



Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC281618
Original Issued Date: 11/30/2020
Issued Date: 11/30/2020
Expiration Date: 11/30/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Emerald City Growers Incorporated

Phone Number: 978-337-0590 Email Address: emeraldcitygrowersinc@gmail.com

Business Address 1: 843 Main Street

Business Address 2:

Business City: Clinton

Business State: MA

Business Zip Code: 01510

Mailing Address 1: 25 Juniper Street

Mailing Address 2:

Mailing City: Billerica

Mailing State: MA

Mailing Zip Code: 01862

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Woman-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: 25.5

Percentage Of Control: 25.5

Role: Owner / Partner

Other Role:

First Name: Karol

Last Name: Simon

Suffix:

Gender: Female

User Defined Gender:

Date generated: 12/03/2020

Page: 1 of 7

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 25.5

Percentage Of Control: 25.5

Role: Owner / Partner

Other Role:

First Name: Anne

Last Name: Rosone Franco Suffix:

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 24.5

Percentage Of Control: 24.5

Role: Owner / Partner

Other Role:

First Name: Attila

Last Name: Simon Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 24.5

Percentage Of Control: 24.5

Role: Owner / Partner

Other Role:

First Name: John

Last Name: Franco Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 5

Percentage Of Ownership:

Percentage Of Control:

Role: Executive / Officer

Other Role:

First Name: Dalton

Last Name: Simon Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 6

Percentage Of Ownership:

Percentage Of Control:

Role: Executive / Officer

Other Role:

First Name: Blake

Last Name: Simon Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

Date generated: 12/03/2020

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: John Last Name: Franco Suffix:
Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$900000 Percentage of Initial Capital: 53
Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Attila Last Name: Simon Suffix:
Types of Capital: Land, Buildings, Monetary/Equity Other Type of Capital: Use of \$300,000 of land/building Total Value of the Capital Provided: \$800000 Percentage of Initial Capital: 47
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: 843 Main Street
Establishment Address 2:
Establishment City: Clinton Establishment Zip Code: 01510
Approximate square footage of the Establishment: 10000 How many abutters does this property have?: 26
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes
Cultivation Tier: Tier 02: 5,001 to 10,000 sq. ft. Cultivation Environment: Indoor

FEE QUESTIONS

Cultivation Tier: Tier 02: 5,001 to 10,000 sq. ft. Cultivation Environment: Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	ECG-Plan to Remain Compliant with Zoning.pdf	pdf	5dfbe67ed74bf6532e9ffb46	12/19/2019
Community Outreach Meeting Documentation	ECG-Community-Outreach-Meeting-Attestation-Form pt 4.pdf	pdf	5dfbedfafa65bd575070129f	12/19/2019
Community Outreach Meeting Documentation	ECG-Community-Outreach-Meeting-Attestation-Form pt 3.pdf	pdf	5dfbee060aa7ba5339f6c18c	12/19/2019
Community Outreach Meeting Documentation	ECG-Community-Outreach-Meeting-Attestation-Form pt 2.pdf	pdf	5dfbee1600f72d57285edbf7	12/19/2019
Community Outreach Meeting Documentation	ECG-Community-Outreach-Meeting-Attestation-Form pt 1.pdf	pdf	5dfbee29cb8cc6573ebd0a49	12/19/2019
Certification of Host Community Agreement	ECG-HCA Certification.JPG	jpeg	5dfd01cfcb8cc6573ebd0c27	12/20/2019

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
Other	ECG-MRCC Cult PIP letter.pdf	pdf	5dfbef94fab70557127ef051	12/19/2019
Plan for Positive Impact	Emerald City Growers PIP updated 5-20-2020.pdf	pdf	5ec7d6c68caba634a843a8bb	05/22/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role: President
First Name: Karol Last Name: Simon Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 2

Role: Owner / Partner Other Role: Treasurer
First Name: Attila Last Name: Simon Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 3

Role: Owner / Partner Other Role: Vice President
First Name: Anne Last Name: Rosone Franco Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 4

Role: Executive / Officer Other Role: Secretary
First Name: John Last Name: Franco Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 5

Role: Board Member Other Role: Operations Manager
First Name: Dalton Last Name: Simon Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 6

Role: Employee Other Role:
First Name: Blake Last Name: Simon Suffix:
RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	ECG-Sec of Comm CoGS.pdf	pdf	5dfbf07738f8ab571d6e1c2a	12/19/2019
Bylaws	ECG-Corporate Bylaws.pdf	pdf	5dfbf0790aa7ba5339f6c1b0	12/19/2019
Articles of Organization	ECG-Articles of Incorporation.pdf	pdf	5dfbf07ab7ff09534ba0032b	12/19/2019
Department of Revenue - Certificate of Good standing	DUA form Emerald City Growers.pdf	pdf	5ec6eb965f1314349d5fa189	05/21/2020
Department of Revenue - Certificate of Good standing	Emerald City Growers Inc DOR Certif of Good Standing 2020.pdf	pdf	5edd2b9b721f40180b730f5b	06/07/2020

No documents uploaded

Massachusetts Business Identification Number: 001341649

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	ECG-Proposed Business Timeline.pdf	pdf	5dfbf096ef24345344e4e5c0	12/19/2019
Business Plan	ECG-Business Plan.pdf	pdf	5dfd0b2b2f1a0653113963b1	12/20/2019
Plan for Liability Insurance	Emerald City Growers - Letter of Intent to Bind Coverage.pdf	pdf	5dfd4088f76dd253236e1ac6	12/20/2019

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Transportation of marijuana	ECG_Transportation SOPs.pdf	pdf	5dfbf255fab70557127ef094	12/19/2019
Storage of marijuana	ECG_Storage SOPs.pdf	pdf	5dfbf257f76dd253236e17b8	12/19/2019
Restricting Access to age 21 and older	ECG_Restricting To Over 21 SOPs.pdf	pdf	5dfbf25abb37d053183de0df	12/19/2019
Record Keeping procedures	ECG_Record Keeping SOPs.pdf	pdf	5dfbf271bb37d053183de0e3	12/19/2019
Quality control and testing	ECG_Quality Control SOPs.pdf	pdf	5dfbf272cb8cc6573ebd0a9c	12/19/2019
Qualifications and training	ECG_Qualifications & Training.pdf	pdf	5dfbf27400f72d57285edc44	12/19/2019
Maintaining of financial	ECG_Financial Records SOPs.pdf	pdf	5dfbf2980557385733b4114d	12/19/2019

records				
Policies and Procedures for cultivating.	ECG_Cultivation SOPs.pdf	pdf	5dfbf29afe65bd57507012f6	12/19/2019
Prevention of diversion	ECG_Diversion Prevention SOPs.pdf	pdf	5dfbf29b5e2d54535a9c1784	12/19/2019
Inventory procedures	ECG_Inventory SOPs.pdf	pdf	5dfbf2a9cb8cc6573ebd0aa2	12/19/2019
Security plan	Emerald City Security Plan updated 5-18-2020.pdf	pdf	5ec2b8881cd17834bad6343a	05/18/2020
Personnel policies including background checks	Updated Emerald City Personnel Policies including Background Checks 5-20-2020.pdf	pdf	5ec7d83d5fa02a2d3651e9e3	05/22/2020
Diversity plan	Emerald City Growers updated 05-20-20 - Diversity Plan.pdf	pdf	5ec7d84c5c6c422d41afcdb4	05/22/2020

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 8:00 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: 7:30 PM

Emerald City Growers Inc.
Plan to Remain Compliant with Local Zoning

Emerald City Growers Inc. (“the Company”) is committed to remaining in compliance with all applicable zoning bylaws of the Town of Clinton, MA, including, but not limited to Section 3130 Table of Use Regulations, Section 6800 Recreational Marijuana Establishments, 6840 Special Permit, Section 9300 Special Permits, Section 9400 Site Plan Review, and Section 10000 Definitions. The Company’s facility is located at 843 Main Street, which is in the Commercial Zoning District and which will require a special permit from the Planning Board. The facility’s location and construction shall comply with the requirements of Section 6830.

Pursuant to Section 6842, the Company shall comply with the Town of Clinton’s Zoning Bylaw’s procedural requirements, which shall consist of the following:

In addition to the submittal requirements described in Section 9300 of this By-law, applications [for a special permit] under this Section shall include the following: a. The name and address of each owner of the Marijuana Establishment; b. A copy of the license from the Cannabis Control Commission (although this is impossible to comply with under the Cannabis Control Commission’s implementing statute and regulations, which the Company shall inform the Town of Clinton); c. Evidence that the applicant has site control and right to use the site for a Marijuana Establishment; d. A copy of the security procedures approved [this is not something that can be complied with under the Commission’s regulations] by the Cannabis Control Commission for the Marijuana Establishment, including location and specification of lighting, fencing, gates, alarms, and other security devices. e. A copy of the emergency procedures approved [again, this is not something that can be complied with under the Commission’s regulations] by Cannabis Control Commission for the Marijuana Establishment; f. A detailed floor plan identifying the areas available and functional uses (including square footage); g. Depictions of all signage being proposed for the facility; and h. A description of all activities proposed for the site.

Section 6842 (please note that the comments in the brackets are from the Company’s attorney).

The Company’s use as a proposed cultivator, as defined by Section 10000, complies with Sections 3130 and 6800.

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2569 88

Article Number (Transfer from service label)
7018 0680 0001 2953 7676

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☒ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery
JUN 14 2

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery

☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

(over \$500) Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☒ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery
JUN 15 2019

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

7560

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2571 52

Article Number (Transfer from service label)
7018 0680 0001 2953 7546

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery
6-17

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

(over \$500) Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2571 76

Article Number (Transfer from service label)

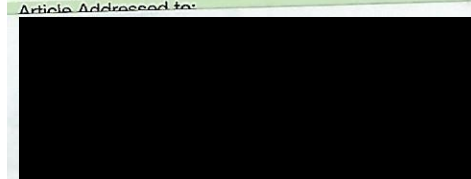
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SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2570 22

Article Number (Transfer from service label)
7018 0680 0001 2953 7713

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery
6/17

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

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☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

(over \$500) Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2570 91

Article Number (Transfer from service label)

7018 0680 0001 2953 7485

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee <input type="checkbox"/> Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7018 0680 0001 2953 7539</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee <input type="checkbox"/> Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7018 0680 0001 2953 7638</p>		<p>B. Received by (Printed Name) C. Date of Delivery 6/14</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee <input type="checkbox"/> Date of Delivery</p>	
<p>1. Article Addressed to:</p> <p>2. Article Number (Transfer from service label)</p> <p>7018 0680 0001 2953 7492</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery</p>		<p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

Irienne Porter
e Mensing Group LLC
5 Adams Street
n, MA 01746-2221



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Mensing Group LLC
Adams Street
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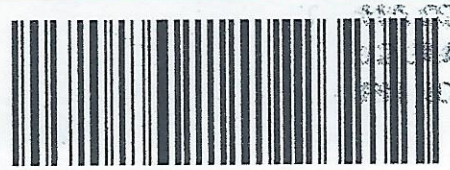
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ANK

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Irienne Porter
e Mensing Group LLC
5 Adams Street
n, MA 01746-2221

CERTIFIED MAIL



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NAME: _____
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Adrienne Porter
ATTN: The Mensing Group LLC
135 Adams Street
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CERTIFIED MAIL®



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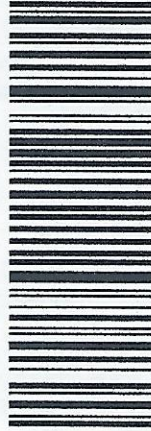
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BC: 01746146935

Adrienne Porter
ATTN: The Mensing Group LLC
135 Adams Street
Holliston, MA 01746-2221

CERTIFIED MAIL®



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Adrienne Porter
ATTN: The Mensing Group LLC
135 Adams Street
Holliston, MA 01746-2221

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RETURN TO SENDER
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UNABLE TO FORWARD

BC: 01746146935 *1521-07691-12-45

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01510-3559

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CERTIFIED MAIL

Adrienne Porter
ATTN: The Mensing Group LLC
135 Adams Street
Holliston, MA 01746-2221



7018 0680 0001 2953 7553



1000



01510

U.S. POST
FCM LETTER
HOLLISTON
01746
JUN 12 19
AMOUNT

\$6

R2305P151

NIXIE 015 DE 1 0007/02/19

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

BC: 01746146935 *2021-06030-12-45

01746-1459
01510-3559

--93000000000000000000

may
6/25/19
6/30
6/30

BC
may
6/1/19

Attachment C

June 12, 2019

To whom it may concern:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 20, 2019 at 6:30 pm at the Bigelow Free Public Library, 54 Walnut Street, Clinton, MA 01510. The proposed Marijuana Cultivation Establishment is anticipated to be located at 843 Main Street, Clinton, MA 01510. There will be an opportunity for the public to ask questions.

The Mensing Group LLC

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*
 B. Received by (Printed Name)
 C. Date of Delivery
 D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY
 A. Signature *[Signature]*
 B. Received by (Printed Name)
 C. Date of Delivery
 D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☐ Priority Mail Express
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery



9590 9402 4464 8248 7276 28

Article Number (Transfer from service label)

7018 0680 0001 2953 7584

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*
 B. Received by (Printed Name)
 C. Date of Delivery
 D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4464 8248 7276 66

Article Number (Transfer from service label)

7018 0680 0001 2953 7621



9590 9402 4464 8248 7276 11

Article Number (Transfer from service label)

7018 0680 0001 2953 7577

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*
 B. Received by (Printed Name)
 C. Date of Delivery
 D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*
 B. Received by (Printed Name)
 C. Date of Delivery
 D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery



9590 9402 4444 8248 2570 15

Article Number (Transfer from service label)

7018 0680 0001 2953 7706

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2571 21

Article Number (Transfer from service label)

7018 0680 0001 2953 7515

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Town Clerk
242 Church Street
Clinton, MA 01510



9590 9402 4444 8248 2570 84

Article Number (Transfer from service label)

7018 0680 0001 2953 7478

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature ☐ Priority Mail Express
☐ Adult Signature Restricted Delivery ☐ Registered Mail
☒ Certified Mail® ☐ Registered Mail Restricted Delivery
☐ Collect on Delivery ☐ Return Receipt Merchandise
☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature ☐ Priority Mail Express
☐ Adult Signature Restricted Delivery ☐ Registered Mail
☒ Certified Mail® ☐ Registered Mail Restricted Delivery
☐ Collect on Delivery ☐ Return Receipt Merchandise
☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Planning Board
242 Church Street
Clinton, MA 01510



9590 9402 4444 8248 2570 77

Article Number (Transfer from service label)

7018 0680 0001 2953 7461

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature ☐ Priority Mail Express
☐ Adult Signature Restricted Delivery ☐ Registered Mail
☒ Certified Mail® ☐ Registered Mail Restricted Delivery
☐ Collect on Delivery ☐ Return Receipt Merchandise
☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature ☐ Priority Mail Express
☐ Adult Signature Restricted Delivery ☐ Registered Mail
☒ Certified Mail® ☐ Registered Mail Restricted Delivery
☐ Collect on Delivery ☐ Return Receipt Merchandise
☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

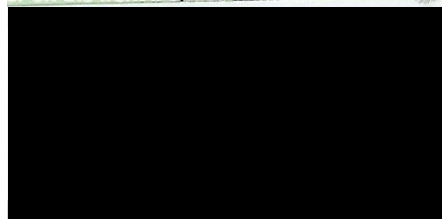
Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2571 38

Article Number (Transfer from service label)

7018 0680 0001 2953 7522

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☒ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature ☐ Priority Mail Express
☐ Adult Signature Restricted Delivery ☐ Registered Mail
☒ Certified Mail® ☐ Registered Mail Restricted Delivery
☐ Collect on Delivery ☐ Return Receipt Merchandise
☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

Community & Economic Development
242 Church Street
Clinton, MA 01510



9590 9402 4444 8248 2570 60

7018 0680 0001 2953 7454

2.

