



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR281779
Original Issued Date: 09/14/2020
Issued Date: 09/14/2020
Expiration Date: 09/14/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Delta 420 LLC

Phone Number: 617-838-3000 Email Address: kalra33@gmail.com

Business Address 1: 199 Main Street Business Address 2:

Business City: Blackstone Business State: MA Business Zip Code: 01504

Mailing Address 1: 199 Main Street Mailing Address 2:

Mailing City: Blackstone Mailing State: MA Mailing Zip Code: 01504

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: 51

Percentage Of Control: 100

Role: Manager

Other Role:

First Name: Gurpreet

Last Name: Kalra

Suffix:

Gender: Male

User Defined Gender:

Date generated: 03/25/2021

Page: 1 of 6

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 39

Percentage Of Control:

Role: Manager

Other Role:

First Name: Raspreet

Last Name: Kalra

Suffix:

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 10

Percentage Of Control:

Role: Manager

Other Role:

First Name: Harpreet

Last Name: Singh

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

Entity with Direct or Indirect Authority 1

Percentage of Control: 100

Percentage of Ownership: 100

Entity Legal Name: Indowestern Corp

Entity DBA:

DBA

City:

Entity Description: Delaware Corporation

Foreign Subsidiary Narrative:

Entity Phone: 617-838-3000

Entity Email: kalra33@gmail.com

Entity Website:

Entity Address 1: 199 Main Street

Entity Address 2:

Entity City: Blackstone

Entity State: MA

Entity Zip Code: 01504

Entity Mailing Address 1: 199 Main Street

Entity Mailing Address 2:

Entity Mailing City: Blackstone

Entity Mailing State: MA

Entity Mailing Zip Code: 01504

Relationship Description: The parent company, Indowestern Corp (the "Parent"), has indirect control of the Marijuana Establishment, its subsidiary. Gurpreet Kalra, the manager of the Marijuana Establishment, Delta 420 LLC, is also the President and majority owner of the Parent, with an ownership interest of 64%. All other holders of the Parent have an ownership interest of less than 10% in the Parent and none have any managerial role or any ownership interest in the Marijuana Establishment.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Gurpreet

Last Name: Kalra

Suffix:

Types of Capital: Monetary/
Equity

Other Type of
Capital:

Total Value of the Capital Provided:
\$69785.6

Percentage of Initial Capital:
23.2

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Raspreet

Last Name: Kalra

Suffix:

Date generated: 03/25/2021

Page: 2 of 6

Types of Capital: Monetary/ Equity	Other Type of Capital:	Total Value of the Capital Provided: \$230989.3	Percentage of Initial Capital: 76.8
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: 199 Main Street

Establishment Address 2:

Establishment City: Blackstone

Establishment Zip Code: 01504

Approximate square footage of the establishment: 1340

How many abutters does this property have?: 43

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
Certification of Host Community Agreement	Delta 420 - Single Page Certification.pdf	pdf	5d162f4a622b7c1357f73f8f	06/28/2019
Plan to Remain Compliant with Local Zoning	Delta 420 - Plan for Compliance with Local Zoning 07.12.19.pdf	pdf	5d28d7da8e518f09d0718c54	07/12/2019
Certification of Host Community Agreement	Delta 420 - Host Community Documents.pdf	pdf	5e7e849c5f1da0353e2b1777	03/27/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Delta 420 - Disproportionate Impact Plan.pdf	pdf	5e7e861ff0445c357cb05d05	03/27/2020
Other	Donation Letter.pdf	pdf	5e908d9db3c49635509ec103	04/10/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Manager

Other Role:

First Name: Gurpreet

Last Name: Kalra Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Manager

Other Role:

First Name: Raspreet

Last Name: Kalra Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Manager

Other Role:

First Name: Harpreet

Last Name: Singh Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company

Other Role:

Entity Legal Name: Indowestern Corp

Entity DBA:

Entity Description: Parent Company of Delta 420 LLC

Phone: 617-838-3000

Email: kalra33@gmail.com

Primary Business Address 1: 199 Main Street

Primary Business Address 2:

Primary Business City: Blackstone

Primary Business State: MA

Principal Business Zip Code: 01504

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	Delta 420 LLC - Good Standing Certificate.pdf	pdf	5d15257858ad7e1336c2a127	06/27/2019
Department of Revenue - Certificate of Good standing	Delta 420 LLC - Tax Good Standing.pdf	pdf	5d152584bbb965134133e34e	06/27/2019
Articles of Organization	Delta 420 LLC - Certificate of Organization.pdf	pdf	5d15258e748dc71348c3af17	06/27/2019
Bylaws	Delta 420 LLC - Operating Agreement.pdf	pdf	5e41db8b4fa2b004756a1428	02/10/2020

No documents uploaded

Massachusetts Business Identification Number: 001380596

Doing-Business-As Name: Buds N Roses

DBA Registration City: Blackstone

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
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Business Plan	Business Plan.pdf	pdf	5d152c3041a4321320f2ac2a	06/27/2019
Plan for Liability Insurance	Delta 420 - Plan for Obtaining Liability Insurance.pdf	pdf	5d1b71ea50e7af1803c22750	07/02/2019
Proposed Timeline	Delta 420 - Proposed Timeline - 01.29.pdf	pdf	5e41dbc364339304b08fed09	02/10/2020
Proposed Timeline	Delta 420 - Proposed Timeline.pdf	pdf	5e7e8680554b033566ccf1c1	03/27/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Separating recreational from medical operations, if applicable	Delta 420 - Separating Recreational from Medical Operations - 07.12.19.pdf	pdf	5d28d4f35457e109c526f9b0	07/12/2019
Quality control and testing	Delta 420 - Quality Control and Testing 07.12.19.pdf	pdf	5d28d50fc5c3be09dbf0927b	07/12/2019
Plan for obtaining marijuana or marijuana products	Delta 420 - Plan for Obtaining Marijuana and Marijuana Products - 07.12.19.pdf	pdf	5d28d515742e9b04ecc38dcd	07/12/2019
Inventory procedures	Delta 420 - Inventory Procedures - 07.12.19.pdf	pdf	5d28d52fece777050c09398b	07/12/2019
Personnel policies including background checks	Delta 420 - Personnel Policies Including Background Checks - 07.12.19.pdf	pdf	5d28d53417426909bafa769f	07/12/2019
Maintaining of financial records	Delta 420 - Maintaining of Financial Records - 07.12.19.pdf	pdf	5d28d53542805c051718c19c	07/12/2019
Security plan	Delta 420 - Security Plan - 02.10.20.pdf	pdf	5e41dcf6813339048c3fc386	02/10/2020
Storage of marijuana	Delta 420 - Storage of Marijuana- 02.10.20.pdf	pdf	5e41dd0464339304b08fed10	02/10/2020
Transportation of marijuana	Delta 420 - Transportation of Marijuana - 02.10.20.pdf	pdf	5e41dd0f1c3b1d04a32b1e02	02/10/2020
Restricting Access to age 21 and older	Delta 420 - Restricting Access to Age 21 or Older - 02.10.20.pdf	pdf	5e41dd1a02a6e7045352c4da	02/10/2020
Prevention of diversion	Delta 420 - Prevention of Diversion - 02.10.20.pdf	pdf	5e41dd2661c9e9045a791ffe	02/10/2020
Dispensing procedures	Delta 420 - Dispensing Procedures - 02.10.20.pdf	pdf	5e41dd3281ae16046bec88be	02/10/2020
Record Keeping procedures	Delta 420 - Recordkeeping Procedures- 02.10.20.pdf	pdf	5e41dd3e69dc9d0456db85fb	02/10/2020
Qualifications and training	Delta 420 - Qualifications and Training Procedures - 02.10.20.pdf	pdf	5e41dd494fa2b004756a1430	02/10/2020
Diversity plan	Delta 420 - Diversity Plan - 02.10.20.pdf	pdf	5e41dd585a2369047f22542f	02/10/2020
Diversity plan	Delta 420 - Diversity Plan.pdf	pdf	5e7e87ac81ed8a355b8d7182	03/27/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION


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

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, GURPREET S. KALRA, (insert name) certify as an authorized representative of DELTA 420 LLC (insert name of applicant) that the applicant has executed a host community agreement with TOWN OF BLACKSTONE (insert name of host community) pursuant to G.L.c. 94G § 3(d) on 4/16/19 (insert date).


Signature of Authorized Representative of Applicant

Host Community

I, Daniel M. Keyes, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Blackstone (insert name of host community) to certify that the applicant and Town of Blackstone (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 4/16/19 (insert date).


Signature of Contracting Authority or
Authorized Representative of Host Community

PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

At the May 28, 2019 Town Meeting, the Town of Blackstone amended its Zoning Bylaw to regulate Marijuana Establishments and Marijuana Retailers. In particular, pursuant to Blackstone's amended Zoning Bylaw, a Marijuana Retailer will be allowed by Special Permit from the Blackstone Planning Board in the R-1 District on sites that abut a Commercial or Industrial District and that have previously been used for commercial purposes.

As of the date of this Application, the Attorney General's office had not yet completed its review of the May 28, 2019 Zoning Amendment. Once the Amendment becomes effective, however, Delta 420, LLC (the "Company") will apply for a Special Permit from the Blackstone Planning Board to operate a marijuana dispensary (the "Facility").

The Company will be able to satisfy all municipal requirements for operation of a dispensary in the town of Blackstone.

The Company's proposed Facility will be located at 199 Main Street, Blackstone, which is located in Blackstone's R-1 District, on property that abuts a Commercial District, and which was for many years used as a TV and electronics retail store and repair shop, and is thus an eligible location for a Marijuana Retailer under local zoning.

The Facility will not be located in a building that contains any residential units, nor will the Facility be located within 500 feet of a public or private school or within 200 feet of a library, church, child-care facility, park or playground.

The Company understands that, once in operation, the Company will be required to provide the Blackstone Police Department, Building Inspector and the Special Permit Granting Authority with the names, phone numbers and email addresses of all management staff and key holders to whom one can provide notice if there are operating problems associated with the Facility.

Finally, the Company understands that, once in operation, the Company will be required to file an annual report to and appear before the Special Permit Granting Authority and the Town Clerk no later than January 31st each year, providing a copy of all current applicable state licenses for the Facility and/or its owners and demonstrate continued compliance with the conditions of the Special Permit.

No other local approvals are required beyond the Special Permit.

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, Gurpreet Kalra, (insert name) attest as an authorized representative of Delta 420 LLC d/b/a Buds N Roses (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 March 19, 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 March 7th, 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 March 5, 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 March 5, 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.

Triple-murderer seeks an early parole date

Man convicted of murdering pregnant woman, two children in 1987

By Bob Salsberg
The Associated Press

BOSTON — A Massachusetts man who as a teenager was convicted of raping and murdering a pregnant woman and drowning her two young children in a bathtub asked the state's highest court through a lawyer on Tuesday for a shot at earlier parole.

Daniel LaPlante is serving three consecutive life sentences for the 1987 killings in Townsend. Since each of the sentences include the possibility of parole after 15 years, LaPlante could not seek early release until serving at least 45 years, when he would be 62.

In arguments before the seven-member court, Merritt Schnipper said his client's current sentence conflicts with previous court rulings which say defendants convicted of murder as juveniles should be given a "meaningful" opportunity to re-engage with society.

"Is 45 years too much to serve for a juvenile homicide defendant before you are pushing up against the functional equivalent of life without parole?" Schnipper asked the justices. He called for a resentencing that would allow for parole eligibility after 30 to 35 years, offering LaPlante a chance to make a case for release immediately or within a few years.

Crystal Lyons, a prosecutor with the Middlesex District Attorney's office, urged the court to reject any change in LaPlante's sentence, citing the brutality of the crimes.

"This sentence, 45 years before parole eligibility for



In this Dec. 4, 1987 file photo, Middlesex Sheriff's officers escort murder suspect Daniel J. LaPlante, 17, from district court in Ayer after he pleaded innocent to charges of fatally shooting a mother and strangling or drowning her two children at their Townsend home. (AP FILE/PHOTO)

the separate murders of a pregnant mother and her two young children does not violate proportionality," Lyons said.

Legal experts have said the SJC's ruling, which could come within 130 days, will likely set a precedent for other juvenile offenders, particularly those serving consecutive, rather than concurrent, sentences for multiple homicides.

At his trial, prosecutors said LaPlante, a neighbor of the victims, broke into Priscilla Gustafson's home intending to burglarize it. When the 33-year-old woman returned home and encountered LaPlante, prosecutors say he tied her to a bed, raped and shot her, then drowned the children, 7-year-old Abigail and 5-year-old William, in a bathtub.

Andrew Gustafson discovered the bodies of his wife and children when he returned home from work. LaPlante was originally sentenced to life in prison without parole. In 2013, the

SJC ruled it was unconstitutional to sentence juveniles to life sentences without parole eligibility, prompting bids for resentencing from dozens of people who committed murders before they were 18.

In 2017, a Superior Court judge turned down a bid to shorten the time before LaPlante was eligible for parole, ruling he committed "three distinct and brutal murders." While LaPlante had made progress in prison, the judge said he continued to display an anti-social personality disorder and lacked empathy.

Relatives of the Gustafson family, some of whom attended Tuesday's hearing, have argued LaPlante should never be allowed to go free. The defense attorney noted making someone eligible for parole is no guarantee of eventual freedom.

"We may need to keep him here until he fully serves his sentence but that is a decision under the law that should be made by the parole board," said Schnipper.

Would you play baseball without a bat?

If you did, you'd strike out.

Some goes for your business' marketing plan, and that's where we can help. We offer everything you need to build your brand, connect you to your audience, and get your business to hit it out of the park.

+90%

Recent analysis showed that customers using digital marketing services to support lead generation (SEM, Social Marketing) AND branding (SEO, Display, Email) have **90% more visitors** on average!

+130%

AND these customers get up to 130% more site visitors by adding print!

