



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR284256
Original Issued Date: 10/19/2023
Issued Date: 10/19/2023
Expiration Date: 10/19/2024

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Community Growth Partners Boston, LLC

Phone Number: 646-408-1196 Email Address: charlotte@communitygrowthpartners.com

Business Address 1: 591 Albany Street Business Address 2:

Business City: Boston Business State: MA Business Zip Code: 02118

Mailing Address 1: 783 S. Main Street Mailing Address 2:

Mailing City: Great Barrington Mailing State: MA Mailing Zip Code: 01230

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: 60.1 Percentage Of Control: 100
Role: Manager Other Role: Manager of Community Growth Partners Boston, LLC
First Name: Charlotte Last Name: Hanna 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 2

Percentage Of Ownership:

Percentage Of Control:

Role: Other (specify)

Other Role: Director of Community Growth Partners Holdings, Inc.

First Name: Ernest

Last Name: Hanna

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 3

Percentage Of Ownership:

Percentage Of Control:

Role: Director

Other Role: Director of Community Growth Partners Holdings, Inc.

First Name: Jeanne

Last Name: Sullivan

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:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 90.1

Percentage of Ownership: 90.1

Entity Legal Name: Community Growth Partners Holdings, Inc.

Entity DBA:

DBA City:

Entity Description: Delaware Corporation

Foreign Subsidiary Narrative:

Entity Phone: 646-408-1196

Entity Email: charlotte@communitygrowthpartners.com

Entity Website:

Entity Address 1: 783 South Main St.

Entity Address 2:

Entity City: Great Barrington

Entity State: MA

Entity Zip Code: 01230

Entity Mailing Address 1: 783 South Main St.

Entity Mailing Address 2:

Entity Mailing City: Great Barrington

Entity Mailing State: MA

Entity Mailing Zip Code: 01230

Relationship Description: Community Growth Partners Holdings, Inc. holds 90.1% of the membership interests of Community Growth Partners Boston, LLC.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS
Individual 1

First Name: Charlotte	Last Name: Hanna	Suffix:
Marijuana Establishment Name: Community Growth Partners Great Barrington Operations LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Great Barrington	Marijuana Establishment State: MA	

Individual 2

First Name: Charlotte	Last Name: Hanna	Suffix:
Marijuana Establishment Name: Community Growth Partners Northampton Operations LLC	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Northampton	Marijuana Establishment State: MA	

Individual 3

First Name: Charlotte	Last Name: Hanna	Suffix:
Marijuana Establishment Name: Community Growth Partners Northampton Operations LLC	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Northampton	Marijuana Establishment State: MA	

Individual 4

First Name: Ernest	Last Name: Hanna	Suffix:
Marijuana Establishment Name: Community Growth Partners Northampton Operations LLC	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Northampton	Marijuana Establishment State: MA	

Individual 5

First Name: Ernest	Last Name: Hanna	Suffix:
Marijuana Establishment Name: Community Growth Partners Northampton Operations LLC	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Northampton	Marijuana Establishment State: MA	

Individual 6

First Name: Ernest	Last Name: Hanna	Suffix:
Marijuana Establishment Name: Community Growth Partners Great Barrington Operations LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Great Barrington	Marijuana Establishment State: MA	

Individual 7

First Name: Ernest	Last Name: Hanna	Suffix:
Marijuana Establishment Name: Community Growth Partners Delivery, Inc.	Business Type: Other	
Marijuana Establishment City: Northampton	Marijuana Establishment State: MA	

Individual 8

First Name: Charlotte	Last Name: Hanna	Suffix:
Marijuana Establishment Name: Community Growth Partners Delivery, Inc.	Business Type: Other	

Marijuana Establishment City: Northampton

Marijuana Establishment State: MA

Individual 9

First Name: Jeanne

Last Name: Sullivan

Suffix:

Marijuana Establishment Name: Community Growth Partners Delivery, Inc.

Business Type: Other

Marijuana Establishment City: Northampton

Marijuana Establishment State: MA

Individual 10

First Name: Jeanne

Last Name: Sullivan

Suffix:

Marijuana Establishment Name: Community Growth Partners Northampton Operations LLC

Business Type: Marijuana Cultivator

Marijuana Establishment City: Northampton

Marijuana Establishment State: MA

Individual 11

First Name: Jeanne

Last Name: Sullivan

Suffix:

Marijuana Establishment Name: Community Growth Partners Northampton Operations LLC

Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Northampton

Marijuana Establishment State: MA

Individual 12

First Name: Jeanne

Last Name: Sullivan

Suffix:

Marijuana Establishment Name: Community Growth Partners Great Barrington Operations LLC

Business Type: Marijuana Retailer

Marijuana Establishment City: Great Barrington

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 591 Albany St

Establishment Address 2:

Establishment City: Boston

Establishment Zip Code: 02118

Approximate square footage of the establishment: 2418

How many abutters does this property have?: 60

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	CGP Boston - Plan to Remain Compliant with Local Zoning.pdf	pdf	64aca0c6cabcb870007106557	07/10/2023
Community Outreach Meeting Documentation	CGPB_-_Community_Outreach_Form_Redacted (signed)_rfs.pdf	pdf	64b1895fcabcb87000715ce6b	07/14/2023
Certification of Host Community Agreement	CGPB HCA Certification.pdf	pdf	64cd257622035f0008fc25ef	08/04/2023
Community Outreach Meeting Documentation	Re: 591 Albany Street - Outreach Meeting.pdf	pdf	64d4e36222035f0008011067	08/10/2023

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	CGPB PIP RFI 8.10.23.pdf	pdf	64d4e4c1e317fe0008fe01ce	08/10/2023

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Manager

Other Role:

First Name: Charlotte

Last Name: Hanna Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Other (specify)

Other Role: Director of Community Growth Partners Holdings, Inc.

First Name: Ernest

Last Name: Hanna Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Other (specify)

Other Role: Director of Community Growth Partners Holdings, Inc.

First Name: Jeanne

Last Name: Sullivan Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company

Other Role:

Entity Legal Name: Community Growth Partners Holdings, Inc.