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4464 8248 7276 59

Article Number (Transfer from service label)

7018 0680 0001 2953 7614

Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ A
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☒ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

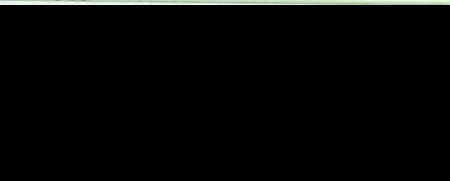
COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.



COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ A
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2569 64

2. Article Number (Transfer from service label)
7018 0680 0001 2953 7614



9590 9402 4444 8248 2571 14

Article Number (Transfer from service label)

7018 0680 0001 2953 7508

Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ A
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

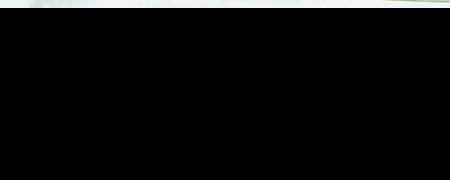
COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.



3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION

Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2570 08

2. Article Number (Transfer from service label)
7018 0680 0001 2953 7690



9590 9402 4444 8248 2569 71

Article Number (Transfer from service label)

7018 0680 0001 2953 7669

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4464 8248 7276 59

Article Number (Transfer from service label)

7018 0680 0001 2953 7614

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ A
X *[Signature]* ☐ B
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☒ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

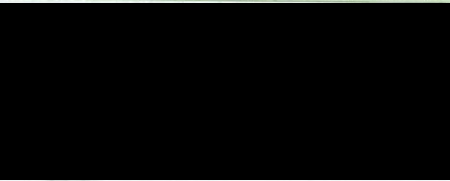
COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent
X *[Signature]* ☐ Addressee
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☒ No

3. Service Type
☐ Priority Mail Express
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.



COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ A
X *[Signature]* ☐ B
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

■ Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2569 64

2. Article Number (Transfer from service label)

7018 0680 0001 2953 7614



9590 9402 4444 8248 2571 14

Article Number (Transfer from service label)

7018 0680 0001 2953 7508

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ A
X *[Signature]* ☐ B
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent
X *[Signature]* ☐ Addressee
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☒ No

3. Service Type
☐ Priority Mail Express
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery



9590 9402 4444 8248 2569 71

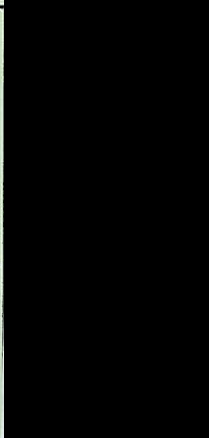
7018 0680 0001 2953 7669

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

R: COMPLETE THIS SECTION

■ Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2570 08

2. Article Number (Transfer from service label)

7018 0680 0001 2953 7690

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2569 88

Article Number (Transfer from service label)
7018 0680 0001 2953 7676

Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature] B. Received by (Printed Name)

C. Date of Delivery JUN 14 2

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Priority Mail Express
- ☐ Registered Mail
- ☐ Registered Mail Delivery
- ☐ Return Receipt Merchandise
- ☐ Signature Confirmation
- ☐ Signature Confirmation Restricted Delivery

(over \$500)

Restricted Delivery

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature]

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Priority Mail Express
- ☐ Registered Mail
- ☐ Registered Mail Delivery
- ☐ Return Receipt Merchandise
- ☐ Signature Confirmation
- ☐ Signature Confirmation Restricted Delivery

(over \$500)

Restricted Delivery

Domestic Return

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2571 52

Article Number (Transfer from service label)
7018 0680 0001 2953 7546

Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature] B. Received by (Printed Name)

C. Date of Delivery 6-17

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Priority Mail Express
- ☐ Registered Mail
- ☐ Registered Mail Delivery
- ☐ Return Receipt Merchandise
- ☐ Signature Confirmation
- ☐ Signature Confirmation Restricted Delivery

(over \$500)

Restricted Delivery

Domestic Return

SENDER: COMPLETE THIS SECTION

- ☒ Complete items 1, 2, and 3.
- ☒ Print your name and address on the reverse so that we can return the card to you.
- ☒ Attach this card to the back of the mailpiece, or on the front if space permits.

Domestic Return

Article Number (Transfer from service label)

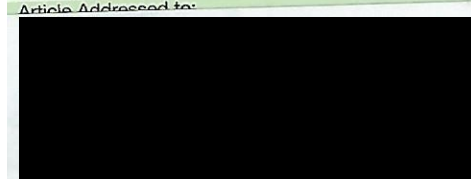
7018 0680 0001 2953 7560

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2570 22

Article Number (Transfer from service label)
7018 0680 0001 2953 7713

Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature] B. Received by (Printed Name)

C. Date of Delivery 6/17

D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Priority Mail Express
- ☐ Registered Mail
- ☐ Registered Mail Delivery
- ☐ Return Receipt Merchandise
- ☐ Signature Confirmation
- ☐ Signature Confirmation Restricted Delivery

(over \$500)

Restricted Delivery

Domestic Return

SENDER: COMPLETE THIS SECTION

- ☒ Complete items 1, 2, and 3.
- ☒ Print your name and address on the reverse so that we can return the card to you.
- ☒ Attach this card to the back of the mailpiece, or on the front if space permits.

Domestic Return

Article Number (Transfer from service label)

7018 0680 0001 2953 7485

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature</p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><input type="checkbox"/> Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7018 0680 0001 2953 7539</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>		<p>Restricted Delivery</p>	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature</p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><input type="checkbox"/> Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7018 0680 0001 2953 7638</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>		<p>Restricted Delivery</p>	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature</p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><input type="checkbox"/> Date of Delivery</p>	
<p>1. Article Addressed to:</p> <p>2. Article Number (Transfer from service label)</p> <p>7018 0680 0001 2953 7492</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>		<p>Restricted Delivery</p>	

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

Irienne Porter
e Mensing Group LLC
5 Adams Street
n, MA 01746-2221



7018 0680 0001 2953 7430



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01510



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RETURN TO SENDER
UNCLAIMED
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.. 93000000000000000000

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BC: 01746146935

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enne Porter
Mensing Group LLC
Adams Street
, MA 01746-2221

CERTIFIED MAIL®



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RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD

.. 9303610654809488

ANK

BC: 01746146935

*2021-05936-12-45

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Irienne Porter
e Mensing Group LLC
5 Adams Street
n, MA 01746-2221

CERTIFIED MAIL®



7018 0680 0001 2953 7645



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AMOUNT
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R2305P151

6-18-19
26-19

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NAME: _____

1ST NOTICE

NIXIE

015 FE 1

0006/14/19

Adrienne Porter
ATTN: The Mensing Group LLC
135 Adams Street
Holliston, MA 01746-2221

CERTIFIED MAIL®



7018 0680 0001 2953 7591



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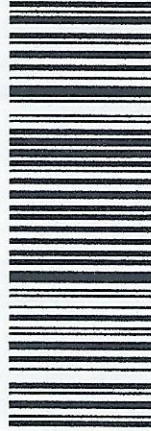
NIXIE 015 DE
RETURN TO
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BC: 01746146935

Adrienne Porter
ATTN: The Mensing Group LLC
135 Adams Street
Holliston, MA 01746-2221

CERTIFIED MAIL®



7018 0680 0001 2953 7683



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01510

U.S. POST
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01746
JUN 12 1
AMOUNT
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May 15/19
6/15/20
6/20/20

NIXIE 015 DE 1
RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

0151046146935

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BC: 01746146935

*2021-00086-12-46

ACQUAINTANCE

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AMOUNT
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RETURN TO SENDER
UNCLAINED
UNABLE TO FORWARD

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- 9300000000

Adrienne Porter



U.S. POST/FCM LETTER
HOLLISTON
01746
JUN 12 19
AMOUNT
\$6.
R2305P151

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RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

BC: 01746146935 *2021-06030-12-45

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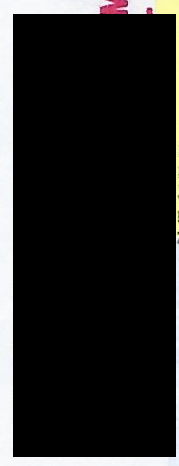
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CERTIFIED MAIL®



7018 0680 0001 2953 7553

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RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

BC: 01746146935 *2021-06030-12-45

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, Karol Simon, President, *(insert name)* attest as an authorized representative of Emerald City Growers Inc. *(insert name of applicant)* that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on June 20, 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 June 12, 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 June 12, 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 June 12, 2019 *(insert date)*, which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C *(please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee)*.

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

Attachment B

June 12, 2019

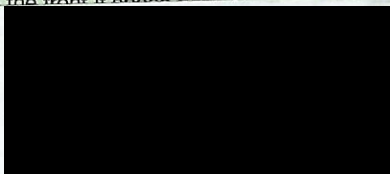
To whom it may concern:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 20, 2019 at 6:30 pm at the Bigelow Free Public Library, 54 Walnut Street, Clinton, MA 01510. The proposed Marijuana Cultivation Establishment is anticipated to be located at 843 Main Street, Clinton, MA 01510. There will be an opportunity for the public to ask questions.

The Mensing Group LLC

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4464 8248 7276 28

Article Number (Transfer from service label)

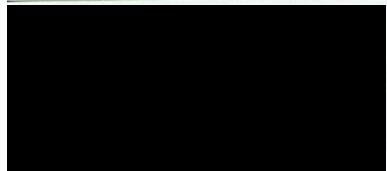
7018 0680 0001 2953 7584

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4464 8248 7276 11

Article Number (Transfer from service label)

7018 0680 0001 2953 7577

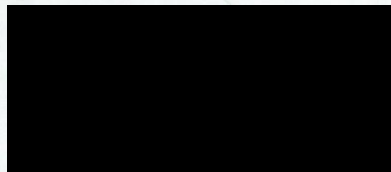
Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:



9590 9402 4444 8248 2570 15

Article Number (Transfer from service label)

7018 0680 0001 2953 7706

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*

B. Received by (Printed Name) *[Name]*

C. Date of Delivery *[Date]*

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express

☐ Registered Mail

☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation

☐ Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*

B. Received by (Printed Name) *[Name]*

C. Date of Delivery *[Date]*

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Priority Mail Express

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation

☐ Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*

B. Received by (Printed Name) *[Name]*

C. Date of Delivery *[Date]*

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express

☐ Registered Mail

☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation

☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

3. Service Type

☐ Priority Mail Express

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation

☐ Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]*

B. Received by (Printed Name) *[Name]*

C. Date of Delivery *[Date]*

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Priority Mail Express®

☐ Registered Mail™

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

3. Service Type

☐ Priority Mail Express

☐ Registered Mail

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation

☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Town Clerk
242 Church Street
Clinton, MA 01510



9590 9402 4444 8248 2570 84

Article Number (Transfer from service label)

7018 0680 0001 2953 7478

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature ☐ Priority Mail Express
☐ Adult Signature Restricted Delivery ☐ Registered Mail
☒ Certified Mail® ☐ Registered Mail Restricted Delivery
☐ Collect on Delivery ☐ Return Receipt Merchandise
☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Priority Mail Express
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Planning Board
242 Church Street
Clinton, MA 01510



9590 9402 4444 8248 2570 77

Article Number (Transfer from service label)

7018 0680 0001 2953 7461

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature ☐ Priority Mail Express
☐ Adult Signature Restricted Delivery ☐ Registered Mail
☒ Certified Mail® ☐ Registered Mail Restricted Delivery
☐ Collect on Delivery ☐ Return Receipt Merchandise
☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

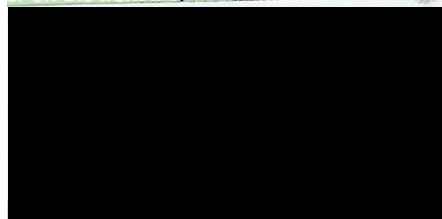
3. Service Type
☐ Priority Mail Express®
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Return Receipt Merchandise
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.



9590 9402 4444 8248 2571 38

Article Number (Transfer from service label)

7018 0680 0001 2953 7522

Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☒ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature ☐ Priority Mail Express
☐ Adult Signature Restricted Delivery ☐ Registered Mail
☒ Certified Mail® ☐ Registered Mail Restricted Delivery
☐ Collect on Delivery ☐ Return Receipt Merchandise
☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery

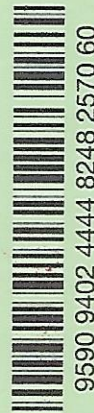
Restricted Delivery

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

Community & Economic Development
242 Church Street
Clinton, MA 01510



9590 9402 4444 8248 2570 60

7018 0680 0001 2953 7454

2.



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, Karol Simon - President, (*insert name*) certify as an authorized representative of Emerald City Growers, Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with Town of Clinton, Massachusetts (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on January 23, 2019 (*insert date*).

Signature of Authorized Representative of Applicant

Host Community

I, Michael J. Ward - Town Administrator, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Clinton Board of Selectmen (*insert name of host community*) to certify that the applicant and Town of Clinton, Massachusetts (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on January 23, 2019 (*insert date*).

Signature of Contracting Authority or
Authorized Representative of Host Community

EMERALD CITY GROWERS INC.
POSITIVE IMPACT PLAN

Goals: Provide financial support to Massachusetts Recreational Consumer Council because they are an entity that offers support, education and/or job training to Massachusetts residents disproportionately impacted by the War on Drugs. The amount of this donation will depend on the financial growth and profitability of the company. As sales and profits increase, Emerald City Growers Inc. (“Emerald City”) will revisit its program donation goals to consider more generous donations as business allows.