That's a complete marketing solution for optimal reach.

Step up to the plate with digital and print — we can help you hit a home run.

See Yourself.
gatehouse.com/getstarted

GateHouse
NEW ENGLAND

Search Analysis of 10,000 GateHouse Media customer accounts from Jan 1, 2016 to Nov 1, 2018. For the sake of the analysis, brand awareness driven by digital marketing included SEO, Display, and Email (with purchased targeted) and was absent in digital marketing included search engine marketing (SEM) and Social (with or without purchased targeted).

Tax Lien

LEGAL NOTICE
COMMONWEALTH OF MASSACHUSETTS

LAND COURT
DEPARTMENT OF THE TRIAL COURT
COMPLAINT TO FORECLOSE TAX LIEN

No. 93TL098750 & 14TL149539

TO ALL WHOM IT MAY CONCERN, and to

No. 93TL098750

Florence Sandberg, deceased, formerly of Malden, Middlesex County, said Commonwealth; Charles Frederick Shiffer and Julia Betty Shiffer, both deceased, both formerly of Lakewood, in the State of California; Singhe Clark, deceased, formerly of Virginia Beach, in the Commonwealth of Virginia; Eugene Lundgren, deceased, formerly of McLean, in the Commonwealth of Virginia; Harold Clark, deceased, formerly of Meyersdale, in the Commonwealth of Pennsylvania; Lilian Dugway, deceased, formerly of Wakefield, Middlesex County, and the Commonwealth of Massachusetts; Jay Clark, deceased, formerly of Riverside, in the State of California; Angelina M. Lundgren, Marguerite Purcell, Elmer M. Purcell, Jr., all deceased, all formerly of Concord, Middlesex County, said Commonwealth; Robert Lundgren, deceased, formerly of Bradenton, in the State of Florida; William E. Lundgren, deceased, formerly of Worcester County, said Commonwealth; Stella S. Lundgren, now or formerly of Ellenton, in the State of Florida; Deborah L. Guenther, now or formerly of Amelia, in the State of Ohio; Charles R. Lundgren and Michael J. Lundgren, both now or formerly of Bradenton, in the State of Florida; Mary Ann Lundgren and Lisa M. Lundgren, both now or formerly of McLean, in the Commonwealth of Virginia; Eugene Lundgren, Jr., now or formerly of Reston, in the Commonwealth of Virginia; Alma Hayes, also known as Mary Alma Lundgren Hayes, now or formerly of Springfield, Hampden County, and the Commonwealth of Massachusetts; Anya First, now or formerly of Madison, in the State of Wisconsin; Jan First, now or formerly of Berlin, in the State of New York; David Shiffer, now or formerly of Anaheim, in the State of California; Jon Shiffer and Donald Clark, both now or formerly of Lakewood, in the State of California; Linda Shiffer, now or formerly of Buena Park, in the State of California; Elizabeth Purcell, now or formerly of Acton, Middlesex County, said Commonwealth; Melinda Byrd, now or formerly of Madison, Middlesex County, said Commonwealth; Laurie Laconte, now or formerly of Chatham, Barnstable County, said Commonwealth; Amy Vorenberg, now or formerly of Norfolk, in the State of Connecticut; To any trustee, beneficiary or any other persons claiming any interest in the William E. Lundgren Trust dated June 18, 1980, an unrecorded and unregistered trust under the will of William E. Lundgren; or their heirs, devisees, legal representatives, successors and assigns:

No. 14TL149539

James E. Kelleit, Sr., Albert V. Kelleit, Jr., Jean (Desbarres) Kelleit, all deceased, all formerly of Milford, Worcester County, said Commonwealth; James E. Kelleit, II, deceased, formerly of Mendon, Worcester County, said Commonwealth; Albert V. Kelleit, III, deceased, formerly of Uxbridge, Worcester County, said Commonwealth; Janet M. Conigli-Kelleit, also known as Janet M. Kelleit, Lauren Marie Cormier, Rachel Stewart, also known as Rachel A. Stewart, all now or formerly of Mendon, Worcester County, said Commonwealth; James E. Kelleit, III, and Paula Kelleit, both now or formerly of Milford, Worcester County, said Commonwealth; Kendra R. Starkus, now or formerly of Oxford, Worcester County, said Commonwealth; Kevin Kelleit, now or formerly of Blackstone, Worcester County, said Commonwealth; Patricia Long, now or formerly of Wareham, Plymouth County, said Commonwealth; Kathleen Kelleit, now or formerly of Trumbull, in the State of Connecticut; Carolyn Kelleit, Albert V. Kelleit, IV, Jacob T. Kelleit, Adam P. Kelleit, all now or formerly of Northbridge, Worcester County, said Commonwealth; or their heirs, devisees or legal representatives:

Whereas, a complaint has been presented to said Court by the Town of Milford, in the County of Worcester, and said Commonwealth, to foreclose all rights of redemption from the tax lien proceedings described in said complaints in and concerning two (2) parcels of land situate in said Milford, in the County of Worcester, and in said Commonwealth, bounded and described in said complaints as follows:

No. 93TL098750

A parcel of land containing 8.3 acres, more or less, with any buildings or structures thereon, located near the intersection of Cedar Street and Route 1495, as shown on Assessors Sheet 19, Lot 4, being the same premises conveyed in a deed from Eugene A. Lundgren, Mary L. Hayes and Mary A. Lundgren to Harriet Lundgren dated November 20, 1986 and recorded at the Worcester District Registry of Deeds at Book 4734, Pages 416-417.

No. 14TL149539

A parcel of land containing .72 acres, more or less, located to the rear of Hale Avenue and shown on Assessors Sheet as Parcel 140, Lot 121 and as more fully described in a deed recorded in Worcester District Registry of Deeds at Book 3328, Page 188.

If you desire to make any objection or defense to said complaint you or your attorney must file a written appearance and an answer, under oath, setting forth clearly and specifically your objections or defenses to each part of said complaint, in the office of the Recorder of said Court in Boston (at the Courthouse located on Three Pemberton Square, Room 507 in Boston, MA 02108), on or before the fifteenth day of April in the year two thousand and nineteen.

Unless an appearance is so filed by or for you, your default will be recorded, the said complaint will be taken as confessed and you will be forever barred from contesting said complaint or any judgment entered thereon.

And in addition to the usual service of this notice as required by law, it is ordered that the foregoing citation be published forthwith once in the Milford Daily News, a newspaper published in Needham.

Witness, GORDON H. PIPER, Esquire, Chief Justice of said Court, this nineteenth day of February in the year two thousand and nineteen.

Attest with Seal of said Court.

Deborah J. Patterson
Recorder

Plaintiff's Attorney: Charles D. Boddy, Jr., Esq., Town Counsel, Town Hall, 52 Main St., Milford, MA 01757-2622 (508) 634-2302

AD#13761575
MDN 3/7/19



Attachment A

Legal Notices

Legal Notices

FRANKLIN/ZBA/PUBLIC HEARING 3/27/19
LEGAL NOTICE

Notice is hereby given that the Town of Franklin Board of Appeals will hold a Public hearing on March 21, 2019 in the Franklin Municipal Building, 355 East Central Street, Franklin, MA

At: 7:30 PM

Applicant: THOMAS AND JANET TRAVERS
Address of Subject Property: 108 Miller Street (Map & Parcel 231-043-000-000)
Petition Type: Special Permit

From Section (or Schedule): Article 185, Attachment 7 (use regulations schedule part 116.3.5.)

To Allow: Applicant is seeking to convert an existing dwelling into an accessory dwelling unit. The building permit is denied without a special permit from the ZBA

An appeal from the decision of the Board of Appeals may be made by any person aggrieved pursuant to MGL Chap. 40A, Section 17 as amended, within twenty (20) days after the date of the filing of the notice of decision with the City Clerk. All records and files for this project can be viewed in the Building Department on the 1st floor of the Franklin Municipal Building during regular office hours. Franklin Zoning Board of Appeals: (508) 553-4856. Any person or organization so wishing will be afforded an opportunity to be heard. The hearing location is accessible to persons with physical disabilities. The Council Chambers offers equipment for the hearing impaired.

AD#13776586
MDN 3/7/19

OUTREACH MEETING
3/19/19

LEGAL NOTICE
Public Notice
Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting is proposed by Delta 420 LLC for a Marijuana Establishment is scheduled for March 19, 2019 from 7pm-8pm at Blackstone Library, 86 Main St. Blackstone MA 01504. The proposed Marijuana license retail store is anticipated to be located at 199 Main St. Blackstone MA 01504. There will be an opportunity for public to ask questions.

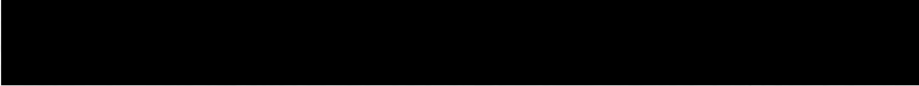
AD#13777479
MDN 3/7/19

Whether you're looking for the right job or looking to fill a job
Wicked Local Jobs
will get the job done.



**NOTICE OF INTENT TO TOWN OFFICIAL
PROPOSED MARIJUANA RETAIL STORE**

~~Land~~^{Business}owner: Delta 420 LLC/Gurpreet Kalra
Address: 199 Main Street, Blackstone, MA 01504
Date Notice Sent: March 5, 2019



Dear town official:

The purpose of this letter is to serve as a notice that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for March 19, 2019 from 7:00 p.m. – 8:00 p.m. in Blackstone Public Library, 86 Main Street, Blackstone, MA 01504. The proposed Marijuana Licensed Retail Store is anticipated to be located at 199 Main Street, Blackstone, MA 01504. There will be an opportunity for the public to ask questions.

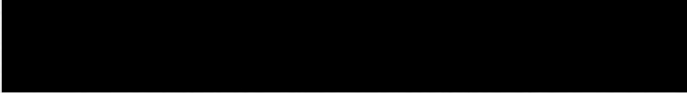
This letter is to meet the notice requirement as set out by the Commonwealth of Massachusetts Cannabis Control Commission.

Sincerely,

Gurpreet Kalra, Principal
Delta 420 LLC
Telephone Number: 508-883-1362
Email Address: Kalra33@gmail.com

**NOTICE OF INTENT TO TOWN OFFICIAL
PROPOSED MARIJUANA RETAIL STORE**

~~Landowner~~^{Business}: Delta 420 LLC/Gurpreet Kalra
Address: 199 Main Street, Blackstone, MA 01504
Date Notice Sent: March 5, 2019



Dear Selectman:

The purpose of this letter is to serve as a notice that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for March 19, 2019 from 7:00 p.m. – 8:00 p.m. in Blackstone Public Library, 86 Main Street, Blackstone, MA 01504. The proposed Marijuana Licensed Retail Store is anticipated to be located at 199 Main Street, Blackstone, MA 01504. There will be an opportunity for the public to ask questions.

This letter is to meet the notice requirement as set out by the Commonwealth of Massachusetts Cannabis Control Commission.

Sincerely,

Gurpreet Kalra, Principal
Delta 420 LLC
Telephone Number: 508-883-1362
Email Address: Kalra33@gmail.com

**NOTICE OF INTENT TO ABUTTERS FOR
PROPOSED MARIJUANA RETAIL STORE**

Business
Owner: Delta 420 LLC/Gurpreet Kalra
Address: 199 Main Street, Blackstone, MA 01504
Date Notice Sent: March 5, 2019

Abutter: [REDACTED]
Abutter Address: [REDACTED]

Dear Abutter:

The purpose of this letter is to serve as a notice that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for March 19, 2019 from 7:00 p.m. – 8:00 p.m in Blackstone Public Library, 86 Main Street, Blackstone, MA 01504. The proposed Marijuana Licensed Retail Store is anticipated to be located at 199 Main Street, Blackstone, MA 01504. There will be an opportunity for the public to ask questions.

The records of the Town of Blackstone Assessor's office show that you own property with a boundary within three hundred feet from the property line of the proposed establishment. This letter is to meet the notice requirement as set out by the Commonwealth of Massachusetts Cannabis Control Commission.

Sincerely,

Gurpreet Kalra, Principal
Delta 420 LLC
Telephone Number: 508-883-1362
Email Address: kalra33@gmail.com

PLAN FOR POSITIVE IMPACT ON AREAS OF DISPROPORTIONATE IMPACT

I. Plan Goals

The Delta 420, LLC (the “Company”) cannabis retail store at 199 Main Street, Blackstone, MA (the “Facility”) will develop and implement a Disproportionate Impact Area Plan (the “Plan”) consistent with the guidance of the Cannabis Control Commission (the “Commission”). The goal of the Plan is to have a positive impact on areas of disproportionate impact, as defined by the Commission.

II. Plan Elements

To achieve its goal, the first and most important element of the Plan has been to locate the Facility within a reasonable distance from several Commission-designated areas of disproportionate impact (including, but not limited to, Worcester, Mansfield, Taunton and Brockton). This location will benefit these areas in several ways, including creating five-plus cannabis-related jobs right away in this South Central area of Massachusetts near the above-mentioned areas with room for expansion. These new jobs will include salary-based and hourly employees. The Company cannot commit to hiring all of its employees and/or contractors from areas of disproportionate impact but intends to have residency in areas of disproportionate impact be a supportive factor to be considered relative to possible employment. The Company shall see to hire twenty percent (20%) of these new jobs from areas of disproportionate impact and shall seek a similar percentage of vendors from areas of disproportionate impact.

Information about open positions and vendor opportunities will be disseminated as needed and, at least, quarterly via the internet, listings at local college placement offices, participation in job fairs sponsored by local colleges, and contact with varied community organizations, as well as the Department of Unemployment Assistance. In particular, postings and listings concerning open positions and vendor opportunities will target the Commission-designated areas of disproportionate impact discussed above. All listings, postings and outreach efforts should make clear that all candidates for open positions or vendor opportunities must be age 21 or older.