Entity DBA:

Entity Description: A parent company of the licensee

Phone: 646-408-1196

Email: charlotte@communitygrowthpartners.com

Primary Business Address 1: 783 S Main St

Primary Business Address 2:

Primary Business City: Great Barrington

Primary Business State: MA

Principal Business Zip Code: 02130

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	CGPB - Articles of Organization.pdf	pdf	64ad7bdbcab87000710fc99	07/11/2023
Bylaws	Community Growth Partners Boston, LLC - MA	pdf	64ad7c24cab87000710fd72	07/11/2023

Single Member LLC Agreement - EXECUTED(11182669.2).pdf				
Department of Revenue - Certificate of Good standing	CGPB_DOR_Attestation (Signed).pdf	pdf	64b16129e317fe0008e241bb	07/14/2023
DUA attestation if no employees	CGPB_DUA_Attestation (signed).pdf	pdf	64b1612ce317fe0008e241ef	07/14/2023
Secretary of Commonwealth - Certificate of Good Standing	William Francis Galvin.pdf	pdf	64b6bbf9e317fe0008e5af71	07/18/2023

No documents uploaded

Massachusetts Business Identification Number: 001623032

Doing-Business-As Name: Rebelle

DBA Registration City: Boston

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	CGPB - Timeline.pdf	pdf	64ad94e7cab870007113f64	07/11/2023
Business Plan	CGPB - Business Plan.pdf	pdf	64ad9600e317fe0008de3c72	07/11/2023
Plan for Liability Insurance	CGPB - Liability Insurance.pdf	pdf	64ad963fe317fe0008de3cc9	07/11/2023

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Security plan	CGPB - Security.pdf	pdf	64ad96a2cab87000711450d	07/11/2023
Personnel policies including background checks	CGPB - Personnel.pdf	pdf	64ad96a7e317fe0008de3d6e	07/11/2023
Plan for obtaining marijuana or marijuana products	CGPB - Plan to Obtain Marijuana.pdf	pdf	64ad96d9e317fe0008de3d9e	07/11/2023
Separating recreational from medical operations, if applicable	CGPB - Plan to Separate Medical.pdf	pdf	64ad9703cab8700071145fb	07/11/2023
Restricting Access to age 21 and older	CGPB - Plan to restrict access.pdf	pdf	64ad9725e317fe0008de3ea6	07/11/2023
Storage of marijuana	CGPB - Storage.pdf	pdf	64ad9768e317fe0008de3f3f	07/11/2023
Transportation of marijuana	CGPB - Transportation.pdf	pdf	64ad9785cab8700071146e7	07/11/2023
Inventory procedures	CGPB - Inventory.pdf	pdf	64ad97b7cab870007114731	07/11/2023
Quality control and testing	CGPB - Quality Control and Testing.pdf	pdf	64ad97d7e317fe0008de3fd5	07/11/2023
Dispensing procedures	CGPB - Dispensing.pdf	pdf	64ad9838e317fe0008de4040	07/11/2023
Record Keeping procedures	CGPB - Recordkeeping.pdf	pdf	64ad9876e317fe0008de40d2	07/11/2023

Maintaining of financial records	CGPB - Financial Records.pdf	pdf	64ad9894cab8700071148ea	07/11/2023
Qualifications and training	CPGB - Qualifications and Training.pdf	pdf	64ad98b0cab870007114901	07/11/2023
Energy Compliance Plan	CGPB - Energy.pdf	pdf	64ad98e9e317fe0008de415d	07/11/2023
Prevention of diversion	CGPB - Diversion Prevention.pdf	pdf	64d4e64722035f00080115cd	08/10/2023
Dispensing procedures	Rebelle logo.png	png	64d4e71fe317fe0008fe0433	08/10/2023
Diversity plan	CGP Boston Diversity 3.pdf	pdf	64e9145e832c6e000832e51c	08/25/2023

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 10:00 AM	Monday To: 7:00 PM
Tuesday From: 10:00 AM	Tuesday To: 7:00 PM
Wednesday From: 10:00 AM	Wednesday To: 7:00 PM
Thursday From: 10:00 AM	Thursday To: 7:00 PM
Friday From: 10:00 AM	Friday To: 7:00 PM

Saturday From: 10:00 AM	Saturday To: 7:00 PM
Sunday From: 10:00 AM	Sunday To: 6:00 PM

PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

Community Growth Partners Boston, LLC (“Rebelle”) will remain compliant at all times with the local zoning requirements set forth in the City of Boston’s Zoning Code. The company’s proposed facility at 591 Albany Street is allowed through Conditional Use Permit by the Zoning Board of Appeals. Such a permit must be effectuated within three years of issuance. While the company will not need to complete any construction, it will maintain a Certificate of Occupancy.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12.

Rebelle will apply for any other local permits required to operate at the proposed location, including a license from the Boston Cannabis Board and will comply with all conditions and standards set forth in its permit.

Rebelle will continue to work cooperatively with various municipal departments, boards, and officials to ensure that it remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.



Community Outreach Meeting Attestation Form

Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC), 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 5/8/23
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

a. Date of publication:

4/22/23

b. Name of publication:

Boston Globe

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

a. Date notice filed:

4/20/23

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

a. Date notice(s) mailed:

4/27/23

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



Name of applicant:

Community Growth Partners Boston, LLC. d/b/a Rebelle

Name of applicant's authorized representative:

Charlotte Hanna

Signature of applicant's authorized representative:

DocuSigned by:
Charlotte Hanna
C0360D59E88F418...



From: [Bridgette Nikisher](#)
To: publicnotice@boston.gov
Cc: [Rebecca Rutenberg](#)
Subject: Notice of Public Meeting - Community Growth Partners Boston, LLC
Date: Thursday, April 20, 2023 4:58:00 PM
Attachments: [591 Albany Street Flyer \(2\).pdf](#)
[image002.png](#)

Hi,

I hope this email finds you well. Attached, please find a notice of public meeting. Should additional information be required, please don't hesitate to ask.