Goal: Donate a total of \$5,000.00 annually to the organization as more particularly described below.

Program: The donation to be made to the following organization are intended to benefit its ability to develop skills for Economic Empowerment Priority Applicants and Social Equity Training Program participants through mentoring, educational and informational events with cannabis industry networking opportunities, and to provide financial support to allow them to continue educating adult-use cannabis consumers in Massachusetts:

1. Massachusetts Recreational Consumer Council (\$5,000.00 annual donation)

Measurement and Accountability: At the end of each year, Emerald City will conduct an analysis and create a report on the amounts and percentages of donations and other financial support that the company has given to the program outlined above. Emerald City will continue to assess the viability and impact of financial donations made, and annually review donation goal amounts.

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

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

Emerald City expressly understands that the progress or success of this plan will be required to be demonstrated upon each annual license renewal period in conformity with 935 CMR 500.101(1) and (2).



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

William Francis Galvin
Secretary of the
Commonwealth

Date: December 16, 2019

To Whom It May Concern :

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

EMERALD CITY GROWERS INCORPORATED

is a domestic corporation organized on **August 19, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

A handwritten signature in blue ink that reads "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 19120419070

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

Processed by:

EMERALD CITY GROWERS INC.
BYLAWS

SECTION 1 Articles of Organization

The name of the corporation shall be as set forth in the articles of organization. These bylaws, the powers of the corporation and of its directors and shareholders, and all matters concerning the conduct and regulation of the business of the corporation shall be subject to the articles of organization. All references in these bylaws to the articles of organization shall mean the articles of organization of the corporation, as from time to time in effect. All references in these bylaws to the Massachusetts Business Corporation Act shall mean Massachusetts General Laws Chapter 156D, as from time to time in effect.

SECTION 2 Shareholders

2.1 Annual Meeting

The annual meeting of the shareholders shall be held on the [third Tuesday of March] if it is not a legal holiday, and if it is a legal holiday, then on the next succeeding day not a legal holiday, at the hour stated in the written notice of such meeting, or on such other date as may be determined by the board of directors. Except as otherwise may be provided in the articles of organization, purposes for which an annual meeting is to be held, in addition to the election of directors, may be specified by the board of directors or by the President and stated in the notice of the meeting.

2.2 Special Meetings

Special meetings of the shareholders may be called by the President or the board of directors. A special meeting of the shareholders shall be called by the Secretary, or in the case of the death, absence, incapacity, or refusal of the Secretary, by any other officer, if the holders of at least 10 percent of the votes entitled to be cast on any issue to be considered at the proposed special meeting sign, date, and deliver to the Secretary one or more demands for the meeting describing the purpose for which it is to be held. Such call shall state the date, time, place, and purposes of the meeting.

2.3 Place of Meetings; Remote Participation

All meetings of the shareholders shall be at the principal office of the corporation or at such other place as the board of directors, the President, or the person or persons calling into the meeting may determine. If authorized by the directors, any meeting of shareholders need not be held at any place but instead may be held solely by remote communication. Shareholders and proxyholders not physically present at a meeting of shareholders may participate in a meeting of shareholders, be deemed present in person, and vote at a meeting of shareholders, by means of remote communication, subject to such guidelines and procedures as the board of directors may adopt. Such guidelines and procedures shall include reasonable measures (1) to verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxyholder, and (2) to provide such shareholders and proxyholders a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings. If any shareholder or proxyholder votes or takes other action at the meeting by means of remote communication, the corporation shall maintain a record of such vote or other action.

2.4 Notice of Shareholder Meetings

A written notice of each meeting of shareholders, stating the place, day, and hour of such meeting and the purposes for which the meeting is called, shall be given by the Secretary, Assistant Secretary, President, or such person designated by the board of directors, at least seven and no more than 60 days before the meeting, to each shareholder entitled to such notice. A shareholder may waive any notice required by the Massachusetts Business Corporation Act, the articles of organization, or the bylaws before or after the

date and time stated in the notice. The waiver shall be in writing, signed by the shareholder entitled to the notice, and delivered to the corporation for inclusion with the records of the meeting. A shareholder's attendance at a meeting waives objection to lack of notice or defective notice of the meeting, unless the shareholder at the beginning of the meeting objects to holding the meeting or transacting business at the meeting. A shareholder's attendance at a meeting waives objection to consideration of a particular matter at the meeting that is not within the purpose or purposes described in the meeting notice, unless the shareholder objects to considering the matter when it is presented.

2.5 Action at Meeting

Unless otherwise provided by the Massachusetts Business Corporation Act, the articles of organization, or these bylaws, at any meeting of the shareholders, a majority of the votes entitled to be cast upon a matter by a voting group at the meeting shall constitute a quorum of that voting group for action on that matter, but a lesser interest may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice. A share once represented for any purpose at a meeting is deemed present for quorum purposes for the remainder of the meeting and for any adjournment of that meeting unless: (1) the shareholder attends solely to object to lack of notice, defective notice, or the conduct of the meeting on other grounds, and does not vote the shares or otherwise consent that they are to be deemed present; or (2) in the case of an adjournment, a new record date is or shall be set for that adjourned meeting. Unless otherwise required by Massachusetts Business Corporation Act, the articles of organization, or these bylaws, if a quorum of a voting group exists, (1) favorable action on a matter, other than the election of directors, is taken by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, and (2) directors shall be elected by a plurality of the votes cast by the shares entitled to vote in the election at the meeting.

2.6 Voting and Proxies

Unless otherwise provided in the articles of organization, each share shall have one vote on any matter to be considered at the meeting. Shareholders may vote either in person or by proxy, which shall be filed with the Secretary or Temporary Secretary at the meeting, or any adjournment of the meeting, before being voted. Unless otherwise provided in the appointment form, a proxy is valid for 11 months from the date the shareholder signed the form, or if it is undated, from the date of its receipt by the officer or agent of the corporation. Such proxy shall entitle the holder thereof to vote at any adjournment of such meeting, but shall not be valid after the final adjournment of such meeting.

2.7 Action by Consent; Electronic Transmission

a. Any action required or permitted to be taken at a shareholders' meeting may be taken without a meeting if the action is taken either by all shareholders entitled to vote on the action, or to the extent permitted by the articles of organization, by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the dates of the signatures of such shareholders, and are delivered to the corporation for inclusion with the records of meetings within 60 days of the earliest dated consent delivered to the corporation. Such consents shall be treated as a vote of shareholders for all purposes. If the shareholders take action by written consent, the corporation shall give such notice of the action to shareholders who have not signed such consent as is required by the Massachusetts Business Corporation Act.

b. Any vote, consent, waiver, proxy appointment, or other action by a shareholder or by the proxy or other agent of any shareholder shall be considered given in writing, dated, and signed if it consists of an electronic transmission that sets forth or is delivered with information from which the corporation can determine (1) that the electronic transmission was transmitted by the shareholder, proxy, or agent or by a person authorized to act for the shareholder, proxy, or agent; and (2) the date on which such shareholder, proxy, agent, or authorized person transmitted the electronic transmission. The date on which the electronic transmission is transmitted shall be considered the date on which it was signed. The electronic transmission shall be considered received by the corporation if it has been sent to any address specified by the corporation for that purpose or, if no address has

been specified, to the principal office of the corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of shareholders.

SECTION 3 Directors

3.1 Number and Election

The corporation shall have a board of directors consisting of one or more individuals. The board of directors shall be elected by such shareholders as have the right to vote at the annual meeting of the shareholders or at a special meeting held in place thereof. No ballot shall be required for such election unless requested by a shareholder present or represented at the meeting and entitled to vote in the election. Subject to any minimum number of directors required by the Massachusetts Business Corporation Act, the number of directors shall be fixed by vote at the meeting at which they are elected, but the shareholders, at any special meeting held for the purpose, or a majority of the directors then in office, may increase the number of directors as thus fixed and elect new directors to complete the number so fixed, and the shareholders, at any such special meeting, may decrease the number of directors as thus fixed and remove directors to reduce the number of directors to the number so fixed. Subject to the articles of organization and these bylaws, each director shall hold office until the next annual meeting and until his or her successor is elected and qualified.

3.2 Resignation, Removal, and Vacancy

A director may resign at any time by delivering written notice of resignation to the board of directors, its chairman, or the corporation. Except as otherwise provided by the Massachusetts Business Corporation Act, the articles of organization, or these bylaws: (1) the shareholders may remove one or more directors with or without cause, (2) the directors may remove a director for cause by vote of a majority of the directors then in office, and (3) the shareholders or board of directors may fill any vacancy, or if the directors remaining in office constitute fewer than a quorum of the board, they may fill the vacancy by the affirmative vote of a majority of all the directors remaining in office.

3.3 Powers of Directors

Subject to law and the articles of organization, all corporate power shall be exercised by or under the authority of, and the business and affairs of the corporation shall be managed under the direction of, its board of directors.

3.4 Regular Meetings

Regular meetings of the board of directors may be held without call or formal notice at such places and at such times as the board may by vote from time to time determine. A regular meeting of the board of directors may be held without call or formal notice immediately after and at the same place as the annual meeting of the shareholders, or the special meeting of the shareholders held in place of such annual meeting.

3.5 Special Meetings

Special meetings of the board of directors may be held at any time and at any place when called by the President, Treasurer, or two or more directors, or the sole director if there is only one director. Notice of such meeting shall be given to each director by the Secretary or, if there is no Secretary, or in case of the death, absence, incapacity, or refusal of the Secretary, by the officer or directors calling the meeting. Such notice (1) must be given at least two days prior to the date of the special meeting, and (2) need not describe the purpose of the meeting unless otherwise required by the articles of organization or these bylaws.

3.6 Waiver of Notice

A director may waive notice of any directors' meeting before or after the date of the meeting. The waiver shall be in writing, signed by the director entitled to the notice, or in the form of an electronic transmission by the director to the corporation, and filed with the minutes or corporate records. A director's attendance at or participation in a meeting waives any required notice to such director of the meeting unless the director at the beginning of the meeting, or promptly upon his or her arrival, objects to holding the meeting or transacting business at the meeting and does not thereafter vote for or assent to action taken at the meeting.

3.7 Quorum and Voting

A majority of the directors then in office shall constitute a quorum for the transaction of business, but a lesser number may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice. If a quorum is present when a vote is taken, the affirmative vote of a majority of the directors present is the act of the board of directors, unless the vote of a greater number of directors is required by the articles of organization or these bylaws.

3.8 Action by Consent

Any action by the board of directors may be taken without a meeting by unanimous consent by the directors and filed with the records of the directors' meetings. The action must be evidenced by one or more consents describing the action taken, in writing, signed by each director, or delivered to the corporation by electronic transmission, to the address specified by the corporation for the purpose or, if no address has been specified, to the principal office of the corporation, addressed to the Secretary or other officer having custody of the records of proceedings of directors. Such consent shall be treated as a vote of the board of directors for all purposes.

3.9 Remote Participation

Members of the board of directors or any committee designated by the board of directors may participate in a meeting of the board or such committee, or conduct any such meeting, through the use of any means of communication by which all directors participating may simultaneously hear each other during the meeting and participation by such means shall constitute presence in person at the meeting.

3.10 Committees

Except as otherwise provided in the articles of organization, the board of directors may, by vote of a majority of the directors, appoint from its own number a committee or committees, consisting of one or more members who shall serve at the pleasure of the board of directors, and which may exercise such authority of the board of directors as is delegated by the board, except for those powers which, pursuant to the Massachusetts Business Corporation Act, may not be delegated to any such committee. Subject to the Massachusetts Business Corporation Act, the provisions of such Act and these bylaws governing meetings, action without meetings, notice and waiver of notice, and quorum and voting requirements of the board of directors shall apply to committees and their members.

SECTION 4 Officers

4.1 Identity, Election, and Appointment of Officers

The officers of the corporation shall consist of a President, Treasurer, and Secretary, who shall be elected by the board of directors, and such other officers as the board of directors may appoint.

4.2 Duties and Powers; Qualification and Tenure

Subject to these bylaws, each officer shall have, in addition to the duties and powers specifically set forth in these bylaws, such duties and powers as are customarily incident to his or her office and such duties and powers as the board of directors may from time to time designate. Any officer may, but need not, be a shareholder or director. Any two or more offices may be held by the same person. Any officer may be required by the board of directors to give bond for the faithful performance of his or her duties to the corporation in such amount and with such sureties as the board of directors may determine. Except as otherwise provided by law, the articles of organization, these bylaws, or the directors' resolution electing or appointing such officer, the President, Treasurer, and Secretary shall hold office until the first meeting of the board of directors following the annual meeting of shareholders and thereafter until his or her successor is elected and qualified, and all other officers shall hold office until the respective successor of each is elected and qualified.

4.3 President

The President shall be the chief executive officer of the corporation and shall, subject to the direction of the board of directors, have general supervision and control of its business. Unless otherwise provided by the board of directors, the President shall preside, if present, at all meetings of shareholders and of the board of directors.

4.4 Treasurer

The Treasurer, subject to the direction and under the supervision of the board of directors, shall have general charge of the financial concerns of the corporation and the care and custody of the funds and valuable papers of the corporation, except his or her own bond. The Treasurer shall keep, or cause to be kept, accurate books of account, which shall be the property of the corporation.

4.5 Secretary

The Secretary shall keep a record of the meetings of shareholders, the board of directors, and any executive and other committees. In the absence of the Secretary from any such meetings, an Assistant Secretary, if one has been elected, otherwise a Temporary Secretary, designated by the person presiding at the meeting, shall perform the duties of the Secretary.

4.6 Removal and Vacancies

The board of directors may remove any officer at any time with or without cause, and may fill any vacancy in any office.

SECTION 5 Capital Shares

5.1 Share Certificates

Each shareholder shall be entitled to a share certificate in such form as is prescribed by law and approved from time to time by the board of directors. The certificates shall be signed by the President or any Vice President and by the Treasurer or any Assistant Treasurer. Such signatures may be facsimiles. If any officer who has signed or whose facsimile signature has been placed on such certificate no longer holds office when the certificate is issued, the certificate shall nevertheless be valid.

5.2 Transfer of Shares

Subject to restrictions, if any, imposed by the articles of organization, title to a share certificate and to the shares represented thereby shall be transferred only by delivery of the certificate properly endorsed, or by delivery of the certificate accompanied by a written assignment of shares represented by such certificate, or a written power of attorney to sell, assign, or transfer the certificate or the shares represented thereby, properly executed. The person registered in the records of the corporation as the owner of shares shall have the exclusive right to receive dividends thereon and to vote thereon as such owner, shall be held liable for such calls and assessments, if any, as may lawfully be made thereon, and, except only as may be required by law, may in all respects be treated by the corporation as the exclusive owner thereof unless and to the extent that the corporation has established a procedure by which the beneficial owner of shares that are registered in the name of a nominee will be recognized by the corporation as the shareholder.

