Law Office, presented this application on behalf of the applicant.

Attorney Ryan explained the history of the property and the associated commercial uses it has maintained. He also noted how the current applicant's intentions would comply with the Zoning By-Laws and the intended use of the property would adhere to the commercial uses of surrounding properties. Attorney Ryan further offered reasons to how the dispensary would benefit the Town, such as in economic ways.

Brian Carney of DDM Sales, Inc. was present to speak before the Board.

Mr. Carney addressed general concerns of the Board and potential concerns that residents may have. He stated several means of control and solutions towards such issues as security, parking, and traffic that may arise due to the opening of the dispensary.

On a motion made by Mr. Therrien to grant the special permit and duly seconded by Mr. Marvelle and Mr. Gregoire, the Board voted unanimously (5-0) and the motion passed.

FINDINGS

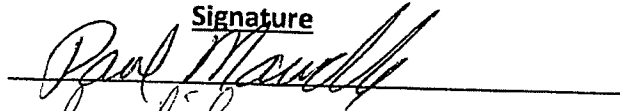
Section §123-4 Special Permits of the Zoning By-Law of the Town of Blackstone states that determination of the following criteria must be indicated:

- Social, economic, or community needs which are served by the proposal:
Economic and community needs will be better met as a result of the additional income to the Town generated by the dispensary. There will be no negative effect upon social needs.
- Traffic flow and safety:
The traffic and safety plan presented by the Applicants demonstrated to the Board that there will be no significant impact on traffic flow and safety.
- Adequacy of utilities and public services:
Current utilities are more than adequate for the proposed use. Granting a Special Permit will cause a positive effect on public services as a result of additional monies generated by the dispensary for the Town and Town services.
- Neighborhood character and social structure:
Granting the Special Permit and operation of a retail adult-use cannabis dispensary will have no negative effect on the neighborhood character and social structure. The building is already constructed. It is located in an area of retail stores, a bank, and a private club that serves liquor both indoors and outdoors.
- Qualities of the natural environment
The dispensary will be inside an existing building. There will be no negative impact.
- Potential Fiscal Impact
Fiscal impact will be positive. The dispensary will be paying 5% of gross sales to the Town as per a signed Host Community Agreement.
- Additional Findings
Also, the Board finds that the proposed extension, alteration or change, which is the retail sale of adult-use cannabis and related products, will not be substantially more detrimental to the neighborhood than the existing nonconforming use which is the retail sale of garage doors and of a prior use which was the retail sale of liquor and related products. See §123-10(A).

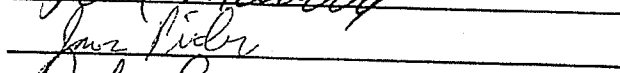
For all of the above reasons, the Board finds that the applicant meets the requirements for granting a Special Permit for the retail sale of adult-use cannabis and related products.

Blackstone Zoning Board of Appeals Special Permit**Name:****Signature****Vote**

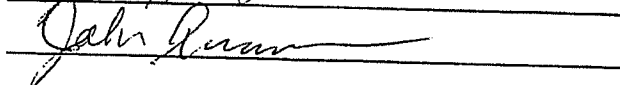
Paul Marvelle

Yes: ☒ No: ☐

Jim Pitler

Yes: ☒ No: ☐

John Therrien

Yes: ☒ No: ☐


Gary Jolicoeur

Yes: ☐ No: ☐

Marc Gregoire

Yes: ☒ No: ☐

Joe Belrose

Yes: ☒ No: ☐

Jeannine Castonguay

Yes: ☐ No: ☐DATE OF DECISION: 3/20/19GRANTED: ☒NOT GRANTED: ☐

This decision does not relieve the petitioner or any other person of the necessity of complying with all other applicable federal, state, or local statutes, bylaws, and/or regulations.

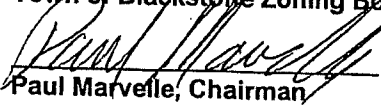
Any appeals of this Decision shall be made pursuant to Massachusetts General Laws, Chapter 40A, Section 17, and a copy of the appeal shall be filed in the Town Clerk's Office within 20 days after date of filing the Decision in the office of the Town Clerk.

Per Massachusetts General Laws, Chapter 40A, Section 11, this Decision shall not take effect until a copy, along with certification by the Town Clerk that no appeals have been made, has been recorded at the Registry of Deeds. It shall be the Applicant's responsibility to record the Decision with the Registry of Deeds and to submit a copy of the recorded Decision, including the Book and Page Number stamped by the Registry, with a Building Permit Application.

If the rights authorized by a special permit are not exercised within one(1) year of the grant of such special permit, such right shall lapse; provided, however, that the permit granting authority in its discretion, and upon written application by the grantee of such rights, may extend the time for exercise of for a period not to exceed six (6) months; and provided further that the application for such extension is filed with such permit granting authority prior to expiration of such one (1) year period.

The Blackstone Board of Selectmen requires that any persons granted a special permit for activity requiring any street openings in a public right-of-way shall apply for a street opening permit from the Department of Public Works. Work within the right-of-way shall not commence until the appropriate approval has been received. The Department of Public Works will strictly enforce this permitting process.

Town of Blackstone Zoning Board of Appeals



Paul Marvelle, Chairman

Decision filed with the Town Clerk on: MARCH 25, 20194-14-19
Appeal period ends4-15-19
Building permit may be issued on or after:

CONDITIONS

No conditions were implemented by the Zoning Board of Appeals.

Voting 5-0 on the Petition for Special Permit: Paul Marvelle, Jim Pitler, John Therrien, Marc Gregoire, and Joe Belrose

DONNA M. BIK — ASSISTANT

I, ~~Claudette Dolinski~~, Town Clerk of the Town of Blackstone, hereby certify that 20 days have elapsed since the filing with my office on March 25 2019 of the above decision by the Zoning Board of Appeals and that no appeal concerning said decision has been filed, dismissed, or denied.

Donna M. BIK
Claudette Dolinski

Asst Town Clerk

RECEIVED AND ENTERED WITH THE REGISTRER OF DEEDS IN THE COUNTY OF WORCESTER.

BOOK: PAGE:

ATTEST: _____
Register of Deeds

NOTICE TO BE RECORDED BY LAND OWNER

REF

BOOK 50202 PAGE 155

PROPERTY
OWNER

JOSHUA REALTY, LLC
77 ELM STREET
BLACKSTONE, MA 01504

ATTEST: WORC Kathryn A. Toomey, Register

DDM Sales, Inc. - Plan for Positive Impact

Program 1:

Measurable Goal: DDM Sales, Inc. (hereinafter “DDM”) will complete at least two (2) annual waterway or city clean-up events in communities that were disproportionately affected by marijuana laws. Waterways shall be defined as oceanside beach areas, lakeside beach areas, and riverfront areas.

Metric: At the end of the year, DDM will count the number of waterway and city clean-ups performed in communities that were disproportionately affected by marijuana laws to make sure that at least two (2) clean-ups were performed.

Program: DDM employees will travel to these municipalities in order to help in the revitalization of these disproportionately impacted areas. To do this, DDM plans to organize a bi-annual waterway or city clean-up whereby at least five (5) DDM employees, along with volunteers, will spend a morning or afternoon cleaning trash from public spaces. DDM shall coordinate the event with government officials, provide logistical assistance and provide materials, supplies, and equipment. Each year DDM will organize a waterway clean-up in the Fall or Summer and a city clean up in the Spring or Summer.

The President of DDM will choose clean-up dates at least two months in advance. Over the course of these two months, the President or an appointed employee shall publish at least two clean-up Notices in a newspaper of general circulation in the city or town in which the clean-up is scheduled. The newspaper Notice shall contain information relating to the waterway or city clean-up but will not contain anything related to marijuana or the nature of the business of DDM. The President of DDM or an appointed employee will document the event so that DDM has a record to present to the Cannabis Control Commission upon license review.

Which Municipalities Were Chosen and Why: The municipalities chosen were selected from a Cannabis Control Commission guidance document titled Guidance for Identifying Areas of Disproportionate Impact. Because the proposed dispensary is located in Worcester County but just a few feet from the dividing line between Worcester County and Norfolk County, DDM selected all eight (8) of the disproportionately affected areas located in Worcester County and Norfolk County. The yearly clean-up schedule will be as follows:

Year 1 - Worcester city clean-up (Worcester County) & Braintree waterway clean-up (Norfolk County)

Year 2 – Spencer city clean-up (Worcester County) & Randolph waterway clean-up (Norfolk County)

Year 3 – Fitchburg city clean-up (Worcester County) & Quincy waterway clean-up (Norfolk County)

Year 4 – Walpole city clean-up (Norfolk County) & Southbridge waterway clean-up (Worcester County)

After Year 4, DDM will start all over again, repeating the clean-up schedule as depicted above (Worcester 1st, Braintree 2nd, Spencer 3rd, Randolph 4th, Fitchburg 5th, Quincy 6th, Walpole 7th, Southbridge 8th).

The clean-up schedule is designed to make sure that at least one event is held in each of the two selected counties per year. As a result, the schedule alternates between municipalities in Worcester County and Norfolk County on a yearly basis.

In addition, DDM will routinely review guidance documents from the Cannabis Control Commission in order to determine whether or not the above-stated Areas of Disproportionate Impact have been increased or decreased in Worcester and Norfolk Counties whereupon the clean-up schedule will be revised to either add a new Area of Disproportionate Impact or subtract an area that has been removed from the most recent Cannabis Control Commission guidance document. Even if an Area of Disproportionate Impact has been removed, DDM will continue to operate at least two clean-ups per year.

PROGRAM 2:

MEASURABLE GOAL: PARTNER WITH AN ESTABLISHED NOT-FOR-PROFIT COMMUNITY ORGANIZATION THAT PROVIDES DIRECT SOCIAL SERVICES TO POPULATIONS IN WORCESTER. OUR GOAL IS TO PROVIDE A MINIMUM DONATION OF \$5,000 AND 75 HOURS OF SERVICE ANNUALLY.

PROGRAM: DDM HAS CHOSEN THE SOUTH WORCESTER NEIGHBORHOOD IMPROVEMENT CORP. (SWNIC) [HTTP://WWW.SWNIC.NET/](http://www.swnic.net/) AS OUR COMMUNITY SERVICE PARTNER. SWNIC IS A 501(C)(3) CHARITY THAT SERVES AREAS OF DISPROPORTIONATE IMPACT, INCLUDING CITY OF WORCESTER CENSUS TRACTS 731002, 731203, 731204, 731300, 732400, 732700 AND 733000.

SWNIC IS LOCATED IN CENSUS TRACT 733000. SWNIC SERVICES INCLUDE FACILITATING ACCESS TO HOUSING, UNEMPLOYMENT OPPORTUNITIES, HEALTH SERVICES, EDUCATION AND OTHER SOCIAL SERVICES TO THE RESIDENTS OF SOUTH WORCESTER.

A. DDM WILL MAKE A MINIMUM \$5,000 DONATION ANNUALLY TO THE ABOVE-NAMED ORGANIZATION.

I. THE FIRST DONATION WILL OCCUR ONCE DDM HAS RECEIVED PROVISIONAL LICENSURE FROM THE COMMISSION.

B. EACH 30+ HOUR EMPLOYEE WITH 3+ MONTHS COMPANY TENURE WILL RECEIVE 8 HOURS OF PAID VOLUNTEERISM TO THIS ORGANIZATION. DDM SHALL DELIVER AT LEAST 75 PAID VOLUNTEER HOURS TO THE AGENCY EACH YEAR.

I. THE DONATION OF VOLUNTEER HOURS WILL BEGIN NO LATER THAN 90 DAYS AFTER DDM HAS COMMENCED OPERATIONS.

C. SUPPORT FOR SWNIC'S FOOD PANTRY WILL BE ENCOURAGED THROUGH ONGOING STAFF PARTICIPATION AND DDM WILL HOST AN ANNUAL FOOD DRIVE FOR THE SWNIC FOOD PANTRY.

METRIC: DDM SHALL RECORD THE \$5,000 DONATION TO BE MADE TO SWNIC UPON ISSUANCE OF A PROVISIONAL LICENSE IN ITS POSITIVE IMPACT FOLDER WHICH SHALL BECOME PART OF DDM'S INTERNAL PROCESSES.

DDM SHALL CREATE A SPREADSHEET. THIS SPREADSHEET SHALL ALSO BE IN DDM'S POSITIVE IMPACT FOLDER. THE SPREADSHEET SHALL LIST THE NAMES OF ALL EMPLOYEES, DATE OF HIRE, AND HOURS WORKED PER WEEK IN ORDER TO IDENTIFY ALL EMPLOYEES WHO ARE 30+ HOUR PER WEEK WITH 3+ MONTHS COMPANY TENURE. THE SPREADSHEET SHALL LIST PAID VOLUNTEER HOURS WORKED WITH SWNIC PER YEAR. SUCH HOURS WORKED SHALL BE VERIFIED WITH SWNIC PRIOR TO ENTERING HOURS WORKED ON THE SPREADSHEET. TOTAL DONATION VOLUNTEER HOURS WORKED SHALL BE AT LEAST 75 PER YEAR FOR THE DISPENSARY.

Attestation: DDM Sales, Inc. acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and 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.

South Worcester Neighborhood Improvement Corporation

47 Camp Street – Worcester, MA 01603 508-757-8344

April 22, 2020

Vishnubhai B. Patel – President
DDM Sales, Inc.
220 Pulaski Boulevard
Bellingham, MA 02019

Dear Mr. Patel,

This letter serves to memorialize our conversation regarding donations of time and money from DDM Sales, Inc. to the South Worcester Neighborhood Improvement Corporation.

The South Worcester Neighborhood Improvement Corporation is a 501(c)(3) nonprofit in Worcester, Massachusetts. Our mission is to provide encouragement, momentum, and tools people need including education, employment, housing, health, food security, and assistance with family issues.

The South Worcester Neighborhood Improvement Corporation can and will accept monetary donations from DDM Sales, Inc. along with donations of time from employees of DDM Sales, Inc. as part of your plan to positively impact communities that have been disproportionately harmed by cannabis prohibition.

If there are any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom L'Ecuyer", with a long, sweeping horizontal line extending to the right.

Tom L'Ecuyer
Director

BY-LAWS
OF
DDM SALES, INC.

ARTICLE I – OFFICES

The principal office of the corporation in the State of Massachusetts shall be located in the Town of Bellingham County of Norfolk. The corporation may have such other offices, either within or without the State of incorporation as the board of directors may designate or as the business of the corporation may from time to time require.

ARTICLE II – STOCKHOLDERS

1. ANNUAL MEETING.

The annual meeting of the stockholders shall be held on the first day of July in each year, beginning with the year 2019 at the hour 1:00 o'clock PM, for the purpose of electing directors and for the transaction of such other business as may come before the meeting. If the day fixed for the annual meeting shall be a legal holiday such meeting shall be held on the next succeeding business day.

2. SPECIAL MEETINGS.

Special meetings of the stockholders, for any purpose or purposes, unless otherwise prescribed by statute, may be called by the president or by the directors, and shall be called by the president at the request of the holders of not less than 75 per cent of all the outstanding shares of the corporation entitled to vote at the meeting.