I would be appreciative if you are able to kindly confirm receipt.

Thank you!

Bridgette Nikisher
Strategic Affairs Specialist
she / her / hers

Cell: 914-483-8836
Office: 917-398-0685
B.Nikisher@VicenteLLP.com

Vicente

1115 Broadway, Suite 1218
New York, NY 10010

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From: [Bridgette Nikisher](#)
To: cityclerk@boston.gov
Cc: [Rebecca Rutenberg](#)
Subject: Notice of Public Meeting - Community Growth Partners Boston, LLC
Date: Thursday, April 20, 2023 3:29:00 PM
Attachments: [591 Albany Street Flyer \(2\).pdf](#)
[image002.png](#)

Hi,

I hope this email finds you well. Attached, please find a notice of public meeting. Should additional information be required, please don't hesitate to ask.

I would be appreciative if you are able to kindly confirm receipt.

Thank you!

Bridgette Nikisher
Strategic Affairs Specialist
she / her / hers

Cell: 914-483-8836
Office: 917-398-0685
B.Nikisher@VicenteLLP.com

Vicente

1115 Broadway, Suite 1218
New York, NY 10010

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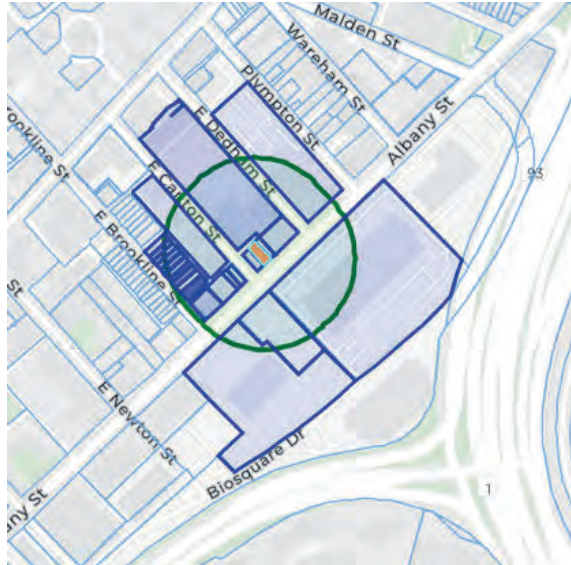
NOTICE OF PUBLIC MEETING

Notice is hereby given that a Community Meeting for a Proposed Cannabis Establishment is scheduled for:

Application Name: Community Growth Partners Boston, LLC

Application Address: 591 Albany Street, Boston MA 02118

License Type: Co-located Retail and Medical License



Join virtually at the Zoom link below - this is NOT an in person meeting:

Proposal: Community Growth Partners Boston, LLC. d/b/a Rebelle, is proposing a new co-located Cannabis Establishment (no construction proposed) - the scheduled date for the meeting will be on Monday, May 8th at 6pm via Zoom.

Date: Monday, May 8th 2023

Time: 6:00PM

Event Link: <https://bit.ly/4li9UAe>

Event password: 880 5318 2012

Dial-in Number: 1 646 558 8656

Access Code: 880 5318 2012

There will be an opportunity for the public to raise comments, questions, and concerns.

If you any questions or comments about this proposal, please contact:

Kim Crucioli

South End and Bay Village Liaison

Mayor's Office of Neighborhood Services

(617) 635-4517 | kimberly.crucioli@boston.gov

Please note, the City does not represent the owner(s)/developer(s)/attorney(s)/applicant(s). The purpose of this notice is to notify area abutters to this project proposal. This flyer has been dropped off by the proponents per the city's request.


Neighborhood Services

Host Community Agreement Certification Form

Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. Please note that submission of information that is "misleading, incorrect, false, or fraudulent" is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

Certification

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

1. Name of applicant:

Community Growth Partners Boston LLC d/b/a Rebelle

2. Name of applicant's authorized representative:

Charlotte Hanna, LLC Manager

3. Signature of applicant's authorized representative:



4. Name of municipality:

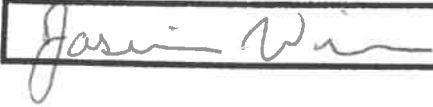
Boston

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

Jasmin Winn



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



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

cannabisboard@boston.gov

8. Host community agreement execution date:

August 2, 2023

Thursday, August 10, 2023 at 09:16:47 Eastern Daylight Time

Subject: Re: 591 Albany Street - Outreach Meeting
Date: Wednesday, August 9, 2023 at 12:07:48 PM Eastern Daylight Time
From: Kimberly Crucioli
To: Rebecca Rutenberg
CC: Charlotte Hanna, Hawkins, Lesley D
Attachments: image001.png, external.png

 External email >

Hi Becca!

Here is the link, let me know if there are any issues accessing it! I set it so anyone with the link can view.

https://us06web.zoom.us/rec/share/7UH9XJfc-6MiwHW5NfnQWV0wJ-D-sMeiIfn_ocsEdqInnF3ITqrmSngkJmIMHP4A.JOGSp66grHEBgc6E

Passcode: t4uMtCJ!

I believe we only had 1 participant, David Stone from Blackstone Franklin Square Neighborhood Association.

Thanks!
Kim

On Wed, Aug 9, 2023 at 10:07AM Rebecca Rutenberg <r.rutenberg@vicentellp.com> wrote:

Good morning Kim –

I hope all is well!

The Cannabis Control Commission has requested a link to the Community Growth Partners Boston, LLC community outreach meeting at 591 Albany Street. Any chance you can send it over along with the number of participants if you have it?

Many thanks!

Becca

Becca Rutenberg

Vice President, Northeast Markets + Business Intelligence

Vicente.

Prudential Tower

800 Boylston Street, 26th Floor

Boston, MA 02199

cell: 610.675.5958

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Kim Crucioli

South End and Bay Village Liaison

Office of Neighborhood Services

617-635-4517

Sign up for neighborhood news [here](#)

Notice: This email is subject to the [MGL: Chpt.66, Sec.10 Public Records Law](#).