5.3 Transfer Records

Unless a transfer agent is appointed, the Secretary shall keep or cause to be kept, at the principal office of the corporation or at the office of the Secretary, the share and transfer records of the corporation, in which are contained the names of all shareholders and the record address and the amount of shares held by each. The transfer records of the shares of the corporation may be closed for such period from time to time in anticipation of shareholders' meetings or the declaration or payment of dividends as the board of directors may determine.

5.4 Lost or Destroyed Certificates

In case of the alleged loss, destruction, or mutilation of a share certificate, a new share certificate may be issued in place of the lost, destroyed, or mutilated certificate upon such terms as the board of directors may determine.

SECTION 6 Fiscal Year

Except as from time to time otherwise determined by the board of directors, the fiscal year of the corporation shall end on December 31.

SECTION 7 Indemnification

The corporation shall indemnify and hold harmless each present or former director or officer of the corporation

to the fullest extent permitted by law, subject to such determination as the law may require that indemnification is permissible, for any threatened, pending, or completed action, suit, or proceeding, whether civil, criminal, administrative, arbitrative, or investigative, and whether formal or informal ("Proceeding"), against such director or officer in his or her capacity as such or in his or her capacity as a director, officer, partner, trustee, manager, employee, or agent of another domestic or foreign corporation, partnership, joint venture, trust, limited liability company, employee benefit plan, or other entity, if the corporation requested him or her to so serve. A director or officer is considered to be serving an employee benefit plan at the corporation's request if his or her duties to the corporation also impose duties on, or otherwise involve services by, him or her to the plan or to participants in or beneficiaries of the plan. The corporation may, before final disposition of any Proceeding, advance funds to pay for or reimburse the reasonable expenses incurred by a director or officer who is a party to a Proceeding to the extent permitted by law. Nothing in this Section shall affect any rights to indemnification to which any person may be entitled by contract or otherwise under law. No amendment or repeal of any provision of this Section shall adversely affect the right of a person to indemnification under this Section with respect to his or her acts or omissions that occurred at any time prior to such amendment or repeal.

SECTION 8 Other Provisions

8.1 Notices

Notices to or from any shareholder, director, officer, or the corporation may be given in any manner permitted under the Massachusetts Business Corporation Act.

8.2 Voting of Securities

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

SECTION 9 Amendments

These bylaws may be amended or repealed by the shareholders. If authorized by the articles of organization, the board of directors may also make, amend, or repeal the bylaws in whole or in part, except with respect to this Section and any provision of these bylaws which, by an express provision in the Massachusetts Business Corporation Act, the articles of organization, or these bylaws, requires action by the shareholders. Not later than the time of giving notice of the meeting of shareholders next following the making, amending, or repealing by the board of directors of any bylaw, notice stating the substance of the action taken by the board of directors shall be given to all shareholders entitled to vote on amending the bylaws. Any action taken by the board of directors with respect to the bylaws may be amended or repealed by the shareholders.

[END]



The Commonwealth of Massachusetts William Francis Galvin

Minimum Fee: \$250.00

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

Special Filing Instructions

None

Articles of Organization

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

Identification Number: 001341649

ARTICLE I

The exact name of the corporation is:

EMERALD CITY GROWERS INCORPORATED

ARTICLE II

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

ARTICLE III

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

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

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

ARTICLE IV

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

ONE CLASS OF COMMON STOCK

ARTICLE V

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

NO RESTRICTIONS

ARTICLE VI

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

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

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

Name: ATTILA SIMON
No. and Street: 843 MAIN STREET
City or Town: CLINTON State: MA Zip: 01510 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	ATTILIA SIMON	25 JUNIPER STREET BILLERICA, MA 01862 USA
TREASURER	KAROL SIMON	25 JUNIPER STREET BILLERICA, MA 01862 USA
SECRETARY	JOHN G FRANCO	749 CHESTNUT STREET WABAN, MA 02468 USA
VICE PRESIDENT	ANNE ROSONE FRANCO	749 CHESTNUT STREET WABAN, MA 02468 USA
ASSISTANT SECRETARY	BLAKE SIMON	25 JUNIPER STREET BILLERICA, MA 01862 USA
DIRECTOR	DALTON SIMON	25 JUNIPER STREET BILLERICA, MA 01862 USA

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

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

HORTICULTURE

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

No. and Street: 843 MAIN STREET

City or Town: CLINTON State: MA Zip: 01510 Country: USA

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

No. and Street: 749 CHESTNUT STREET

City or Town: WABAN State: MA Zip: 02468 Country: USA

which is

☐ its principal office

☐ an office of its transfer agent

☒ an office of its secretary/assistant secretary

☐ its registered office

Signed this 19 Day of August, 2018 at 11:39:09 PM by the incorporator(s). (*If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.*)

JOHN G FRANCO SECRETARY

THE COMMONWEALTH OF MASSACHUSETTS

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

August 19, 2018 11:38 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**Certificate of Good Standing or Compliance from the Massachusetts
Department of Unemployment Assistance Attestation Form**

Signed under the pains and penalties of perjury, I, Karol Simon, an authorized representative of Emerald City Growers Incorporated certify that Emerald City Growers Incorporated does not currently have employees and is therefore unable to register with the Massachusetts Department of Unemployment Assistance to obtain a Certificate of Good Standing or Compliance.

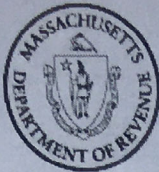

Signature of Agent

5/19/2020
Date

Name: Karol Simon

Title: President

Entity: Emerald City Growers Inc.

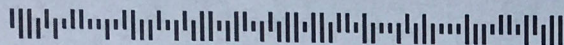


Commonwealth of Massachusetts
Department of Revenue
Geoffrey E. Snyder, Commissioner

mass.gov/dor

Letter ID: L0224234048
Notice Date: May 26, 2020
Case ID: 0-000-707-378

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



EMERALD CITY GROWERS INC
843 MAIN ST
CLINTON MA 01510-1609

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

Emerald City Growers Inc.

Business Plan

Executive Summary

Company Name

Emerald City Growers

Facility Location

843 Main Street
Clinton, MA 01510



Mission

Our mission is to own and operate a recognized cultivation facility in Massachusetts that sells high-grade cannabis to licensed dispensaries and manufacturers.

Goals

- ✓ Build a successful commercial cultivation facility
- ✓ Establish a recognizable brand
- ✓ Comply fully with all State and Local regulations
- ✓ Be prepared for national expansion and further compliance
- ✓ Create jobs

Business Objectives

- ✓ Obtain Tier 2 Cultivation license from the Cannabis Control Commission (“CCC”)
- ✓ Net annual income to support operational expenses
- ✓ Sales and capacity increasing monthly
- ✓ Achieve profitability by the end of the first year

Keys to Success

- ✓ Focus on producing unique, high quality products
- ✓ Develop strong relationships with dispensaries and manufacturers
- ✓ Work in conjunction with local community to foster goodwill

The Company

Emerald City Growers is a cannabis cultivation company seeking to obtain a Tier 2 cultivation license from the CCC in order to operate a 5,000-10,000 sq.ft. cultivation facility located at 843 Main Street, Clinton, Massachusetts.

Our experienced and committed team is intent on achieving our goal of producing high-quality, recognized products. We believe that our knowledge and passion are what separate us from the competition and will allow us to stand out in this emerging market.

Products & Services

Emerald City Growers will cultivate ten (10) strains of cannabis, both sativa and indica. As we will be cultivating indoors, we will be able to control the growing conditions to develop a uniform and consistent product, to be harvested several times each year.

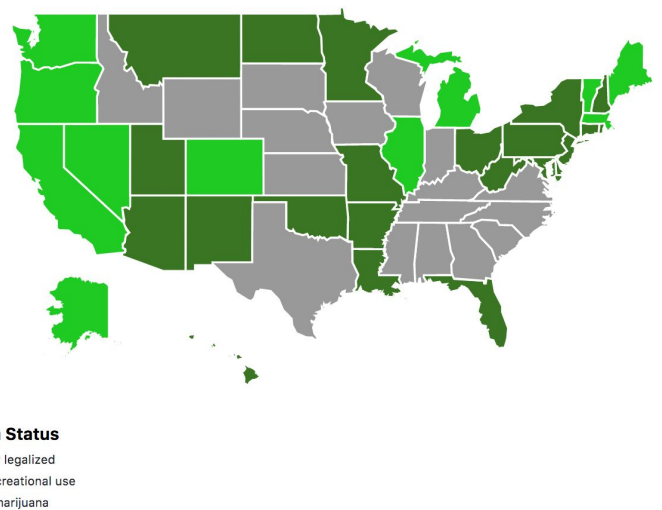


Market Analysis

National Market

According to a poll by the Pew Research Center, public support for legalizing marijuana is on the rise. Today, the increase in approval has nearly doubled to 62%, up from 31% in the year 2000.

While the United States federal government still classifies cannabis as a Schedule I Controlled Substance, they have taken a static approach at the state level and have given the states autonomy to regulate local marijuana markets. Today, thirty-three states have legalized medical marijuana, and eleven (and the District of Columbia) of these states also legalizing recreational adult-use.



The Wall Street projects that the U.S. will be the largest cannabis market in the world. Sales are predicted to grow exponentially from the \$8 billion generated in 2018 to an estimated \$41 billion by 2025.

Massachusetts Market

On November 8, 2016, 1.7 million Massachusetts voters approved Question 4, the ballot initiative that would end marijuana prohibition for recreational adult-use. Cannabis sales began on November 20, 2018, when two licensed retail shops opened their doors to customers. The CCC reported that these shops generated \$2.2 million worth of marijuana sales in the first 5 days of operation and \$9.3 million during the first month.

The residents of Clinton, MA voted in favor of Question 4:

Yes: 4,009

No: 3,107

Financial Summary

Initial Start-Up Expense Summary

The chart below itemizes the initial start-up expenses that will be incurred prior to our official launch date.

Expense	
Rent	\$20,000.00
Build-Out	\$170,000.00
Equipment	\$300,000.00
Security	\$120,000.00
Legal	\$25,000.00
Misc.	\$10,000.00
Total:	\$645,000.00

Direct and Operating Expenses Breakdown

Direct Costs: The chart below itemizes and estimates the direct costs associated with the production of Emerald City Growers cannabis products for our first year of operation.

DIRECT COSTS	1st Year (2020)
Electricity	\$10,000.00
Water	\$7,000.00
Nutrients	\$3,500.00
Packaging	\$3,500.00
Lab Testing	\$6,000.00
Labor	\$350,000.00
Total:	\$380,000.00

Marketing

Emerald City Growers will adhere to the rules and regulations that guide the marketing of cannabis products. We will utilize authorized digital, media and print platforms to promote our brand and products.

We will NOT market, advertise or brand:

- ✓ in any manner that is deemed deceptive or misleading
- ✓ to audiences under the age of 21 years old
- ✓ in any way that appeals to an audience under the age of 21 years old via promotional giveaways or coupons
- ✓ by any unsolicited means
- ✓ by any portable means including vehicles, clothing or merchandise

Our marketing and advertising campaign will include:

- ✓ Developing close personal relationships with cultivators and manufacturers and through direct, personal communication
- ✓ Creating an email list and developing a web presence

- ✓ Attending cannabis/hemp/wellness related conventions/events
- ✓ Advertising via print publications
- ✓ Advertising via digital/mobile platforms

Marketing Objectives

- ✓ Create a strong digital presence
- ✓ Become a preferred, reputable and trusted cannabis cultivation brand
- ✓ Grow brand awareness
- ✓ Acquire new customers
- ✓ Establish relationships with dispensing and manufacturing organizations

Organizational Structure

Emerald City Growers will employ a staff of five dedicated and qualified people, including, a Head Cultivator, General Manager, Grow Assistant, Maintenance, and a Trimmer. The role of each staffer is defined below:

Head Cultivator

Oversees the planting, cultivation and harvesting of all products.

General Manager

Oversees the daily business activities, manages budgets, develops strategic plans, creates policies, and communicates business goals.

Grow Assistant

Assists Head Cultivator and General Manager with their tasks.

Maintenance

Oversees condition and repair of the building and equipment.

Trimmer

Tends to and trims cannabis plants to maximize THC content.

Operations & Procedures

Design & Function

Our indoor cultivation facility will be designed so that we have total control over the grow conditions allowing us to cultivate consistent, quality products. The facility will be designed to include:

- ✓ Heating and cooling systems
- ✓ Water collection systems
- ✓ Intelligent lighting systems
- ✓ Air filtration and circulation systems
- ✓ Irrigation system
- ✓ Nutrient management system

Our facility design will include:

- ✓ Vegetative Growth Rooms
- ✓ Flowering Rooms
- ✓ Mother Room and Cloning Room
- ✓ Drying & Trimming Rooms
- ✓ Packaging Room

Security

Emerald City Growers will fully comply with all security measures stipulated by the CCC and Town of Clinton, in order to protect our staff, clients, community and plants.

External

- ✓ Outside perimeter sufficiently lit to facility surveillance
- ✓ Commercial grade security equipment installed to alarm the perimeter, including all entry and exit points and windows
- ✓ Video cameras installed in all points of entry and exit and in parking lot
- ✓ A silent duress alarm installed to notify local law enforcement
- ✓ Video cameras to run for 24 hours and shall provide date and time stamps
- ✓ Video camera shall be installed in all areas that may contain cannabis product
- ✓ No Loitering signs will be placed around premises

Internal

- ✓ All persons entering the premises must show Identification
- ✓ All persons on-premises must wear ID tag (staff and vendor)
- ✓ Limit Access Areas will be labeled with “Do Not Enter” sign
- ✓ All cannabis products are to be stored in a locked area, out of plain sight
- ✓ All production equipment will be in locked areas
- ✓ All Limited Access Areas are to be secured with electronic lock

Community Impact

Emerald City Growers is dedicated to positively impacting the Town of Clinton in as many ways as we can. We believe that giving back to our host community will help destigmatize cannabis and allow us to grow as we adopt the values of our neighborhood. A few ways we plan to get involved include:

- ✓ Holiday food drive
- ✓ Offer cooking and cultivation classes



72 River Park Street Needham MA 02494 617-500-1824

Cannabis Control Commission
101 Federal Street, 13th floor Boston, MA 02110

RE: Emerald City Growers, Inc.