3. PLACE OF MEETING.

The directors may designate any place, either within or without the State unless otherwise prescribed by statute, as the place of meeting for any annual meeting or for any special meeting called by the directors. A waiver of notice signed by all stockholders entitled to vote at a meeting may designate any place, either within or without the state unless otherwise prescribed by statute, as the place for holding such meeting. If no designation is made, or if a special meeting be otherwise called, the place of meeting shall be the principal office of the corporation.

4. NOTICE OF MEETING.

Written or printed notice stating the place, day and hour of the meeting and, in case of a special meeting, the purpose or purposes for which the meeting is called, shall be delivered not less than ten (10) days nor more than thirty (30) days before the date of the meeting, either personally or by mail, by or at the direction of the president, or the secretary, or the officer or persons calling the meeting, to each stockholder of record entitled to vote at such meeting. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail, addressed to the stockholder at his address as it appears on the stock transfer books of the corporation, with postage thereon prepaid.

5. CLOSING OF TRANSFER BOOKS OR FIXING OF RECORD DATE.

For the purpose of determining stockholders entitled to notice of or to vote at any meeting of stockholders or any adjournment thereof, or stockholders entitled to receive payment of any dividend, or in order to make a determination of stockholders for any other proper purpose, the directors of the corporation may provide that the stock transfer books shall be closed for a stated period but not to exceed, in any case, sixty days. If the stock transfer books shall be closed for the purpose of determining stockholders entitled to notice of or to vote at a meeting of stockholders, such books shall be closed for at least thirty days immediately preceding such meeting. In lieu of closing the stock transfer books, the directors may fix in advance a date as the record date for any such determination of stockholders, such date in any case to be not more than sixty days and, in case of a meeting of stockholders, not less than thirty days prior to the date on which the particular action requiring such determination of stockholders is to be taken. If the stock transfer books are not closed and no record date is fixed for the determination of stockholders entitled to notice of or to vote at a meeting of stockholders, or stockholders entitled to receive payment of a dividend, the date on which notice of the meeting is mailed or the date on which the resolution of the directors declaring such dividend is adopted, as the case may be, shall be the record date for such determination of stockholders. When a determination of stockholders entitled to vote at any meeting of stockholders has been made as provided in this section, such determination shall apply to any adjournment thereof.

6. VOTING LISTS.

The officer or agent having charge of the stock transfer books for shares of the corporation shall make, at least sixty days before each meeting of stockholders, a complete list of the stockholders entitled to vote at such meeting, or any adjournment thereof, arranged in alphabetical order, with the address of and the number of shares held by each, which list, for a period of sixty days prior to such meeting, shall be kept on file at the principal office of the corporation and shall be subject to inspection by any stockholder at any time during usual business hours. Such list shall also be produced and kept open at the time and place of the meeting and shall be subject to the inspection of any stockholder during the whole time of the meeting. The original stock transfer book shall be prima facie evidence as to who are the stockholders entitled to examine such list or transfer books or to vote at the meeting of stockholders.

7. QUORUM.

At any meeting of stockholders fifty-one (51%) of the outstanding shares of the corporation entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of stockholders. If less than said number of the outstanding shares are represented at a meeting, a majority of the shares so represented may adjourn the meeting from time to time without further notice. At such adjourned meeting at which a quorum shall be present or represented, any business may be transacted which might have been transacted at the meeting as originally notified. The stockholders present at a duly organized meeting may continue to transact business until adjournment, notwithstanding the withdrawal of enough stockholders to leave less than a quorum.

8. PROXIES.

At all meetings of stockholders, a stockholder may vote by proxy executed in writing by the stockholder or by his duly authorized attorney in fact. Such proxy shall be filed with the secretary of the corporation before or at the time of the meeting.

9. VOTING.

Each stockholder entitled to vote in accordance with the terms and provisions of the certificate of incorporation and these by-laws shall be entitled to one vote, in person or by proxy, for each share of stock entitled to vote held by such stockholders. Upon the demand of any stockholder, the vote for directors and upon any question before the meeting shall be by ballot. All elections for directors shall be decided by plurality vote; all other questions shall be decided by majority vote except as otherwise provided by the Certificate of Incorporation or the laws of this State.

10. ORDER OF BUSINESS.

The order of business at all meetings of the stockholders, shall be as follows:

1. Roll call.
2. Proof of notice of meeting or waiver of notice .
3. Reading of minutes of preceding meeting.
4. Reports of Officers.
5. Reports of Committees.
6. Election of Directors.
7. Unfinished business.
8. New business.

11. INFORMAL ACTION BY STOCKHOLDERS.

Unless otherwise provided by law, any action required to be taken at a meeting of the shareholders, or any other action which may be taken at a meeting of the shareholders, may be taken without a meeting if a consent in writing, setting forth the action so taken, shall be signed by all of the shareholders entitled to vote with respect to the subject matter thereof.

ARTICLE III – BOARD OF DIRECTORS

1. GENERAL POWERS.

The business and affairs of the corporation shall be managed by its board of directors. The directors shall in all cases act as a board, and they may adopt such rules and regulations for the conduct of their meetings and the management of the corporation, as they may deem proper, not inconsistent with these by-laws and the laws of this State.

2. NUMBER, TENURE AND QUALIFICATIONS.

The number of directors of the corporation shall be more than one but less than six. Each director shall hold office until the next annual meeting of stockholders and until his/her successor shall have been elected and qualified.

3. REGULAR MEETINGS.

A regular meeting of the directors, shall be held with- out other notice than this by-law immediately after, and at the same place as, the annual meeting of stockholders. The directors may provide, by resolution, the time and place for the holding of additional regular meetings without other notice than such resolution.

4. SPECIAL MEETINGS.

Special meetings of the directors may be called by or at the request of the president or any two directors. The person or persons authorized to call special meetings of the directors may fix the place for holding any special meeting of the directors called by them.

5. NOTICE.

Notice of any special meeting shall be given at least thirty days previously thereto by written notice delivered personally or by mail addressed to each director at her/his business address. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail so addressed, with postage thereon prepaid. A notice may also be given by Certified Mail or a nationally recognized overnight courier with proof of delivery or receipt. The attendance of a director at a meeting shall constitute a waiver of notice of such meeting, except where a director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.

6. QUORUM.

At any meeting of the directors two directors shall constitute a quorum for the transaction of business, but if less than said number is present at a meeting, a majority of the directors present may adjourn the meeting from time to time without further notice.

7. MANNER OF ACTING.

The act of the majority of the directors present at a meeting at which a quorum is present shall be the act of the directors.

8. NEWLY CREATED DIRECTORSHIPS AND VACANCIES.

Newly created directorships resulting from an increase in the number of directors and vacancies occurring in the board for any reason except the removal of directors without cause may be filled by a vote of a majority of the directors then in office, although less than a quorum exists. Vacancies occurring by reason of the removal of directors without cause shall be filled by vote of the stockholders. A director elected to fill a vacancy caused by resignation, death or removal shall be elected to hold office for the unexpired term of his/her predecessor.

9. REMOVAL OF DIRECTORS.

Any or all of the directors may be removed for cause by vote of the stockholders or by action of the board. Directors may be removed without cause only by vote of the stockholders.

10. RESIGNATION.

A director may resign at any time by giving written notice to the board, the president or the secretary of the corporation. Unless otherwise specified in the notice, the resignation shall take effect upon receipt thereof by the board or such officer, and the acceptance of the resignation shall not be necessary to make it effective.

11. COMPENSATION.

No compensation shall be paid to directors, as such, for their services, but by resolution of the board a fixed sum and expenses for actual attendance at each regular or special meeting of the board may be authorized. Nothing herein contained shall be construed to preclude any director from serving the corporation in any other capacity and receiving compensation therefor.

12. PRESUMPTION OF ASSENT.

A director of the corporation who is present at a meeting of the directors at which action on any corporate matter is taken shall be presumed to have assented to the action taken unless his dissent shall be entered in the minutes of the meeting or unless he shall file his written dissent to such action with the person acting as the secretary of the meeting before the adjournment thereof or shall forward such dissent by registered mail to the secretary of the corporation immediately after the adjournment of the meeting. Such right to dissent shall not apply to a director who voted in favor of such action.

13. EXECUTIVE AND OTHER COMMITTEES.

The board, by resolution, may designate from among its members an executive committee and other committees, each consisting of three or more directors. Each such committee shall serve at the pleasure of the board.

ARTICLE IV – OFFICERS

1. NUMBER.

The officers of the corporation shall be a president, a vice -president, a secretary and a treasurer, each of whom shall be elected by the directors. Such other officers and assistant officers as may be deemed necessary may be elected or appointed by the directors.

2. ELECTION AND TERM OF OFFICE.

The officers of the corporation to be elected by the directors shall be elected annually at the first meeting of the directors held after each annual meeting of the stockholders. Each officer shall hold office until his successor shall have been duly elected and shall have qualified or until his death or until he shall resign or shall have been removed in the manner hereinafter provided.

3. REMOVAL.

Any officer or agent elected or appointed by the directors may be removed by the directors whenever in their judgment the best interests of the corporation would be served thereby, but such removal shall be without prejudice to the contract rights, if any, of the person so removed.

4. VACANCIES.

A vacancy in any office because of death, resignation, removal, disqualification or otherwise, may be filled by the directors for the unexpired portion of the term.

5. PRESIDENT.

The president shall be the principal executive officer of the corporation and, subject to the control of the directors, shall in general supervise and control all of the business and affairs of the corporation. The president shall, when present, preside at all meetings of the stockholders and of the directors, and may sign, with the secretary or, any other proper officer of the corporation thereunto authorized by the directors, certificates for shares of the corporation, any deeds, mortgages, bonds, contracts, or other instruments which the directors have authorized to be executed, except in cases where the signing and execution thereof shall be expressly delegated by the directors or by these by-laws to some other officer or agent of the corporation, or shall be required by law to be otherwise signed or executed and in general shall perform all duties incident to the office of president and such other duties as may be prescribed by the directors from time to time.

6. VICE-PRESIDENT.

In the absence of the president or in event of her/his death, inability or refusal to act, the vice-president shall perform the duties of the president, and when so acting, shall have all the powers of and be subject to all the restrictions upon the president. The vice-president shall perform such other duties as from time to time may be assigned to her/him by the president or by the directors.

7. SECRETARY.

The secretary shall keep the minutes of the stockholders and of the directors meetings in one or more books provided for that purpose, see that all notices are duly given in accordance with the provisions of these by-laws or as required, be custodian of the corporate records and of the seal of the corporation and keep a register of the post office address of each stockholder which shall be furnished to the secretary by such stockholder, have general charge of the stock transfer books of the corporation and in general perform all duties incident to the office of secretary and such other duties as from time to time may be assigned by the president or by the directors.

8. TREASURER.

If required by the directors, the treasurer shall give a bond for the faithful discharge of his/her duties in such sum and with such surety or sureties as the directors shall determine. The treasurer shall have charge and custody of and be responsible for all funds and securities of the corporation, receive and give receipts for moneys due and payable to the corporation from any source whatsoever, and deposit all such moneys in the name of the corporation in such banks, trust companies or other depositories as shall be selected in accordance with these by-laws and in general perform all of the duties incident to the office of treasurer and such other duties as from time to time may be assigned by the president or by the directors.

9. SALARIES.

The salaries of the officers shall be fixed from time to time by the directors and no officer shall be prevented from receiving such salary by reason of the fact that he/she is also a director of the corporation.

ARTICLE V – CONTRACTS, LOANS, CHECKS AND DEPOSITS

1. CONTRACTS.

The directors may authorize any officer or officers, agent or agents, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the corporation, and such authority may be general or confined to specific instances.

2. LOANS.

No loans shall be contracted on behalf of the corporation and no evidences of indebtedness shall be issued in its name unless authorized by a resolution of the directors. Such authority may be general or confined to specific instances.

3. CHECKS, DRAFTS, ETC.

All checks, drafts or other orders for the payment of money, notes or other evidences of indebtedness issued in the name of the corporation, shall be signed by such officer or officers, agent or agents of the corporation and in such manner as shall from time to time be determined by resolution of the directors.

4. DEPOSITS.

All funds of the corporation not otherwise employed shall be deposited from time to time to the credit of the corporation in such banks, trust companies or other depositaries as the directors may select.

ARTICLE VI – CERTIFICATES FOR SHARES AND THEIR TRANSFER

1. CERTIFICATES FOR SHARES.

Certificates representing shares of the corporation shall be in such form as shall be determined by the directors. Such certificates shall be signed by the president and by the secretary or by such other officers authorized by law and by the directors. All certificates for shares shall be consecutively numbered or otherwise identified. The name and address of the stockholders, the number of shares and date of issue, shall be entered on the stock transfer books of the corporation. All certificates surrendered to the corporation for transfer shall be canceled and no new certificate shall be issued until the former certificate for a like number of shares shall have been surrendered and canceled, except that in case of a lost, destroyed or mutilated certificate a new one may be issued therefor upon such terms and indemnity to the corporation as the directors may prescribe.

2. TRANSFERS OF SHARES.

- (a) Upon surrender to the corporation or the transfer agent of the corporation of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment or authority to transfer, it shall be the duty of the corporation to issue a new certificate to the person entitled thereto, and cancel the old certificate; every such transfer shall be entered on the transfer book of the corporation which shall be kept at its principal office.
- (b) The corporation shall be entitled to treat the holder of record of any share as the holder in fact thereof, and, accordingly, shall not be bound to recognize any equitable or other claim to or interest in such share on the part of any other person whether or not it shall have express or other notice thereof, except as expressly provided by the laws of this state.

ARTICLE VII – FISCAL YEAR

The fiscal year of the corporation shall begin on the first day of January in each year.

ARTICLE VIII – DIVIDENDS

The directors may from time to time declare, and the corporation may pay, dividends on its outstanding shares in the manner and upon the terms and conditions provided by law.

ARTICLE IX – SEAL

The directors shall provide a corporate seal which shall be circular in form and shall have inscribed thereon the name of the corporation, the state of incorporation, year of incorporation and the words, "Corporate Seal."

ARTICLE X – WAIVER OF NOTICE

Unless otherwise provided by law, whenever any notice is required to be given to any stockholder or director of the corporation under the provisions of these by-laws or under the provisions of the articles of incorporation, a waiver thereof in writing, signed by the person or persons entitled to such notice, whether before or after the time stated therein, shall be deemed equivalent to the giving of such notice.


ARTICLE XI – AMENDMENTS

These by-laws may be altered, amended or repealed and new by-laws may be adopted by a vote of the stockholders representing a majority of all the shares issued and outstanding, at any annual stockholders' meeting or at any special stockholders' meeting when the proposed amendment has been set out in the notice of such meeting.

Secretary Certificate

I, Vishnubhai B. Patel, Secretary of DDM Sales, Inc., hereby certify that the attached copy of the By-Laws of DDM Sales, Inc. is a true and correct copy of same.

Signed and sealed this 23rd day of May, 2019.