Community Growth Partners Boston, LLC DBA Rebelle
Retail Application
Positive Impact Plan

Introduction

Community Growth Partners Boston (CGP) is committed to being an active and engaged community partner and educator in Boston and throughout the surrounding region. As a start-up whose social purpose is core to our mission, we believe that a new type of just and equitable capitalist enterprise like us can help contribute to our community in many positive way. We believe that it is our duty to provide consistent and reliable educational resources on the impact and uses of cannabis, to bring awareness to the social injustices widely present within the cannabis industry today, and to use portions of our income to pay reparations to families and individuals who have been disproportionately negatively impacted by the criminalization of cannabis.

CGP is committed to being a transparent resource for any cannabis related concern, and we believe that by developing collaborative relationships with the local municipal, business, law enforcement, healthcare, and non-profit professionals in Boston, we will be able to minimize negative perception towards the cannabis industry. Our goal is to be a partner in supporting the needs of the community, while also eliminating stigma and heightened fear amongst our neighbors.

We have created a layered community engagement platform centered around criminal justice reform and the economic empowerment of communities and individuals who have been most harmed as a result of the criminalization of cannabis.

Positive Community Impact Goals

CGP is a social impact cannabis brand dedicated to providing consistent access to a safe and reliable product that is ethically grown and sourced. We are delighted to work with a Cannabis Control Commission that is so clearly devoted to building social equity in this space as a response to the many injustices that have disproportionately targeted low socioeconomic areas. We believe this is an important responsibility of all cannabis entrepreneurs and enthusiasts and look forward to executing our Community Engagement Plan in Massachusetts.

- *Goal 1* Develop an effective platform for criminal justice reform within City of Boston Census Tract 711.01
- *Goal 2* Develop an effective platform for support of areas of disproportionate impact within City of Boston Census Tract 711.01

These goals represent our long-term vision for relevant and effective community engagement across the state. We believe that in order to achieve these goals, we need a layered approach to address the injustices caused by cannabis criminalization, economically empower those populations most impacted by said criminalization, and to eliminate the negative stigma associated with cannabis and its use.

Positive Community Impact Programs

CGP will employ a Director of Community Affairs, whose primary duties will include the execution of our statewide Community Engagement Plan and we will partner with a local non-profit organization to help us execute these initiatives.

1. Criminal Justice Reform Program

CGP will commit 3% of our annual net profits to our criminal justice reform program, as outlined below. This program is committed to providing comprehensive assistance and real change in the lives of families and communities that have been disenfranchised as a result of cannabis criminalization.

Expungement: Year 1 will focus on the financial assistance of legal fees for individuals attempting to expunge cannabis criminal charges from their record. Criminal record expungement can cost anywhere from a few hundred to over several thousand in legal fees, depending on the number and severity of charges. Our goal is to cover the legal expungement fees, in their entirety, of at least 5 individuals from areas of disproportionate impact who have otherwise been unable to seek this service, and to help those individuals identify and pay for the appropriate legal help if/when they cannot do so themselves. We will contribute to programs such as ROCA which conduct this process for individuals in the Boston area and specifically in Boston Census Tract 711.01.

2. Compensation for Employee Driven Community Engagement

Consistent with our corporate values, we look forward to nurturing a company culture that encourages employees to actively participate in community engagement efforts that they are passionate about.

Dollar-for-Dollar Donation Match Program – CGP will match the donations its employees make to charities in areas of disproportionate impact, up to \$500 per employee per year. Through this program, we hope to increase the available funding for local charities and demonstrate to our employees that we support the causes they care about. These charities will be approved based on their proximity to our facility and/or their service to areas of disproportionate impact. Potential organizations will be contacted in advance and required to provide a letter stating that they are willing to receive the donation. Currently, ROCA has agreed to accept donations through this program (see attached letters), and we hope to develop additional community partners willing to accept donations as we engage further in Boston.

Community Impact Measurements

The company will produce an annual community engagement report to outline the progress of our efforts as part of our annual renewal. This will be made available on our website, and can be requested in printed format by any of our community partners. The Director of Community Affairs will be responsible for the tracking management and reporting of all relative qualitative and quantitative data. The information will be released within 45 days of our annual report and will be provided to the Commission upon request or as part of CGP's annual license renewal process. The community engagement report will describe CGP's progress toward the goals of the below-outlined programs.

Criminal Justice Reform Program

- We will measure how many individuals are served through our expungement efforts
- We will measure our financial contribution through our criminal record expungement efforts
- Future reports will measure all additional engagement efforts, including number of individuals served, manner in which they were served, services provided, and the financial contribution of all efforts.

Employee Donation Program

CGP will measure how many dollars are going to not-for-profit organizations through our matching program.

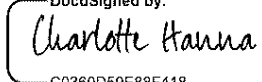
CGP acknowledges, is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws. Finally, none of the actions taken or programs instituted by CGP will violate the Commission's regulations with respect to limitations on ownership or control or any other applicable state laws.

**CERTIFICATE OF ORGANIZATION OF
COMMUNITY GROWTH PARTNERS BOSTON, LLC**

This Certificate of Organization of Community Growth Partners Boston, LLC (the “**Company**”), dated December 8, 2022, is being duly executed and filed by Charlotte Hanna, an authorized person, to form a limited liability company under the Massachusetts Limited Liability Company Act, M.G.L. Chapter 156C (the “**Act**”).

1. The name of the limited liability company is Community Growth Partners Boston, LLC.
2. The address of the office of the Company required to be maintained in the Commonwealth for maintaining its records is 783 S. Main Street, Great Barrington, Massachusetts 01230.
3. The name and address of the registered agent for service of process on the Company in the Commonwealth is C T Corporation System, 155 Federal Street, Suite 700, Boston, Massachusetts, 02110.
4. The Company has no specific date of dissolution.
5. The name and address of the initial manager of the Company is Charlotte Hanna, 783 S. Main Street, Great Barrington, Massachusetts 01230.
6. The general character of the Company’s business is to apply for licensure with the Massachusetts Cannabis Control Commission, to engage in cannabis activities in accordance with applicable law, to engage in any and all activities necessary, advisable or incidental thereto, and to engage in any lawful act or activity for which a limited liability company may be formed under the Act.
7. Charlotte Hanna is hereby authorized to file documents, including this Certificate, on behalf of the Company with the office of the Secretary of State.
8. The name of the person authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property, whether to be recorded with a registry of deeds or a district office of the land court, is Charlotte Hanna.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Organization as of the date first above written.