As a second element of the Plan, the Company plans on being a long-term contributor to the South-Central area of Massachusetts, including the above-listed areas of disproportionate impact. The Company plans on investing itself in the well-being and growth of these areas by being a good corporate citizen and sponsoring selected community organizations in Brockton, which is a disproportionate impact city. The Company anticipates supporting Brockton Self-Help, Inc. Head Start to help improve the community. Brockton Self-Help, Inc. Head Start positively impacts Brockton by helping children in the area get a head start in life by providing them with activities that help them to develop mentally, socially, mentally, emotionally, and physically. The Company has discussed with and received written consent to work with and contribute to Brockton Self-Help, Inc. Head Start. As an initial goal, the Company anticipates making a financial contribution of not less than \$5,000.00 per year and, if practicable, having staff volunteer at the organization not less than quarterly every year.

III. Measurement and Accountability

Regularly measuring success will be a key component of the Plan. The Company will periodically gather pertinent information to measure the efficacy of its direct efforts to benefit Commission-designated areas of disproportionate impact, including, but not limited to, actual and/or estimated dollars or resources expended in and for Commission-designated areas.

Specifically, at the end of the first year from receipt of a provisional license, and each year thereafter in connection with submission of its renewal application to the Commission, the Company will seek to quantify its vendor purchases, employee salaries, community event spending, and staff time in charitable activities, associated with each of the surrounding areas of disproportionate impact. It will also undertake written assessments of its success in making contributions to Brockton Self-Help, Inc. Head Start and other selected community organizations located in areas of disproportionate impact, consistent with the goals of the Plan, and will submit such at each renewal period. The written assessments will include, but not be limited to: (1) amount of Facility fee contributions to such selected community organizations; (2) number of employees and total gross spending on compensation and benefits for residents of areas of disproportionate impact; and (3) to the extent necessary, recommendations for improving the effectiveness of the Company's efforts relative to disproportionate impact areas.

IV. Legal Obligations/Affirmations

The Company will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

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



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

William Francis Galvin
Secretary of the
Commonwealth

May 10, 2019

TO WHOM IT MAY CONCERN:

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

DELTA 420 LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **May 7, 2019.**

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

I also certify that the names of all managers listed in the most recent filing are:
GURPREET KALRA, HARPREET SINGH, RASPREET KALRA

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **GURPREET KALRA, HARPREET SINGH, RASPREET KALRA**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **GURPREET KALRA, HARPREET SINGH, RASPREET KALRA**

In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

A handwritten signature in dark ink, reading "William Francis Galvin".

Secretary of the Commonwealth





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

mass.gov/dor

Letter ID: L1512817536
Notice Date: May 13, 2019
Case ID: 0-000-624-322



CERTIFICATE OF GOOD STANDING/TAX COMPLIANCE REQUEST STATUS



ANNA O. CHAN
DELTA 420 LLC
1 BOSTON PL FL 37
BOSTON MA 02108-4407

Why did I receive this notice?

We received your request for a Certificate of Good Standing and/or Tax Compliance for DELTA 420 LLC. As of the date of this notice, the Commissioner of Revenue is unable to certify whether you are in compliance with your tax obligations under Chapter 62C of the Massachusetts General Laws.

According to our records, you're not registered with the Department of Revenue. As a result, we don't know if you have any outstanding liabilities. We're also unable to determine if you're legally required to file and pay taxes in Massachusetts.

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

Use the confirmation code below to print another copy of this letter or to review your submission.
Confirmation Code: k26tdw

Edward W. Coyle, Jr., Chief
Collections Bureau



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001380596

1. The exact name of the limited liability company is: DELTA 420 LLC

2a. Location of its principal office:

No. and Street: 202 MAIN STREET
City or Town: BLACKSTONE State: MA Zip: 01504 Country: USA

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

No. and Street: 202 MAIN STREET
City or Town: BLACKSTONE State: MA Zip: 01504 Country: USA

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

TO PREPARE AN APPLICATION FOR LICENSURE TO SELL CANNABIS IN MASSACHUSETTS.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: GURPREET KALRA
No. and Street: 202 MAIN STREET
City or Town: BLACKSTONE State: MA Zip: 01504 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	GURPREET KALRA	137 ENDEAN DR EAST WALPOLE, MA 02032 USA
MANAGER	RASPREET KALRA	137 ENDEAN DR EAST WALPOLE, MA 02032 USA
MANAGER	HARPREET SINGH	672 HIGH STREET, UNIT 2 WESTWOOD, MA 02090 USA

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

DELTA33 CORP

April 26, 2019

Secretary of the Commonwealth
Corporations Division
One Ashburton Place, 17th Floor
Boston, MA 02108

Re: Consent to Use Delta

Dear Sir or Madam:

The undersigned, Delta33 Corp, hereby gives permission and consent for Delta 420 LLC to use the name "Delta" for all business purpose within and without the Commonwealth of Massachusetts.

Sincerely,

DELTA33 CORP

B.

Gurpreet Kalra
President

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	HARPREET SINGH	672 HIGH STREET, UNIT 2 WESTWOOD, MA 02090 USA
SOC SIGNATORY	RASPREET KALRA	137 ENDEAN DR EAST WALPOLE, MA 02032 USA
SOC SIGNATORY	GURPREET KALRA	137 ENDEAN DR EAST WALPOLE, MA 02032 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	GURPREET KALRA	137 ENDEAN DR EAST WALPOLE, MA 02032 USA
REAL PROPERTY	RASPREET KALRA	137 ENDEAN DR EAST WALPOLE, MA 02032 USA
REAL PROPERTY	HARPREET SINGH	672 HIGH STREET, UNIT 2 WESTWOOD, MA 02090 USA

9. Additional matters:

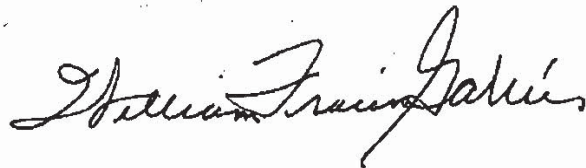
SIGNED UNDER THE PENALTIES OF PERJURY, this 7 Day of May, 2019,
GURPREET KALRA

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

THE COMMONWEALTH OF MASSACHUSETTS

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

May 07, 2019 03:48 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, stylized "G" at the end.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**OPERATING AGREEMENT
OF
Delta 420 LLC**

This Operating Agreement (the "**Agreement**") of Delta 420 LLC (the "**Company**"), effective as of May 7, 2019, is entered into by and among Gurpreet Kalra, Raspreet Kalra and Harpreet Singh (the "**Managers**") and the persons identified on **Schedule A** hereto as the members of the Company (the "**Members**").

WHEREAS, the Company was formed as a limited liability company on May 7, 2019 by filing a certificate of organization (the "**Certificate of Organization**") with the Secretary of the Commonwealth of Massachusetts pursuant to and in accordance with the Massachusetts Limited Liability Company Act, as amended from time to time (the "**MLLCA**"); and

WHEREAS, the Member and the Company agree that the membership in and management of the Company shall be governed by the terms set forth herein.

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

1. **Name.** The name of the Company is Delta 420 LLC
2. **General Character.** The general character of the business of the Company is to establish and then operate a retail cannabis dispensary and to engage in any and all other businesses and acts permitted to a limited liability company organized under the MLLCA, as the Managers may determine.
3. **Records Address.** The address of the office in the Commonwealth of Massachusetts at which the Company will maintain its records as required by the MLLCA shall be as set forth in the Certificate of Organization or subsequent filing with the Secretary of the Commonwealth. The Company may at any time change this address by making the appropriate filing with the Secretary of the Commonwealth.
4. **Resident Agent.** The name and street address of the Company's resident agent in the Commonwealth of Massachusetts shall be as set forth in the Certificate of Organization or subsequent filing with the Secretary of the Commonwealth. The Company may at any time change this information by making the appropriate filing with the Secretary of the Commonwealth.
5. **Members.**

a. **Initial Member.** The Company's members shall be those persons identified as such on **Schedule A** hereto. **Schedule A** shall be amended by the Managers to reflect the admission of new Members

b. **Additional Members.** One or more additional members may be admitted to the Company with the written consent of the Member. Prior to the admission of any such additional members to the Company, the Member shall amend this Agreement or adopt a new operating agreement to make such changes as the Member shall determine to reflect the fact that the Company shall have such additional members. Each additional member shall execute and deliver a supplement or counterpart to this Agreement, as necessary.

c. **No Certificates for Membership Interests.** The Company will not issue any certificates to evidence ownership of the membership interests.

6. Management.

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

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

7. Liability of Member; Indemnification.

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

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

8. **Term.** The term of the Company shall be perpetual unless the Company is dissolved and terminated in accordance with Section 12.

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

10. Tax Status; Income and Deductions.

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

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

11. **Distributions**. Distributions shall be made to the Member at the times and in the amounts determined by the Member in its sole and absolute discretion.

12. **Dissolution; Liquidation.**

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

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

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

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

13. **Miscellaneous.**

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

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

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

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

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

MEMBERS:

Gurpreet Kalra

Raspreet Kalra

Harpreet Singh

COMPANY:

Delta 420 LLC, a Massachusetts limited
liability company

By: _____
Gurpreet Kalra, Manager

SCHEDULE A

Name	Address	Membership Interest
Gurpreet Kalra	137 Endean Drive East Walpole, MA 02032	51%
Raspreet Kalra	137 Endean Drive East Walpole, MA 02032	39%
Harpreet Singh	672 High Street, Unit 2 Westwood, MA 02092	10%

***Strategic & Tactical Business Plan
For***

Delta 420 LLC

***“Establishing a Conveniently Located Marijuana Dispensary
That Provides Premium Grade Marijuana, Edibles, and
Marijuana Infused Products to Qualified Clients
In a Clean and Safe Environment”***

**199 Main Street
Blackstone, Massachusetts 01504**



Phone Number: (617) 838-3000

Email Address:

kalra33@gmail.com

Outline Editor – Master Outline

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3.2 Mission

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- 9.7 Explanation of Business Ratios
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10.0 Web Plan Summary

- 10.1 Web Marketing Strategy
- 10.2 Development Requirements

2. Confidentiality Agreement

This agreement is to acknowledge that the information provided by *Delta 420 LLC* in this business plan is unique to this business and confidential; therefore, anyone reading this plan agrees not to disclose any of the information in this business plan without the express written permission of *Delta 420 LLC*. It is also acknowledged by the reader of this business plan that the information furnished in this business plan, other than information that is in the public domain, may cause serious harm or damage to *Delta 420 LLC* and will be kept in the strictest confidence.

Upon request, this document is to be immediately returned to *Delta 420 LLC*.

Signature _____

Name (typed or printed) _____

Date _____

This is the business plan for *Delta 420 LLC*. The presentation of this business plan does not imply an offering of securities.

3. EXECUTIVE SUMMARY

There is an opportunity in Blackstone, Massachusetts to open and operate a marijuana dispensary. Gurpreet Kalra, Raspreet Kalra and Harpreet Singh recognize this opportunity and have decided to go forward with their new company named *Delta 420 LLC*. The company will penetrate the market in the business of establishing a conveniently located marijuana dispensary that provides premium grade marijuana, edibles, and marijuana infused products to qualified clients in a clean and safe environment designed to promote repeat business and generate positive word of mouth referrals. Gurpreet Kalra, Raspreet Kalra and Harpreet Singh also recognize the opportunities for offering an experienced management team comprised of knowledgeable personnel who possess the skills required to ensure that all company operations are performed to exemplary standards. *Delta 420 LLC* will serve its area of business working to make its operations more productive while at the same time controlling expenses.

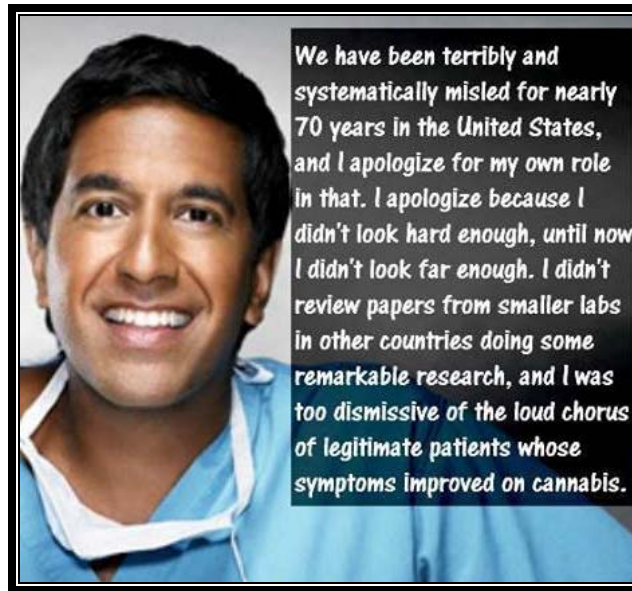


The money required getting the company organized and structured has been provided by Gurpreet Kalra, Raspreet Kalra and Harpreet Singh. To make this company a reality there will be an amount needed of \$200,000.00, which the owners will be investing. The \$200,000.00 is the complete amount needed to open and operate this business. The money will be allocated to take care of all the requirements (see Section 4.3). This business plan will show the components that make up and accomplish this exciting business venture.

This business is based on two vital components:

1. Excellent management that has a mastery of choosing the right product and the right service at the right time with a mastery of knowing what its total market is and how to keep gaining a greater share of that market.
2. Providing an excellent product or service that is not only well accepted now but also whose acceptance and use will continue to grow at an accelerated rate into the future.

Delta 420 LLC will coordinate worker productivity with increasing market demand to ensure continued company growth and development. Its approach emphasizes the individual participation of every employee and member of this organization and the total process of building the company to acquire an ever-increasing market share. By guiding and helping employees with knowledge and awareness, it will build a solid foundation for achieving its most ambitious goals. *Delta 420 LLC* realizes that this is an ideal time to establish its business in this expanding industry and move forward in a steady progression over the next five years.