DDM Sales, Inc.
By: Vishnubhai B. Patel
Its: Secretary



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

William Francis Galvin
Secretary of the
Commonwealth

Date: January 27, 2020

To Whom It May Concern :

I hereby certify that according to the records of this office,
DDM SALES, INC.

is a domestic corporation organized on **September 21, 2018**, under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 20010543960

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

Processed by:

DDM Sales, Inc.
220 Pulaski Boulevard
Bellingham, MA 02019

December 30, 2019

Commonwealth of Massachusetts
Cannabis Control Commission
2 Washington Square
Worcester, MA 01604

RE: DDM Sales, Inc.
Change of Officer, Director, and Equity Owner

Dear Sir/Madam:

Please consider this letter as notification that my wife, Rekhaben V. Patel, has resigned her positions of Treasurer and Director of DDM Sales, Inc. As a result, I am the sole officer and director of DDM Sales, Inc.

In addition, Rekhaben V. Patel, transferred all of her equity interest in DDM Sales, Inc. to me. As a result, I am the sole equity owner of DDM Sales, Inc.

Attached are copies of documents evidencing the transfer. If you have any questions, please feel free to contact me at any time. Thank you.

Very truly yours,

Vishnubhai B Patel, President
DDM Sales, Inc.
By: Vishnubhai B. Patel
Its: President

Rekhaben V. Patel
8 Field Circle
Wrentham, MA 02093

December 24, 2019

Vishnubhai B. Patel, President
DDM Sales, Inc.
220 Pulaski Boulevard
Bellingham, MA 02019

RE: DDM Sales, Inc.
Letter of Resignation

Dear President Patel:

Effective today, I hereby resign my positions as Treasurer and Director of DDM Sales, Inc.

THE REMAINDER OF THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.

Signed and sealed this 24th day of December, 2019

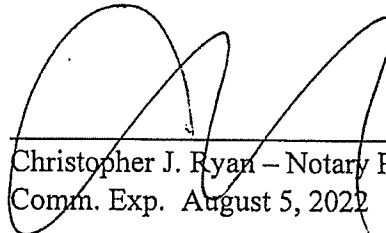
Rekhaben V. Patel
Rekhaben V. Patel

COMMONWEALTH OF MASSACHUSETTS

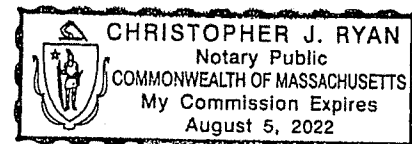
Worcester, ss.

December 24, 2019

On this 24th day of December, 2019, before me, the undersigned Notary Public, personally appeared Rekhaben V. Patel, proved to me through satisfactory evidence of identification, which was a Massachusetts Drivers License, to be the person whose name is signed on the preceding or attached document, and acknowledged to me that she signed it voluntarily for its stated purpose.



Christopher J. Ryan – Notary Public
Comm. Exp. August 5, 2022



Rekhaben V. Patel
8 Field Circle
Wrentham, MA 02093

December 24, 2019

Vishnubhai B. Patel, President
DDM Sales, Inc.
220 Pulaski Boulevard
Bellingham, MA 02019

RE: DDM Sales, Inc.
Transfer of Equity Interest

Dear President Patel:

Effective today, I hereby transfer all of my equity interest in DDM Sales, Inc. to Vishnubhai B. Patel.

Said transfer is made by gift as Vishnubhai B. Patel is my spouse.

THE REMAINDER OF THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.

Signed and sealed this 24th day of December, 2019

Rekhaben V. Patel
Rekhaben V. Patel

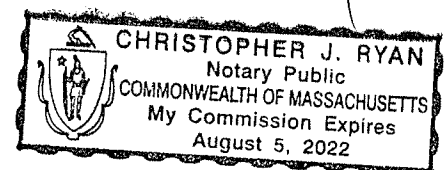
COMMONWEALTH OF MASSACHUSETTS

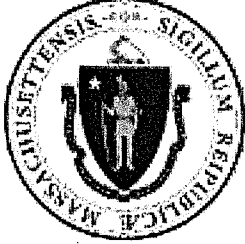
Worcester, ss.

December 24, 2019

On this 24th day of December, 2019, before me, the undersigned Notary Public, personally appeared Rekhaben V. Patel, proved to me through satisfactory evidence of identification, which was a Massachusetts Drivers License, to be the person whose name is signed on the preceding or attached document, and acknowledged to me that she signed it voluntarily for its stated purpose.

Christopher J. Ryan – Notary Public
Comm. Exp. August 5, 2022





The Commonwealth of Massachusetts
William Francis Galvin

No Fee

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

Statement of Change of Supplemental Information

(General Laws, Chapter 156D, Section 2.02 AND Section 8.45; 950 CMR 113.17)

1. Exact name of the corporation: DDM SALES, INC.

2. Current registered office address:

Name: VISHNUBHAI B. PATEL

No. and Street: 220 PULASKI BOULEVARD

City or Town: BELLINGHAM State: MA Zip: 02019 Country: USA

3. The following supplemental information has changed:

☒ Names and street addresses of the directors, president, treasurer, secretary

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	VISHNUBHAI B PATEL	8 FIELD CIRCLE WRENTHAM, MA 02093 USA
TREASURER	VISHNUBHAI B PATEL	8 FIELD CIRCLE WRENTHAM, MA 02093 USA
SECRETARY	VISHNUBHAI B PATEL	8 FIELD CIRCLE WRENTHAM, MA 02093 USA
DIRECTOR	VISHNUBHAI B PATEL	8 FIELD CIRCLE WRENTHAM, MA 02093 USA

☐ Fiscal year end:
December

☐ Type of business in which the corporation intends to engage:

RETAIL SALES OF VARIOUS PRODUCTS

☐ Principal office address:

No. and Street: 220 PULASKI BOULEVARD

City or Town: BELLINGHAM State: MA Zip: 02019 Country: USA

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

No. and Street: 220 PULASKI BOULEVARD

City or Town: BELLINGHAM State: MA Zip: 02019 Country: USA

which is

- ☒ its principal office ☐ an office of its transfer agent
☐ an office of its secretary/assistant secretary ☐ its registered office

Signed by VISHNUBHAI B. PATEL , its PRESIDENT
on this 27 Day of December, 2019

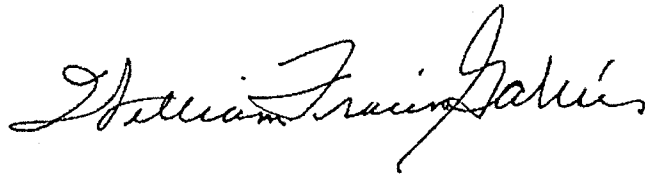
© 2001 - 2019 Commonwealth of Massachusetts
All Rights Reserved

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:

December 27, 2019 01:44 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

CERTIFICATE OF VOTE

A meeting of the officers, directors, and shareholders of **DDM SALES, INC.** was held on December 24, 2019. The President, Vishnubhai B. Patel, presided at the meeting. The President declared a quorum to be present and in attendance.

Upon Motions duly made and seconded, the officers, directors, and shareholders unanimously

VOTED: Accepting the resignation of Rekhaben V. Patel as Treasurer and Director of the Corporation.

VOTED: To elect Vishnubhai B. Patel as Treasurer and recognized that Vishnubhai B. Patel is already a Director of the Corporation.

VOTED: To acknowledge the transfer of all of the equity interest in the Corporation owned by Rekhaben V. Patel to her husband, Vishnubhai B. Patel.

VOTED: To authorize Vishnubhai B. Patel to file appropriate documents with the Secretary of the Commonwealth and to take any and all additional actions necessary.

Witness the execution hereof under seal as of this 24th day of December 2019.

A TRUE COPY
ATTEST:

DDM SALES, INC.

Vishnubhai B. Patel President
By: Vishnubhai B. Patel
Its: President

I, Vishnubhai B. Patel, hereby certify that I am the duly elected and qualified Secretary of the above-named Corporation and that the above is a true copy of the Vote that was passed.

ATTEST:

Vishnubhai B. Patel SECRETARY
Vishnubhai B. Patel, Secretary



The Commonwealth of Massachusetts William Francis Galvin

Minimum Fee: \$250.00

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

[Special Filing Instructions](#)

Articles of Organization

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

Identification Number: 001347142

ARTICLE I

The exact name of the corporation is:

DDM SALES, INC.

ARTICLE II

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

THE CORPORATION IS ORGANIZED TO SELL, DISTRIBUTE, PROMOTE, MARKET, AND OTHERWISE PROVIDE RETAIL SALES OF PRODUCTS IN ACCORDANCE WITH THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS. TO ENGAGE IN ALL ACTIVITIES INCIDENTAL THERETO, AND TO ENGAGE IN ALL OTHER ACTIVITIES IN WHICH A CORPORATION FORMED UNDER THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS MAY LAWFULLY ENGAGE.

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CNP	\$0.00000	10,000	\$0.00	0

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

ARTICLE IV

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

NOT APPLICABLE

ARTICLE V

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

NOT APPLICABLE

ARTICLE VI

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

ARTICLE VI OTHER LAWFUL PROVISIONS: 1.MINIMUM NUMBER OF DIRECTORS. THE BOARD OF DIRECTORS MAY CONSIST OF ONE OR MORE INDIVIDUALS, NOTWITHSTANDING THE NUMBER OF SHAREHOLDERS. 2.PERSONAL LIABILITY OF DIRECTORS TO CORPORATION. NO DIRECTOR SHALL HAVE PERSONAL LIABILITY TO THE CORPORATION FOR MONETARY DAMAGES FOR BREACH OF HIS OR HER FIDUCIARY DUTY AS A DIRECTOR NOTWITHSTANDING ANY PROVISION OF LAW IMPOSING SUCH LIABILITY, PROVIDED THAT THIS PROVISION SHALL NOT ELIMINATE OR LIMIT THE LIABILITY OF A DIRECTOR (A) FOR ANY BREACH OF THE DIRECTOR'S DUTY OF LOYALTY TO THE CORPORATION OR ITS SHAREHOLDERS, (B) FOR ACTS OR OMISSIONS NOT IN GOOD FAITH OR WHICH INVOLVE INTENTIONAL MISCONDUCT OR A KNOWING VIOLATION OF LAW, (C) FOR IMPROPER DISTRIBUTIONS UNDER CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS, OR (D) FOR ANY TRANSACTION FROM WHICH THE DIRECTOR DERIVED AN IMPROPER PERSONAL BENEFIT. 3.SHAREHOLDER VOTE IS REQUIRED TO APPROVE MATTERS ACTED ON BY SHAREHOLDERS. WITH RESPECT TO ANY MATTER AS TO WHICH THE AFFIRMATIVE VOTE OF MORE THAN A MAJORITY OF THE SHARES IN ANY VOTING GROUP SHALL BE REQUIRED BY ANY PROVISION OF CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS FOR THE APPROVAL OF THE MATTER, THE AFFIRMATIVE VOTE OF A MAJORITY OF ALL THE SHARES IN ANY SUCH VOTING GROUP ELIGIBLE TO VOTE ON THE MATTER SHALL BE SUFFICIENT FOR THE APPROVAL OF THE MATTER NOTWITHSTANDING THAT SUCH GREATER VOTE ON THE MATTER WOULD BE OTHERWISE REQUIRED. 4.SHAREHOLDER ACTION WITHOUT A MEETING BY LESS THAN UNANIMOUS CONSENT. ACTION REQUIRED OR PERMITTED BY CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS TO BE TAKEN AT A SHAREHOLDERS MEETING MAY BE TAKEN WITHOUT A MEETING BY SHAREHOLDERS HAVING NOT LESS THAN THE MINIMUM NUMBER OF VOTES NECESSARY TO TAKE THE ACTION AT A MEETING AT WHICH ALL SHAREHOLDERS ENTITLED TO VOTE ON THE ACTION ARE PRESENT AND VOTING. 5.AUTHORIZATION OF DIRECTORS TO MAKE, AMEND OR REPEAL BYLAWS. THE BOARD OF DIRECTORS MAY MAKE, AMEND OR REPEAL THE BYLAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH, BY VIRTUE OF AN EXPRESS PROVISION IN CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS, THE ARTICLES OF ORGANIZATION OR THE BYLAWS REQUIRES ACTION BY THE SHAREHOLDERS. 6.AUTHORITY OF DIRECTORS TO CREATE NEW CLASSES AND SERIES OF SHARES. THE BOARD OF DIRECTORS, ACTING WITHOUT THE SHAREHOLDERS, MAY (A) RECLASSIFY ANY UNISSUED SHARES OF ANY AUTHORIZED CLASS OR SERIES INTO ONE OR MORE EXISTING OR NEW CLASSES OR SERIES, AND (B) CREATE ONE OR MORE NEW CLASSES OR SERIES OF SHARES, SPECIFYING THE NUMBER OF SHARES TO BE INCLUDED THEREIN, THE DISTINGUISHING DESIGNATION THEREOF AND THE PREFERENCES, LIMITATIONS AND RELATIVE RIGHTS APPLICABLE THERETO, PROVIDED THAT THE BOARD OF DIRECTORS MAY NOT APPROVE AN AGGREGATE NUMBER OF AUTHORIZED SHARES OF ALL CLASSES AND SERIES WHICH EXCEEDS THE TOTAL NUMBER OF AUTHORIZED SHARES SPECIFIED IN THE ARTICLES OF ORGANIZATION APPROVED BY THE SHAREHOLDERS. 7. MEETINGS OF THE SHAREHOLDERS OF THE CORPORATION MAY BE HELD ANYWHERE IN THE UNITED STATES. 8. THE CORPORATION SHALL HAVE THE POWER TO BE A PARTNER IN ANY BUSINESS ENTERPRISE WHICH THIS CORPORATION WOULD HAVE THE POWER TO CONDUCT BY ITSELF.

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

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

Name: VISHNUBHAI B. PATEL
No. and Street: 12 MANCHESTER DRIVE
City or Town: WRENTHAM State: MA Zip: 02093 Country: USA

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

Title	Individual Name <small>First, Middle, Last, Suffix</small>	Address (no PO Box) <small>Address, City or Town, State, Zip Code</small>
PRESIDENT	VISHNUBHAI B PATEL	12 MANCHESTER DRIVE WRENTHAM, MA 02093 USA
TREASURER	REKHABEN V. PATEL	12 MANCHESTER DRIVE WRENTHAM, MA 02093 US
SECRETARY	VISHNUBHAI B PATEL	12 MANCHESTER DRIVE WRENTHAM, MA 02093 USA
DIRECTOR	VISHNUBHAI B PATEL	12 MANCHESTER DRIVE WRENTHAM, MA 02093 USA
DIRECTOR	REKHABEN V. PATEL	12 MANCHESTER DRIVE WRENTHAM, MA 02093 US

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

e. A brief description of the type of business in which the corporation intends to engage:
RETAIL SALES OF VARIOUS PRODUCTS

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

No. and Street: 12 MANCHESTER DRIVE
City or Town: WRENTHAM State: MA Zip: 02093 Country: USA

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

No. and Street: 12 MANCHESTER DRIVE
City or Town: WRENTHAM State: MA Zip: 02093 Country: USA

which is

☒ its principal office ☐ an office of its transfer agent

___ an office of its secretary/assistant secretary

___ its registered office

Signed this 21 Day of September, 2018 at 3:02:58 PM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

VISHNUBHAI B. PATEL, INCORPORATOR

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:

September 21, 2018 03:02 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

Unemployment Assistance Affidavit

In accordance with 935 CMR 500.101(1) and in support of the application of DDM Sales, Inc. (the "**Applicant**") with a principal address of 220 Pulaski Blvd., Bellingham, MA 02019, hereby confirms and certifies to the Cannabis Control Commission (the "CCC") that:

1. DDM Sales, Inc. cannot register with the Department of Unemployment Assistance until employees are hired.

Under penalties of perjury I declare that I have examined this certification and to the best of my knowledge and belief it is true, correct and complete, and I further declare that I have authority to sign this document.