Please be informed that the above referenced applicant has made formal application through our general brokerage for general liability and product liability insurance with minimum limits of \$1,000,000 per occurrence, and \$2,000,000 annual aggregate, and application for additional excess liability limits. The below underwriters have received this application and are expecting to provide proposals within the coming weeks. Emerald City Growers, Inc. has purchased a bond through our brokerage with a bond limit in compliance with the Commission's request. We look forward to providing liability coverage to Emerald City Growers, Inc. as soon as a bindable proposal is available.

Cannasure Insurance Services, Inc.
Next Wave Insurance Services LLC
Canopus US Insurance Company
Prime Insurance Company
United Specialty Insurance Company

Best Regards,

James Boynton

James Boynton
Managing Broker
MA Insurance License #1842496

EMERALD CITY GROWERS INC.
POLICIES AND PROCEDURES FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Emerald City Growers Inc. (the “Company”) is a *marijuana establishment* as defined by 935 CMR 500.002. The Company sets forth the following policies and procedures for restricting access to marijuana and marijuana infused products to individuals over the age of twenty-one (21) pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.105(1)(o). This regulation states that written operating procedures for the Company shall include “[p]olicies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.”

A. COMPLIANCE WITH 935 CMR 500.105(1)(o)

The Company incorporates and adopts herein by reference, all of the provisions for the prevention of diversion outlined in the Company’s *Standard Operating Procedure for the Prevention of Diversion*. The provisions detailed in the Company’s *Standard Operating Procedure for the Prevention of Diversion* apply to the prevention of marijuana and marijuana infused products to all minors *and* all individuals under the age of twenty-one (21).

B. SPECIFIC PROVISIONS FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

As stated above, the Company incorporates herein, all provisions for the prevention of diversion of marijuana and marijuana infused product to individuals under the age of twenty-one (21) as detailed in the Company’s *Standard Operating Procedure for the Prevention of Diversion*. Specific provisions regarding restricting access to individuals age twenty-one (21) and older include the following.

1. The Company will only employ *marijuana establishment agents*, as defined by the Commission’s definitions at 935 CMR 500.002, who are at least twenty-one (21) years old.
2. The Company understands that *consumers* of marijuana and marijuana infused products must be at least twenty-one (21) years old as defined by the Commission’s definitions at 935 CMR 500.002.
3. The Company will only allow *visitors*, age twenty-one (21) or older, at the Company’s facilities located in Hudson, Massachusetts. The Company defines *visitors* in accordance with the Commission’s definitions at 935 CMR 500.002. The Company will designate an authorized agent to check the identification of all visitors entering the Company’s facilities. Acceptable forms of identification include:
 - a. A motor vehicle license;
 - b. A liquor purchase identification card;
 - c. A government-issued identification card;
 - d. A valid government-issued passport; and
 - e. A valid United States-issued military identification card.

4. The Company will only market marijuana and marijuana infused products to individuals age twenty-one (21) or older. Any marijuana product labeling will make it clear that marijuana and marijuana infused products are not to be accessed or consumed by individuals under the age of twenty-one (21). Specifically, the Company will follow 935 CMR 500.105(4)(a)(5) to ensure that any Company branding, marketing, and advertising is done in a manner that does not encourage or promote the diversion of marijuana. Furthermore, the Company understands that in accordance with 935 CMR 500.105(4)(a)(2), advertising of marijuana and marijuana infused products may only be done at charitable or public events where at least 85% of the audience is reasonably expected to be age twenty-one (21) or older.

EMERALD CITY GROWERS INC.
RECORD-KEEPING AND DOCUMENT RETENTION
POLICIES AND PROCEDURES

Emerald City Growers Inc. (the “Company”) is a *marijuana establishment* as defined by 935 CMR 500.002. The Company sets forth the following policies and procedures pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1)(c)(7) (i). This regulation requires the Company to provide a detailed summary of operating procedures and policies including record-keeping procedures. All of the Company’s records shall be kept pursuant to 935 CMR 500.105(9). The Company acknowledges that its records are subject to inspection and shall be made readily available to the Commission upon request.

A. COMPLIANCE WITH 935 CMR 500.105(9)

The Company’s *Record-Keeping and Document Retention Policies and Procedures* are designed to:

1. Comply with all of the Commission’s regulations regarding record-keeping;
2. Allow the Company to access, retain, and reconstruct any records relevant to security and the production of marijuana and marijuana infused product; and
3. Permit the Company to fully respond to requests for records from regulators, law enforcement officials, and judicial bodies.

The Company will keep diligent and detailed records regarding all standard operating procedures, including but not limited to the following areas: Company operating procedures; manufacturing; cultivation; responsible vendor training compliance; inventory; personnel; financial and business matters; waste disposal; transportation; storage; security; and quality control and testing of marijuana and marijuana infused products. All records will be kept securely in either hardcopy or electronic format. Only designated management-level authorized agents and employees will have access to the Company’s records. (All *agents* and *employees* referred to herein are licensed and defined in accordance with the Commission’s definitions at 935 CMR 500.002.) All records shall be maintained dating back for a period of at least two (2) years. Pursuant to 935 CMR 500.105(9)(g), in the event the Company were to close, it would keep all financial and business records available to the Commission for two (2) years after closure.

B. ACCESS TO RECORDS

1. Agents and Employees with Access to Records

Only designated management-level authorized agents and employees will have access to the Company’s records. The Company may choose to designate a Chief Compliance Officer (“CCO”) to manage access to any Company records. The CCO or other reliable agent designated by the Company shall be responsible for the following: compiling any and all information and documentation requested by the Commission, law enforcement, or judicial bodies; taking charge of any offsite storage of hardcopy documents at a certified commercial

storage facility; allowing regulators access to any and all documents and data stored remotely; allocating space on-site at the Company's facilities for the storage of documents; and external auditing of compliance with all provisions of record-keeping set forth by the Commission.

2. Provisions of Hardcopy and Electronic Record Keeping

The Company shall maintain some hardcopy records. The majority of the Company's records, however, shall be maintained electronically. The Company shall ensure that its records are maintained in a manner that: shall guarantee confidentiality of information; shall provide safeguards against erasures and unauthorized changes in data after information has been entered and verified; is capable of placing a litigation hold or enforcing a records retention hold for purposes of conducting an investigation or pursuant to ongoing litigation; and can be reconstructed if a computer malfunctions or an accident resulting in destruction of data occurs.

3. Security in Hardcopy and Electronic Record Keeping

Physical records shall be kept in a designated and monitored area of restricted access under lock and key. Areas of limited access shall comply with all provisions of 935 CMR 500.110(4). Access to electronic records will also be restricted. The Company will designate an Information Technology Administrator ("ITA") or other authorized agent or employee to ensure that access controls are implemented for each administrative, physical, and technical control of information technology systems. These access controls shall include:

- a. Security policy instructions and directions for each agent and employee regarding how information technology security should be implemented and followed, and repercussions for noncompliance;
- b. Personnel controls to indicate how employees are expected to interact with information technology security mechanisms and how to address noncompliance issues pertaining to these expectations;
- c. Enforcement of separation of duties so that no one individual can carry out a critical task alone that could prove to be detrimental to the Company;
- d. Regular policy reviews of record storage procedures annually or more frequently, completed by the ITA or another designated agent or employee to ensure that storage procedures are appropriate for the Company's records;
- e. Maintenance of hardcopy records stored in a locked and restricted access area accessible to authorized personnel only; and
- f. Maintenance of quick response strategies to recover lost information, should a disaster or emergency occur. The Company's strict response strategies shall include duplication of hardcopy records, with offsite storage depending on criticality, and use of secure cloud storage for electronic records.

4. Record Storage and Disposal

The Company shall audit its electronic and hardcopy records at its facility in secure areas of restricted access which shall include a secure server room equipped with fire detection and suppression systems. Any hardcopy records held offsite shall be stored at certified commercial storage facilities. Before any vital records are destroyed, a list of records due for destruction or transfer shall be reviewed by one of the Company's C-level managers, (CFO, CEO, CCO, or COO). Records will not be destroyed or transferred without the approval of an authorized C-level manager.

C. RECORDS RETENTION

The Company shall keep all records for a period of at least two (2) years. Likewise, in the event of Company closure, all records would be made available to the Commission for two (2) years after closure pursuant to 935 CMR 500.105(9)(g). As indicated above, hardcopy records shall be stored in locked and fire-resistant areas of limited access. Electronic records shall be stored in cloud-based auditable data servers which are backed up on a daily basis or more frequently. Financial and business records shall be maintained in accordance with Generally Accepted Accounting Principles (GAAP). (For more regarding the Company's Financial and Business Records, refer to the Company's *Policies and Procedures for Maintaining Financial Records*.)

The Company shall keep and maintain true, complete, legible, and current books and records of the following data types. All records and data shall be made readily available to the Commission upon request pursuant to 935 CMR 500.105(9).

1. Written Operating Procedures

- a. In accordance with 935 CMR 500.105(9)(a), an authorized agent or employee shall be responsible for maintaining all written operating procedures that address, at a minimum, the following as required by 935 CMR 500.105(1):
 - i. Security measures in compliance with 935 CMR 500.110;
 - ii. Employee security policies, including personal safety protocols and crime prevention techniques;
 - iii. Description of hours of operation and after-hours contact information provided to the Commission upon request;
 - iv. Storage of marijuana in compliance with 935 CMR 500.105(11) (for more information regarding the storage of marijuana, see the Company's *Standard Operating Procedures for the Storage of Marijuana*);
 - v. Description of strains of marijuana to be cultivated, processed, or sold, as applicable, and the forms of marijuana infused products to be cultivated, processed, or sold, as applicable;
 - vi. Procedures to ensure accurate record-keeping including inventory protocols in compliance with 935 CMR 500.105(8) and 935 CMR 500.105(9) (for more information regarding inventory, see the Company's *Inventory Policies and Procedures*);
 - vii. Plans for quality control including product testing for contaminants in compliance with 935 CMR 500.160;

- viii. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
 - ix. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
 - x. Alcohol, smoke, and drug-free workplace policies;
 - xi. A plan for the maintenance of confidential information;
 - xii. A policy for immediate dismissal of any employee or marijuana establishment agent who has engaged in any of the following activities:
 - i. Diverted marijuana;
 - ii. Engaged in unsafe practices; or
 - iii. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority;
 - xiii. Policies and procedures for making a list of all board members and executive members pursuant to 935 CMR 500.105(1)(m);
 - xiv. Policies and procedures for the handling, storage, transportation, or collection of any cash;
 - xv. Policies and procedures to prevent the diversion of marijuana to individuals younger than twenty-one (21) years of age (also see the Company's *Plan for Restricting Access to Age 21 and Older*); and
 - xvi. Policies and procedures for energy efficiency and conservation pursuant to 935 CMR 500.105(1)(p).
- b. In addition to the above general operating procedures set forth under 935 CMR 500.105(1), the Company shall also maintain additional policies and procedures addressing the following:
- i. Methods for identifying, recording, and reporting diversion, theft, or loss and methods for correcting all errors and inaccuracies in inventories which shall, at a minimum, be compliant with 935 CMR 500.105(8);
 - ii. Policies and procedures for handling voluntary and mandatory recalls of marijuana;
 - iii. Policies and procedures in compliance with 935 CMR 500.105(12) for ensuring outdated, damaged, deteriorated, mislabeled, or contaminated marijuana is segregated from other marijuana and destroyed;
 - iv. Transportation policies and procedures which shall be compliance with 935 CMR 500.105(13) (also see the Company's *Standard Operating Procedures for the Transportation of Marijuana*);
 - v. Policies and procedures in compliance with 935 CMR 500.105(15) and 935 CMR 500.120(11) to reduce energy and water usage, engage in energy conservation, and mitigate other environmental impacts; and
 - vi. Policies and procedures for the transfer, acquisition, or sale of marijuana between the Company and other licensed marijuana establishments.

2. Cultivation and Manufacturing Records

A designated and authorized agent or employee of the marijuana establishment shall be responsible for maintaining all records relevant to the cultivation, manufacturing, and processing of marijuana and marijuana infused products. At a minimum, these records shall include the following:

- a. Standard operating procedures for the cultivation of marijuana (for more information see the Company's *Operational Plan: Policies and Procedures for Cultivation*);
- b. The forms and types of cannabis being cultivated;
- c. Soil amendment, fertilizers, pesticides, or other chemicals applied to growing medium or plants, including dates of application, amounts, and a signature of the agent responsible for application;
- d. Documentation that pesticides are applied in compliance with M.G.L. c. 132B and the regulations promulgated at 333 CMR 2.00 through 333 CMR 14.00;
- e. Documentation of compliance with the testing requirements of 935 CMR 500.160;
- f. Documentation of consistency with the United States Department of Agriculture's organic requirements at 7 CFR 205;
- g. Production records including planting, harvesting, curing, weighing, packaging, and labeling records; and
- h. Records of any recalled product including:
 - i. Date of recall;
 - ii. Whether recall was voluntary or mandatory;
 - iii. Batch and/or lot number of the product being recalled;
 - iv. Form of the product being recalled;
 - v. Reason for recall;
 - vi. Amount of recalled product sold;
 - vii. Amount of recalled product received; and
 - viii. Method and date of disposal of recalled product.

3. Records of Responsible Vendor Training Program Compliance

Records of Responsible Vendor Training Program Compliance for all owners, managers, and employees that are involved in the handling and sale of marijuana shall be maintained for a minimum of four (4) years in accordance with 935 CMR 500.105(2)(b)(5). These records shall be maintained by an authorized agent designated by the Company.

4. Inventory Records

In accordance with 935 CMR 500.105(9)(b), the Company shall maintain inventory records in compliance with 935 CMR 500.105(8). (For more information regarding inventory, see the Company's *Inventory Policies and Procedures*.) An authorized agent or employee designated by the Company shall be responsible for maintaining accurate inventory records. Records of marijuana in the process of cultivation and records of finished and stored

marijuana and marijuana infused products shall be generated monthly or more frequently. Records of comprehensive annual inventory shall be generated at least once a year if not more often. Inventory records shall include at a minimum:

- a. Information related to initial inventory upon commencement of operations;
- b. The number of marijuana plants, plant-seeds, and clones in any phase of development;
- c. Information related to any marijuana ready for dispensing;
- d. A list of all marijuana infused products;
- e. A list of all damaged, defective, expired, or contaminated marijuana and marijuana infused products awaiting disposal;
- f. The date inventory was recorded or taken;
- g. A summary of all information collected during the inventory process; and
- h. The names, signatures, and titles of any individuals involved with the inventory process.