Some of the highlights of its strategy are here briefly summarized:

- ✓ *Delta 420 LLC* has talent and experience that is superior for the marketplace.
- ✓ Profitability is assured by its preparation of knowing what the market requirements are presently and what they are to be in the next several years.
- ✓ With its strategy and budget in place, sales are expected to multiply rapidly, and the company expects to move in on the leaders in the industry.

3.1 OBJECTIVES

Delta 420 LLC has definite objectives in order to fulfill its desire to achieve a growing market share of the industry it is entering. What follows is a brief summary of the key objectives of *Delta 420 LLC*:

1. Penetrate the market in the business of operating a marijuana dispensary.
2. Develop employee capabilities to ensure a strong foundation for participation in a rapidly growing company.
3. Increase sales and revenue at a rate no less than 10% per year.

3.2 MISSION STATEMENT

Delta 420 LLC is a company that will strive to excel in the business of establishing a conveniently located marijuana dispensary that provides premium grade marijuana, edibles, and marijuana infused products to qualified clients in a clean and safe environment designed to promote repeat business and generate positive word of mouth referrals. What makes *Delta 420 LLC* different and special is that *Delta 420 LLC* will offer an experienced management team comprised of knowledgeable personnel who possess the skills required to ensure that all company operations are performed to exemplary standards.

3.3 KEYS TO SUCCESS

Delta 420 LLC is confident of the following attributes that it demonstrates as keys to its success:

1. Founders' abilities to recognize and define the best course of action
2. The consistent raising of productivity
3. Diligent effort to regularly lower overall cost
4. Recruitment of experienced and talented employees
5. Ability to effectively market *Delta 420 LLC*

4. COMPANY SUMMARY

Delta 420 LLC will begin its operation in 2019. The inspiration for the company was the realization that there remains a need for a company that provides a vast selection of premium grade marijuana and related products at affordable prices. The company will also conduct informative seminars where guest speakers will deliver educational presentations that will help to shed light on some of the latest advances in the various medicinal applications of cannabis. We are strong proponents of supporting the sales of medical-grade marijuana to people suffering from chronic pain in order to create a more natural way to address their medical conditions rather than pharmaceutical medications, which often results in patients becoming addicted to pain pills. The company will be headquartered in the city of Blackstone in the state of Massachusetts. Its operations will expand regionally.

4.1 COMPANY OWNERSHIP

Delta 420 LLC will be set up as a Limited Liability Company. The ownership is held by Gurpreet Kalra (51%), Raspreet Kalra (39%) and Harpreet Singh (10%). Any and all questions relative to ownership should be directed to *Delta 420 LLC*.

4.2 COMPANY HISTORY

Delta 420 LLC is proud of the accomplishments of the people that have made up this company. *Delta 420 LLC* is particularly proud of the fact that we possess a dedicated management team that demonstrates honesty, integrity and professionalism in all aspects of operations. The company is also proud of the fact that all of our associates are carefully prescreened to ensure the highest standard of quality and we consistently strive to provide a superior level of service designed to exceed the expectations of our clients.

4.3 START-UP SUMMARY

The money required getting the company organized and structured has been provided by Gurpreet Kalra, Raspreet Kalra and Harpreet Singh. To make this company a reality there will be an amount needed of \$200,000.00, which the owners will be investing. The \$200,000.00 is the complete amount needed to open and operate this business. The money will be allocated to take care of all the requirements including \$5,000.00 for licensing and permit fees; \$60,000.00 for inventory; \$10,000.00 for lease of premises; \$20,000.00 for legal fees; \$20,000.00 for contractor fees; \$10,000.00 for sign and web design; \$25,000.00 for security and surveillance; \$40,000.00 for employee wages and retention, \$10,000.00 for extra use.

4.4 COMPANY LOCATIONS AND PREMISES

Delta 420 LLC will maintain its headquarters where its management staff will be located in the city of Blackstone in Worcester County in the state of Massachusetts. At no time will management allow a situation to exist where the company is supporting locations or premises that are not absolutely essential to the most effective operation of the company.

Demographics Worcester County, Massachusetts

As of the United States Census, there were 798,552 people, 303,080 households, and 202,602 families residing in the county. The population density was 528.6 inhabitants per square mile (204.1/km²). There were 326,788 housing units at an average density of 216.3 per square mile (83.5/km²). The racial makeup of the county was 85.6% white, 4.2% black or African American, 4.0% Asian, 0.2% American Indian, 3.6% from other races, and 2.3% from two or more races. Those of Hispanic or Latino origin made up 9.4% of the population.[12] In terms of ancestry, 22.2% were Irish, 15.1% were French as well as 6.7% French Canadians, 14.4% were Italian, 11.7% were English, 7.0% were Polish, 6.9% were German, and 3.2% were American. Of the 303,080 households, 33.7% had children under the age of 18 living with them, 50.0% were married couples living together, 12.2% had a female householder with no husband present, 33.2% were non-families, and 26.2% of all households were made up of individuals. The average household size was 2.55 and the average family size was 3.09. The median age was 39.2 years.

The median income for a household in the county was \$64,152 and the median income for a family was \$79,121. Males had a median income of \$56,880 versus \$42,223 for females. The per capita income for the county was \$30,557. About 6.9% of families and 9.5% of the population were below the poverty line, including 12.1% of those under age 18 and 9.0% of those age 65 or over.

5. PRODUCT DESCRIPTION

Delta 420 LLC is proud of its main product line and the features and benefits that make up its attractiveness to this ever-growing market. The entire operation will be regulated by the state from seed to sale and the company will maintain complete transparency in its facility to ensure strict adherence to all regulatory guidelines. The main features and benefits of its core products to its customers include that we specialize in the sales of high-quality rare or new products at affordable prices. Our entire operation will be regulated by the state from seed to sale and we will maintain complete transparency in all of our facilities to ensure strict adherence to all regulatory guidelines. Some of the strengths and capabilities of its core products as it pertains to shelf life, durability and availability include that we plan to supply consumers with superior quality products that provide relief from various medical conditions. While recreational pot usage is controversial, many people agree that provides a medicinal effect for various illnesses and maladies. We will different strains that will be target specific: for mood, pain, menstrual cramps, oil, ailment or experience. The strength of our business is also consumer satisfaction but providing a safe place for consumers to buy products and really a one stop shop. To be competitive is to have a vision for the future and what the product will do in the future for people. *Delta 420 LLC* will carry different strains and supports the movement of helping to find more beneficial uses to help patients get the relief they need. The FDA advisory panel gave a resounding recommendation to GW Pharmaceutical for its canvas-based medicine study.

Whether the benefits of marijuana and CBD products are overstated by advocates of marijuana legalization, new laws will contribute to the research tests being conducted to study its medicinal uses in an effort to better understand how it impacts the body. We support the movement of helping find more medicinal uses designed to help patients get the relief they need. Marijuana's health benefits are undisputable. A Food and Drug Administration (FDA) advisory panel gave a resounding recommendation to GW Pharmaceuticals' cannabis-based medicine Epidiolex on Thursday. The decision wasn't even close – the expert group of panelists described the treatment, derived from the non-THC cannabis component cannabidiol (CBD) and meant to treat rare childhood epilepsy disorders, as a “breakthrough” to treat a horrible disease. One of the most comprehensive reports on the issue to date was a massive National Academies of Sciences, Engineering, and Medicine study released in January 2017. For instance, cannabis products probably do, based on current evidence, help treat chronic pain, prevent nausea in cancer patients under chemotherapy, and improve patient-reported outcomes for muscle problems in people with certain diseases, according to the report. There's moderate evidence it can help certain kinds of patients sleep better.

5.1 SERVICE DESCRIPTION

Delta 420 LLC is proud of its main service line and the features and benefits that make up its attractiveness to this ever-growing market. The main features and benefits of its main service to its customers include that we offer a new kind of pain relief that is an all natural product and less harmful than pharmaceutical medication. *Delta 420 LLC* will specialize in providing a variety of different products that are not normally found in the state of Massachusetts. Some of the strengths and capabilities of its main service as it pertains to potential market, administration and availability include that we will have a variety of products to fit every budget and need, along with an innovative approach to how we bring it to the consumer with the added value of delivery services as well when it becomes available. We provide highly personalized service featuring a hands-on management team that will oversee all aspects of operations to ensure quality and customer satisfaction.

5.2 COMPETITIVE COMPARISON

Delta 420 LLC has done extensive research and investigation of all of the aspects of the competitiveness of the existing market in which it will be participating. *Delta 420 LLC* management team is fully aware of the major competitors who include:

- Caroline

Delta 420 LLC recognizes this competitor as a prime focus because they have been evaluated using criteria of price and value given. This company specifically knows that the advantages that it has over its competition include that *Delta 420 LLC* provides a superior level of service designed to exceed the expectations of our clients. This study of its competition has given the company a mastery of the effects of regulatory agencies, business share, pricing strategies, cut-throat or permissive posturing, as well as strengths and weaknesses of the management teams who head up the companies that make up the competition.

5.3 SALES LITERATURE

Delta 420 LLC is prepared to highlight all of the most important benefits and features in a packet of sales literature. This information will present a compelling point of view as well as a detailed explanation why the consumer should exchange their hard earned dollars for the company's essential products and services. The sales literature will be complete in every way and will answer the questions of who, what, why, when and where of what the company is presenting.

5.4 SOURCING AND FULFILLMENT

Delta 420 LLC is totally prepared in the preparation for ease and completion of fulfillment requirements. All aspects of fulfillment have been considered, evaluated and highlighted for the purpose of assuring both customers and pertinent employees that fulfillment will never be a major concern.

5.5 TECHNOLOGY

Delta 420 LLC has positioned itself in a way to take full advantage of all the technology available for its particular industry. Management has determined that it will use state of the art software and appropriate hardware will be implemented to assist all employees in gaining maximum productivity. In particular, the company will be utilizing accounting procedures both off-line and online to monitor weekly, monthly, quarterly and annual results of all aspects of operations.

5.6 FUTURE PRODUCTS AND FUTURE SERVICES

Delta 420 LLC is currently using its experience and talent to position itself in future markets with the appropriate future products and future services. Its current product and service lines, which include establishing a marijuana dispensary, are sufficient in today's demanding market and will fare very well in future years as well.

6.0 MARKET ANALYSIS SUMMARY

Delta 420 LLC has done an exhaustive study of the state of its industry. This industry is one of the most exciting industries in the United States. It presents an ever increasing market, a very healthy bottom line, and excellent opportunities for growth. The outside world demands a conveniently located marijuana dispensary that provides premium grade marijuana, edibles, and marijuana infused products to qualified clients in a clean and safe environment designed to promote repeat business and generate positive word of mouth referrals. *Delta 420 LLC* has all this to offer and its management team will keep its finger on the pulse of market demands. The emerging Massachusetts marijuana market has the potential to generate hundreds of millions of dollars in revenue. With growth and revenues producing staggering numbers, the industry is aligned for huge expansion in the long-term. The industry is overcoming its many challenges and expanding at a solid clip through 2020 and into 2028 where new medical marijuana and recreational cannabis markets will begin to develop. The industry has provided companies with an opportunity for growth over the next 5-10 years, according to various industry experts. Medicinal marijuana and recreational marijuana are necessary now and will continue to be needed in the future by a diverse patient base because of the health benefits it has provided to hundreds of thousands of patients. With the demand so high, it only makes sense to invest in a business that can handle the supply. This is why *Delta 420 LLC* fits perfectly for meeting the demands of its industry.

6.1 MARKET SEGMENTATION

Delta 420 LLC is very much aware of the importance of market analysis as it pertains to market segmentation. At the current time management feels that in relationship to market segmentation the market for *Delta 420 LLC* is very large and growing. The reason for this conclusion in reference to market segmentation is after careful study of its current and potential customer base. The company strongly feels that the market requires a marijuana dispensary with a dedicated management team who possess an extensive amount of industry knowledge and experience. By treating our clients with the utmost dignity and respect while providing them with the finest quality products available, *Delta 420 LLC* should be able to capture its market.

6.2 TARGET MARKET AND SEGMENT STRATEGY

Delta 420 LLC aims to understand each and every reason why a consumer buys a particular product or service. In its total analysis there is a study of everything that affects a person's behavior, their cultural background, their economic status, their educational background, as well as any and all factors that relate to their behavior. *Delta 420 LLC* strives to target that segment of the market that is in the ideal position to need its service, afford its service, and be in a position to act on buying its service immediately. This company is always able to determine these results from such sources as existing customers, suppliers, bankers, trade groups, chamber of commerce, and industry trade journals.

6.2.1 MARKET NEEDS

Delta 420 LLC evaluates its market primarily from the standpoint of what the needs are of the individual consumer. This can be very complex. This company understands and appreciates what a particular product does. This can be a very varied thing. *Delta 420 LLC* knows that the needs of its consumers in relationship to what it offers are primarily because we possess the right tools and technology to remain on the cutting edge of success in today's competitive marketplace. *Delta 420 LLC* understands that to master this area its management team needs to constantly be tapping into those sources of information that reveal the true motivations of the consumer.

6.2.2 MARKET TRENDS

Delta 420 LLC is very confident about the timing of the business in its industry. It is the company's position that this is the ideal time to be on the move in this ever growing market. Evaluating different factors and events that make up a particular pattern in identifying all aspects of that pattern secure them in an enviable position of providing what is needed in the marketplace at this particular time. The company is always watching the big picture and continues to monitor any pattern or trend on a daily basis.

6.2.3 MARKET GROWTH

Delta 420 LLC recognizes that it is participating in a very large industry with a great growth rate. Its projected growth will be set at a rate greater than the industry average. *Delta 420 LLC* implementation of its business strategy will lend itself to fast paced development and dominance of a significant market share. The company has determined the growth of its market on the basis of an ever-increasing customer base, and dollar volume base as well.