Dated as of January 27, 2020

By: 

Name: Vishnubhai B. Patel
Company: DDM Sales, Inc
Title: President



Commonwealth of Massachusetts
Department of Revenue
Kevin W. Brown, Acting Commissioner

mass.gov/dor

Letter ID: L1458531392
Notice Date: February 15, 2020
Case ID: 0-000-717-318



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



DDM SALES INC 0
220 PULASKI BLVD
BELLINGHAM MA 02019-2409

000040

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, DDM SALES INC 0 is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

Plan for Obtaining Liability Insurance

DDM Sales, Inc. (the “Company”) will work with an insurance broker licensed in the Commonwealth of Massachusetts to obtain insurance that meets or exceeds the requirements set forth in 935 CMR 500.105(10).

Pursuant to 935 CMR 500.105(10) the Company shall obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, or such amount as otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

Pursuant to 935 CMR 500.105(10)(b) if the Company is unable to obtain minimum liability insurance coverage as required by 935 CMR 500.105(10)(a) the Company will place in escrow (the “**Liability Insurance Escrow Account**”) a sum of no less than Two Hundred Fifty Thousand and 00/100 (\$250,000.00) Dollars or such other amount approved by the Commission, to be expended for coverage of liabilities. If the Company is unable to obtain minimum liability insurance coverage as required by 935 CMR 500.105(10)(a) the Company will properly document such inability through written records that will be retained in accordance with the Company’s Record Retention Policy (incorporated herein by reference). If the Liability Insurance Escrow Account is used to cover such liabilities, it will be replenished within ten (10) business days of such expenditure. The Company will submit reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

This policy may also be referred to by the Company as the “**Liability Insurance Policy**”.

Executive Summary – DDM Sales, Inc.

DDM Sales, Inc. (hereinafter “DDM” or the “Company”) is applying for a license with the Cannabis Control Commission to operate an adult-use cannabis retail facility in Blackstone, MA.

The Company is a single owner corporation owned and operated by Vishnubhai B. Patel (hereinafter “Mr. Patel”) who is a minority applicant. Mr. Patel’s company is well capitalized and has sufficient financial resources to successfully develop an adult-use dispensary. Mr. Patel has many years of retail experience selling regulated products such as tobacco and alcohol. As a result, Mr. Patel has the experience necessary to keep the Company in compliance with Cannabis Control Commission regulations.

The Company is leasing a 4,000 square foot building and was granted a Host Community Agreement as well as a special permit to build the dispensary. Once open, the product menu will include a wide range of flower strains, concentrates, edibles, and topicals. The company will control its supply chain by entering into wholesale supply agreements with multiple vendors to create variety in product offerings. All cannabis purchases shall be made from Massachusetts licensed facilities.

DDM’s Mission:

To source and sell high quality cannabis to customers with a product and service they can rely on and trust. Our brand will be built on the core values of customer service, product quality, and responsibility.

Vision:

To become a well respected cannabis dispensary. To own and operate a dispensary that customers can rely upon for excellent products and superior customer service. To become the “go-to” dispensary for area cannabis purchasers.

Management:

Mr. Patel has many years of retail sales experience. He worked in stores with government regulated tobacco, liquor, and lottery. As a result of his many years of experience, Mr. Patel developed Standard Operating Procedures (SOPs) that create a framework of standards for operation of the Company. As the Company grows, it will remain in compliance with government regulations without compromising service standards.

Products & Services

In addition to dispensing dried cannabis and concentrates, DDM will sell a wide range of additional cannabis Infused products such as edibles and topicals. The Company will also engage in the sale of cannabis accessories and supplies. All cannabis products will be pre--packaged prior to arriving at the dispensary in child-resistant, opaque, re--sealable containers. All packaging shall be in compliance with Cannabis Control Commission packaging regulations:

Flower –Sold in 1.0, 3.5, 7.0, 14.0, 28.0 gram units

Pre rolls –Sold in .5 and 1.0 gram units

Edibles –Sold in 2.5 or 5mg units. Packaged in 5 and 10 packs.

Concentrates –Concentrates will include distillate, wax, live rosin, hash, mints, and capsules. Each will be sold in .5 gram and 1.0 gram units.

Vaporizer Cartridges –Cartridges will be sold in 500mg and 250mg units.

Other cannabis items may be sold so long as the type, quantity, and packaging are all in compliance with Cannabis Control Commission regulations.

Financial Position:

DDM Sales, Inc. is solely funded by its owner, Vishnubhai B. Patel. Mr. Patel has ownership interests in multiple retail businesses in Massachusetts. His success in owning and running these retail establishments is allowing him to self--fund his new venture in the Massachusetts adult-use cannabis industry. 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.

Market Overview:

According to the report by Arcview Market Research and BDS Analytics: "The Road Map to a \$57 Billion Worldwide Market"¹, spending on legal cannabis worldwide is expected to hit \$57 billion by 2027. The recreational cannabis market will cover about 67% of the spending while medical cannabis will take up the remaining 33%.

Massachusetts voters approved Question 4, the initiative to legalize the recreational use of cannabis and first retail cannabis business was opened in Massachusetts in November 2018. As of December 2019, there are over 461 pending applications, including 193 retailer, 137 cultivator, 101 manufacturer, 15 microbusiness, 7 transporter and 7 testing licenses.

As of January 2020, total cannabis sales have amounted to \$458,335,971 according to figures released by the Cannabis Control Commission. It is expected over 700,000 residents are interested in buying adult--use cannabis in Massachusetts. Massachusetts cannabis sales are projected to become a \$1 billion industry by the end of 2020.

DDM Sales, Inc. acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

Operating Plan:

DDM Sales, Inc. operating plan is centered around a set of standard operating procedures and a focus on continual process improvement. All new staff will be required to pass the Massachusetts mandated Responsible Vendor Training Program as well as an in-house training program. Properly trained staff will navigate and guide customers through DDM's vast product variety featuring Massachusetts sourced products.

Timeline:

Quarter 4, 2018

October 1st --October 15th: •Business Plan completed

October 15th --November 15th: Legal and Accounting: • “Company Structure” legally established, with entities filed and operating agreements executed. •Community Host Agreement process started •Establishment of bank account

Quarter 1, 2019

January 1st --March 31st •Community host agreement obtained for Blackstone location

Quarter 2, 2019

April 10th --June 30th Licensing: •Securing of Insurance quotes •Establishment of “wind--down” account (in the event that cannabis activities need to be abruptly stopped and business dismantled) •Standard Operating Procedures completed and submitted •Background Checks •Architectural plans started

Quarter 4, 2019

October 1st --December 31st •Website designed and built •Branding designs finalized with packaging prototypes

Quarter 1, 2020

January 1st --March 31st •Architecture finalized •MEP Engineering finished •General Contractor quotes obtained and company selected •Operational teams secured •Demo and construction commenced at retail facility •Strategic Partnerships/Vendor Relations finalized

Quarter 2, 2020

April 1st --June 30th: •Construction finalized •All employees fully trained and licensed and trained via Responsible Vendor Training Program •Retail Location open and operational

Standard Operating Procedure

RESTRICTING ACCESS TO AGE 21 AND OLDER

1. Purpose

The purpose of this SOP is to provide guidance to employees on the overall restriction of access to persons age 21 and older protocols at the facility and the responsibility of employees working there.

2. Scope

The scope of this SOP is for anyone working in the facility or for the company. Proper access to the facility is a paramount concern for our employees, our staff, and the public.

3. Prerequisites

All employees working in the facility are required to have gone through initial training and mentoring that specifically includes all aspects of the restriction of access to persons age 21 and older at the facility.

4. Responsibilities

Proper access to the facility is the direct responsibility of the Director of Security, who has a staff of security agents, but every employee is trained in specific aspects of the facility's access.

5. Procedure

Under the Massachusetts 935 CMR 500.000: Adult Use of Marijuana law:

- “Consumer” is defined as a person who is at least 21 years of age.
- “Visitor” means an individual, other than a Marijuana Establishment Agent authorized by the Marijuana Establishment, to be on the premises of a Marijuana Establishment for a purpose related to Marijuana Establishment operations and consistent with the objectives of the Act and 935 CMR500.000, provided, however, that no such individual shall be under 21 years of age.

Customer access

Consumer access is strictly limited to consumers that are 21 years of age or older, pursuant to 935 CMR 500.105(14). Consumers must have a valid driver's license, government-issued ID card, military identification card, or a passport. Customers will only be permitted in the Dispensary area (i.e. retail area) and are prohibited from remaining on the premises once the purpose of their visit has been completed.

On-Premises Verification of Identification

Upon entry into the facility, by an individual, the individual's proof of identification shall be immediately inspected to determine the individual's age. An individual shall not be admitted to the premises unless it has first been verified that the individuals 21 years of age or older. We will be using the Intellicheck service to check the ID of everyone that enters the premises.

Enclosed, Locked Area

Enclosed marked area means a closet, room, or other indoor or outdoor area equipped with locks or other security devices, which shall only be accessible to customers 21 years of age or older.

Visitor protocols

Summary of visitor protocols:

- All vendors, contractors, state or local government representatives, and all others without permanent Complex-issued ID, are considered visitors.

- Before being permitted to enter the premises, all visitors shall provide proof of age and ID, included on an expected list of visitors or show official documentation of an unscheduled inspection or authority to perform such inspection and sign the visitor log on camera. The entry guard will verify that the name on the identification matches the name in the visitor log. Identification must contain a picture, date of birth, valid and not expired.

- All visitors or official visitors shall be escorted at all times.

- Escorting means within reasonable line of sight.

- A single employee may escort no more than five visitors.
- The escorting employee shall log all access by visitors to Limited Access Areas at the time of the access.
- Compensation may not be used as leverage for allowing visitors onsite.

6. References

The facility director and the director of security maintain detailed security plans and schematics and are available at any time to answer any specific security questions.

7. Reporting

Any incident involving a security matter must be logged and reported to the facility director, the director of security, and the board of directors.

Standard Operating Procedure

RECORD KEEPING PROCEDURES

1. Purpose

The purpose of this SOP is to provide guidance on some of the logs and records to be kept by the dispensary.

2. Scope

The scope of this SOP includes all employees working in the facility, and all visitors, contractors, law enforcement, regulators, etc.

3. Prerequisites

Each employee will be taught the proper way to fill out logs and records, and how to properly store them and deliver them to the appropriate personnel.

4. Responsibilities

The director of the facility is responsible for insuring all logs and records are kept up to date, and stored for the proper statutory period.

5. Procedure

Pursuant to 935 CMR 500.105(1), the facility will continually update and maintain written operating procedures. The facility will also update and maintain any financial records in accordance with generally accepted accounting principles. We will utilize the Metrc as well as a Point of Sale software system for tracking seed to sale inventory, financial records, and facility records, dispensary records and to integrate accounting records originated in the financial program. Payroll will be performed by an outside service, and adjusting entries will be imported into Metrc. We will be able to track any product that is sold or transferred to and from our facility. Our record keeping will include sales, seed-to-sale tracking and all other business components except for the following, which will be in an add on database:

- Internal Auditor Spot Counts
- Record Shredding Log

- Emergency Action Plan
- Security Logs
- Visitor Log
- Foreign Matter Inspection
- Shipping Records
- Corrective and Preventative Actions
- Chain of Custody Logs
- Employee Handbook/Training Log
- Sanitation Program
- Cannabis Destruction Records
- Waste Disposal Plan/Log
- Daily Opening/Closing Checklist
- End of Day Deposit Template
- Master Employee Scheduling Form
- Product Return Log
- Employee Applications
- Employee Discipline Reports

The following personnel records will be maintained

- Job descriptions for each agent;
- A personnel record for each agent;
- A staffing plan that will demonstrate accessible business hours and safe conditions;
- Personnel policies and procedures;
- All background check reports obtained in accordance with 935 CMR 500.030. The following business records will be maintained:
- Assets and liabilities;
- Monetary transactions;
- Books and accounts;●Sales records; and
- Salary and wages paid to each employee.

Tracking/Logging Workflow and Pertinent Data

All workflow will be tracked and recorded for daily review by the facility manager. Logs may be utilized by designated employees to track workflow. In addition to logging, all information shall be entered into the seed to sale tracking software.

Visitor Log

The company compliance manager is responsible for ensuring any authorized personnel visiting the facility use a visitor log. The visitor log will be located inside the main secured entrance to the facility.

Cleaning Log

The facility manager is responsible for overseeing the use of a daily cleaning log to track cleaning within all zones of the facility.

Maintenance Log

A facility maintenance log will be utilized to track maintenance and upkeep on all equipment within the facility.

6. References

Please refer to the different logs maintained by the facility director for specific instructions for record keeping.

7. Reporting

All logs must be kept up to date, and all entries must be signed by the person making them.

Standard Operating Procedure

RECORD RETENTION POLICY

1. Purpose

The purpose of this SOP is to provide guidance on the facility's record retention policy, including where and how it is stored.

2. Scope

The scope of this SOP is for all employees who provide back office support and are responsible for the records maintained by the facility.

3. Prerequisites

The prerequisites for reaching the security level where employees have access to the database, passwords, and physical hard copy includes original training and specialty training in back room procedures, record databases, and protocols for record retention/destruction. The facility director will maintain a list of all employees with access to the ability to purge records from the software system, and also who may designate records to be physically shredded.

4. Responsibilities

Only senior level employees may actually destroy records, and only upon clearance with the facility director, who will provide time frames for record destruction based on outside counsel's interpretation of the regulations.

5. Procedure

Records and Documents Storage Retention

Unless otherwise specified, the facility will retain and maintain all records and duplicate sets of records for a minimum of six (6) years.

Duplicate Records and Off-Site Storage

The facility will maintain duplicate sets of all records required by regulation. These duplicate copies of the facility's records will be maintained at a secure, off-site location. This location will only be disclosed to personnel with proper security clearance. The off-site record storage will be secured with a security alarm and surveillance system to ensure access is limited to authorized personnel only. The facility will maintain duplicate copies of all records at a secure storage facility within the state.

Waste Records

The facility will keep waste records for a minimum of three years.

Reports

The facility can generate a list of the products and their specifications that have been offered for distribution. These reports are to be provided to the Department upon request.

- Reports can be created through the Metrc inventory control system.
- Within the inventory control system, the facility will be able to generate a list of all the products along with their specifications that were offered for distribution.
- This list can be generated for all products offered within specific date ranges.