5. Seed-To-Sale Tracking Records

The Company shall utilize a software program that is capable of API integration with the Commission's seed-to-sale-system-of-record, METRC. In accordance with 935 CMR 500.105(9)(c), the Company shall maintain real-time seed-to-sale tracking records at each stage of cultivation, manufacturing, production, transport, and sale in compliance with 935 100.105(8)(e). Likewise, any marijuana or marijuana infused product that is found to be damaged, defective, expired, contaminated, or scheduled for disposal shall be recorded and tracked in the Company's seed-to-sale tracking system. Seed-to-sale tracking records shall be recorded and investigated in accordance with the Company's standard operating procedures. The Company's *Inventory Policies and Procedures* sets forth further details regarding the Company's seed-to-sale tracking software.

6. Personnel Records

In compliance with 935 CMR 500.105(9)(d), a designated agent or employee authorized by the Company shall be responsible for maintaining personnel records, including but not limited to the information and records listed below. (For more information regarding personnel, see the Company's *Personnel Policies Including Background Checks and Standard Operating Procedures Regarding Qualifications, Training, and Requirements of Personnel*.)

- a. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with job descriptions;
- b. A staffing plan that will demonstrate accessible business hours and safe conditions;
- c. Personnel policies and procedures;
- d. All background checks in accordance with 935 CMR 500.030; and
- e. A personnel record for each agent or employee which shall be maintained for at least twelve (12) months after termination of an agent's affiliation with the Company in

accordance with 935 CMR 500.105(9)(d)(2). All personnel records shall include the following information:

- i. All materials submitted to the Commission pursuant to 935 CMR 500.030(2), including a copy of the agent's registration card;
- ii. Documentation of verification of references;
- iii. A detailed job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- iv. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the trainee indicating the date, time, and place they received said training and the topics discussed, including the name and title of presenters;
- v. Documentation of periodic performance evaluations;
- vi. Records of any disciplinary action taken; and
- vii. Notice of completed responsible vendor and eight-hour related duty training.

7. Financial and Business Records

All financial and business records will be kept in accordance with 935 CMR 500.105(9)(e). As stated above, all records shall be kept in either hardcopy or electronic format or both in compliance with the Commission's regulations. See the Company's *Policies and Procedures for Maintaining Financial Records* for a detailed description of the Company's compliance with 935 CMR 500.105(9)(e). An authorized agent designated by the Company shall be responsible for maintaining Company business and financial records. Hardcopies of business and financial records shall be maintained in secured areas accessible only to designated employees and agents. All financial records will be maintained in accordance with Generally Accepted Accounting Principles (GAAP). Financial records include but are not limited to information regarding the following:

- a. Assets and liabilities;
- b. Monetary transactions;
- c. Books of accounts, which include journals, ledgers, supporting documents, agreements, checks, invoices, and vouchers;
- d. Sales records including the quantity, form, and cost of marijuana and marijuana products; and
- e. Salary, wages, bonuses, benefits, or any value paid to any employee, agent, or individual affiliated with the Company.

8. Waste Disposal Records

Pursuant to 935 CMR 500.105(9)(f), waste disposal records shall be maintained as required under 935 CMR 500.105(12). An authorized agent or employee designated by the Company shall be assigned to maintain all waste disposal records. (For more information regarding the Company's procedures for the disposal of plant, solid and liquid waste, see the Company's *Operational Plan: Policies and Procedures for Cultivation*.) Waste disposal records shall be kept for a minimum of three (3) years or throughout the duration of any enforcement action

or as long as required by the Commission, whichever period is longest. Waste disposal records shall include the following information:

- a. Date of waste disposal or other handling;
- b. Type and quantity of waste disposed or handled;
- c. Manner of waste disposal or other handling;
- d. Location of waste disposal or handling; and
- e. Names and signatures of the two (2) agents present during the disposal or handling of waste.

9. Transportation Manifests

An authorized agent or employee designated by the Company shall be responsible for generating and maintaining transportation manifests documenting transportation of all marijuana and marijuana infused products as required under 935 CMR 500.105(13). Transportation manifests will comply with all provisions of 935 CMR 500.105(13)(f). Pursuant to 935 CMR 500.105(13)(f)(1), each transportation manifest will be kept in triplicate. The Company will have a copy of all manifests, any licensed third-party marijuana transporter is to maintain a copy of all relevant manifests, and all receiving marijuana establishments will have a copy of relevant manifests. For more information regarding transportation manifests, see the Company's *Standard Operating Procedures for the Transportation of Marijuana*.

10. Security Recordings

In accordance with 935 CMR 500.110(5)(a)(5), the Director of Security or another authorized agent or employee designated by the Company shall ensure that all 24-hour video surveillance recordings are retained for at least ninety (90) calendar days or as long as necessary in case of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information. In order to prevent theft, loss, destruction, or alterations, security recordings shall be maintained in a locked and restricted area accessible only to the Director of Security and other authorized agents and employees pursuant to 935 CMR 500.110(5)(b). Additionally, in accordance with 935 CMR 500.110(7), documentation related to security incidents that are reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by the Director of Security or other authorized agent or employee in an auditable form for a period one year or throughout the duration of an open investigation, whichever period is longer.

11. Records of Testing of Marijuana and Marijuana Infused Products

No marijuana or marijuana infused product will be cultivated or manufactured for adult-use or distribution that is not capable of being tested by an authorized and licensed independent testing laboratory. An authorized agent or employee designated by the Company shall ensure that test results for all marijuana and marijuana infused products are generated in accordance with 935 CMR 500.160 and are maintained by the Company for no less than one year. The Company has written policies for responding to laboratory results that indicate contaminant

levels are above the acceptable limits identified in DPH protocols pursuant to 935 CMR 500.160(1). For more information regarding the testing of marijuana and marijuana infused products, see the Company's *Procedures for Quality Control and Testing for Potential Contaminants*.

EMERALD CITY GROWERS INC.
PROCEDURES FOR QUALITY CONTROL
AND TESTING FOR POTENTIAL CONTAMINANTS

Emerald City Growers Inc. (the “Company”) is a *marijuana establishment* as defined by 935 CMR 500.002. The Company sets forth the following standard operating procedures for the quality control and testing of all marijuana and marijuana infused product pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1)(c)(7)(f). The regulations require that the marijuana establishment provide a detailed summary of operating policies and procedures including provisions for the quality control and testing of marijuana and marijuana infused product for potential contaminants.

A. COMPLIANCE WITH 935 CMR 500.101(1)(c)(7)(f)

Quality control and contaminant testing will be conducted for each batch of marijuana and marijuana infused products. The Company shall utilize the procedures set forth herein for the quality control and testing for potential contaminants for its cultivation and manufacturing operations. The Company understands that testing ensures that all marijuana and marijuana infused products are safe and appropriately potent. The Company shall not sell, market, or promote any marijuana or marijuana infused products that are incapable of being tested by a testing laboratory licensed by the Commission pursuant to 935 CMR 500.160(9).

The procedures contained herein shall be periodically reviewed and updated to ensure that the Company achieves its desired outcome of cultivating and producing only the highest quality marijuana and marijuana infused products that meet or exceed each and every testing requirement as mandated by the Commission’s regulations. The Company shall require that all employees and agents adhere to these quality control and contaminant testing procedures as both an ongoing professional responsibility and an express condition of their continued employment.

B. INDEPENDENT LICENSED TESTING LABORATORY

The Company intends to contract with Pro Verde Labs, or another independent testing laboratory licensed by the Commission, to perform all required testing pursuant to 935 CMR 500.160. The Company may also choose to contract with another independent testing laboratory licensed by the Commission. Any independent testing laboratory (hereinafter “testing laboratory”) that the Company contracts with shall meet the definition under 935 CMR 500.002, shall be licensed by the Commission, and shall comply with all requirements set forth under 935 CMR 500.050(7).

For every sample of marijuana or marijuana infused product produced by the Company, the testing laboratory is required to abide by all of the Commission’s regulations, the standard operating procedures contained herein, and the DPH *Finished Products Protocol* published by the Department of Public Health (“DPH”). As a part of its contract, the Company shall require an authorized agent of the testing laboratory to provide a signature confirming that all provisions of the Commission’s regulations, the standard operating procedures contained herein, and the DPH Finished Products Protocol published by the DPH shall be adhered to.

C. PROCEDURES FOR QUALITY CONTROL DURING TESTING

The Company, the selected testing laboratory, and any other involved, authorized, and licensed parties shall adhere to all of the following requirements to prevent the contamination of and to ensure the quality of all marijuana and marijuana infused product produced by the Company. The Company shall verify with the testing laboratory that all testing is done pursuant to the requirements under 935 CMR 500.160.

1. The Company shall verify that the independent testing laboratory it contract with complies with 935 CMR 500.160(7), which requires that all storage of marijuana at a testing laboratory shall comply with 935 CMR 500.105(11).
2. The Company shall ensure that transportation of marijuana and marijuana infused products to an independent testing laboratory shall comply with 935 CMR 500.105(13). The Company shall communicate with both the testing laboratory and any licensed third-party marijuana transporters to ensure that this regulation is adhered to.
3. The Company will request that the testing laboratory provide a variety of testing including but not limited to: cannabinoid potency profiling, pesticide residue analysis, plant growth regulator screening, microbial contamination assays, and heavy metal concentrations.
4. Pursuant to 935 CMR 500.160(2), the Company shall provide written notice to the Commission within seventy-two (72) hours of receiving laboratory test results that show contaminant levels above the acceptable limits established in the DPH Protocol. Likewise, the Company shall ensure that the selected testing laboratory also has a policy for, and a contractual obligation to, notify the Commission within seventy-two (72) hours of the transmission of laboratory test results indicating that a contaminant has exceeded any applicable level found in the DPH Protocol. The Company's notification to the Commission in such an instance of contamination shall include a written description of a plan to destroy the contaminated batch in accordance with the requirements for waste disposal found in 935 CMR 500.105(12). The Company's notification shall also include a proposed plan of action to identify the source of the contamination and to promptly fix, remediate, or mitigate the source of the contamination once identified. If any of the Company's inventory is spoiled, deteriorated, mislabeled, contaminated, or expired, it shall be disposed of pursuant to 935 CMR 500.105(12).
5. In the event that the selected testing laboratory discovers a contaminated batch requires disposal, Company's preference is to be notified immediately prior to the testing laboratory disposing of the contaminated product pursuant to 935 CMR 500.105(12). Disposal by the testing laboratory is the preferred method to reduce the risk associated with transportation of contaminated product. In the event that the testing laboratory does not dispose of such contaminated product, Company shall do so pursuant to 935 CMR 500.105(12).
6. The Company shall maintain all test results for its marijuana and marijuana infused products for no less than one year from the date of receipt of the results, pursuant to 935 CMR 500.160(3).

7. Following testing, all marijuana and marijuana infused product that meets all standards shall be labeled with a statement and a seal pursuant to 935 CMR 500.105(5)(a)(6), 935 CMR 500.105(5)(b)(14), 935 CMR 500.105(5)(c)(11), or 935 CMR 500.105(5)(d)(9).

D. PROCEDURES FOR QUALITY CONTROL THROUGHOUT THE CULTIVATION, MANUFACTURING, AND HANDLING OF MARIJUANA

The Company shall follow the following procedures during the cultivation and manufacturing of all marijuana and marijuana infused product to ensure that marijuana and marijuana infused product is not contaminated and is of the highest quality. The Company shall also follow these procedures to protect the surrounding community and the environment.

1. An authorized marijuana establishment agent selected by the Company will examine all nutrients utilized in the process of cultivation for potential contaminants. The Company shall maintain records of the ingredient information of all supplemental nutrients utilized during cultivation and shall furnish said information to the Commission upon request.
2. All water utilized during cultivation shall be filtered via the process of reverse osmosis and treated in order to be reused to the maximum extent practicable in order to minimize total water consumption. Any water discharged from the Company's facilities shall be tested prior to discharge to ensure that it meets all applicable regulatory limits before entering the municipal system. The Company shall not discharge any water into the ambient environment.
3. Only approved, biologically derived, pesticides, insecticides, and fungicides shall be utilized in the cultivation facility, and the dosage of each shall adhere to the manufacturer's recommended dose for commercial scale cultivation.
4. In accordance with 935 CMR 500.120(5), pesticide application shall only be performed in compliance with M.G.L. c. 132B and the regulations promulgated at 333 CMR 2.00 through 333 CMR 14.00. Any testing results indicating noncompliance shall be immediately reported to the Commission, who may refer any such result to the Massachusetts Department of Agricultural Resources.
5. Any soil used for cultivation shall meet federal standards identified by the Commission.
6. Pursuant to 935 CMR 500.120(9), the Company shall conduct its cultivation processes using best practices to limit contamination including, but not limited to, mold, fungus, bacterial diseases, rot, pests, pesticides not in compliance with 935 CMR 500.120(5) for use on marijuana, mildew, and any other contaminant identified as posing potential harm.
7. All water used by the Company for irrigation shall be filtered or treated via reverse osmosis to ensure that there are no exceedances of contaminant levels.
8. All marijuana establishment agents, employees, and visitors shall be required to wear disposable cleanroom jumpsuits, protective footwear, and a protective head wrap or hood, prior to entering portions of the cultivation facility that house cultivation and manufacturing operations.
9. Any marijuana establishment agent or employee engaged in the handling of marijuana and marijuana infused products at any time shall be required to adhere to the regulations at 105 CMR 300.000 (which details the requirements for food handlers).
10. Any and all edible marijuana infused products shall be prepared, handled, and stored in full compliance with 105 CMR 500.000's *Good Practices for Food* and in compliance

with the requirements for food handlers specified in 105 CMR 300.000's *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*.

11. All marijuana and marijuana infused products shall be stored at the appropriate temperature to guard against bacterial growth. The Company will use commercial-grade refrigeration to achieve the appropriate temperatures for all marijuana and marijuana infused product.
12. The Company's marijuana establishment agents shall abide by strict sanitary practices when working directly in the preparation of any marijuana infused products. Requisite sanitary practices include strict hand washing procedures and maintenance of personal cleanliness.
 - a. All marijuana establishment agents shall adhere to frequent and thorough hand washing practices in designated hand-washing stations. Hand washing shall occur frequently and always immediately prior to handling or working with marijuana and marijuana infused products. Hand washing stations will be located in close proximity to the production areas for cultivation and manufacturing. Hand washing stations will be equipped with: running water maintained at a suitable temperature; adequate antiseptic and antimicrobial soaps; surfaces that are impervious and easily cleaned; and an adequate drying apparatus. Hand washing will be performed with soap, under hot water, with vigorous agitation of the upper extremities and digits, and for a minimum of thirty (30) seconds. Hand washing shall be repeated whenever hands have, or may have, become contaminated, dirty, or soiled.
 - b. All marijuana establishment agents shall maintain the highest standards of personal cleanliness.
13. Waste and litter shall be disposed of and periodically removed to minimize odors and to reduce the potential for waste attracting or housing pests and other contaminants. All waste disposal shall be conducted in compliance with 935 CMR 500.105(12).
14. All cultivated and manufactured marijuana and marijuana infused product shall be stored in a manner that prevents the growth of any undesirable organisms. The Company will follow all provisions of 935 CMR 500.105(11) in the storage of marijuana and marijuana infused product. The Company's procedures for storage are further detailed in its *Standard Operating Procedures for the Storage of Marijuana*.