6.3 INDUSTRY & BUSINESS ANALYSIS

Delta 420 LLC knows that in the final analysis it can only do well if overall sales are there and expenses are capped at a reasonable level. Its particular position in this industry is that the other companies do some of the things correctly but not as many as it feels that it can do to become a market leader. For example, it has found that some of the other companies are totally profit driven and do not provide any concern for the well being of their clients. They offer a limited selection of inferior quality products and maintain an inexperienced staff comprised of substandard personnel who demonstrate a lack of professionalism. *Delta 420 LLC* operates in an advantageously different manner by offering marijuana that is 100% organic and includes a wide variety of products such as edibles, flowers, cannabis oil, accessories, vapor pens, gummies, chocolate, pre-rolled, gifts, and CBD pet products for sick or ailing pets to make them feel better. We provide a convenient location with a comprehensive selection of superior quality products in a clean and safe environment along with a courteous and knowledgeable staff of well trained personnel dedicated to providing exceptional customer service.

6.3.1 INDUSTRY & BUSINESS PARTICIPANTS

Industry and business participants include Caroline. The primary weaknesses are that some of these other companies are totally profit driven and do not provide any concern for the well being of their clients. They offer a limited selection of inferior quality products and maintain an inexperienced staff comprised of substandard personnel who demonstrate a lack of professionalism. *Delta 420 LLC* operates in an advantageously different manner by offering a comprehensive selection of superior quality products comprised of premium grade marijuana, edibles, and marijuana infused products featuring the added value of personalized service designed to promote repeat business and generate positive word of mouth referrals. In addition, we plan on partnering with other organizations and charities in order to build a sense of community and philanthropy, which is a big part of our vision. This is how *Delta 420 LLC* distinguishes itself.

6.3.2 DISTRIBUTING A PRODUCT & SERVICE

Because of the nature of this business the company has learned that the best places to locate its establishments are on busy streets. This is because there are many advantages to distributing its products in this way. Those advantages include the fact that the company will generate more revenue.

6.3.3 COMPETITION AND BUYING PATTERNS

Delta 420 LLC is excited about its position in relationship to its competition. The management of the company has discovered some innovative and creative ways of acquiring all the components that make up its product line. The need for a low-based cost that transcends to a lower net cost prior to sale and therefore transcends into a greater profit is what keeps *Delta 420 LLC* on the cutting edge of continuously competing on a favorable basis. Such things as inventory control, source of components, fast turnover, production schedules, all contribute to a healthy aspect of competing with other companies.

6.3.4 MAIN COMPETITORS

Delta 420 LLC recognizes the following main competitors that affect its industry. *Delta 420 LLC* has chosen them because of their level of participation, stability, and marketing. The main competitors include:

- Caroline

7. STRATEGY AND IMPLEMENTATION

Delta 420 LLC centers its strategy on the premise that the company resonates with the consumer because it offers premium grade marijuana and related products to qualified clients in a clean and safe environment designed to accommodate the needs of a diverse clientele. Always keeping that in mind, it has its management constantly focus on productivity being high and of course expenses remaining very modest. *Delta 420 LLC* is diligent in dissecting every aspect of this business to make each component productive and contributive to the goal of a highly profitable relationship with its customers.

7.1 STRATEGY PYRAMID

Delta 420 LLC knows that it's wise to understand the framework from initial goal back to the essential implementation. The purpose of the pyramid here is to place at the very top an individual emphasis that is the focus of a strategy for the company, such as introduction of a new product line.



Picture if you will, the next level down the individual actions or tactics necessary to implement the emphasis or strategy. Finally, at the bottom of its pyramid are the individual programs necessary to support any and all actions that contribute to achieving the emphasis or goal. *Delta 420 LLC* wants to highlight that it is not only adhering to its understanding of the strategy pyramid, but that it also monitors everything in the process which leads to a logical whole plan.

7.2 VALUE PROPOSITION

Delta 420 LLC adheres to value-based marketing in its conceptual outlook. The value-based benefits of the company that it strives for consumers to acknowledge include that it provides a more natural way to address severe medical conditions rather than pharmaceutical medications, which often results in patients becoming addicted to pain pills with adverse side effects. In this way *Delta 420 LLC* is very sensitive to the communication of what it is proposing to its customers as well as living up to the promise behind what it does. The company demonstrates that it backs up what it does with a 100% customer satisfaction attitude.

7.3 COMPETITIVE EDGE

Delta 420 LLC is decisive about staying ahead of its competition. The company knows that this is an everyday every hour re-evaluation of what is going on in its marketplace. Its current key advantages in relationship to competitive edge include that we possess a dedicated management team that demonstrates honesty, integrity and professionalism in all aspects of operations.

7.4 MARKETING STRATEGY

Delta 420 LLC is aware of all of the different choices in relationship to marketing strategy. Because of management it has chosen to market through online Internet exposure through search engine optimization, industry contacts, and by word of mouth.

It has chosen this strategy because costs are minimal, effectiveness is extremely high and branding recognition is enhanced.

7.4.1 POSITIONING STATEMENT

Delta 420 LLC takes the position that its primary focus of what it does in the marketplace is to treat clients with the utmost dignity and respect while providing them with the finest quality products available in a stress free environment designed to ensure complete client satisfaction. We plan to consistently offer superior quality products at a reasonable price and to aggressively market our brand to further our reach and maximize profitability. This is how *Delta 420 LLC* distinguishes itself in the marketplace.

7.4.2 PRICING STRATEGY

Delta 420 LLC has after careful consideration decided to align its pricing at a lower level in comparison to its competition. This fits in perfectly with where the company sees itself positioned in the total marketplace and communication with its customer base as far as getting appropriate value and still maintaining sufficient motivation for high volume.

7.4.3 PROMOTION STRATEGY

The management of *Delta 420 LLC* believes very strongly in word of mouth to significantly get the word out of the value of what it does. This will always be a focus of its promotion efforts. However, though this is a crucial part, this is only one part of its promotion strategy. On a consistent basis the company will be promoting what it does through its own website, industry contacts, and by word of mouth. This along with all the individual selling efforts of its staff demonstrates a dynamic way for it to build the penetration of what it does in the marketplace.

7.4.4 DISTRIBUTION STRATEGY

Delta 420 LLC focuses on all three aspects of distribution concerns, that is, coverage, control and costs. These aspects can all be complex. *Delta 420 LLC* is certain that it has made the wisest decision in relationship to its coverage and control and cost for its distribution strategy. The coverage and control that it's striving for is achieved by its various marketing programs. Its cost structure is geared to enhance its distribution based upon its positioning in the marketplace.

7.4.5 MARKETING PROGRAMS

Delta 420 LLC knows that its marketing programs need to tell an excellent story that is compelling, detailed and highlights many of its capabilities. The company knows that consumers hear its voice loud and clear through every aspect of the company, staff, reputation, and quality control.

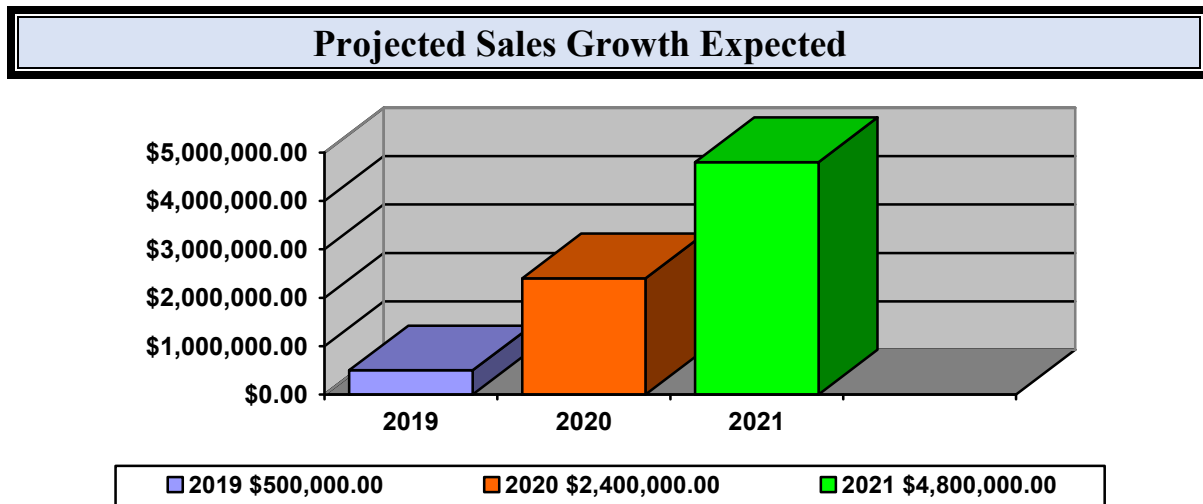
The company strives to be indispensable to the consumer. Its marketing programs work to identify this company, highlight competitive advantages, show appreciation for customer feedback, take advantage of marketing resources and demonstrate its knowledge, energy and enthusiasm.

7.5 SALES STRATEGY

As stated earlier, *Delta 420 LLC* will implement strategic marketing programs that include online Internet exposure through search engine optimization, social media marketing, industry contacts, and by word of mouth.

7.5.1 SALES FORECAST

Delta 420 LLC has developed a method for not only developing its sales forecast but also the ability to stand behind the numbers. The company has determined that based on its distribution resources, competitive advantages and sound financial analysis it expects to do the following sales over the year 2019: \$500,000.00; the next year 2020: \$2,400,000.00; and over the following year 2021: \$4,800,000.00. This company knows that in order to make its business plan happen, everything has to make sense. The company is grounded in reality in making reasonable assumptions that it feels very confident it can accomplish. Its strategies are state of the art, clear, and precise.



7.5.2 SALES PROGRAMS

Delta 420 LLC has sales programs that assure that its revenue forecasts are realized completely and on schedule. The person on its dedicated management team directly responsible for sales performance is Gurpreet Kalra, Raspreet Kalra and Harpreet Singh. To make this real the company has set deadlines with amounts as well as budget restrictions for a highly profitable sales program. With its comprehensive marketing program and competitive positioning, *Delta 420 LLC* is confident in concrete terms to see its sales milestones and deadlines become realities.

7.6 STRATEGIC ALLIANCES

Delta 420 LLC is constantly working to build a network of key individuals and companies that work as alliances to accomplish its major strategies. The company management is strongly encouraged to develop relationships with any and all individuals that may have a favorable relationship with any of its working teams. These alliances are to strengthen and broaden the foundation of the company and the assurance that its market share and profitability will continually increase.

7.7 EXPLAINED MILESTONES

Delta 420 LLC is very pleased with the accomplishments of the company and the participants of the company. The company is very proud of its loyal wonderful staff and the staff's dedication to reach all forecasts and milestones on which the staff sets its course. The goals for the company include securing the financing required to establish the operation, establishing a solid client base, and reaching the total sales projected.

8. MANAGEMENT SUMMARY

Management is the core and nucleus of any organization. It's not just personnel and individuals' resumes but so much more that encompasses vision, talent, harmony, beliefs, and commitment. *Delta 420 LLC* is led by Gurpreet Kalra, Raspreet Kalra and Harpreet Singh, the key players of the management team who provide all the talent necessary to complete every aspect of this business plan.

8.1 ORGANIZATIONAL STRUCTURE

Delta 420 LLC knows how important the organizational structure is to the success of a company. Each position with this company has a detailed job description as well as a defined relationship to the whole. At the very head of the company are Gurpreet Kalra, President; Raspreet Kalra, Vice President; and Harpreet Singh, Secretary. From other management positions to department heads, to first line implementation staffs, the structure of the organization is detailed and complete. Authority is properly positioned to achieve maximum effectiveness of each organizational structure.

8.2 MANAGEMENT TEAM

What follow are the top positions of *Delta 420 LLC*, their names, and a brief description of their qualifications as it pertains to the successful management and development of this company's goals.

❖ Gurpreet Kalra, President

Gurpreet Kalra is an accomplished business owner who in 2007 opened an Indian grocery store that generated over \$600,000.00 in revenue. In 2010 he acquired another Indian retail store which was under performing and turned it into a \$1.2 million in four years.

In November 2016 he bought and renovated a beer and wine store where he tripled the annual sales within one year of acquiring the business.

❖ **Raspreet Kalra, Vice President**

Raspreet Kalra works well with people and is ready to help advise consumers regarding what is the best product for their specific need. She will also be our hiring manager and oversee the daily operations of the business.

❖ **Harpreet Singh, Secretary**

Harpreet Singh also assisted in the operation of the business with Gurpreet Kalra in 2007. His responsibilities include web design, online order capabilities, and verifying the accuracy of order fulfillment when completed. In 2007 he started a delivery service with the Indian grocery store in Boston that generated huge profits.

8.3 MANAGEMENT TEAM GAPS

Delta 420 LLC recognizes that in any growing company often times management personnel have to wear more than one hat. As a result, often times a gap or gaps may exist until the company is developed enough to have a specific person for every task required. *Delta 420 LLC* currently has everything covered and feels very confident that each task is assigned to a very competent member of its management team. The company will always be sensitive to this issue and prevent any weakness by having and planning a contingency program that overlaps job responsibilities.

8.4 PERSONNEL PLAN

Delta 420 LLC defines its total work force to protect the success of its business plan. All aspects of the business have been sufficiently analyzed to determine each and every position required to run a fully functioning operation that can complete all of the strategies and programs to be undertaken.

9. FINANCIAL PLAN

Delta 420 LLC has developed its financial plan with the awareness that cash and the bottom line are key components of any successful company. Revenues for the company will come from charges and fees generated from operating a marijuana dispensary. The opportunity to increase revenues is being fully taken advantage of as outlined in its overall marketing strategy. To assure that bottom line adequately follows increases in revenue every cure possible is being taken to control expenses and overhead. The financial plan is based on solid growth, increase in revenues, and controlled expenses.