Record retention

- The facility shall retain for a minimum of six years business operation records including but not limited to:
 - Inventory tracking including transport of marijuana and manufactured marijuana products;
 - Sales and compliance with any dispensing limitations;
 - Financial records including income, expenses, bank deposits and withdrawals, and audit reports;
 - Logs of entry and exit for facility; and
 - Employee records.

6. References

Please refer to the outside counsel's report on record retention policies which is updated quarterly.

7. Reporting

Any and all changes to the record retention policy must be vetted by the facility director. If the policy is changed, a copy is circulated to all employees through our email listserv.

Standard Operating Procedure

MAINTAINING OF FINANCIAL RECORDS

1.Purpose

The purpose of this SOP is to provide guidance on the facility's maintaining of financial records policy, including where and how it is stored.

2.Scope

The scope of this SOP is for all employees who provide back office support and are responsible for the records maintained by the facility.

3.Prerequisites

The prerequisites for reaching the security level where employees have access to the database, passwords, and physical hard copy includes original training and specialty training in back room procedures, record databases, and protocols for record retention/destruction. The facility director will maintain a list of all employees with access to the ability to purge records from the software system, and also who may designate records to be physically shredded.

4.Responsibilities

Only senior level employees may actually destroy records, and only upon clearance with the facility director, who will provide time frames for record destruction based on outside counsel's interpretation of the regulations.

5.Procedure

Records and Documents Storage Retention

- Unless otherwise specified, the facility will retain and maintain all financial records and duplicate sets of records for a minimum of six (6) years.
- The following financial records shall be maintained:
 - Assets and liabilities;

- Monetary transactions;
 - Books of accounts;
 - Sales records; and
 - Salary and wages paid to each employee.
- The company will not use any software or methods to manipulate or alter sales data
- Monthly analysis of all equipment will be conducted to determine that no software has been installed that could be utilized to manipulate or alter sales data.
 - Records that these monthly reports have been conducted will be retained for a minimum of three (3) years.
- During these monthly inspections, if it is determined that software or other methods of have been used/utilized to manipulate or alter sales data, the incident will be reported to the Cannabis Control Commission immediately, as well as cooperate in any investigation, and take such other action directed by the commission.
- We will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive16-1 regarding record keeping requirements.
- We will establish separate accounting practices at the point of sale for marijuana and non-marijuana sales.
- This facility is not co-located, however if it were, we will maintain and provide the Cannabis Control Commission on a biannual basis accurate sales data during the six monthly immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under935 CMR 500.140(10).

Duplicate Records and Off-Site Storage

The facility will maintain duplicate sets of all financial records required by regulation. These duplicate copies of the facility's financial records will be maintained at a secure, off-site location. This location will only be disclosed to personnel with proper security clearance. The off-site financial record storage will be secured with a security alarm and surveillance system to ensure access is limited to authorized personnel only. The facility will maintain duplicate copies of all records at a secure storage facility within the state.

6.Reporting

Any and all changes to the record retention policy must be vetted by the facility director. If the policy is changed, a copy is circulated to all employees through our email listserv.

Standard Operating Procedures

POSITIONS AND QUALIFICATIONS

PRESIDENT

Role - Develops the organization's vision, creates and implements policies, manages strategy development and monitors financials and actual production.

Responsibilities – The president is responsible for the overall performance of the company. (S)He monitors revenue and expenses, ensuring that resources are efficiently used, and is responsible for signing contracts with vendors and outside parties. The President hires high level staff and provides feedback on their performance. The president is responsible for strategy development, performance management, and public relations as well. Additionally, the president accepts fiscal responsibility and bottom line accountability for the company.

Relationships - The President sits at the top of the organizational hierarchy and has the directors of mission critical sections reporting to him or her. The President is responsible for the hierarchy to work as smoothly as possible all the way down the chain of command. The president reports to the board of directors of the company.

GENERAL MANAGER

Roles - Oversees day to day operations, ensuring standard operating procedures are adhered to.

Responsibilities - The General Manager is responsible for driving revenue goals while providing an outstanding customer experience while maximizing revenue goals, leading the management & development of the dispensary staff and ensuring compliance with all inventory, security, and system protocols. The GM is also responsible for forecasting inventory levels, ordering & receiving product, and maintaining accurate systems for regulatory reporting and sales analysis.

Relationships - The General Manager has direct authority over all staff in the dispensary and reports to the President of the company.

DISPENSARY STAFF

Roles - Performs all of the day to day tasks

Responsibilities - Dispensary staff are responsible for the following:

- Handling sales transactions and ensuring all required customer information is obtained (license, ID etc.) and properly filed or stored for each purchase
- Executes internal policies and procedures in compliance with all Massachusetts and CCC rules and regulations, governing the adult use marijuana dispensary program
- Responsible for assisting in all sales operations related to dispensary: patient admissions, patient consultation, product dispensing, displays, keeping shelves stocked, and financial accounting for daily operations
- Responsible for assisting in Security Operating Procedure compliance
- Overseeing security for Product Delivery, parking lot and store/customer safety

Relationships - All dispensary staff report directly to the General Manager.

INTERNAL AUDITOR

Roles – The internal auditor provides a check and balance to the bookkeeper, the harvesting staff, and to the growing facility manager to ensure that all weights, cash, and product are accounted for, and that the reports produced for each are accurate. They will spot check each part of the operation to ensure there is no collusion, and to ensure that all safeguards and reporting mechanisms are functioning properly.

Responsibilities – The internal auditor is responsible for checking and crosschecking the inventory, cash deposits and receipts, accounts payable and receivable, and insuring that a solid audit trail is available to compliance officials and other professionals engaged by the company.

Relationships – The internal auditor responds directly to the president, and also to any outside compliance, accounting and legal teams. The internal auditor has only one boss – the president.

SECURITY

Roles – The security team is responsible for insuring the safety of the employees, any visitors, and the facilities themselves. They will patrol the grounds, observe through closed circuit cameras, and interface with management to help document any weaknesses found in the system.

Responsibilities – The security team is responsible for insuring that inventory is not removed from the premises without documentation, that employees are watched during the day to avoid theft, that cash is collected and drivers maintain different routes to prevent robbery, and interface with management as well as any experts hired by the company to prepare safety procedures.

Relationships - The security team reports to the facility manager and to the president of the company as well.

MARKETING

Roles – The marketing manager will work to achieve greater market share, make customers aware of our presence and products, and use traditional media and social networks to attract new customers as well as retain current customers.

Responsibilities – The marketing manager will create and monitor Facebook, Twitter, and other social network outlets to allow customers to find pricing and delivery times and policies for our products. The marketing manager will also be in charge of the web site and will update it with timely information to inform customers of new strains developed in our facility.

Relationships – the marketing manager will report directly to the president of the company.

Standard Operating Procedure

CPR TRAINING

1. Purpose

The purpose of this SOP is to provide guidance on CPR Training for all employees of the facility.

2. Scope

The scope of this SOP is for all employees. Training is a requirement for continued employment.

3. Prerequisites

All employees who have passed through their probationary employment phase will be given CPR training. During their original training, they will learn rudimentary first aid, but during their employment other emergency medical training will be offered.

4. Responsibilities

It is the responsibility of the director of human resources to insure all personnel are reminded of their obligation to take CPR training, and to help arrange classes on premises for it.

5. Procedure

The American Heart Association's Heart saver CPR AED Course has been updated to reflect new science in the 2015 American Heart Association Guidelines Update for CPR and Emergency Cardiovascular Care. This course which is taught regularly a tour facility is used to provide CPR and use an AED in a safe, timely, and effective manner. Heart saver CPR AED Online is the eLearning portion of the Heart saver CPR AED blended learning course and is designed to teach students the cognitive information needed for CPR and AED training. The Director of Human Resources assigns passwords to employees for online training. Upon successful completion of both portions of the course, students receive a Heart saver CPR AED course completion card, valid for two years.

After completing this course, employees of the facility will be able to:

- Describe how high-quality CPR improves survival.
- Explain the concepts of the Chain of Survival.
- Recognize when someone needs CPR.
- Perform high-quality CPR for an adult.
- Describe how to perform CPR with help from others.
- Give effective breaths by using mouth-to-mouth or a mask for all age groups.
- Demonstrate how to use an AED on an adult.
- Perform high-quality CPR for a child.

- Demonstrate how to use an AED on a child.
- Perform high-quality CPR for an infant.
- Describe when and how to help a choking adult or child.
- Demonstrate how to help a choking infant.

6. References

The facility utilizes the information from the American Heart Association's website for construction of our inhouse CPR modules.

7. Reporting

All employees will be given attendance slips to sign, and will be awarded a completion certificate upon successful training in CPR.

Standard Operating Procedure

TRAINING PROTOCOLS & RECORDS

1. Purpose

The purpose of this SOP is to provide guidance on training for new employees, and documenting the training through handouts, video recordings, and entries into the employee's personnel records for completed modules.

2. Scope

The scope of the SOP is for anyone working at the facility as a registered agent.

3. Prerequisites

All employees must have gone through the training modules and documentation and be prepared to discuss and be tested on:

- a) Health, safety, and sanitation standards as required by the Cannabis Control Commission
- b) Security procedures
- c) Prohibitions and enforcement as described by state regulation

- d) Confidentiality and customer privacy
- e) Training on Commission Statutes and Rules and Other State and Local Laws and Regulations
- f) Training on Company Standard Operating Procedures
- g) Training on Detection and Prevention of Diversion of Cannabis
- h) Training on Security and the Company's Security System
- i) Training on Hazards and Safety and Emergency Procedures such as a Medical Emergency, Fire, Chemical Spill, Security and a Threatening Event.
- j) Training on Inventory Control and Record Keeping

4. Responsibilities

It is the responsibility of the corporate trainer to insure all modules necessary for successful employment have been taken by new employees, and the proper documentation including employee signatures on training materials, test or quiz results, and an actual video of the training session must be on file in each hire's personnel file.

5. Procedure

The facility will utilize the operational experience and knowledge from its management employees and corporate trainer to provide extensive training and education for all registered employees. All facility employees will receive extensive training prior to commencing work in any facility.

Registered employees will be required to read the relevant state and county law pertaining to marijuana in order to have a general understanding of the laws and regulation with which that they must comply. Training retail and dispensing operations will be provided by our corporate trainer, training will also be provided from selected 3rd party security vendors, Metrc inventory control systems and POS vendors and other subject matter experts. Training will include an extensive hands-on approach and the use of Standard

Operating Procedures (SOP's) and various other materials and methods as deemed appropriate.

The facility will utilize targeted training materials and programs for different operations. There will be specific training for registered employees involved in retail dispensing operations. Ongoing and cross-functional training will be continued as operations commence. All registered employees will also be required to receive training on general sanitary requirements. Registered employees will be required to read and agree to comply with the company Employee Handbook, SOP's, and other materials management deems necessary prior to commencing work in any of our facilities. Management will fully prepare facility staff on all aspects of the business before operations are commenced. Training and education will be all-encompassing, covering regulatory compliance, seed-to-sale tracking, point-of-sale training, dispensing, security and diversion prevention, health and safety protocols, sanitation, transportation, and organizational functioning operation. Registered employee training will cover but not be limited to the following:

- Retail Dispensing Operations SOP's
 - Standard Operating Procedures detailing and explaining the various daily operations, activities, tasks, and responsibilities associated with the retail dispensing operations.
- Log Sheets and Templates
 - Numerous log sheets and templates for proper record keeping and documentation for all operations.
- Responsible vendor training
- On-site training
- Initial job training
- Job shadowing
- Employee educational information

In addition to the in-house training program, all owners, manager, and employees will be required to complete a Responsible Vendor Training program. These required training classes will be completed within 90 days of

hire and employees must score 70% or higher. Course material includes, but is not limited to:

- a) Marijuana's physical effects on the human body
- b) Diversion prevention and prevention of sales to minors, including best practices
- c) Compliance with all tracking requirements
- d) Acceptable forms of identification
- e) Maintenance of records
- f) Incident and notification requirements
- g) Administrative and criminal liability
- h) License sanctions and court sanctions
- i) Waste disposal
- j) Health and safety standards
- k) Patrons prohibited from bringing marijuana onto licensed premises
- l) Permitted hours of sale
- m) Permitting inspections by state and local licensing and enforcement authorities
- n) Licensee responsibilities for activities occurring within licensed premises
- o) Privacy issues
- p) Prohibited purchases and practices

6. References

Please refer to the training manual which will contain:

1. A new-hire orientation training section - All new employees will go through an orientation training before starting their employment. The training manual will include an orientation section containing a review of all company policies, such as drug-free workplace rules and confidentiality requirements. This phase of training will also include an orientation to the SOP system and how to use it on the job.

2.Laws and Regulations: This section of the training manual will include critical laws and regulations the Company and employees are subject to. Certain of these laws and regulations will also be incorporated into the company's SOPs.

3.SOP training curriculum -The training manual will include a comprehensive copy of the Company's SOPs. The primary training

curriculum for process or agents for the performance of their duties will be the SOPs themselves. The SOPs will have an administrative section which will include a signature line for employees and managers to indicate proficiency. This documentation will go into the employee's files to be available for audit and for inspection by the commission.

4.Detection and prevention of diversion - This section of the training manual will be created with the assistance of our professional security consultant. They will also develop the security plan for the company and will perform training sessions for the employees.

5.Processor Facility Security - This section of the training manual will be created with the assistance of our professional security consultant. They will also develop the security plan for the company and will perform training sessions for the employees.

6.Safety and emergencies - This section of the manual will be created with the assistance of our security consultants, processor consultants and local fire and safety agencies. All employees will be trained on emergency situations and periodic drills will be performed to ensure preparedness.

7.Inventory Control - The training manual will include a section that provides an overview of inventory control. The inventory control system is a third-party software system which will have a comprehensive user manual. This user manual will be retained onsite and will be available for inspection at all times by the commission.

7. Reporting

All training materials and results from any quiz or exam will be placed in the employee's personnel file.

Standard Operating Procedures

EMPLOYEE SAFETY TRAINING

1. Purpose

The purpose of this SOP is to provide guidance for the safety training given in the facility for all employees.

2. Scope

The scope of this SOP is for all employees of the facility without exception.

3. Prerequisites

All employees in their initial training go through multiple modules on employee safety, personal protective equipment uses, storage and cleaning, and other training for specific mechanical and other equipment used in the facility.

4. Responsibilities

Initial safety training is the responsibility of the facility director, the corporate trainer, and all staff mentors. Every employee must have been given the safety training modules and passed the accompanying exam. All employees go through recurrent safety training biannually.

5. Procedure

State and Federal regulations require employers to provide a workplace free from serious recognized hazards. In order to accomplish safety training, the facility will do the following:

- Make sure employees have and use safe tools and equipment and properly maintain this equipment.
- Use color codes, posters, labels or signs to warn employees of potential hazards.
- Establish or update operating procedures and communicate them so that employees follow safety and health requirements.
- The facility will provide safety training in a language and vocabulary workers can understand.
- Since the facility has hazardous chemicals in the workplace we have developed and implemented a written hazard communication program and we have trained employees on the hazards they are exposed to and proper precautions (along with the relevant of safety data sheets).