DocuSigned by:

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Charlotte Hanna, Authorized Person

Consent of Resident Agent

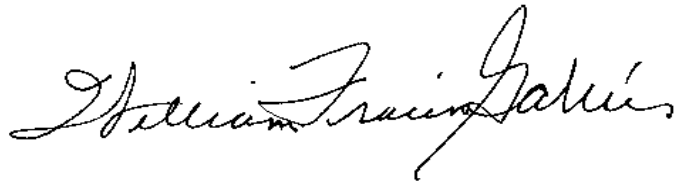
CT Corporation System hereby consents to its appointment as resident agent of the above limited liability company pursuant to M.G.L. Chapter 156C, Section 12.

/s/ Dahlena K. Mitchell-Asst. 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:

December 08, 2022 01:26 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

LIMITED LIABILITY COMPANY AGREEMENT OF COMMUNITY GROWTH PARTNERS BOSTON, LLC

THIS LIMITED LIABILITY COMPANY AGREEMENT this “**Agreement**”) of Community Growth Partners Boston, LLC (the “**Company**”), is entered into by Community Growth Partners Holdings, Inc., as the sole initial member of the Company (the “**Member**”) as of December 8, 2022.

The Member hereby forms a limited liability company pursuant to and in accordance with the Massachusetts Limited Liability Company Act, Massachusetts General Laws, c. 156C (the “**Act**”), and hereby sets forth the rights, duties and obligations with respect to the Company as follows:

1. **Name.** The name of the Company shall be “Community Growth Partners Boston, LLC”.

2. **Purpose.** The principal purpose and general character of the Company’s business is to apply for licensure with the Massachusetts Cannabis Control Commission, to engage in cannabis activities in accordance with applicable law, to engage in any and all activities necessary, advisable or incidental thereto, and to engage in any lawful act or activity for which a limited liability company may be formed under the Act. The Company shall have the power, privilege and authority to take any and all actions necessary, convenient, desirable or incidental to the business and purposes of the Company.

3. **Principal Office.** The address of the office of the Company in The Commonwealth of Massachusetts at which shall be kept the records required under Section 9 of the Act is 783 S. Main Street, Great Barrington, Massachusetts 01230, or such other address within The Commonwealth of Massachusetts as the Member may designate.

4. **Resident Agent.** The name and address of the resident agent for service of process on the Company is C T Corporation System, 155 Federal Street, Suite 700, Boston, Massachusetts, 02110. The Member may from time to time designate another person to be such resident agent, provided such person is an individual resident of, a corporation incorporated under the laws of, or a foreign corporation authorized to do business in, The Commonwealth of Massachusetts.

5. **Member.** The name of the sole initial member of the Company is Community Growth Partners Holdings, Inc., with an address at 783 S. Main Street, Great Barrington, Massachusetts 01230.

6. **Powers.** The business and affairs of the Company shall be managed by the Member. The Member shall have the power to do any and all acts necessary or convenient to or in furtherance of the purposes described herein, including all powers, statutory or otherwise, granted by the Act to members.

7. **Capital Contributions.** The capital contributions of the Member to the Company shall consist of any funds or property contributed to the Company by the Member as reflected in the books and records of the Company.

8. Distributions. Distributions shall be made at such times and in such amounts as the Member shall determine in accordance with the Act.

9. Additional Contributions. The Member is not required to make any additional capital contributions to the Company.

10. Dissolution. The Company shall continue until the earlier of (i) the effective date of judicial dissolution under Section 44 of the Act or (ii) the date specified in a written consent by the Member to dissolve the Company.

11. Incapacity. If the Member is adjudged by a court of competent jurisdiction to be incompetent or lacking in the capacity to manage the Member's person or property, the Member's personal representative may exercise all of the Member's rights for the purpose of administering his property.

12. Liability. The Member shall have no liability for the obligations or liabilities of the Company except to the extent required by the Act. No member shall be obligated personally for any debt, obligation or liability of the Company solely by reason of being a member or acting as a manager of the Company.

13. Governing Law. This Agreement shall be governed by, and construed and enforced under, the Act and the other laws of The Commonwealth of Massachusetts, without regard to its principles of conflicts of laws.


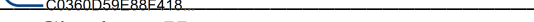
14. Effective Time. This Agreement shall be effective as of the time of the filing of a certificate of organization with the Secretary of The Commonwealth of Massachusetts.

[Remainder of page intentionally left blank.]

IN WITNESS WHEREOF, the undersigned, intending to be legally bound hereby, has duly executed this Limited Liability Company Agreement as of the date first set forth above.

MEMBER:

Community Growth Partners Holdings, Inc., a
Delaware corporation

DocuSigned by:

By: 
Name: Charlotte Hanna
Title: President

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

Signed under the pains and penalties of perjury, I, Charlotte Hanna, an authorized representative of Community Growth Partners Boston, LLC certify that the company has not yet registered with the Massachusetts Department of Revenue to obtain a Certificate of Good Standing or Compliance.

DocuSigned by:

Charlotte Hanna

C0360D59E88F418...

Name

7/13/2023

Date



William Francis Galvin
Secretary of the
Commonwealth

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

July 11, 2023

TO WHOM IT MAY CONCERN:

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

COMMUNITY GROWTH PARTNERS BOSTON, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 8, 2022.**

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

I also certify that the names of all managers listed in the most recent filing are:
CHARLOTTE HANNA

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

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



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

William Francis Galvin

Secretary of the Commonwealth

Processed By:PMLH

BUSINESS PLAN: EXECUTIVE SUMMARY

Mission Statement and Message from the CEO

Community Growth Partners Boston, LLC (“Rebelle”) is an applicant for Marijuana Establishment Licenses in the Commonwealth that is committed to creating a safe and clean community environment and that provides consistent, high quality cannabis to consumers who are 21 years of age or older.