9.1 IMPORTANT ASSUMPTIONS

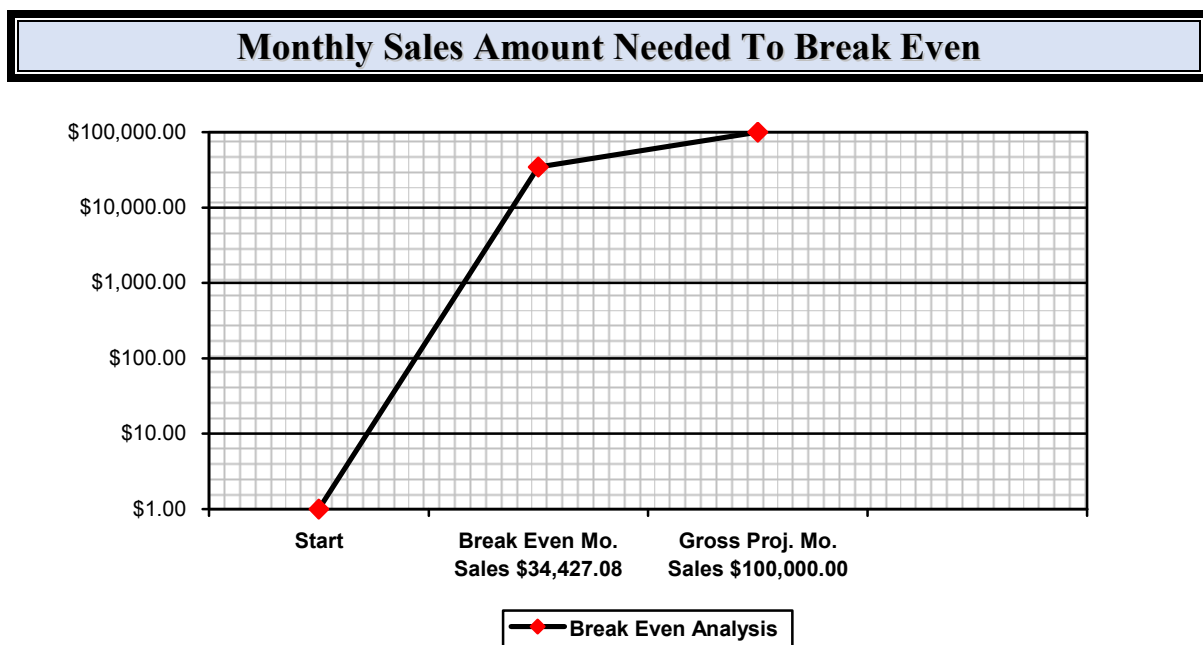
Delta 420 LLC makes every effort not to assume any aspect of its operation other than having hard factual data to back up any forecast. The entire management team is constantly reminded to base all programs on highly researched statistical information with the slightest possible margin of variation.

9.2 KEY FINANCIAL INDICATORS

Delta 420 LLC recognizes that the most important financial indicators are cash and bottom line. This company will be constantly monitoring the flow of revenue to the company as well as the expense requirements that deplete the company of its cash. *Delta 420 LLC* will always try to improve the ratio of revenue and expenses to generate a healthier bottom line in addition to a healthier cash base.

9.3 EXPLANATION OF BREAK-EVEN ANALYSIS

The break-even analysis for this company calculates at what point the company becomes profitable, and also at what point the company will be operating at a loss.



The analysis takes into consideration forecasted revenues as well as regular running fixed costs and average per unit sales price also known as per unit revenue. The purpose of this analysis is to maintain insight on financial realities. This information is vital for all kinds of things, from deciding how to price products or service to figuring whether a marketing program is worth the investment.

The breakeven point for this company occurs when gross sales in any given month = \$34,427.08. Formula: (Gross Profit \$480,000.00 / Gross Sales \$1,200,000.00) = 40%. Total Expenses \$165,250.00 / 40% as a decimal .40 = \$413,125.00 / 12 = \$34,427.08 (Break even amount monthly).

9.4 EXPLAINED PROJECTED PROFIT AND LOSS

Delta 420 LLC sales are forecasted to be increasing on a regular basis. Gross margin is also expected to increase on a regular basis. Breaking down the profit and loss projections and monitoring them on a regular basis is essential to the foundation of the company.

9.5 EXPLAINED PROJECTED CASH FLOW

As stated earlier, *Delta 420 LLC* will focus its attention on bottom line and cash. Its projected cash flow is very positive. With forecasted increasing revenues and controls on overhead and expenses it will look to see an increasing bottom line as well as increasing cash.

9.6 EXPLAINED PROJECTED BALANCE SHEET

The projected balance sheet for *Delta 420 LLC* highlights total assets, total liabilities, as well as capital. With projected cash flow already established the company balance sheet exemplifies a company whose revenues are increasing as well as its bottom line in cash.

9.7 BUSINESS RATIOS

To clarify and spotlight its financials it presents the following ratios and illustrates an accurate picture with all things having been considered. The first ratio is the current ratio = current assets \$200,000.00 divided by current liabilities \$0.00. The CURRENT RATIO is to be determined. The second ratio is the quick ratio = (cash \$200,000.00 + investments \$0.00 + receivables \$0.00) divided by current liabilities \$0.00. The QUICK RATIO is to be determined. The net profit margin = net profit \$188,850.00 divided by gross revenue on sales \$1,200,000.00. The NET PROFIT MARGIN RATIO is 15.74%. The return on investment = net profit \$188,850.00 divided by total assets \$200,000.00. The RETURN ON INVESTMENT RATIO or ROI is 94.4%.

9.8 EXPLAINED LONG-TERM PLANS

Delta 420 LLC believes that its long-term prospects for a very successful company are excellent. The industry chosen and the strong foundation of the company lend itself to nothing but positive results in the long-term future. With a market sensitive management team and excellent systems in place to monitor competitive shifts or changes *Delta 420 LLC* is ideally positioned to continue its successful plan on through the next decade.

10. WEB PLAN SUMMARY

Delta 420 LLC observes the increasing importance of the Internet in all that the worldwide web encompasses. This company not only is a participant in the worldwide web but also with its management team will continually strive to have a competitive edge by a significant presence and plans for exposure on the worldwide web. Because of the ever-increasing sophistication of the American Consumer and the ever-increasing participation on the Internet by the American Consumer, *Delta 420 LLC* will apply all of its resources to be the industry leader in utilization of the Internet and its commerce.

10.1 WEB MARKETING STRATEGY

Delta 420 LLC recognizes that there are many parts to a company success and its involvement in the Internet. The first part is a fully functioning presentable web site that resonates with the consumer and the personnel of the company. To that end, the management team has assigned the evolving development and maintenance of the web site for *Delta 420 LLC*. The second part is a concerted program of search engine optimization to assure that penetration of the marketplace is vast and consistent. Association of company identity and web site presence shall be an integral part of all company promotional activities and materials. The third part is to utilize the company web site in all aspects of sales processing and customer service. The fourth part is to utilize all capabilities on the worldwide web for company banking, training, and procedures. In the future as video conferencing and other technologies become commonplace and developed for the worldwide web, the company shall be among the first to participate.

10.2 DEVELOPMENT REQUIREMENTS

Delta 420 LLC sees that the expertise of someone involved with the worldwide web is very specific. The management team is committed to providing ongoing training for those members of the company directly associated with the development of its website, the implementation of search engine optimization, and the adaptability for customer service and other procedures utilizing the world-wide web. In addition to ongoing training, the company will commit an appropriate amount of company resources sensitive to revenues generated by the web site presence. In addition, as it relates to productivity personnel will have access to computer capabilities that tie in the web presence with all of its internal company workings. The development of these programs will be the direct responsibility of an assigned person from its management team.

Balance Sheet			
<i>Delta 420 LLC</i>			
Category	2019	2020	2021
Assets			
Current Assets:			
Cash	\$200,000.00	\$428,850.00	\$838,740.00
Accounts Receivable	\$0.00	\$0.00	\$0.00
Inventories	\$0.00	\$0.00	\$0.00
Prepaid Items	\$0.00	\$0.00	\$0.00
Investment Portfolio	\$0.00	\$0.00	\$0.00
Total Current Assets:	\$200,000.00	\$428,850.00	\$838,740.00
Fixed Assets:			
Land	\$0.00	\$0.00	\$0.00
Buildings	\$0.00	\$0.00	\$0.00
Computer, Office and Misc. Equipment	\$0.00	\$0.00	\$0.00
Machinery	\$0.00	\$0.00	\$0.00
Total Fixed Assets:	\$0.00	\$0.00	\$0.00
Intangibles			
Goodwill	\$0.00	\$0.00	\$0.00
Copyrights	\$0.00	\$0.00	\$0.00
Patents	\$0.00	\$0.00	\$0.00
Total Intangibles	\$0.00	\$0.00	\$0.00
Total Curr., Fixed & Intangible Assets	\$200,000.00	\$428,850.00	\$838,740.00
Liabilities			
Current Liabilities:			
Accounts Payable	\$0.00	\$0.00	\$0.00
Accrued Expenses Payable	\$0.00	\$0.00	\$0.00
Other	\$0.00	\$0.00	\$0.00
Total Current Liabilities	\$0.00	\$0.00	\$0.00
Long Term Liabilities:			
Notes Payable	\$0.00	\$0.00	\$0.00
Balloon Payments Due	\$0.00	\$0.00	\$0.00
Total Long Term Liabilities	\$0.00	\$0.00	\$0.00
Total Curr. & Long Term Liabilities	\$0.00	\$0.00	\$0.00
Net Worth = Assets- Liabilities	\$200,000.00	\$428,850.00	\$838,740.00

Profit & Loss Statement			
<i>Delta 420 LLC</i>			
Category	2019	2020	2021
Revenue			
Gross Sales	\$1,200,000.00	\$2,400,000.00	\$4,800,000.00
Less Charge Backs, Returns & Neg. Adjs.	\$0.00	\$0.00	\$0.00
Net Sales	\$1,200,000.00	\$2,400,000.00	\$4,800,000.00
Overall Cost of Products Sold 60%	\$720,000.00	\$1,440,000.00	\$2,880,000.00
Gross Profit	\$480,000.00	\$960,000.00	\$1,920,000.00
Operating Expenses			
Sales Expenses:			
Commissions	\$0.00	\$0.00	\$0.00
Payroll Taxes	\$0.00	\$0.00	\$0.00
Advertising and Marketing	\$3,000.00	\$6,000.00	\$12,000.00
Promotions and Various Events	\$600.00	\$1,200.00	\$2,400.00
Total Sales Expenses	\$3,600.00	\$7,200.00	\$14,400.00
Admin. & General Expenses:			
Salaries and Wages	\$90,000.00	\$180,000.00	\$360,000.00
Bonuses	\$600.00	\$600.00	\$600.00
Employee Benefits	\$6,000.00	\$6,000.00	\$6,000.00
Payroll Taxes 10%	\$9,000.00	\$18,000.00	\$36,000.00
Insurance	\$4,800.00	\$4,800.00	\$4,800.00
Lease Expenses/Maintenance	\$18,250.00	\$18,250.00	\$18,250.00
Miscellaneous Supplies	\$1,500.00	\$3,000.00	\$6,000.00
Telephone and Internet	\$3,600.00	\$3,600.00	\$3,600.00
Utilities	\$4,800.00	\$4,800.00	\$4,800.00
Licenses, Membership Costs and Dues	\$6,000.00	\$6,000.00	\$6,000.00
Legal & Accounting	\$12,000.00	\$15,000.00	\$18,000.00
Miscellaneous	\$3,000.00	\$6,000.00	\$12,000.00
Automobile and Travel Expenses	\$1,500.00	\$3,000.00	\$6,000.00
Entertainment	\$600.00	\$600.00	\$600.00
Total Admin. & General Expenses	\$161,650.00	\$269,650.00	\$482,650.00
Total Operating Expenses	\$165,250.00	\$276,850.00	\$497,050.00
Profits Or (Losses)			
Operating Profit or (Loss)	\$314,750.00	\$683,150.00	\$1,422,950.00
Adj. For Other Income (Int. Income, etc.)	\$0.00	\$0.00	\$0.00
Net Income or (Loss) Before Taxes	\$314,750.00	\$683,150.00	\$1,422,950.00
Income Taxes 40%	\$125,900.00	\$273,260.00	\$569,180.00
Net Income or (Loss) After Taxes	\$188,850.00	\$409,890.00	\$853,770.00

PLAN FOR OBTAINING LIABILITY INSURANCE

Delta 420 LLC (the “Company”) retail store, located at 199 Main Street, Blackstone, MA (“Facility”), has secured quotes from an established insurance company (name to be provided to the Cannabis Control Commission if requested) to purchase general liability and products liability coverage for the Facility in the amounts required in 935 CMR 500.105(10) - specifically, 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, and with the deductible for each policy being no higher than \$5,000 per occurrence. The Company is prepared to purchase such coverages for the Facility upon approval of this application.

SEPARATING RECREATIONAL FROM MEDICAL OPERATIONS, IF APPLICABLE

Not applicable.