- Provide medical examinations and training
- We have posted, at a prominent location within the workplace, a poster informing employees of their rights and responsibilities.
- Keep records of work-related injuries and illnesses.
- Provide access to employee medical records and exposure records to employees or their authorized representatives.
- The facility will never discriminate against employees who exercise their rights under the Act.

6. References

The facility models its safety requirements after industry best practices.

7. Reporting

All safety training must be documented through video recording, and having employees sign a log sheet for each class attended.

Standard Operating Procedures

EMPLOYEE TRAINING

1. Purpose

All employees must undergo and pass a two-week training course prior to active employment and being assigned scheduled hours. Additionally, they must successfully pass a Responsible Vendor Program within the first 90 days of employment as well as receive a minimum of 8 hours of ongoing training annually, in compliance with 935 CMR 500.105(2).

2. Scope

Our employee-training curriculum will provide critical procedures and instruction to employees to ensure all systems are in place to produce cannabis safely. These systems also ensure that every employee understands how to implement these systems accurately. In addition, there are sanitation, product quality, and quantity accuracy checkpoints to ensure

that errors or problems are caught and remedied long before customers receive any product.

3. Prerequisites

All employees will be extensively trained and validation techniques will be utilized for ensuring continued competency. Employees are required to follow all safety signage, regulatory guidance and GMP's to ensure a safe, clean and sustainable working environment.

4. Responsibilities

The facility manager and the corporate trainer are responsible for insuring the attendance and requisite test of employee knowledge before allowing them to be placed on the work schedule.

5. Procedure

Training and education

In addition to the Company's mandatory training on security, standard operating procedures, and other standard requirements, the Company will provide specialized training for each position. The Company commits to setting a high bar for its products, which requires treating and training employees well. Training and education for all personnel will be the cornerstone of the operations success through dedicated programs for employees so they are prepared to consistently operate at the highest industry standards. In addition, the Company will develop policies that support furthering the educational attainment of employees.

Personnel training

1. Manufacturing, packaging, labeling and holding operations must:
 - a. Ensure that each person engaged in the operation has the education, training, and experience, or any combination thereof, to enable that person to perform all assigned functions;
 - b. Provide personnel with training in the applicable requirements of this part; and
 - c. Maintain records of any training provided to personnel for the performance of all assigned functions.

2. Personnel training should include:
 - a. Instructions regarding regulatory inspection preparedness and law-enforcement interactions; and
 - b. Information on U.S. federal, state and local laws, regulations, and policies relating to individuals employed in these operations, and the implications of these for such personnel.

All employees will also attend training sessions on the following:

- State regulations.
- Confidentiality and Privacy
- Marijuana Strains, Treatments, and Usage.
- The facility's operation manuals.
- Standard Operating Procedures (SOPs and applicable forms)

Employees must also display familiarity with the following:

- Retail Dispensing Operations SOP's.
 - Standard Operating Procedures detailing and explaining the various daily operations, activities, tasks, and responsibilities associated with the facility's retail dispensing operations.
- Log Sheets and Templates
 - Numerous log sheets and templates for proper record keeping and documentation for all operations including cultivation, MIP, and dispensing.
- Responsible vendor training.
- On-site training.
- Initial job training.
- Job shadowing.
- Employee educational information

In addition to the in-house training program, all owners, manager, and employees will be required to complete a Responsible Vendor Training program. These required training classes will be completed within 90 days of hire and employees must score 70% or higher. Course material includes, but is not limited to:

- a) Marijuana's physical effects on the human body
- b) Diversion prevention and prevention of sales to minors, including best practices
- c) Compliance with all tracking requirements
- d) Acceptable forms of identification
- e) Maintenance of records
- f) Incident and notification requirements
- g) Administrative and criminal liability
- h) License sanctions and court sanctions
- i) Waste disposal
- j) Health and safety standards
- k) Patrons prohibited from bringing marijuana onto licensed premises
- l) Permitted hours of sale
- m) Permitting inspections by state and local licensing and enforcement authorities
- n) Licensee responsibilities for activities occurring within licensed premises
- o) Privacy issues
- p) Prohibited purchases and practices

6. References

Please refer to job descriptions and original training material for further understanding of this SOP.

7. Reporting

All training must be documented with attendance taken, a video recording of the actual classroom during training, and a copy of the content presented. The results of any training quizzes or exams must be placed in the employee's personnel file.

Standard Operating Procedure

QUALITY CONTROL

1. Purpose

The purpose of the following Standard Operating Procedures are to provide guidance on quality control over the products grown and produced in the facilities that we will be purchasing products from. Although DDM Sales, Inc. will not own or operate a cultivation facility, the company plans to audit their product supply vendors to make sure the following standards are in place.

2. Scope

The scope of this SOP is for all employees throughout the manufacturing facility.

3. Prerequisites

The initial training provided for new employees includes best practices in all parts of the operation. Employees must pass the quality control module in order to continue working at the facility.

4. Responsibilities

It is the responsibility of each department to ensure that they have quality control protocols and standards in place.

5. Procedure

We will utilize an outside third-party lab for testing. SOP's for 3rd party vendors quality control and testing include:

- The floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair.
- All nutrients will be examined for contents & potential contaminants.
- Only biological pesticides will be applied.
- Filtered water will be used to prevent contamination.
- All workers will walk through a ceiling blower to remove potential contaminants before entering facility.

- Workers will walk through a special container of a water/chlorine mix to kill shoe borne contaminants.
- Application of ozone equipment to kill 99% of all microorganisms.
- All testing performed subject to the Cannabis Inflorescence and Leaf monograph (American Herbal Pharmacopoeia) standards.
- Limit tests will include foreign organic matter, total ash, & acid-insoluble ash.
- All external testing done by state approved labs.
- All crops batch tested for pests, contaminants, mold and potency.
- Soil testing before use for contaminants and pests.
- Determination of sample size for internal and external testing.
- Calculation of the acceptable range utilizing ISO Guide 34:2009.
- Written procedure for responding to contaminated samples.
- Additional batch sampled uniquely bar coded for further sampling.
- All testing documentation retained for five years.
- Procedures in place for stability testing to determine shelf life for MIPS.
- Random sampling of finished products currently for sale.
- All nutrients and additives shelf life recorded and reviewed.
- Expiration dates in large font on labels.

Quality control measures will primarily be in the form of adherence to the written standard operating procedures along with specific testing of the product in order to ensure quality and consistency of products produced within the facility. The facility will utilize the established and proven SOP's for all cultivation and processing operations. The facility will use standard operating procedures (SOP's) to promote good growing and handling practices including:

All aspects of the:

- Irrigation, propagation, cultivation, fertilization; harvesting, drying, curing;
- Rework or reprocessing;
- Packaging, labeling, and handling of marijuana products, byproduct; and waste products, and the control thereof, to promote good growing and handling practices.
- The facility will require that each individual engaged in the cultivation, manufacturing, handling, packaging, and testing of marijuana has received the training, education, or experience necessary to perform assigned functions; and

- Will also require that all registered employees practice good hygiene and wear protective clothing as necessary to protect the product as well as themselves from exposure to potential contaminants.
- All agents whose job includes contact with marijuana are subject to the requirements for foods handlers specified in 105 CMR 300.000.
- All agents whose job includes contact with marijuana will conform to sanitary practices while on duty, including;
 - Maintaining adequate personal cleanliness; and
 - Washing hands appropriately
- Hand washing facilities will be located in production areas and where good sanitary practices require employees to wash and sanitize their hands.
- There will be sufficient space for placement of equipment and storage materials as is necessary for the maintenance of sanitary operations.
- All contact surfaces will be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination.
- Plumbing in facility will be of adequate size and designed and maintained to carry sufficient quantities of water to required locations throughout the facility.
 - Water supply will be sufficient for necessary operations
- The facility will provide its employees with adequate, readily accessible toilet facilities.
- There shall be sufficient space in the facility for placement of equipment and storage of materials as is necessary for sanitary operations.
- The facility will require grower agents to follow the protocol for Receipt of Material including:
 - The facility shall quarantine received material that will be used to produce marijuana and/or manufactured marijuana products;
 - All toxic items will be identified, held, and stored in a manner that protects against the contamination of any other marijuana in the facility;
 - The facility shall inspect materials for defects and contamination.
 - Material may not be released from quarantine by the facility until the material passes inspection; and
 - Is determined to be acceptable for use as intended.
- Storage and transportation of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination.

- Litter and waste shall be properly removed to minimize the development of odor and the potential for the waste attracting and harboring pests.
- No marijuana will be sold or otherwise marketed for adult-use that is not capable of being tested by an independent testing laboratory.
- The company will notify the Cannabis Control Commission within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary.

6. References

Please refer to inspection SOP's for further information about quality control.

7. Reporting

All quality control reports are stored in the seed to sale tracking software, where they are categorized by department. The software has the ability to generate custom reports to determine if there is an issue with product shelf life, production techniques, or other quality control issues.

Standard Operating Procedure

TESTS ON FORMULATED PRODUCT

1. Purpose

The purpose of this SOP is to provide guidance on testing finished product before releasing it for public consumption.

2. Scope

The scope of this SOP is for all employees involved in quality control and creating formulated (infused) products.

3. Prerequisites

All product that is finished in the manufacturing facility is tested at a licensed laboratory, who will provide a detailed analysis of the product, its ingredients, and its strength. All employees who work in quality control must be capable of reading a laboratory report and understanding the specific tolerances allowed by the state.

4. Responsibilities

It is the responsibility of the quality control director to insure all employees under their direct supervision understand how the facility provides samples to the independent lab for testing, as well how infused products is tested internally. Additionally, the quality control director must insure that cannabis infused products are quarantined separately from other inventory during testing.

5. Procedure

All formulated product is entered into a testing log before it is provided to the laboratory. After curing and before any processing or packaging, the processing manager will make samples from each batch available to an independent laboratory for testing. The sample will be weighed, RFID scanned, and all data will be recorded on the seed to sale tracking software prior to be removed from the secured curing area. The laboratory employee

will select and prepare several random samples from every batch sample in order to ensure the quality, purity, and consistency of dose through a statistical approach. The laboratory staff will then test each random sample for harmful microbiological contaminants, mycotoxins, heavy metals and pesticide chemical residue. In addition, each sample will also be tested for active ingredients including but not limited to cannabinoid profiling for the following: THC, THCa, CBD, CBDa, and CBN.

Under no circumstances shall cannabis batches awaiting contamination results and active ingredient analysis be included in a cannabis product or sold to a retail dispensary facility prior to the time that the laboratory has provided those results, in writing, to the dispensary. If samples from a batch are tested and do not fall within state accepted health and safety levels for any of the above- mentioned contaminants or any additional contaminants the state does not deem for distribution, it is the facility's policy to destroy and remove any contaminated product in a manner consistent with state compliance for the policy for disposal of green waste.

As soon as a batch sample passes the microbiological, mycotoxin, heavy metal and pesticide chemical residue test, the entire batch will be released for immediate manufacturing, packaging and labeling for transport and sale to a dispensary facility. An electronic copy of all test results will be filed by laboratory staff for any batch that does not meet the standards set for microbiological, mycotoxin, heavy metal or pesticide chemical residue tests. The laboratory staff will also maintain a comprehensive record of test results and make them available to state and local officials, and or the public, as needed. The compliance manager will provide test results for each batch of cannabis used in any product purchased by a dispensary to that dispensary to be made available upon request.

6. References

The independent testing lab we work with provides us guidelines for sample preparation that conforms to the state's regulations. The quality control manager maintains their source documents for preparing samples, along with the requisite forms that must accompany all samples. In the event of a

question, the resource documents provided by the lab are helpful, and they also provide a toll-free number for questions.

7. Reporting

The quality control manager receives all lab reports for all samples sent out for testing. All lab reports are scanned and uploaded to our seed to sale tracking software, and all lab reports are also stored in a locked file cabinet in the facility manager's office.

Standard Operating Procedure

TESTS ON HARVESTED FLOWER

1. Purpose

The purpose of this SOP is to provide guidance on testing harvested flower before releasing it for public consumption.

2. Scope

The scope of this SOP is for all employees involved in quality control and preparing samples for testing.

3. Prerequisites

All product that is grown in our vendor's facility is tested at a licensed laboratory, who provide a detailed analysis of the product and its strength. All employees who work in quality control must be capable of reading a laboratory report and understanding the specific tolerances allowed by the state.

4. Responsibilities

It is the responsibility of the quality control director to insure all employees under their direct supervision understand how the facility provides samples to the independent lab for testing.

5. Procedure

After curing and before any processing or packaging, the processing manager shall make samples from each batch available to an independent laboratory for testing. All leaves and flowers of the female plant will be processed accordingly in a safe and sanitary manner as prescribed below:

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

The sample shall be weighed, RFID scanned, and all data shall be recorded on Metrc tracking software prior to being removed from the originating facility. The laboratory employee will select and prepare several random samples from every batch sample in order to ensure the quality, purity, and consistency of dose through a statistical approach. The laboratory staff will then test each random sample for harmful microbiological contaminants, mycotoxins, heavy metals and pesticide chemical residue. In addition, each sample will also be tested for active ingredients including but not limited to cannabinoid profiling for the following: THC, THCa, CBD, CBDa, and CBN. Under no circumstances shall cannabis batches awaiting contamination results and active ingredient analysis be included in a cannabis product or sold to a retail dispensary facility prior to the time that the laboratory has provided those results, in writing, to the cultivation management team. If samples from a batch are tested and do not fall within state accepted health and safety levels for any of the above-mentioned contaminants or any additional contaminants the state does not deem for distribution, it is the facility's policy to destroy and remove any contaminated product in a manner consistent with state compliance for the policy for disposal of green waste. As soon as a batch sample passes the microbiological, mycotoxin, heavy metal and pesticide chemical residue test, the entire batch will be released for immediate manufacturing, packaging and labeling for transport and sale to a dispensary facility.

An electronic copy of all test results will be filed by laboratory staff for any batch that does not meet the standards set for microbiological, mycotoxin, heavy metal or pesticide chemical residue tests. The laboratory staff will also maintain a comprehensive record of test results and make them available to state and local officials, and or the public, as needed. The compliance manager will provide test results for each batch of cannabis used in any product purchased by a dispensary facility to that dispensary facility to be made available upon request.

6. References

The independent testing lab we work with provides us guidelines for sample preparation that conforms to the state's regulations. The quality control manager maintains their source documents for preparing samples, along with the requisite forms that must accompany all samples. In the event of a question, the resource documents provided by the lab are helpful, and they also provide a toll-free number for questions.

7. Reporting

The quality control manager receives all lab reports for all samples sent out for testing. All lab reports are scanned and uploaded to our seed to sale tracking software, and all lab reports are also stored in a locked file cabinet in the facility manager's office.

Standard Operating Procedure

STABILITY TESTING

1. Purpose

The purpose of this SOP is to provide guidance on stability testing products that have been released to the public.

2. Scope

The intended audience for this SOP is all employees involved in inventory processing, quality control, and retail sales.