License Types

Rebelle is applying for the following Licenses from the Massachusetts Cannabis Control Commission (the “Commission”) to operate Marijuana Establishments in Massachusetts:

- Adult Use Marijuana Retailer at 591 Albany Street in Boston, MA

What Drives Us

Rebelle’s goals include:

1. Providing customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting local communities in offsetting the cost of Rebelle’s operations within its communities;
3. Hiring employees and contractors from within the communities served;
4. Hiring employees and contractors from communities that have been disproportionately impacted by the war on drugs;
5. Having a diverse and socially representative pool of employees;
6. Empowering the next generation of entrepreneurs and leaders through hiring, training and teaching; and
7. Running an environmentally friendly Marijuana Establishment.

COMPANY DESCRIPTION

Structure

Rebelle is a Massachusetts domestic limited liability company that is applying for Licenses from the Commission to operate Marijuana Establishments in the Commonwealth.

Rebelle will file, in a form and manner specified by the Commission, an application for licensure as a Marijuana Establishment consisting of three packets: An Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

Operations

Rebelle will establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories finished, stored marijuana; conduct a monthly inventory of finished, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

Rebelle will tag and track all marijuana seeds, clones, plants, and marijuana products using Metrc and in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that has not first been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Rebelle will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles and maintained for at least 12 months or as specified and required by 935 CMR 500.000.

Rebelle will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence. If adequate coverage is unavailable at a reasonable rate, Rebelle will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. Rebelle will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

Rebelle will provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements.

Rebelle will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure.

Prior to commencing operations, Rebelle will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of Rebelle. If Rebelle is unable to secure a surety bond, it will place in escrow a sum of no less than \$5,000 or such other amount approved by the Commission, to be expended for coverage of liabilities. The escrow account will be replenished within ten business days of any expenditure required under 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* unless Rebelle has ceased operations. Documentation of the replenishment will be promptly sent to the Commission.

Rebelle and Rebelle agents will comply with all local rules, regulations, ordinances, and bylaws.

Security

Rebelle will contract with a professional security and alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

Rebelle's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs. A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Police Department. These surveillance cameras will remain operational even in the event of a power outage. The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only Rebelle's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity. All agents and visitors will be required to visibly display an ID badge, and Rebelle will maintain a current list of individuals with access. Rebelle will have security personnel on-site during business hours.

On-site consumption of marijuana by Rebelle's employees and visitors will be prohibited.

Benefits to Host Communities

Rebelle looks forward to working cooperatively with its host communities to ensure that Rebelle operates as a responsible, contributing member of those host communities. Rebelle has established a mutually beneficial relationship with its host communities in exchange for permitting Rebelle to site and operate.

Rebelle's host communities stand to benefit in various ways, including but not limited to the following:

1. **Jobs**: A Marijuana Establishment facility will add a number of full-time jobs, in addition to hiring qualified, local contractors and vendors.
2. **Monetary Benefits**: A Host Community Agreement with significant monetary donations will provide the host community with additional financial benefits beyond local property taxes.
3. **Access to Quality Product**: Rebelle will allow qualified consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants.
4. **Control**: In addition to the Commission, the Police Department and other municipal departments will have oversight over Rebelle's security systems and processes.
5. **Responsibility**: Rebelle is comprised of experienced professionals who will be thoroughly background checked and scrutinized by the Commission.
6. **Economic Development**: Rebelle's operation of its facilities will help to revitalize its host

communities and contribute to the overall economic development of the local community.

MARKET RESEARCH

Customers

Rebelle will only sell marijuana and marijuana products to other licensed Marijuana Establishments, customers ages 21 years and older that provide valid identification, and individuals that possess an active medical registration card issued by the Commission.

Competitive Advantage

Rebelle possesses several strengths that separate Rebelle from the competition. The industry is rapidly growing, and customers are scrutinizing the quality of cannabis dispensed, the services offered, the location of the dispensary, the prices offered for the products, and the branding of the business.

Regulations

Rebelle will maintain the company in good standing with the Massachusetts Secretary of the Commonwealth, the Department of Revenue, and the Department of Unemployment Assistance. Rebelle will apply for all state and local permits and approvals required to build out and operate the facility.

Rebelle will also work cooperatively with various municipal departments to ensure that the proposed facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation, and security.

Products & Services

In addition to traditional sativa, indica, and hybrid cannabis flower, Rebelle will offer a wide range of products that will allow Rebelle to serve customers with a wide variety of needs.

Products Rebelle intends to offer include, but will not be limited to:

1. Concentrates
2. Topical Salves
3. Creams and Lotions
4. Patches
5. Oral Mucosal and Sublingual Dissolving Tablets
6. Tinctures
7. Sprays
8. Inhalation Ready to Use CO2 Extracted Hash Oils
9. Pre-Dosed Oil Vaporizers
10. Ingestion Capsules
11. Infused Food and Beverages

Pricing Structure

Rebelle's pricing structure will vary based on market conditions. Rebelle plans to provide products of superior quality and will price accordingly.

MARKETING & SALES

Growth Strategy

Rebelle's plan to grow the company includes:

1. Strong and consistent branding;
2. Intelligent, targeted, and compliant marketing programs;
3. An exemplary customer in-store experience; and
4. A caring and thoughtful staff made of consummate professionals.

Rebelle plans to seek additional, appropriate locations in the surrounding area to expand business and reach an increased number of customers in the future.

Communication

Rebelle will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the public health, welfare, or safety of the general public, or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising, and branding created for viewing by the public will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will include a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the face of the advertisement.

All marketing, advertising, and branding produced by or on behalf of Rebelle will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA."

Rebelle will seek events where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. At these events, Rebelle will market its products and services to reach a wide range of qualified consumers.