QUALITY CONTROL AND TESTING

Delta 420 LLC (the “Company”), at its 199 Main Street, Blackstone, MA retail store, will implement and adhere to the following quality control and testing procedures as required by 935 CMR 101(1)(c)(7):

- Staff will review all product delivered from other licensed providers to ensure that it is, by appearance: (1) well cured and generally free of seeds and stems; (2) free of dirt, sand, debris, and other foreign matter; and (3) free of contamination by mold, rot, other fungus, and bacterial diseases.
- At all times, the Company staff will comply with Cannabis Control Commission (the “Commission”) requirements for the handling of marijuana including, but not limited to, the following:
 - To the extent the Company engages in any processing of marijuana, it shall do so in a safe and sanitary manner by doing the following:
 - If it processes plant and plant products, only processing the leaves and flowers of the female marijuana plant and keeping the product: (1) well cured and generally free of seeds and stems; (2) free of dirt, sand, debris, and other foreign matter; (3) free of contamination by mold, rot, other fungus, and bacterial diseases; (4) prepared and handled on food-grade stainless steel tables; and (5) packaged in a secure area;
 - If it processes non-edible marijuana products, the Company shall comply with all of the sanitary requirements in 935 CMR 105(3)(b), such as: (1) meeting Massachusetts food handling requirements; (2) complying with sanitary practices including personal hygiene and adequate handwashing before starting work and after hands are soiled or contaminated; (3) providing adequate space for equipment and storage of materials; (4) litter and waste will be properly removed and any operating systems for waste disposal shall be adequately maintained; (5) floors, walls and ceilings shall be kept clean and in good repair; (6) adequate safety lighting shall be maintained; (7) buildings, fixtures and physical facilities shall be kept in sanitary condition; (8) contact surfaces shall be kept in clean and sanitary condition using approved sanitary agents; (9) all potentially toxic items will be properly identified, held and stored in a manner that prevents contamination of product; (10) water supplies and plumbing toilet facilities will be adequate to a level that prevents contamination and takes waste

away from the establishment; and (11) all means of storage and transportation of finished products shall have sufficient measures to protect the products and prevent the products from becoming unsafe; and

- If it processes edible marijuana products, the Company shall assure that processing shall comply with applicable sanitary/sanitation requirements, including preparation, handling and storage in compliance with minimum sanitation standards for food establishments in 105 CMR 590.000.
- Staff also will review product received from other licensed providers for the presence of required testing results from independent testing laboratories that were commissioned by Licensed Medical Establishment (“LME”) counterparties; copies of any test results received from other LMEs shall be retained for not less than one year.
- Although product received from other licensed providers is itself subject to quality control testing requirements established by Commission rules, to the extent testing or retesting is required (such as if product received appears to be contaminated but capable of remediation), the Company will sample product and/or environmental media, if applicable, and send out such samples for testing by a licensed Independent Testing Laboratory to the extent required by the Commission in full compliance with requirements in 935 CMR 500.160 including, but not limited to:
 - Tests shall be performed in compliance with the medical cannabis product testing standards and protocols supported by the Commission;
 - Testing results on all samples shall be retained for not less than one year;
 - Sales of seeds are not subject to these testing requirements;
 - Sales of clones are subject to these testing requirements but are exempt from testing for metals;
 - Transportation to and from the Independent Testing Laboratory must comply with Commission rules at 935 CMR 500.105(13); and

- Any excess marijuana returned from the Independent Testing Laboratory for disposal must be properly disposed of by the Company in compliance with 935 CMR 500.105(12).
- To the extent the Company receives laboratory testing results indicating that the marijuana or marijuana product falls below Commission standards, the Company shall notify the Commission within 72 hours after becoming aware of such results.
- If the contaminated marijuana or marijuana product cannot be remediated, the Company shall dispose of the product (to the extent not already disposed of by the testing laboratory) and notify the Commission of such product disposal.
- To the extent the Company receives results indicating contamination after some product in such batch already has been sold to customers, the Company will reach out to each customer and request that they immediately return the product to the Company for replacement product at no cost or for a full refund.
- The Company will separately contact the source of the contaminated product, forward a copy of testing results if available, and request an action plan from such other Licensed Marijuana Establishment for addressing the source of contamination.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Delta 420 LLC (the “Company”) will maintain personnel policies suitable for an employer in the Commonwealth of Massachusetts at its 199 Main Street, Blackstone, MA retail store. Additionally, the Company will maintain and enforce personnel policies required by Cannabis Control Commission (“Commission”) rules, including, but not limited to, ensuring that (1) hiring is consistent with the Company’s Diversity Plan and Disproportionate Impact Plan, each submitted separately herewith; (2) employees pass background checks and secure Commission licenses as Marijuana Establishment Agents as a condition for being hired on a pay or voluntary basis; (3) references are checked prior to hiring all employees; (4) training is conducted for each employee each year to at least the minimum extent required by Commission rules, and records confirming same are signed for by the employee; and (5) records of personnel are maintained and retained in accordance with Commission record retention requirements.

Projected staff will include at least the following positions in addition to its Board of Directors:

- COO/President;
- General Manager;
- Budtender/Product Specialists/Sales Agent;
- Receptionist/Cashier;
- Security Personnel; and
- Security Personnel (Third Party Monitoring Service – Off-Site).

Please note that this projected personnel list may change once operations begin. More or fewer positions may become available depending on the demand for the product and the efficiency of the operation. Details of the duties of the Board and the above positions are listed in the qualifications and training procedures policy, separately submitted herewith.

In terms of employee conduct, the Company will immediately dismiss any employee who has:

- Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
- Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state or jurisdiction.

In terms of personnel recordkeeping, the Company will retain records of at least the following categories:

- Job descriptions for each employee and volunteer position;
- Organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent, to be retained until not less than 12 months following termination of the individual's affiliation with the Company, and that will specifically include, at minimum: (1) the registration information on the agent submitted in connection with individual agent licensure; (2) documentation of verification of references; (3) the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision; (4) 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; (5) documentation of periodic performance evaluations; (6) records of any disciplinary action taken; and (7) notice of completed responsible vendor and eight-hour related duty training;
- A staffing plan that will demonstrate accessible business hours;
- Personnel policies and procedures; and
- All background check reports obtained by the Company.

MAINTAINING OF FINANCIAL RECORDS

The Delta 420 LLC (the “Company”) retail store located at 199 Main Street, Blackstone, MA (“Facility”), will properly record sales in full compliance with Cannabis Control Commission (the “Commission”) rules and maintain records of same in the manner required by the Commission and applicable law. Sales recording and maintenance requirements include, but are not limited to, the following:

- The Company shall only use a point-of-sale system approved by the Commission, in consultation with the Department of Revenue and/or a sales recording module approved by the Department of Revenue.
- The Company shall not manipulate or alter sales data or make use of software or other methods to manipulate or alter sales data.
- The Company shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data.
- The Company shall maintain records that it has performed the monthly analysis and produce any such records upon Commission request.
- If the Company determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data, it shall: (1) immediately disclose the information to the Commission; (2) cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and (3) take such other action directed by the Commission to comply with applicable Commission rules.
- The Company shall comply with 830 CMR 62C.25.1: Record Retention and Department of Revenue Directive 16-1 regarding recordkeeping requirements.
- The Company shall adopt and maintain separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
- The Company will cooperate with any audits and examinations of the point-of-sale system used by the Company to ensure compliance with Massachusetts tax laws and Commission regulatory requirements.
- The Company is not colocated with a medical marijuana treatment center. Therefore, there is no ability or need for submission of preexisting medical sales data to the Commission for use in determining adequacy of marijuana and marijuana products. However, if the Company were colocated with a medical

marijuana treatment center, then the Company would maintain and provide to the Commission accurate sales data collected during the six months prior to the Company's application to ensure an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).

Records maintained by the Company will include financial records maintained in accordance with generally-accepted accounting principles. Additionally, the Company will maintain business records, which will be retained for at least two years after Facility closure, and which shall include manual or computerized records of the following items specified in Commission rules:

- The Company's assets and liabilities;
- Monetary transactions;
- Books of accounts, which shall include, but not be limited to, journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products; and
- Salary and wages paid to each employee, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with the Company.

Please note that many of the Company's records will be retained for periods longer than the minimum two years after Facility closure, including certain records not specified in Commission rules that will be retained permanently.

CONFIDENTIAL – EXEMPTED FROM PUBLIC RECORDS PER G.L. c. 4, § 7(26)(n)

RESTRICTING ACCESS TO AGE 21 OR OLDER

The Delta 420 LLC Facility at 199 Main Street in Blackstone, Massachusetts, will be an approximately 1,340 square foot dispensary structure. All employees and registered agents of Delta 420 LLC shall be 21 years of age or older. The Facility will include a customer entrance that will also be used by employees and deliveries. The main entrance, and any other access points, to the Facility will come with commercial grade locks, and will require the use of either a keycard or passcode to unlock the door.

Delta 420 LLC will never knowingly invite or allow a person under the age of 21 into the Facility. The Facility begins at the entrance where a licensed security employee will verify the customer is at least 21 years old, and from there he or she will unlock the secured door to let in the customer. If a customer cannot produce a valid ID, the customer may not enter the Facility. If the ID presented appears to be fake or altered, the security employee will seek to retain the ID and will contact appropriate law enforcement personnel.

The customer entrance will lead into a reception area that does not have cannabis or cannabis products, but will include state-mandated informational brochures. Before entering the product area, each customer must wait for his or her name to be called and a product specialist to accompany them.

The sales room will have sales counters (which will only be accessible to employees) with secure bins to house the marijuana products. Other display cases will have edibles, oils, lotions, and other marijuana-infused products (“MIPs”), but these will not be accessible to customers without a sales agent’s assistance. For commercial site visitors, such as law enforcement officers, health professionals, Commission (“Commission”) inspectors or staff, they will also enter through the main entrance and show identification, after which the receptionist will call management to provide assistance. Such commercial site visitors also must be at least 21 years old.

RECORDKEEPING PROCEDURES

The Delta 420 LLC retail store located at 199 Main Street, Blackstone, MA (“Facility”), will maintain required records and make them available for inspection by the Cannabis Control Commission (the “Commission”), upon request. These records will include the following records that will be retained for at least two years after Facility closure:

- Detailed written operating procedures in all areas specified by Commission rules;
- Inventory records;
- Seed-to-sale tracking records for all marijuana products;
- Recordkeeping mandated by Department of Revenue rules at 830 CMR 62C.25.1 and Department of Revenue directive 16-1 regarding recordkeeping requirements;
- The following personnel records:
 - Job descriptions for each employee and volunteer position;
 - Organizational charts consistent with the job descriptions;
 - Personnel records for each marijuana establishment agent which are to be maintained at least 12 months after termination of the individual’s affiliation with Delta 420, LLC and shall include (1) all materials submitted to the Commission pursuant to 935 CMR 500.030(2); (2) documentation of verification of references; (3) the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision; (4) 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; (5) documentation of periodic performance evaluations; (6) records of any disciplinary action taken; and (7) notice of completed and eight-hour duty training and, when applicable, responsible vendor;
 - A staffing plan that will demonstrate accessible business hours;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030.
- Business records, including, but not limited to:

- Assets and liabilities;
 - Monetary transactions;
 - Books of accounts;
 - Salary records; and
 - Salary and wages paid to each employee
- Waste disposal records, which shall be kept for at least three (3) years; and
 - Incident reports filed with the Commission and appropriate local law enforcement authorities.

Please note that many Delta 420, LLC records will be retained for periods longer than the minimum two years after Facility closure, including certain records not specified in Commission rules that will be retained permanently.

All financial records shall be maintained in accordance with generally accepted accounting principles.

QUALIFICATIONS AND TRAINING FOR MARIJUANA ESTABLISHMENT AGENT EMPLOYEES

Overview of Personnel

The Chief Operating Officer (“COO”) of the planned Delta 420 LLC retail store located at 199 Main Street, Blackstone, MA, is responsible for maintaining and updating a staffing plan that will ensure Delta 420 LLC has the right quantity of staff with the current skill set and experience to ensure the success of all operations, subject to leadership and overall supervision from the Delta 420 LLC Board of Directors. New employees may not work on-site until they have received initial orientation training and any critical task-specific training. All staff, both employees and volunteers, must be 21 years of age or older and hold a marijuana establishment agent license and registration card issued by the Cannabis Control Commission (the “Commission”).

Delta 420, LLC staff will potentially include up to and including the following positions:

- Chief Operating Officer/President
- General Manager
- Product Specialists/Budtender/Sales Agent
- Receptionist
- Security Personnel
- Security Monitors (Third Party Monitoring Service – Off-Site)

Roles, Responsibilities and Qualifications

COO/President:

- Responsible for providing business direction
- Responsible for creating, communicating, and implementing the organization’s vision, mission, and overall direction – i.e. leading the development and implementation of the overall organization’s strategy
- Responsible for fixing prices and signing business deals
- Responsible for recruitment
- Responsible for payment of salaries
- Responsible for signing checks and documents on behalf of the company

- Evaluates the success of the organization
- Responsible for payment of tax, levies and utility bills

General Manager:

- Responsible for managing the daily activities of the dispensary store
- Providing advice about printouts, product information in response to customer inquiries
- Responsible for recruiting, training and managing staff
- Responsible for processing orders and dispensing product
- Responsible for ordering, selling and controlling cannabis and cannabinoids and other stock
- Responsible for meeting recreational representatives from other licensed operations
- Responsible for managing the organization's budgets
- Responsible for keeping statistical and financial records
- Responsible for preparing publicity materials and displays
- Handles marketing services
- Interfaces with third-party providers (vendors)
- Controls the sales floor inventory
- Supervises the entire sales staff and workforce
- Handles any other duty as assigned by the COO

Product Budtender/Specialists/Sales Agent:

- Ensures that the store facility is in top shape and conducive to welcome customers (This includes turning on equipment such as computers, scales, printers and fax machines)
- Ensures that goods and products are properly arranged
- Responsible for processing orders

- Responsible for sterilizing the counter tops, scales, and measuring devices
- Handles administrative and bookkeeping tasks, inventory control, stocking shelves, and data entry
- Receives payments on behalf of the organization
- Issues receipt to customers
- Prepares financial report at the end of every working day and week
- Handles financial transactions on behalf of the company
- Interfaces with payment processing
- Handles any other duty as assigned by the floor manager
- Handles any other duty as assigned by management

Receptionist:

- Greets customers and verifies that customers have valid ID providing they are at least 21 years old
- Notifies customers when a Product Specialist is available to assist them
- Handles administrative and bookkeeping tasks, inventory control, stocking shelves, and data entry

Security:

- Maintains safe and secure environment for customers and employees by patrolling and monitoring premises and personnel
- Verifies customers' ID prior to entering premises. Security is in charge of opening the customer entrance after verifying ID
- Guarding the door and reception area when shipments and deliveries arrive to ensure a safe environment for transporting product and cash
- Obtains help by sounding alarms
- Prevents losses and damage by reporting irregularities; informing violators of policy and procedures; restraining trespassers

- Maintains organization's stability and reputation by complying with legal requirements
- Security will act as an agency representative in the absence of top management
- Monitor all clients and staff entering and leaving the building for security purposes
- Log in communications book all activities including deliveries, arrivals and departures
- Conduct security and safety walk-through of the building and grounds
- Intervene and defuse crisis situations. Call 911 for emergency help as required
- Report serious guideline violations to COO, immediately. Minor incidents will be reported during business hours
- Contributes to team effort by accomplishing related results as needed

Security Monitor (Contract Based, Off-Site):

- Off-site Security Monitor will oversee the safety and security of all employees and clients as well as the Facility
- Security ensures that clients entering and exiting the premises will abide by facility policy and guidelines
- Security will also perform other routine administrative tasks as required such as incident reports and maintenance requests; in addition to taking messages, as necessary for other clients

Employee Background Check and Training:

Delta 420, LLC will invest in training to ensure regulatory compliance, decrease turnover and deliver consistent service.