E. CONDITIONS OF THE COMPANY'S FACILITIES

All facilities maintained and operated by the Company shall be kept in the appropriate condition to prevent contamination and to ensure production of the highest quality marijuana and marijuana infused products. Pursuant to 935 CMR 500.105(11)(a), the Company will provide adequate lighting, ventilation, temperature, humidity, space and equipment in accordance with the applicable provisions of 935 CMR 500.105 and 500.110. The Company shall adhere to the following requirements in regards to its facilities.

1. The Company's cultivation and manufacturing operation shall be conducted within designated areas of the Company's facilities. The surfaces and equipment within these facilities, including all cooking utensils and vessels, shall be sanitized and cleaned as often as is required to maintain sanitary conditions. The surfaces and all equipment shall

be subjected to sanitizing and anti-microbial cleaning by the Company's employees, who shall only utilize cleaning products that appear on the Commission's, or the United States Environmental Protection Agency's, list of approved/registered cleaning products. Administration and application of these cleaning products shall strictly adhere to the manufacturer's label and instructions.

2. The facility's physical plant, including, but not limited to floors, ceilings, walls, and fixtures shall be constructed and retrofitted, as appropriate, to be both structurally sound and to allow for surfaces to be cleaned and sanitized. All fixtures shall be maintained in a sanitary condition.
3. All of the Company's facilities shall be laid out so as to allow for the storage of materials and equipment for sanitary maintenance of operations.
4. All restrooms within the Company's facilities shall be frequently stocked, cleaned and inspected to ensure that the Company's employees and visitors have adequate access to sanitary restrooms.
5. The Company's facilities will contain plumbing that is of adequate size and design and is adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and waste water lines.
6. Any cleaners containing toxic ingredients within the Company's facilities shall be held and stored away from marijuana and marijuana infused products to avoid contamination of those products. All cleaning products containing toxins shall be properly labeled to identify the presence of those toxins. Likewise, any other items containing toxins shall be similarly sequestered away from marijuana and marijuana infused products to ensure that the maximum protection against contamination of these products is achieved. All toxic-containing items shall be properly labeled.

F. STORAGE AND TRANSPORTATION

The Company shall ensure that all marijuana and marijuana infused product is transported and stored in a manner to promote and maintain the highest level of quality and to prevent any damage or contamination. The Company will follow all provisions of 935 CMR 500.105(11) in the storage of marijuana and marijuana infused product. The Company's procedures for storage are further detailed in its *Standard Operating Procedures for the Storage of Marijuana*. Likewise the Company shall comply with all of the Commission's provisions regarding transportation as detailed in the Company's *Standard Operating Procedures for the Transportation of Marijuana*. The following provisions shall be followed.

1. The Company shall ensure that all products ready for wholesale are transported and stored under ambient environmental conditions that will provide protection against chemical, microbial, and other physical contamination.
2. The Company's storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds or any other type of pest.
3. Containers holding finished marijuana and marijuana infused products shall be designed to guard against deterioration of the finished tested product. Performance of the

packaging with respect to contaminant protection shall be periodically evaluated and changed if appropriate.

4. The Company shall have a separate area for storage of marijuana or marijuana infused product that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached.
5. The Company's storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.
6. Pursuant to 935 CMR 500.105(3)(b)(16), the Company shall require that all vehicles and transportation equipment used in the transportation of marijuana and marijuana infused products are designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana infused products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).
7. The Company shall provide requisite documentation to any marijuana establishment to which the Company transfers marijuana or marijuana infused products. This documentation will verify the Company's compliance with the testing requirements under 935 CMR 500.160.

EMERALD CITY GROWERS
STANDARD OPERATING PROCEDURES REGARDING
QUALIFICATIONS, TRAINING, AND REQUIREMENTS OF PERSONNEL

Emerald City Growers (the “Company”) is a *marijuana establishment* as defined by 935 CMR 500.002. The Company sets forth the following standard operating procedures regarding the qualifications, training, and requirements of personnel pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1)(c)(8). The regulations require that the marijuana establishment provide a “*detailed description of qualifications and intended training(s) for marijuana establishment agents who will be employees.*”

A. COMPLIANCE WITH 935 CMR 500.101(1)(c)(8) AND SCOPE

Herein, the Company uses the term “personnel” to refer to all authorized marijuana establishment agents and employees of the Company as defined by the Commission’s definitions at 935 CMR 500.002. 935 CMR 500.002 defines “*marijuana establishment agent*” as including, “*a board member, director, employee, executive manager, or volunteer of a marijuana establishment who is 21 years of age or older.*” 935 CMR 500.002 continues to define “*employee*” as including, “*a consultant or contractor who provides on-site services to a marijuana establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.*” These standard operating procedures shall apply to all of the above defined marijuana establishment agents and employees, collectively referred to interchangeably as “personnel,” “authorized agents,” “agents,” or “employees.”

To ensure that Company standards are consistently met by all personnel, the Company has established personnel policies that detail the qualifications and training that all personnel must have as well as Company requirements for all personnel. All personnel will receive a copy of the Company’s employee manual and all standard operating policies and procedures that are applicable to their specific job function within the Company. The Company’s manual will further explain the specific functions of each role within the Company. Personnel will only have access to the areas of the Company’s facilities which relate to their particular job function or as specifically authorized by one of the Company’s management-level agents in writing.

All employees will be registered as agents pursuant to the requirements set forth under 935 CMR 500.030. All registered agents of the Company shall meet the suitability standards set forth under 935 CMR 500.800. (For more information, see the Company’s *Personnel Policies Including Background Checks*.)

B. TRAINING

1. General Provisions for Personnel Training

The Company will ensure that all marijuana establishment agents receive the appropriate training pursuant to all provisions under 935 CMR 500.105(2). All personnel will participate in a comprehensive training program to ensure that they perform their job functions safely and at the highest level. The training program may consist of both hardcopy/written and

online materials. Personnel shall have access to all training materials relevant to their particular job functions with the Company. The Company will also provide on-the-job training to personnel. On-the-job training will be tailored to the roles and responsibilities of the job function of each agent and, when applicable, will consist of “shadowing,” where a new agent observes or works closely with a more veteran agent. Additional training will include, at a minimum, instruction regarding: laws about marijuana usage and distribution; privacy; confidentiality; prohibitions on harassment; safety and security; emergency procedures; and effective interaction with law enforcement personnel. Agents shall complete requisite initial training prior to performing any job functions without supervision in accordance with 935 CMR 500.105(2)(a). Agents shall also undergo testing prior to performing any job functions without supervision in order to demonstrate measurable skills and knowledge. Agents shall receive a minimum of eight (8) hours of ongoing training or supplemental education annually in accordance with 935 CMR 500.105(2)(a).

2. Responsible Vendor Training

All personnel involved in the handling or sale of marijuana for adult use will be required to complete responsible vendor training in accordance with 935 CMR 500.105(2)(b). The company acknowledges that not all personnel will be directly involved with the handling or sale of marijuana for adult use, and pursuant to 935 CMR 500.105(b)(4), the Company will allow administrative employees who do not handle or sell marijuana to take the responsible vendor training on a voluntary basis. The following provisions regarding responsible vendor training apply.

- a. Responsible vendor training will be completed through a Responsible Vendor Training Program as defined by the Commission at 935 CMR 500.002. Under this regulation, “[r]esponsible vendor training means a program operated by an education provider accredited by the Commission to provide the annual minimum two hours of responsible vendor training to marijuana establishment agents.”
- b. The Company shall utilize a Responsible Vendor Training Program that complies with all of the provisions and requirements set forth under 935 CMR 500.105(2)(b)(6) and 935 CMR 500.105(2)(b)(7). Before selecting a Responsible Vendor Training Program for its employees, the Company shall research and communicate with any potential Program to ensure that the Program meets all certification training program standards under 935 CMR 500.105(2)(b)(6). Likewise, the Company shall research and discuss with any potential Program the elements of the Program’s core curriculum to ensure that the curriculum complies with 935 CMR 500.105(2)(b)(7).
- c. Responsible vendor training must be successfully completed by all agents involved in the handling or sale of marijuana and marijuana infused products within ninety (90) days of hire pursuant to 935 CMR 500.105(b)(2).
- d. All personnel involved in the handling or sale of marijuana and marijuana infused products will successfully complete responsible vendor training on an annual basis pursuant to 935 CMR 500.105(b)(3).
- e. In compliance with 935 CMR 500.105(b)(5), the Company will maintain records of responsible vendor training program compliance for at least four (4) years and shall

make these records available to the Commission and any other licensing authority upon request during normal business hours.

- f. Responsible vendor training will include instruction on the following topics among others: discussion concerning marijuana's effect on the human body; diversion prevention; and compliance with seed-to-sale tracking requirements.

3. Documentation of Training

The Company will document all required training of personnel pursuant to 935 CMR 500.105(9)(2)(d). The Company will require a signature and a statement from each trained agent indicating the date, time, and place that they received any training as well as the topics discussed during training and the names and titles of any trainers and presenters. This information will be kept within each agent's personnel file and shall be made available to the Commission upon request. As described above, the Company will maintain records of responsible vendor training program compliance for at least four (4) years and shall make these records available to the Commission and any other licensing authority upon request during normal business hours in compliance with 935 CMR 500.105(b)(5).

C. GENERAL REQUIREMENTS OF AUTHORIZED AGENTS

1. Punctuality and Attendance: Authorized agents are required to be punctual and in regular attendance when scheduled to carry out work for the Company. Authorized agents are expected to report to work as scheduled, on time, and prepared to work. Authorized agents must remain at work for the entire time scheduled, except for meal times, break times, or when authorized. If an authorized agent must be absent or tardy from work, the authorized agent shall notify the Company as soon as the authorized agent is aware of the need to be absent or tardy.
2. Nondisclosure or Use of Trade Secrets: During employment with the Company, authorized agents may have access to and become familiar with confidential or proprietary information. Authorized agents will be required to sign a confidentiality agreement at the beginning of their employment.
3. Drug and Alcohol Policy: All authorized agents are strictly prohibited from working under the influence of drugs or alcohol. The use of prescription medication is not prohibited. However, authorized agents shall notify the Company if they will be taking prescription medication on the Company's facilities or while carrying out any work functions for the Company. Otherwise, the use of drugs and alcohol is strictly prohibited on the Company's facilities and while carrying out any work functions on behalf of the Company. Any violation of this provision will result in discipline which could include immediate discharge.
4. Personal Cleanliness: Any agent working in direct contact with marijuana or marijuana infused product shall maintain adequate personal cleanliness in accordance with 935 CMR 500.105(b)(2)(a). The Company shall require all other employees and agents to also maintain adequate personal cleanliness.
5. Additional and Job Specific Requirements: Additional and job specific requirements are further detailed in the Company's employee handbook.

D. PERFORMANCE EVALUATION

The Company will require periodic performance evaluations for all personnel to confirm that authorized agents can demonstrate requisite skills and knowledge. Periodic performance evaluations shall be documented in each employee's personnel record pursuant to 935 CMR 500.105(9)(d)(2)(e).

E. DISCIPLINARY ACTION

In accordance with 935 CMR 500.105(l), the Company shall immediately dismiss any authorized agent who has:

1. Diverted marijuana or marijuana infused products;
2. Engaged in unsafe practices with regard to the operation of the Company; or
3. Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States, a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Any agent who has engaged in any of the above listed activities shall be immediately reported by the Company to the Commission and any relevant law enforcement officials. Violation of any other safety standard, rule, policy, or procedure of the Company may lead to disciplinary action, up to and including termination of the violating authorized agent. The Company shall document all disciplinary actions taken.

F. PREVENTION OF DIVERSION BY PERSONNEL

Pursuant to 935 CMR 500.030(2)(d), any applicant for employment with the Company must sign an attestation stating that the individual will not engage in the diversion of marijuana products. As stated above, any personnel involved in the diversion of marijuana or marijuana infused products will be dismissed and reported to the Commission and any relevant law enforcement agents. The Company sets forth the following provisions to prevent the diversion of marijuana and marijuana infused products by Company personnel. These provisions are applicable to all authorized agents.

1. Authorized agents may not bring bags, back packs, purses, or any other unauthorized containers into the Company's work facilities. Authorized agents will be issued clear containers in which they can store personal belongings. The Company will have lockers or a designated secure area where authorized agents may secure personal belongings stored in the Company-issued clear containers.
2. The Company reserves the right to inspect each authorized agent's clear container upon request. This measure will help to prevent any theft or diversion. In addition, this will allow the Company to maintain security and ensure that authorized agents are not bringing unauthorized items into the Company's facilities such as firearms or other weapons.

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3. All authorized agents will wear Company-issued uniforms without pockets. Uniforms create a professional environment, and the absence of pockets prevents employee theft of marijuana, marijuana infused products, and other Company property.

EMERALD CITY GROWERS
POLICIES AND PROCEDURES FOR MAINTAINING FINANCIAL RECORDS

Emerald City Growers (the “Company”) is a *marijuana establishment* as defined by 935 CMR 500.002. The Company sets forth the following policies and procedures pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1)(c)(7) (j). This regulation requires the Company to provide a detailed summary of operating procedures and policies including the maintenance of financial records.

All of the Company’s records including financial records shall be kept pursuant to 935 CMR 500.105(9) and in a form and location acceptable to the Commission. All records including financial records shall be made readily available to the Commission upon request. The Company’s policies and procedures for all record keeping are described in detail in the Company’s *Record Keeping and Document Retention Policies and Procedures*. All of the provisions regarding record keeping described therein shall apply to the keeping of financial records as detailed herein.

A. CONTROLLING ACCESS TO FINANCIAL RECORDS

1. Individuals With Access To Financial Records

The Chief Financial Officer (or other authorized individual designated by the Company) shall be responsible for maintaining all financial records on behalf of the Company. The Company shall designate which management-level authorized agents and employees may access the Company’s financial records. Financial and business records will not be accessible to non-management-level employees or specifically authorized agents.

2. Storage of Financial Records

Any hard copies of financial records shall be maintained in locked, fireproof file cabinets accessible only to the Chief Financial Officer and other specifically authorized management-level personnel. Financial records kept electronically will be saved and backed up on a daily basis, if not more frequently. All financial records shall be saved, stored, and kept for a minimum of two (2) years.