Rebelle will communicate with customers through:

1. A company run website;
2. A company blog;
3. Popular cannabis discovery networks such as WeedMaps and Leafly;
4. Popular social media platforms such as Instagram, Facebook, Twitter, and SnapChat; and
5. Opt-in direct communications.

Rebelle will provide a catalogue and a printed list of the prices and strains of marijuana available to consumers and will post the same catalogue and list on its website and in the retail store.

Sales

Rebelle will ensure that all marijuana products that are provided for sale to consumers are sold in tamper or child-resistant packaging. Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors.

Packaging for marijuana products sold or displayed for consumers in multiple servings will allow a consumer to easily perform the division into single servings and include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica, or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.” Rebelle will not sell multiple serving beverages and each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. In no instance will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

Logo

Rebelle has developed a logo to be used in labeling, signage, and other materials such as letterhead and distributed materials.

The logo is discreet, unassuming, and does not use marijuana symbols, images of marijuana, related paraphernalia, or colloquial references to cannabis or marijuana.

FINAL REMARKS

Rebelle has the experience and know-how to safely and efficiently provide high quality, consistent, laboratory-tested cannabis and derivatives. Rebelle hopes to bring its high-quality standards to adult-use consumers to provide them with a safe and clean community environment. Rebelle’s security systems and comprehensive security measures will also help ensure a safe and secure environment that will help deter and prevent diversion.

Rebelle is prepared to position itself well in this market and contribute to this growth through a highly experienced team of successful operators working under an established framework of high quality standard operating procedures and growth strategies. In doing so, Rebelle looks forward to working cooperatively with all the municipalities in which it is operating to help spread the benefits that this market will yield.

PLAN FOR OBTAINING LIABILITY INSURANCE

Community Growth Partners Boston, LLC (“Rebelle”) will contract with an insurance provider to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. Rebelle will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is unavailable at a reasonable rate, Rebelle will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. Rebelle will keep reports documenting compliance with 935 CMR 500.105(10): *Liability Insurance Coverage or Maintenance of Escrow* in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

Community Growth Partners Boston, LLC (“Rebelle”) will securely maintain personnel records, including registration status and background check records. Rebelle will keep, at a minimum, the following personnel records:

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

Agent Personnel Records

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent’s affiliation with Rebelle and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training; and
- Results of initial background investigation, including CORI reports.

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

Agent Background Checks

- In addition to completing the Commission’s agent registration process, all agents hired to work for Rebelle will undergo a detailed background investigation prior to being granted access to a Rebelle facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for Rebelle pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, Rebelle will consider:

- a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
 - b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
 - c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Rebelle will:
 - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
 - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Rebelle will consider the following factors:
 - i. Time since the offense or incident;
 - ii. Age of the subject at the time of the offense or incident;
 - iii. Nature and specific circumstances of the offense or incident;
 - iv. Sentence imposed and length, if any, of incarceration, if criminal;
 - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - vi. Relationship of offense or incident to nature of work to be performed;
 - vii. Number of offenses or incidents;
 - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
 - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
 - x. Any other relevant information, including information submitted by the subject.
 - c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or

Other Types of Criminal History Information Received from a Source Other than the DCJIS.

- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.
- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Rebelle or the Commission.

Personnel Policies and Training

As outlined in Rebelle's Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All Rebelle agents are required to complete training as detailed in Rebelle's Qualifications and Training plan which includes but is not limited to Rebelle's strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

Rebelle will have a policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported the Police Department and to the Commission;
- Engaged in unsafe practices with regard to Rebelle operations, which will be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

PLAN FOR SEPARATING RECREATIONAL FROM MEDICAL OPERATIONS

Community Growth Partners Boston, LLC (“Rebelle”) has developed plans and procedures to ensure virtual and physical separation between medical and adult use marijuana operations in accordance with the requirements of 935 CMR 500.000 and 935 CMR 501.000.

Prior to the point of sale or at the point of sale, Rebelle will designate whether marijuana and/or Marijuana Products are intended for sale for adult use or medical use through Metrc. All marijuana and Marijuana Products will be transferred to the appropriate license within Metrc prior to sale. After the point of sale, Rebelle will reconcile that inventory in Metrc.

Rebelle will ensure that registered patients have access to a sufficient quantity and variety of medical marijuana and marijuana products. For the first six (6) months of operations, 35% of Rebelle’s marijuana product inventory will be marked for medical use and reserved for registered patients. Thereafter, Rebelle will maintain a quantity and variety of medical marijuana products for registered patients that is sufficient to meet the demand indicated by an analysis of sales data collected during the preceding six (6) months. Marijuana products reserved for patient supply will, unless unreasonably impracticable, reflect the actual types and strains of marijuana products documented during the previous six (6) months. If a substitution must be made, the substitution will reflect the type and strain no longer available as closely as possible.

On a quarterly basis, Rebelle will submit to the Commission an inventory plan to reserve a sufficient quantity and variety of medical marijuana and marijuana products for registered patients, based on reasonably anticipated patient needs as documented by sales records over the preceding six (6) months. On each occasion that the supply of any product within the reserved patient supply is exhausted and a reasonable substitution cannot be made, Rebelle will submit a report to the Commission. Marijuana products reserved for patient supply will be either: (1) maintained on-site at Rebelle’s retailer or easily accessible at another Rebelle location and transferable to the retailer location within 48 hours of notification that the on-site supply has been exhausted. Rebelle will perform audits of patient supply available on a weekly basis and retain those records for a period of six (6) months. Rebelle may transfer marijuana products reserved for medical-use to adult-use within a reasonable period of time prior to the date of expiration provided that the product does not pose a risk to health or safety.

In addition to virtual separation, Rebelle will provide for physical separation between the medical and adult use sales areas. A temporary or semi-permanent physical barrier, such as a stanchion or other divider, will be installed to create separate, clearly marked lines for patients/caregivers and adult-use consumers. Trained marijuana establishment agents will verify the age of all individuals, as well as the validity of any Medical Use of Marijuana Program ID Cards, upon entry to the facility and direct them to the appropriate queue. Rebelle’s agents will prioritize patient and caregiver identification verification and physical entry into the retail area.