In order to be retained as an employee, the candidate must be age 21 or older, undergo a background check that complies with Commission requirements and become licensed by the Commission as a licensed marijuana agent.

Delta 420, LLC (or qualified third party) will provide training to produce quality cannabis and cannabis products, ensure regulatory compliance, and deliver consistent service.

Training will, at minimum, include not less than eight hours of training annually, or such other amounts as are required by the Commission, and will be completed within ninety (90) days of

each new hire. Each training is done one-on-one with the COO, a manager or an exceptional employee or, in appropriate cases, an outside vendor. Training topics will include, but not be limited to, the following areas:

- Local, state and federal cannabis laws and rules
- How to check customer and visitor IDs
- Personnel, product and premises security, including, but not limited to, display of ID badges on Facility employees and visitors to the Facility
- Marijuana and marijuana products handling procedures, including handwashing, sanitation practices, and ensuring product is in lawful, sale-able condition
- Locations of Limited Access Areas (“LAAs”), locations or knowledge of keys and lockcodes to such areas, and who are entitled to enter them.
- Recordkeeping and other specific regulatory responsibilities
- Strategies for avoiding diversion, theft and loss of cannabis products
- Protocols for emergency situations
- Protocols and requirements for transportation of cannabis products to and from the Facility, whether by Facility staff or by third-party transportation providers
- Incident reporting protocols
- Waste disposal procedures
- Quality control
- Effects of marijuana on the body and recognizing and preventing substance abuse
- Privacy and confidentiality of sensitive information.

Additionally, all current owners, managers, and employees will complete the Commission’s Responsible Vendor Program prior to the commencement of business operations. Employees hired thereafter shall complete the Responsible Vendor Program within 90 days of being hired. All documentation related to the Responsible Vendor Program will be retained for at least four (4) years.

Retail marijuana is a brand-new industry, which means there will be new products, customer feedback, and regulatory changes of which management and staff must learn about and remain apprised. Employees must be excited to participate in frequent training programs to stay up-to-date with the industry, and must be welcome to accepting feedback from both management and

customers. We are looking for intuitive, versatile employees who can talk to a diverse population of consumers.

DIVERSITY PLAN

The Delta 420, LLC cannabis retail store at 199 Main Street, Blackstone, MA will develop and implement a Diversity Plan (the “Plan”) consistent with the guidance of the Cannabis Control Commission (the “Commission”) and state and federal law. The Plan will be established in conjunction with comprehensive anti-harassment and reasonable accommodation policies, and consistent with appropriate recordkeeping policies and procedures.

I. Plan Goals

The goals of the Plan will be for Delta 420, LLC to hire, train and retain a high quality, diverse workforce, consistent with the culture and diversity of the community in the Blackstone area. The emphasis of the Plan will be to recruit a diverse applicant pool and provide advancement opportunities for minority populations to create and maintain a diverse workplace and to support the success of minority employees in all protected classifications, including, but not limited to, race, gender, veteran status, disability status, sexual orientation and gender identity and expression.

II. Programs

Delta 420 LLC shall seek to hire at least fifty percent (50%) of its managers and staff from the following diverse categories of applicants: women; minorities; veterans; persons with disabilities; and LGBTQ+. To obtain a diverse applicant pool, recruiting efforts will include outreach via the internet and to local community organizations and schools, as well as the Department of Unemployment Assistance. Delta 420, LLC will seek to reach a diverse group of prospective employees through concerted efforts to connect in various ways to Blackstone and other nearby communities. Information about open positions will be disseminated as needed and, at least, quarterly via the internet, listings at local college placement offices, participation in job fairs sponsored by local colleges, and contact with varied community organizations, as well as the Department of Unemployment Assistance, to encourage diversity among job applicants. All listings and outreach efforts should make clear that candidates must be age 21 or older, and Delta 420, LLC will solicit and receive written authorization from each organization prior to communicating job openings.

Particular care will be paid to each aspect of the hiring process, including job applications, interviewing, background checks and orientation to support the goals of the Plan. Staff involved in any manner with hiring process, including but not limited to, training of the Diversity Officer named to direct and monitor implementation of this Plan, will be properly trained and the process will be carefully monitored so as to optimize opportunity for job candidates who are in protected classifications, in compliance with the guidance of the Cannabis Control Commission and applicable law.

III. Measurement and Accountability

Regularly assessing success will be a key component of the Plan. Delta 420, LLC will periodically gather pertinent information to measure the efficacy of each of the programs under

the Plan by evaluating the diversity profile of its applicant pool and employees at every level of the organization. All means used for this purpose will comply with applicable state and federal law. As needed, based on the results of each assessment, recruitment and hiring, training and retention and advancement programs will be modified to more effectively achieve the goals of the Plan.

At the end of the first year from receipt of a provisional license, and each year thereafter in connection with submission of its renewal application to the Commission, Delta 420, LLC will undertake written assessments of its success in attracting and retaining a diverse workforce, consistent with the goals of the Plan and will submit such at each renewal period. The written assessment will include, but not be limited to, (1) self-reported and/or objective data on the characteristics of the overall applicant pool, (2) self-reported and/or objective data on the characteristics of the overall work force retained by Delta 420, LLC, at each level of the organization, (3) a written good faith evaluation of Delta 420, LLC's success at attracting and maintaining diverse applicant pools and workforce, and (4) recommendations for improving the effectiveness of Delta 420, LLC's diversity efforts. Such assessments will include evaluation of both qualitative and quantitative information.

IV. Diversity Officer

Delta 420, LLC recognizes that for the Plan to be effective, the day-to-day responsibility for implementation of the Plan and all related anti-harassment and reasonable accommodation policies must rest with the managerial and supervisory staff. It is the responsibility of all managers and supervisors to commit to the values and goals of the Plan. To coordinate all efforts, assess success, evaluate programs and serve as a resource to all employees, a Diversity Officer will have the primary responsibility for directing and monitoring implementation of the Plan in compliance with applicable state and federal law. He or she will exercise authority with the full support of the organization and its leadership. It will be his or her responsibility to:

- A. Develop policy statements and plans for dissemination of information about the Plan and its programs, both within and outside the organization.
- B. Ensure that the Plan and all anti-harassment and reasonable accommodation policies are strictly enforced.
- C. Provide and/or supervise training to all managers and supervisors consistent with the goals of the Plan and related policies.
- D. Identify and address problem areas and implement solutions.
- E. Design and implement reporting and assessment protocols consistent with the requirements of the Plan.
- F. Review recruitment materials, job postings and job descriptions, as well as qualifications for promotion and transfers, to ensure that they are consistent with the goals of the Plan.

- G. Monitor job offers, promotions, demotions, transfers, and terminations to ensure compliance with the Plan.
- H. Conduct company-wide compensation reviews and pay equity self-evaluations to ensure that wages and benefits are equitable and that they are competitive and attractive to new hires and current employees.

The Diversity Officer, once named, will immediately enroll in and complete 1-3 training programs in the areas of reasonable accommodation policies, and other programs that support and promote diversity. He or she will also attend at least one additional training program on an annual basis.

V. Acknowledgements

The Company acknowledges that it will adhere to the following minimum requirements:

- A. The Company has contacted and received permission, or will do so in the future, prior to communicating employment openings to all schools and organizations;
- B. The Company 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
- C. Any actions taken, or programs instituted, by the Company will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

DIVERSITY PLAN

The Delta 420, LLC cannabis retail store at 199 Main Street, Blackstone, MA will develop and implement a Diversity Plan (the “Plan”) consistent with the guidance of the Cannabis Control Commission (the “Commission”) and state and federal law. The Plan will be established in conjunction with comprehensive anti-harassment and reasonable accommodation policies, and consistent with appropriate recordkeeping policies and procedures.

I. Plan Goals

The goals of the Plan will be for Delta 420, LLC to hire, train and retain a high quality, diverse workforce, consistent with the culture and diversity of the community in the Blackstone area. The emphasis of the Plan will be to recruit a diverse applicant pool and provide advancement opportunities for minority populations to create and maintain a diverse workplace and to support the success of minority employees in all protected classifications, including, but not limited to, race, gender, veteran status, disability status, sexual orientation and gender identity and expression.

II. Programs

Delta 420 LLC shall seek to hire at least fifty percent (50%) of its managers and staff from the following diverse categories of applicants: women; minorities; veterans; persons with disabilities; and LGBTQ+. To obtain a diverse applicant pool, recruiting efforts will include outreach via the internet and to local community organizations and colleges, as well as the Department of Unemployment Assistance. Delta 420, LLC will seek to reach a diverse group of prospective employees through concerted efforts to connect in various ways to Blackstone and other nearby communities. Information about open positions will be disseminated as needed and, at least, quarterly via the internet, listings at local college placement offices, participation in job fairs sponsored by local colleges, and contact with varied community organizations, as well as the Department of Unemployment Assistance, to encourage diversity among job applicants. All listings and outreach efforts should make clear that candidates must be age 21 or older, and Delta 420, LLC will solicit and receive written authorization from each organization prior to communicating job openings.

Particular care will be paid to each aspect of the hiring process, including job applications, interviewing, background checks and orientation to support the goals of the Plan. Staff involved in any manner with hiring process, including but not limited to, training of the Diversity Officer named to direct and monitor implementation of this Plan, will be properly trained and the process will be carefully monitored so as to optimize opportunity for job candidates who are in protected classifications, in compliance with the guidance of the Cannabis Control Commission and applicable law.

III. Measurement and Accountability

Regularly assessing success will be a key component of the Plan. Delta 420, LLC will periodically gather pertinent information to measure the efficacy of each of the programs under

the Plan by evaluating the diversity profile of its applicant pool and employees at every level of the organization. All means used for this purpose will comply with applicable state and federal law. As needed, based on the results of each assessment, recruitment and hiring, training and retention and advancement programs will be modified to more effectively achieve the goals of the Plan.

At the end of the first year from receipt of a provisional license, and each year thereafter in connection with submission of its renewal application to the Commission, Delta 420, LLC will undertake written assessments of its success in attracting and retaining a diverse workforce, consistent with the goals of the Plan and will submit such at each renewal period. The written assessment will include, but not be limited to, (1) self-reported and/or objective data on the characteristics of the overall applicant pool, (2) self-reported and/or objective data on the characteristics of the overall work force retained by Delta 420, LLC, at each level of the organization, (3) a written good faith evaluation of Delta 420, LLC's success at attracting and maintaining diverse applicant pools and workforce, and (4) recommendations for improving the effectiveness of Delta 420, LLC's diversity efforts. Such assessments will include evaluation of both qualitative and quantitative information.

IV. Diversity Officer

Delta 420, LLC recognizes that for the Plan to be effective, the day-to-day responsibility for implementation of the Plan and all related anti-harassment and reasonable accommodation policies must rest with the managerial and supervisory staff. It is the responsibility of all managers and supervisors to commit to the values and goals of the Plan. To coordinate all efforts, assess success, evaluate programs and serve as a resource to all employees, a Diversity Officer will have the primary responsibility for directing and monitoring implementation of the Plan in compliance with applicable state and federal law. He or she will exercise authority with the full support of the organization and its leadership. It will be his or her responsibility to:

- A. Develop policy statements and plans for dissemination of information about the Plan and its programs, both within and outside the organization.
- B. Ensure that the Plan and all anti-harassment and reasonable accommodation policies are strictly enforced.
- C. Provide and/or supervise training to all managers and supervisors consistent with the goals of the Plan and related policies.
- D. Identify and address problem areas and implement solutions.
- E. Design and implement reporting and assessment protocols consistent with the requirements of the Plan.
- F. Review recruitment materials, job postings and job descriptions, as well as qualifications for promotion and transfers, to ensure that they are consistent with the goals of the Plan.

- G. Monitor job offers, promotions, demotions, transfers, and terminations to ensure compliance with the Plan.
- H. Conduct company-wide compensation reviews and pay equity self-evaluations to ensure that wages and benefits are equitable and that they are competitive and attractive to new hires and current employees.

The Diversity Officer, once named, will immediately enroll in and complete 1-3 training programs in the areas of reasonable accommodation policies, and other programs that support and promote diversity. He or she will also attend at least one additional training program on an annual basis.

V. Acknowledgements

The Company acknowledges that it will adhere to the following minimum requirements:

- A. The Company has contacted and received permission, or will do so in the future, prior to communicating employment openings to all colleges and organizations;
- B. The Company 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
- C. Any actions taken, or programs instituted, by the Company will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.