B. TRANSPARENCY AND ACCURACY

The Company places a high level of importance on demonstrating transparency and accuracy in all of its financial record-keeping activities. The Company shall ensure that all financial and business records are maintained in such a manner as to ensure accuracy and transparency. All financial records shall be maintained in accordance with Generally Accepted Accounting Principles (GAAP) pursuant to 935 CMR 500.105(9). All financial and business records will clearly reflect all financial transactions and the financial condition of the Company.

Also in the interest of transparency, information regarding all funding sources and persons and entities with financial interest in the Company shall be documented. These documents shall

contain the following information: the name of the interested entity; the address of the interested entity; the date of birth of the interested entity (if applicable); the social security number of the interested entity (if applicable); and an explanation of the financial interest. In addition, the Company shall maintain an accounting of the financial benefits accruing to the municipality as a result of the host agreement with the Company.

C. MANAGEMENT OF FINANCIAL RECORDS

The may opt to utilize a third-party licensed accounting firm to assist in the management of its financial records. The Company has not yet selected a third-party accounting firm and will diligently screen several options before making any selection. The Company will require that any third-party accounting firm operating on behalf of the Company follow all of the provisions for financial record-keeping set forth herein and all of the Commission's provisions relevant to record-keeping under 935 CMR 500.105(9).

D. CONTENT OF FINANCIAL AND BUSINESS RECORDS

The Company will keep all financial and business records dating back for a period of at least two (2) years. Pursuant to 935 CMR 500.105(9)(g), in the event the Company were to close, it would, likewise, keep all financial and business records available to the Commission for a minimum of two (2) years. The Company's financial and business records shall include manual and/or computerized records documenting the information listed below in compliance with 935 CMR 500.105(9)(e). The Company may choose to include more than is expressed by this list in its financial record-keeping.

1. Company assets and liabilities;
2. Monetary transactions, including a daily reconciliation of any cash-on-hand;
3. Books of accounts, which shall include journals, ledgers, and supporting documents such as agreements, checks, invoices, and vouchers dating back for a period of four (4) years;
4. Sales records including the quantity, form, and cost of each product sold;
5. Salary and wages paid to each establishment agent or employee, stipends paid to board members, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with the Company including members of a nonprofit corporation, if any;
6. Contracts for services performed or received;
7. Purchase invoices, bills of lading, manifests, sales records, copies of bills of sale, and any supporting documents, including items and/or services purchased, individuals from whom items and services were purchased, and the date of any purchase;
8. Bank statements and cancelled checks for all accounts;
9. Up-to-date information for all savings accounts, checking accounts, investment accounts, and trusts associated with the operation of the Company;
10. A copy of annual audit reports;
11. Accounting and tax records related to the Company; and
12. Records of any theft, loss, diversion, or other unaccountability.

EMERALD CITY GROWERS
PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Emerald City Growers (the “Company”) is a *marijuana establishment* as defined by 935 CMR 500.002. The Company sets forth the following personnel policies pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1)(c)(8)(g). The regulations require that the marijuana establishment provide a detailed summary of operating policies and procedures regarding personnel and background checks. This document and the personnel policies and procedures described herein shall be kept in accordance with the record keeping provisions at 935 CMR 500.105(9) and shall be made available to the Commission upon request.

A. COMPLIANCE WITH 935 CMR 500.101(1)(c)(8)(g) AND SCOPE

The Company understands the importance of ensuring that all personnel are properly licensed and registered. An important part of this process is the background check. All marijuana establishment agents are subject to the provisions described herein and within the Commission’s regulations. 935 CMR 500.002 defines “*marijuana establishment agent*” as including, “*a board member, director, employee, executive manager, or volunteer of a marijuana establishment who is 21 years of age or older.*” 935 CMR 500.002 continues to define “*employee*” as including, “*a consultant or contractor who provides on-site services to a marijuana establishment related to the cultivation, harvesting, preparation packaging, storage, testing, or dispensing of marijuana.*” These standard operating procedures shall apply to all of the above defined marijuana establishment agents and employees, collectively referred to herein as “personnel” or “authorized agents”.

B. REGISTRATION OF AUTHORIZED AGENTS

1. The Company must submit an application for registration for any individual which it wishes to employ as an authorized agent. All authorized agents shall be registered pursuant to the requirements set forth under 935 CMR 500.030, and the Company shall, likewise, strictly adhere to all provisions set forth under 935 CMR 500.030. All registered agents of the Company shall meet the suitability standards set forth under 935 CMR 500.800. Pursuant to 935 CMR 500.030(1), the Company must ensure that all applicants:
 - a. Are at least twenty-one (21) years old;
 - b. Have not been convicted of an offense involving the distribution of controlled substances to minors; and
 - c. Are suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802. 935 CMR 500.800 addresses the background check suitability standard for licensure and registration (discussed in further detail below), while 935 CMR 500.802 lists additional suitability standards for licensure as an authorized agent. The Company will always ensure that any applicants seeking licensure as an authorized agent are in compliance with 935 CMR 500.802.

2. The Company shall submit a complete application for registration of all applicants to the Commission containing all of the information set forth under 935 CMR 500.030(2). This regulation requires that the submitted application includes the following information:
 - a. The full name, date of birth, and address of the applicant;
 - b. Any aliases used previously or currently by the applicant, including maiden names;
 - c. A copy of the applicant's driver's license, liquor purchase identification card pursuant to M.G.L. c. § 34B, or other verifiable identity document acceptable to the Commission;
 - d. An attestation that the applicant will not engage in the diversion of marijuana products;
 - e. Written acknowledgment by the applicant of any limitations on his or her authorization to carry out any duties in relation to marijuana within the Commonwealth of Massachusetts;
 - f. Relevant background information as listed under 935 CMR 500.030(2)(f);
 - g. A nonrefundable fee paid by the Company; and
 - h. Any other information requested by the Commission.
3. As indicated above, the Company shall ensure that all provisions of 935 CMR 500.030 are adhered to. This means that the following shall apply:
 - a. The Company will submit to the Commission, a Criminal Offender Record Information ("CORI") report and background check information for each applicant, obtained within 30 days prior to submission;
 - b. The Company will notify the Commission within twenty-four (24) hours in the event that an authorized agent ceases to be associated with the Company;
 - c. The Company will follow all procedures to assist in the renewal of an authorized agent's registration on an annual basis or as determined by the Commission; and
 - d. The Company will notify the Commission within five (5) days if an authorized agent loses their registration card or if any of the authorized agent's personal information required for registration has changed.
4. Pursuant to 935 CMR 500.030, the Commission will give a registration card to each authorized agent deemed suitable for licensure. The Company will require that all authorized agents keep their registration card on their person at all times that they are either physically on Company property or carrying out a work function related to their employment or work for the Company. Likewise, pursuant to 935 CMR 500.030(7), authorized agents shall carry their registration cards at all times while in the possession of marijuana and marijuana infused products.

C. BACKGROUND CHECKS

All applicants and authorized agents shall be subject to background checks. Pursuant to 935 CMR 500.030(3), a representative of the Company who is registered with the Department of Criminal Justice Information Systems under 803 CMR 2.04: *iCORI Registration* shall submit to the Commission, a CORI report and other background check information to the Commission as a

part of the individual's application to become an authorized agent. 935 CMR 500.101(1)(b) sets forth that each applicant for licensure is subject to a background check and must submit specific information to the Commission. Information to be submitted includes all of the information listed under Section (B) above as well as an authorization for the Commission to obtain a full set of fingerprints from the applicant or authorized agent in accordance with M.G.L. c. 94G, § 21. In addition, pursuant to 935 CMR 500.101(1)(b)(3), applicants and authorized agents must provide to the Commission as a part of their application for licensure the following information:

1. Any information related to relevant criminal action;
2. Any information related to relevant civil action;
3. Relevant dates of any past or pending legal enforcement actions;
4. Relevant dates of any administrative action; and
5. Any other information requested by the Commission.

The Company understands that pursuant to 935 CMR 500.800, the Commission has discretion to determine the suitability of any applicant for licensure as an authorized agent. The Company understands that the background checks of applicants and authorized agents play a large part in the Commission's determination of suitability for licensure and registration. Pursuant to 935 CMR 500.801(2), the Commission will consider specific conditions, offenses, violations, and criminal disqualifying conditions in order to determine whether an applicant or authorized agent is suitable for licensure.

D. RECORD KEEPING

The Company shall keep a personnel record for each authorized agent pursuant to 935 CMR 500.105(9)(d). Personnel records will be kept for a minimum of one year after termination of an authorized agent's relationship with the Company. Agents may request a review of their personnel files. Such a review must take place during business hours and in the presence of an authorized and designated Company representative. Personnel records will include all of the information detailed under 935 CMR 500.105(9)(d)(2). In addition, the Company shall also require that personnel records include the following:

1. Job descriptions for the particular authorized agent including duties, authorities, responsibilities, qualifications, and supervision;
2. Any organizational charts consistent with relevant job descriptions;
3. The full name, date of birth, and address of the authorized agent;
4. A written acknowledgement signed by the authorized agent of any limitations on their ability to perform any job duties;
5. A copy of the authorized agent's driver's license or other form of identification acceptable by the Commission;
6. A signed attestation that the authorized agent will not engage in the diversion of marijuana;
7. Documentation of two of the authorized agent's professional references;
8. Documentation relating to all required training (*see Section (F)* below);
9. A copy of any materials related to the authorized agent's background check;

10. Documentation of periodic performance evaluations; and
11. Documentation relating to any disciplinary action taken against the authorized agent.

As indicated above, all personnel records and the personnel policies and procedures described herein shall be kept in accordance with the record keeping provisions at 935 CMR 500.105(9) and shall be made available to the Commission upon request. Personnel records for each agent shall be preserved by the Company for at least twelve (12) months after termination of the agent's affiliation with the Company. The Company further details provisions for record keeping in its *Record-Keeping and Document Retention Policies and Procedures*.

E. TRAINING

All authorized agents will participate in a comprehensive training program to ensure that they perform their job functions safely and at the highest level. The training program is detailed in the Company's *Standard Operating Procedures Regarding the Qualifications, Training, and Requirements of Personnel*.

F. PERFORMANCE EVALUATION AND DISCIPLINARY ACTION

The Company will require periodic performance evaluations to confirm that authorized agents can demonstrate requisite skills and knowledge. The Company will discipline and potentially dismiss any authorized agents who violate any of the Commission's regulations or any standard, rule, policy, or procedure set forth by the Company. Performance evaluation and disciplinary actions are discussed in detail in the Company's *Standard Operating Procedures Regarding the Qualifications, Training, and Requirements of Personnel*.

G. DIVERSION PREVENTION

The Company requires that authorized agents adhere to specific provisions designed to prevent the diversion of marijuana and marijuana infused products. These requirements are reviewed in detail in the Company's *Standard Operating Procedures Regarding the Qualifications, Training, and Requirements of Personnel*.

H. EQUAL OPPORTUNITY EMPLOYMENT STATEMENT

It is the Company's policy to provide equal opportunity in all areas of employment, including recruitment, hiring, training and development, promotions, transfers, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment, in accordance with applicable federal, state, and local laws. The Company will make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable law.

Designated management-level employees are primarily responsible for seeing that equal employment opportunity policies are implemented, but all employees and authorized agents share the responsibility for ensuring that, by their personal actions, the policies are effective and

apply uniformly to everyone. Any authorized agent determined by the Company to be involved in discriminatory practices is subject to disciplinary action and may be terminated. The Company strives to maintain a work environment that is free from discrimination, intimidation, hostility, or other offenses that might interfere with work performance. The Company will not tolerate any unlawful harassment of employees by anyone, including any manager, co-worker, vendor or clients.

In addition to the above, the Company will:

- Provide a staffing plan and records that are in compliance with 935 CMR 500.105(9) and 935 CMR 500.105(1)
- Implement alcohol, smoke, and drug-free workplace policies in compliance with 935 CMR 500.105(1)
- Provide a plan describing how confidential information will be maintained in accordance with 935 CMR 500.105(1).
- Implement a policy for the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor. 935 CMR 500.105(1).

EMERALD CITY GROWERS

DIVERSITY PLAN

Emerald City Growers (“Emerald City” or the “Company”) is committed to actively promoting diversity, inclusion, and cultural competency, by implementing programmatic and operational procedures and policies that will help to make Emerald City a leader and champion of diversity, both in the Town of Clinton and throughout the broader Massachusetts cannabis industry.

Emerald City’s commitment to diversity is reflected in the following Goals, which shall be pursued through the Programs outlined herein, and the progress of which shall be judged by the Measurements/Metrics as stated below, and adjusted as needed if necessary:

Goal One: Achieve at least 10% of our staffing needs from women (5%) and minorities (5%).

Programs to Achieve Diversity Goal One:

- Create a standing Committee on Diversity and Inclusion ("CDI") with membership to be comprised of leaders from all levels of Emerald City’s corporate hierarchy and across all departments. Membership on the CDI shall be determined by seniority of the employee and the composition of the CDI shall be comprised of at least 33% people who are minorities, women, veterans, people with disabilities, and/or members of the LGBTQ+ community.
- Provide on-site interactive workshops, annually (at minimum), covering such topics as the prevention of sexual harassment, racial and cultural diversity, and methods of fostering an inclusive work atmosphere.
- Increase diversity of the make-up of our staff by actively seeking out minorities, women, veterans, people with disabilities, and/or members of the LGBTQ+community, both through in-house hiring initiatives and participation in online diversity job boards including but not limited to <https://diversityjobs.com/> and <https://www.pdnrecruits.com/> and in-person job fairs at least annually and as staffing needs merit.
- Establish clearly written policies regarding diversity and a zero-tolerance policy for discrimination and/or sexual harassment, which shall be incorporated into our employee handbook.

Measurements:

- *Qualitative Metrics:* Perform annual evaluation of inclusion/diversity initiatives to ensure diversity is one of Emerald City’s strengths and remains a primary focus. This may include anonymous employee surveys or other private submission opportunities so that we can attempt to avoid any sort of reluctance for our employees to inform management how we are truly doing in pursuit of our diversity plan goals. The results of the surveys shall be compared to prior years’ results to allow Emerald City to adjust our programs in the event that our goals are not being achieved.
- *Quantitative Metrics:* We will strive to achieve at least 10% of our staffing needs from women and minorities. The personnel files shall be evaluated on a semi-annual basis to determine how many employees are women and minorities that occupy positions within the Emerald City and that number shall be divided by Emerald City’s total staffing at its LOCATION facility to determine the percentage achieved.

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Emerald City acknowledges that it shall show progress or success of our plan at least annually as an express condition of renewal of its licensure, with the submission of a renewal application to be submitted no later than 60 days prior to the date of the anniversary of the issuance of provisional licensure, and every year thereafter.

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

Emerald City acknowledges that any actions taken, or programs instituted will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.