3. Prerequisites

In order to perform stability testing at both pre-determined and random times, the batch from which the edibles or infused foods are created will be sampled, and stored in an air-tight, temperature-controlled vault. Employees must know how to move a portion of the batch in process to create a reserve for stability testing and must understand how we prepare samples for lab testing, and how to interpret the results.

4. Responsibilities

The director of quality controls primary responsibilities are stability testing, the preparation of samples, and interpreting the lab results. If there is an issue, the director of quality control must immediately provide the results and recommendations to the facility director in order to insure customer safety.

5. Procedure

The director of quality control will separate a part of each batch of infused or edible product sufficient to perform stability testing at 6-month intervals. This is done for two reasons:

1. To ensure product potency and purity
2. Provide support for expiration dating

The director will insure that a sufficient amount of product is kept and properly stored, which will usually require an adequate amount (~7-14 grams) of each released batch of marijuana in order to achieve this frequency of testing. See preparation of samples instructions noted in previous content.

Sample Storage-The facility will retain a sample from each batch released. The sample will be sufficient enough to provide for follow-up testing if necessary and the sample will need to be properly stored for a minimum of one (1) year past the date of expiration of the batch.

Samples from each batch released to be retained for a long period of time will be vacuum-sealed to limit oxygen exposure to the marijuana as oxygen will degrade the sample quicker. Possible contamination will be tracked through the use of a Hazard Analysis Critical Control Point (HACCP) Plan. Critical control points will be identified, monitored and preventative procedures recorded throughout the production of marijuana products.

Certain shelf stability testing will be conducted on site. Shelf stability is the time that a product will retain throughout its period of storage and use, the same properties and characteristics that is possessed at the time of its packaging. Products and recipes will be tested and approved before production begins.

Shelf stability testing will cover the four areas of concern:

1. Chemical: The product retains its chemical integrity and potency, within specified limits.
2. Physical: The original physical properties, including appearance, palatability, odor, and wholesomeness are retained.
3. Microbiological: Resistance to microbial growth and product safety is retained according to specified requirements overall bacterial growth is maintained within acceptable levels.
4. Toxicological: No significant increase in toxicity occurs.

6. References

The director of quality control keeps a detailed sampling plan in her office, along with the proper reporting forms, labeling materials, and RFID tags.

7. Reporting

All stability reporting is uploaded to our seed to sale tracking software database where reporting about batches and infused products are maintained.

Standard Operating Procedure

TESTING (heavy metals, pesticides, mold, microbial testing, moisture content)

1. Purpose

After curing and before any processing or packaging, the processing manager shall provide samples from each batch available to an independent laboratory for testing.

2. Scope

The scope of this SOP is for any employee working in the cultivation facility who provides testing samples to our outside vendor.

3. Prerequisites

After curing and before any processing or packaging, the processing manager shall make samples from each batch available to an independent laboratory for testing. The sample shall be weighed, RFID scanned, and all data shall be recorded on the seed to sale software prior to being removed from the secured curing area. The laboratory employee will select and prepare several random samples from every batch sample in order to ensure the quality, purity, and consistency of dose through a statistical approach.

4. Responsibilities

It is the responsibility of the employee preparing batches for testing to insure there are sufficient remains for future testing, and the employee will work with the intendent lab to insure random samples from each grown batch are tested without interference from the facility.

5. Procedure

The sample shall be weighed, RFID scanned, and all data shall be recorded on the seed to sale software prior to being removed from the secured curing area. The laboratory employee will select and prepare several random samples from every batch sample in order to ensure the quality, purity, and consistency of dose through a statistical approach. The laboratory staff will then test each random sample for harmful microbiological contaminants, mycotoxins, heavy metals and pesticide chemical residue. In addition, each sample will also be tested for active ingredients including but not limited to cannabinoid profiling for the following: THC, THCa, CBD,CBDa, and CBN. Under no circumstances shall cannabis batches awaiting contamination results and active ingredient analysis be included in a cannabis product or sold to a retail dispensary.

If samples from a batch are tested and do not fall within state accepted health and safety levels for any of the above-mentioned contaminants or any additional contaminants the state does not deem for distribution, it is the

facility's policy to destroy and remove any contaminated product in a manner consistent with state compliance for the policy for disposal of green waste.

As soon as a batch sample passes the microbiological, mycotoxin, heavy metal and pesticide chemical residue test, the entire batch will be released for immediate manufacturing, packaging and labeling for transport and sale to a dispensary facility. An electronic copy of all test results will be filed by laboratory staff for any batch that does not meet the standards set for microbiological, mycotoxin, heavy metal or pesticide chemical residue tests. The laboratory staff will also maintain a comprehensive record of test results and make them available to state and local officials, and or the public, as needed. The compliance manager will provide test results for each batch of cannabis used in any product purchased by a dispensary facility to that dispensary facility to be made available upon request.

6. References

Please review the independent lab's testing guide for providing samples which is found in the cultivation director's office.

7. Reporting

All lab reports are provided to the cultivation director and are uploaded to the cloud server. They are also placed in a testing log, and the information is also entered into the seed to sale software system.

Standard Operating Procedure

WATER SUPPLY AND TESTING PROTOCOLS

1. Purpose

The purpose of this SOP is to provide testing guidelines and other methods of insuring a safe water supply for the facility.

2. Scope

The scope of this SOP is for any employee working in the cultivation facility responsible for performing water quality tests.

3. Prerequisites

All water quality tests will require two samples – one for our internal testing, and another to be sent to the quality control lab. All water test results will be added to the water test log book.

4. Responsibilities

It is the responsibility of the facility director to insure water is tested at proper intervals both through our own internal control and our outside lab as well.

5. Procedure

Water Quality Test(s)—The facility will perform water quality tests on facility water every six (6) months at a minimum. A water sample from the cultivation facility will be sent to a water testing laboratory where an analysis of the water will be performed to determine what, if any, substances are in the water. A record of all water quality tests will be maintained on-site at the licensed premise within a file labeled “Water Quality Tests”.

Reverse Osmosis of Water (RO System)—all water utilized for cultivation operations will be run through a state-of-the-art Reverse Osmosis (RO) water filtration system to ensure all contaminants have been removed from the water. The RO system will be designed according to the water quality test that will be performed at the facility as well as the RO system being designed to be able to adequately purify and supply the proper amounts of water for daily operations.

As growers of cannabis, the facility carefully monitors total dissolved solids (TDS) which is the amount of solids dissolved in the water or any other solution that can't be removed with a standard filter. Electrical Conductivity (EC) is the measure of a solution's ability to conduct an electrical current. TDS/EC meters have two electrodes that, when placed in the water or nutrient solution, pass AC voltage between them. The amount of current that passes through the solution indicates the conductivity of the solution. The meter reads this current and converts it to a display that will allow you to either read the EC or TDS (parts per million, ppm) of the water or solution.

By determining the baseline TDS of our fresh water, we can later determine the strength of the nutrient solution we are going to mix. For example, if the tap water starts with a TDS of 600 ppm, and the fertilizer of choice suggests a dosage strength of 1200 ppm, we will know that the total TDS should come

out to 1800ppm. If we didn't know the baseline, we might stop at a TDS of 1200 ppm and, by doing so, give our marijuana plants only half of the required nutrients.

The pH (potential of Hydrogen) of our water or any other solution is the measure of its acid or alkali levels. When a solution has equal levels of acid and alkali molecules, then the solution is pH neutral. The pH scale runs from 0.0 to 14.0 where 7.0 is neutral, less than 7.0 is acidic, and levels above 7.0 are alkaline or base/basic solutions. Depending on the growing medium used, we want to stay in the slightly acidic range of 5.5 to 6.5. To keep our growing medium and root zone at the correct pH, you need to keep the water or nutrient solution you are using at the correct pH. Contaminants in the water — whether naturally occurring, added by your municipal water supplier, or added when you mix in nutrients and fertilizers — will all affect the pH and may need to be corrected.

6. References

Please refer to the filter changing SOP for removing, cleaning and inserting a new filter into the RO system.

7. Reporting

All filter changes, cleaning, and lab reports must be inserted into the Water Quality Testing Notebook, with copies provided to the facility director and upper management.

Standard Operating Procedure

PESTICIDE TESTING

1. Purpose

The purpose of this SOP is to provide guidance for pesticide testing of all batches that are sent to an outside lab before being released to the public.

2. Scope

The scope of this SOP is for any employee involved in working with the independent testing lab in helping them to select, batch and label cannabis samples for pesticide and other testing.

3. Prerequisites

Pesticide applicators/registered employees will undergo required courses and testing to be certified by the state and will also be responsible recertification every 3 years. All pesticides applied will be approved by the FDA's National Organic Program and will be approved on the National List of allowed and prohibited pesticides and OMRI approved.

4. Responsibilities

The director of the facility is tasked with implementing the IPM system and monitoring the use of pesticides. All batch results for pesticides will be emailed to the production facility director.

5. Procedure

Pesticide Application Documentation

Any facility that applies any pesticide or other agricultural chemical to any portion of a plant, water or feed used during cultivation or generally within the Licensed Premises must document, and maintain a record on its Licensed Premises of, the following information per state regulations:

(a) Application Log.

- (i) The name, signature and Occupational License number of the individual who applied the Pesticide or other agricultural chemical;(
- ii) Applicator certification number if the applicator is licensed through the Department of Agriculture in accordance with the “Pesticides Applicators’ Act”.
- (iii) The date and time of the application;
- (iv)The EPA registration number of the Pesticide of any other agricultural chemical(s) applied;
- (v) Any of the active ingredients of the Pesticide or other agricultural chemical(s)applied;
- (vi)Brand name and product name of the Pesticide or other agricultural chemical(s)applied;
- (vii) The restricted entry interval from the product label of any Pesticide or other agricultural chemical(s) applied;
- (viii) The RFID tag number of the Retail Marijuana plant(s) to which the Pesticide or other agricultural chemical(s) were applied, or, if the Pesticide or other agricultural chemical(s) were applied to all plants throughout the Licensed Premises, a statement to that effect; and
- (ix)The total amount of each Pesticide or other agricultural chemical applied.

(b) Application Summary Log.

- (i) The name of the individual who applied the Pesticide or other agricultural chemical;
- (ii) The date and time of the application;
- (iii) Brand name and product name of the Pesticide or other agricultural chemical(s)applied;
- (iv)The restricted entry interval from the product label of any Pesticide or another agricultural chemical(s) applied;

- (v) The Restricted Access Interval (REI);
- (vi) The expiration time of the REI; and
- (vii) The area to which the Pesticide or other agricultural chemical(s) were applied, or, if the Pesticide or other agricultural chemical(s) were applied to all plants throughout the Licensed Premises, a statement to that effect.

As soon as a batch sample passes the microbiological, mycotoxin, heavy metal and pesticide chemical residue test, the entire batch will be released for immediate processing manufacturing, packaging and labeling for transport and sale to a manufactured cannabis products facility or a dispensary facility. In order to comply with state regulations, all pesticides regulated by the U.S. Environmental Protection Agency cannot have a concentration greater than 1.0 ppm.

6. References

Please refer to the literature supplied by our independent testing lab for pesticide and other levels monitored and tested for.

7. Reporting

All pesticide testing is performed by an outside laboratory and their results are both emailed and snail mailed to the facility, where they are stored in the seed to sale database.

DDM Sales, Inc. Diversity Plan

Vishnubhai B. Patel (hereinafter “Mr. Patel”) is a minority applicant. Therefore, his company, DDM Sales, Inc. is firmly committed to creating a culture of inclusion and creativity. These principles shall guide how Mr. Patel intends on building his workforce, cultivate future minority leaders and create a company of true inclusion instead of the status quo.

Diversity is extremely important to Mr. Patel. As a minority, Mr. Patel has witnessed disparate and unfair treatment of minorities and women. As the father of minority children, Mr. Patel has witnessed firsthand, disparate treatment of his own children. As a result, he recognizes how difficult it can be for minorities and women to realize their dreams in society.

This Diversity Plan is designed to correct such disparate treatment. As a business owner, Mr. Patel is in the unique position to do so. Mr. Patel has vast experience in retail sales. He already owns several variety stores and gas stations. He has always made it a goal to hire minority and women applicants in order to give them a chance to succeed. In addition, he continues to work closely with those minorities who want to achieve a better life by offering training and assistance thus helping them achieve career goals. As a result of his efforts, some of Mr. Patel’s former employees own their own stores. Mr. Patel intends on continuing his mentorship work with DDM Sales, Inc.

Diversity goals will be reviewed and documented on an annual basis starting one year from receiving a provisional license. Documentation of the results of these reviews will be stored for a minimum of three (3) years and will be available for the Cannabis Control Commission’s review upon request.

Measurable Goal: Assemble a diverse staff, including minorities, women, veterans, people with disabilities, and LGBTQ+. Mr. Patel wants to see a staff comprised of at least fifty percent (50%) women and ten percent (10%) veterans by the end of year 1. However, DDM Sales, Inc. shall not discriminate against any applicant. DDM Sales, Inc. will concentrate on hiring the following:

- **50% WOMEN**
- **10% VETERANS**

Metrics: DDM Sales, Inc. will establish the number of individuals hired who are women and veterans. This number will be assessed from the total number of employees to ensure that 50% of all individuals hired are women and 10% of all individuals hired are veterans, thus achieving our goal.

Program 1 – Advertising: DDM Sales, Inc. will post at least quarterly advertisements in newspapers of the dispensary’s choosing that are in general circulation in communities that are

within a ten mile radius of the proposed dispensary stating that the dispensary is specifically targeting women and veterans to hire.

Also, DDM Sales, Inc. intends on adding a “Careers” section to its website once the website is active. Within the “Careers” section, DDM Sales, Inc. will prominently display information stating that the **DISPENSARY IS RECRUITING WOMEN AND VETERANS TO HIRE.**

Program 2 – Recruitment and Hiring: Continue to improve the recruitment, search, and hiring process to enhance the potential for increasing diversity of the staff.

DDM Sales, Inc. will develop, review and revise a hiring guide and provide training as needed.

Also, the dispensary will establish and implement a plan for outreach to local communities, organizations, and affinity groups to develop connections for hiring diverse groups locally.

In order to promote diversity and equality in hiring and recruitment procedures, DDM Sales, Inc. will:

1. Implement a “blind-hiring” policy that anonymizes the demographic information about a candidate from the recruiter or hiring manager to prevent bias
2. Human Resource training for hiring managers and recruiters that addresses unconscious bias and cultural sensitivity.
3. Use job descriptions that cater to and appeal to diverse candidates
4. Engage with industry trade groups, training companies, and recruitment companies that promote diversity and inclusion.

Program 3 – Internship Program: Create an internship program whereby DDM Sales, Inc. offers a paid intern position to veteran and woman applicants looking to learn management and operations of a marijuana dispensary.

DDM Sales, Inc. will mentor/train a qualified applicant, teaching and helping the applicant learn all of the complex duties and responsibilities relative to operating a cannabis dispensary.

DDM Sales, Inc. will mentor a minimum of two interns per year. Each internship shall last up to six months. One internship will be awarded approximately every six months. DDM Sales, Inc. will choose **FROM A POOL OF APPLICANTS AND CHOOSE EITHER ONE WOMAN APPLICANT OR ONE VETERAN APPLICANT.**

The intern will be trained and become proficient at all job descriptions within the dispensary including but not limited to Dispensary Associate, Order Fulfillment Associate, Security Associate, Facilities Associate, Operations Associate, and most or all other positions within the dispensary.

At the conclusion of the intern's training, the dispensary will provide job placement assistance for the applicant.

Program 4 – Job Fair Partnerships: DDM Sales, Inc. intends on partnering with various employment agencies and nonprofit agencies in order to be in attendance at job fairs biannually in an effort to **RECRUIT WOMEN AND VETERANS.**

Program 5 – Internal Newsletter Program: DDM Sales, Inc. will distribute a monthly internal workplace newsletter encouraging current employees to recommend women and veterans for employment opportunities. It must be noted that DDM shall not discriminate against other individuals who are minorities, persons with disabilities, and LGBTQ+.

This recruitment method will help motivate current employees to recommend such individuals by offering incentives to employees who recommend applicants who are ultimately hired by DDM Sales, Inc.

Attestation:

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

Standard Operating Procedure

PERSONNEL POLICIES

1. Purpose

The purpose of this SOP is to provide guidance for the hiring procedure for new employees.

2. Scope

The scope of this SOP is for all human resource personnel to understand the hiring process for new employees, pay structure, positions available, etc.

3. Prerequisites

Anyone involved with HR must go through job specific training including personnel file confidentiality, workplace policies, job descriptions, pay rates, etc.

4. Responsibilities

It is the responsibility of the corporate trainer along with the director of human resources to train new hires working in personnel.

5. Procedure

The Employee Handbook will contain the following headings, which covers in detail the personnel policy guidelines that will be initially introduced into the facilities:

- New Employee Policies
- Reference/background checks
- Time-Related Policies
- Compensation-Related Policies
- Personnel Records
- Conflicts of Interests
- General Confidentiality
- Professional Conduct
- Technology Policies

- Confidentiality of Records and Data
- Communications
- Health, Safety and Security
- Fire and Safety
- Reporting Accident
- Emergency Plan
- Smoking in the Workplace
- Violence-Free Workplace
- Employee Relations
- Open Communication
- Standard of Conduct General Policy
- Employee Responsibility
- Responsibilities of Supervisors, Managers, Directors
- Employee Conduct
- Problem Resolution
- Employee Benefits
- Discretionary Benefits
- Employee Assistance Program
- Holidays
- Vacation Policy
- Leave of Absence
- Medical Leave of Absence
- Sick Leave
- Funeral Leave
- Jury Duty and Witness Leave Time
- Unpaid Personal Leave
- Pregnancy Disability Leave, Rehabilitation Leave, Military Leave
- Benefits During Leave
- Ending Employment
- Termination

ALCOHOL AND DRUG FREE WORKPLACE

DDM SALES, INC. IS COMMITTED TO PROVIDING ITS EMPLOYEES WITH A SAFE AND PRODUCTIVE WORK ENVIRONMENT. DDM SALES, INC. SHALL MAINTAIN A STRICT POLICY AGAINST THE USE OF ALCOHOL AND THE UNLAWFUL USE OF DRUGS IN THE WORKPLACE. NO EMPLOYEE MAY CONSUME OR POSSESS ALCOHOL, OR USE, POSSESS, SELL, PURCHASE, OR TRANSFER ILLEGAL DRUGS AT ANY TIME WHILE ON DDM SALES, INC. PREMISES OR WHILE USING DDM

SALES, INC. VEHICLES OR EQUIPMENT, OR AT ANY LOCATION DURING WORK TIME.

THE ALCOHOL AND DRUG FREE WORKPLACE POLICY APPLIES TO ALL EMPLOYEES AND MAY BE EXTENDED TO SUBCONTRACTORS. THE FOLLOWING ARE PROHIBITED:

- 1. BEING IMPAIRED BY ALCOHOL AND/OR DRUGS WHILE AT WORK.**
- 2. THE POSSESSION OF ALCOHOL AND/OR ILLICIT DRUGS AT THE WORKPLACE OR IN COMPANY VEHICLES.**
- 3. THE PRESENCE IN THE BODY OF ALCOHOL AND/OR ILLICIT DRUGS (OR OTHER METABOLITES) WHILE AT WORK.**
- 4. REFUSAL TO SUBMIT TO A DRUG AND/OR ALCOHOL TESTING, FAILURE TO REPORT TO A COMPANY-DESIGNATED FACILITY FOR DRUGS AND/OR ALCOHOL TESTING OR TAMPERING OR ATTEMPTING TO TAMPER WITH THE TEST SAMPLE.**

EMPLOYEES WHO VIOLATE THIS POLICY ARE SUBJECT TO DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION OF EMPLOYMENT.

AN EMPLOYEE WHO FEELS HE OR SHE HAS DEVELOPED AN ADDICTION TO, DEPENDENCE UPON, OR A PROBLEM WITH ALCOHOL OR DRUGS, LEGAL OR ILLEGAL, IS STRONGLY ENCOURAGED TO SEEK ASSISTANCE BEFORE A VIOLATION OF THIS POLICY OCCURS. ANY EMPLOYEE WHO REQUESTS TIME OFF TO PARTICIPATE IN A REHABILITATION PROGRAM WILL BE REASONABLY ACCOMMODATED. HOWEVER, EMPLOYEES MAY NOT AVOID DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION, BY ENTERING A REHABILITATION PROGRAM AFTER A VIOLATION OF THIS POLICY IS SUSPECTED OR DISCOVERED.

SMOKE-FREE WORKPLACE

DDM SALES, INC. IS A SMOKE-FREE ENVIRONMENT. SMOKING AND SECONDHAND SMOKE ARE KNOWN TO CAUSE SERIOUS LUNG DISEASE, HEART DISEASE AND CANCER. THIS POLICY WILL BE IMPLEMENTED TO PROVIDE A SMOKE-FREE ENVIRONMENT TO ALL STAFF, CUSTOMERS, AND VISITORS TO KEEP A HEALTHY WORKPLACE. THIS POLICY COVERS THE SMOKING OF ANY TOBACCO

PRODUCTS, E-CIGARETTES OR ANY OTHER SMOKE PRODUCING PRODUCTS.

SMOKING OF ANY KIND IS PROHIBITED THROUGHOUT THE WORKPLACE. THIS POLICY APPLIES EQUALLY TO ALL EMPLOYEES, STAFF, CUSTOMERS, PARTNERS, VENDORS, AND VISITORS. EMPLOYEES AND STAFF WHO VIOLATE THIS POLICY ARE SUBJECT TO DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION OF EMPLOYMENT.

POLICY FOR DIVERSION OF MARIJUANA, UNSAFE PRACTICES, OR A FELONY CHANGE OR GUILTY PLEA OF DISTRIBUTION OF A DRUG TO A MINOR

DDM SALES, INC. SHALL BE COMPLIANT WITH 935 CMR 500(105).

1. ANY EMPLOYEE WHO IS FOUND TO DIVERT MARIJUANA SHALL BE IMMEDIATELY TERMINATED AND SHALL BE IMMEDIATELY REPORTED TO LAW ENFORCEMENT OFFICIALS AND TO THE CANNABIS CONTROL COMMISSION.

2. ANY EMPLOYEE THAT ENGAGES IN UNSAFE PRACTICES WITH REGARD TO THE OPERATION OF THE MARIJUANA ESTABLISHMENT SHALL BE IMMEDIATELY TERMINATED AND SHALL BE IMMEDIATELY REPORTED TO THE CANNABIS CONTROL COMMISSION.

3. ANY EMPLOYEE THAT IS CONVICTED OR ENTERS A GUILTY PLEA OF NOLO CONTENDERE, OR ADMISSION TO SUFFICIENT FACTS OF A FELONY DRUG OFFENSE INVOLVING DISTRIBUTION TO A MINOR IN THE COMMONWEALTH, OR A LIKE VIOLATION OF THE LAWS OF ANOTHER STATE, THE UNITED STATES OR A FOREIGN JURISDICTION, OR A MILITARY, TERRITORIAL, OR NATIVE AMERICAN TRIBAL AUTHORITY, SHALL BE IMMEDIATELY TERMINATED.

PERSONNEL RECORDS

DDM SALES, INC. WILL MAINTAIN 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 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. 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 M.G.L C. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, AND 803 CMR 2.00: CRIMINAL OFFENDER RECORD INFORMATION (CORI).

These personnel records will be held electronically and in hard copy. The electronic records will be stored in a secure server with encryption software that protects against unauthorized access to the files. Access to the electronic records will only be allowed to DDM Sales, Inc. management agents who require access as part of their job duties. Hard copy (written records) will be stored in a secure, locked cabinet in a locked room accessible to only DDM Sales, Inc. management agents who require access. These records will be made available for inspection by the commission upon request.

Recruiting, Benefits, Hiring, Loss of Personnel

The facility will properly train all of its employees before they are permitted to work in any operations. Prior to being offered an employment position with the facility, all potential applicants will be required to pass a background check to ensure the potential applicant does not have any criminal felony convictions or have been convicted of the crimes listed in the state's regulations and otherwise is of good moral character. The facility intends to offer competitive wages and salaries, as well as benefits packages that include paid time off and health insurance, to all employees. Exact compensation and benefits plans and packages are in the process of being developed. It is the facility's goal to pay salaries that are, at a minimum, equitable and commensurate with salaries paid for similar work within the labor market. Accordingly, positions will generally be classified and then assigned a salary range that defines a minimum and maximum pay rate. An employee's salary may advance within the salary range as the result of performance reviews, promotions, market conditions and other business considerations. Such increases in pay are considered merit adjustments which are not guaranteed and may vary in timing and degree from employee to employee.

In accordance with State legal requirements, employees will be compensated for hours worked in excess of forty (40) hours per week. Non-exempt employees will be paid one and one-half times their regular rate of pay for hours worked in excess of forty (40) hours in a workweek. Overtime pay is based on actual hours worked. Paid time off for holidays and vacations does not count as "hours worked" for overtime purposes. Any overtime hours worked by a nonexempt employee will be required to be approved in advance

by the employee's supervisor. Non-exempt employees are not to work before, beyond or outside their normal working hours without such prior approval. Employees who fail to work scheduled overtime or who work overtime without prior authorization from a supervisor may be subject to disciplinary action, up to and including termination of employment.

Number of Employees—exact number of employees employed by the facility is to be determined upon deployment of operations and the establishment of personnel requirements; the breakdown of these requirements can be seen below within the job description section.

Type of Labor— The team at the facility will comprise skilled, unskilled, and professional workers. The various positions within the organization will call for different laborers with different skill sets. The cultivation manager will need to be very skilled in the cultivation of cannabis, whereas an

Pay Structure— The facility will determine this upon deployment of operations and the establishment of personnel requirements. Employee compensation will be competitive with industry standards.

Background Checks— In accordance with 935 CMR 500.101(1)(a)1, All owners, employees and contractors that work for the company shall undergo a background check before permitted to work for the company. The information requested of each owner, employee and contractor will include:

- A. The individual's full legal name and any aliases;
- B. Social Security Number
- C. The individual's address;
- D. The individual's date of birth;
- E. An indication of whether the individual is or has been associated with the existing RMD and in what capacity;
- F. A photocopy of the individual's driver's license or other government-issued identification card;
- G. A CORI Acknowledgment Form, pursuant to 803 CMR 2.09: Requirements for Requesters to Request CORI, provided by the Commission, signed by the individual and notarized; and
- H. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c.94G, § 21, submitted in a form and manner as determined by the Commission.

The information requested will also include:

A. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor including, but not limited to, action against any health care facility or facility for providing cannabis for medical or recreational purposes, in which those individuals either owned shares of stock or served as board member, executive, officer, director or member, and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;

B. A description and the relevant dates of any civil action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, including, but not limited to a complaint relating to any professional or occupational or fraudulent practices;

C. A description and relevant dates of any past or pending legal or enforcement actions in any other state against any board member, executive, officer, director or member, or against any entity owned or controlled in whole or in part by them, related to the cultivation, processing, distribution, or sale of cannabis for medical or recreational purposes;

D. A description and the relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or like action by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, including, but not limited to any complaint or issuance of an order relating to the denial, suspension, or revocation of a license, registration, or certification;

E. A description and relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or a like action by another state, the United States or foreign jurisdiction, or a military, territorial, Native American tribal authority or foreign jurisdiction, with regard to any professional license, registration, or certification, held by any board member, executive, officer, director, or member that is part of the applicant's application, if any;

F. A description and relevant dates of actions against a license to prescribe or distribute controlled substances or legend drugs held by any board member, executive, officer, director or member that is part of the applicant's application, if any; and

G. Any other information required by the Commission.

Job Termination—all termination actions will follow standard procedures. Basic steps include:

1. Notify key personnel of job termination
2. Obtain all facility keys, ID badges or other company property
3. Disable/change all terminated key personnel facility security access codes or passwords
4. Notify required authorities of the job termination of the key personnel
5. Notify all remaining staff of the job termination of the key personnel and inform them of the conditions of termination (i.e. employee is no longer allowed on the premise and to notify police or other authorities if said employee returns, etc.)
6. Contact security vendor and monitoring company to notify them of the job termination of key personnel.
 - a. Remove terminated key personnel from any notification, contact or call lists.

Job Separation—at times key personnel may decide to part ways on their own accord. In such circumstances there will be some basic steps and procedures to follow in for job separations.

1. Obtain all facility keys, ID badges, or other company property
2. Disable/change all key personnel facility security access codes or passwords
3. Notify required authorities of the job separation of the key personnel
4. Notify all remaining staff of the job separation of the key personnel and inform them of the conditions of separation (i.e. mutual separation and key personnel are always welcome back at the facility under visitor status, employee is no longer allowed on the premise, and to notify police or other authorities if said employee returns, etc.)
5. Contact security vendor and monitoring company to notify them of the job separation of key personnel.
 - a. Remove key personnel from any notification, contact or call lists.

Replacement of Key Personnel Position—find and interview a suitable replacement for the position that was vacated. Key personnel positions will need to be filled as soon as possible by management without compromising the quality of potential candidates.

6. References

Please refer to the personnel manual found in the human resources office, and the training modules put together for vetting and hiring new personnel.

7. Reporting

All new hires must have personnel records. Personnel records shall be maintained in accordance with the Personnel Records policy depicted above on page 4.

DDM SALES, INC.

STAFFING PLAN:

EXECUTIVE LEVEL:

- CEO
- CFO
- COO

MANAGEMENT LEVEL:

- GENERAL MANAGER
- SECURITY MANAGER
- UP TO 3 ASSISTANT MANAGERS

STAFF LEVEL:

- UP TO TWENTY (20) STAFF LEVEL SALES REPRESENTATIVES

CONSULTANT LEVEL:

- ATTORNEY / COMPLIANCE OFFICER
- HUMAN RESOURCE PROVIDER
- BRAND CONSULTANT
- UP TO FIVE (5) SECURITY OFFICERS