Access to the adult-use marijuana queue will be limited to individuals 21 years of age or older, regardless of if the individual is registered as a patient/caregiver. Registered patients under the age of 21 will only have access to the medical marijuana queue. A registered patient/caregiver 21

years of age or older will be permitted to access either queue and will not be limited only to the medical marijuana queue, so long as the transaction can be recorded in accordance with 935 CMR 501.105.

Rebelle will also provide an enclosed patient consultation area that is separate from the sales floor to allow privacy and for confidential visual and auditory consultation. The patient consultation area will have signage stating "Consultation Area" and will be accessible by patients and caregivers without having to traverse a Limited Access area.

Rebelle will also maintain separate financial records for adult-use products and medical products to ensure compliance with the applicable tax laws.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), Community Growth Partners Boston, LLC (“Rebelle”) will only be accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID. At Rebelle’s co-located retail operations, for any individual who is younger than 21 years old but 18 years of age or older, they shall not be admitted unless they produce an active medical registration card issued by the Medical Use of Marijuana Program. If the individual is younger than 18 years old, he or she shall not be admitted unless they produce an active medical registration card and they are accompanied by a personal caregiver with an active medical registration card. In addition to the medical registration card, registered qualifying patients 18 years of age and older and personal caregivers must also produce proof of identification. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a Rebelle agent will immediately inspect the person’s proof of identification and determine the person’s age, in accordance with 935 CMR 500.140(2).

In the event Rebelle discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). Rebelle will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), Rebelle will not engage in any advertising practices that are targeted to, deemed to appeal to or portray minors under the age of 21. Rebelle will not engage in any advertising by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including sponsorship of charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data. Rebelle will not manufacture or sell any edible products that resemble a realistic or fictional human, animal, fruit, or sporting-equipment item including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b). In accordance with 935 CMR 500.105(4)(a)(5), any advertising created for public viewing will include a warning stating, **“For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana. Please Consume Responsibly.”** Pursuant to 935 CMR 500.105(6)(b), Rebelle packaging for any marijuana or marijuana products will not use bright colors, defined as colors that are “neon” in appearance, resemble existing branded products, feature cartoons, a design, brand or name that resembles a non-cannabis consumer or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be marketed to minors. Rebelle’s website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

QUALITY CONTROL AND TESTING

Quality Control

Community Growth Partners Boston, LLC (“Rebelle”) will comply with the following sanitary requirements:

1. Any Rebelle agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any Rebelle agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. Rebelle’s hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Rebelle’s production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. Rebelle’s facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Rebelle will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Rebelle’s floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Rebelle’s facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Rebelle’s buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Rebelle will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. Rebelle acknowledges and understands that the Commission may require Rebelle to demonstrate the intended and actual use of any toxic items found on Rebelle’s premises;

11. Rebelle will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet Rebelle's needs;
12. Rebelle's plumbing will be of adequate size and design, and 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 wastewater lines;
13. Rebelle will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Rebelle will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. Rebelle will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

Rebelle's vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Rebelle will ensure that Rebelle's facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

Rebelle will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Rebelle to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Testing

Rebelle will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Any Independent Testing Laboratory relied upon by Rebelle for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited

to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Testing of Rebelle's marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Testing of Rebelle's environmental media will be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

Rebelle's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the *Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. Rebelle acknowledges and understands that the Commission may require additional testing.

Rebelle's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both Rebelle and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Rebelle will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. Rebelle acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Rebelle's marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Rebelle for disposal

or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Any marijuana or marijuana products that fail any test for contaminants must either be reanalyzed without remediation, remediated or disposed of. In the event marijuana or marijuana products are reanalyzed, a sample from the same batch shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, an additional sample from the same batch previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample must have passed the Second Confirmatory Test at a second ITL. Any Marijuana or Marijuana Product that fails the Second Confirmatory Test will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees without first being remediated. Otherwise, any such product shall be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

If marijuana or marijuana products are destined for remediation, a new test sample will be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana Product may be remediated a maximum of two times. Any Marijuana or Marijuana Product that fails any test after the second remediation attempt will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees and will be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

RECORDKEEPING PROCEDURES

General Overview

Community Growth Partners Boston, LLC (“Rebelle”) has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of Rebelle documents. Records will be stored at Rebelle in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

Recordkeeping

To ensure that Rebelle is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of Rebelle’s quarter-end closing procedures. In addition, Rebelle’s operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- **Corporate Records**

Corporate Records are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:

- Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
- Third-Party Laboratory Contracts
- Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
- Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Variances
 - Site Plan Approvals
 - As-Built Drawings
- Corporate Governance:
 - Annual Report
 - Secretary of Commonwealth Filings

- **Business Records**

Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;

- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Rebelle.
- Personnel Records
 - At a minimum, Personnel Records will include:
 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Rebelle and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe operating conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
 - Rebelle will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
 - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
 - Rebelle will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- Sales Records for Marijuana Retailer

- Rebelle will maintain records that it has performed a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate the sales data and produce such records on request to the Commission.
- Incident Reporting Records
 - Within ten (10) calendar days, Rebelle will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident.
 - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Rebelle for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Rebelle's jurisdiction on request.
- Visitor Records
 - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
 - When marijuana or marijuana products are disposed of, Rebelle will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Rebelle agents present during the disposal or other handling, with their signatures. Rebelle will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
 - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
 - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
 - Recordings shall not be destroyed or altered and shall be retained as long as necessary if Rebelle is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
 - Rebelle will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)

- Records that any and all of Rebelle's vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
 - Rebelle shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
 - In the event Rebelle closes, all records will be kept for at least two (2) years at Rebelle's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Rebelle will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

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

 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of Rebelle's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
 - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
 - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
 - A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
 - Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
 - Alcohol, smoke, and drug-free workplace policies;
 - A plan describing how confidential information will be maintained;
 - Policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
 - Engaged in unsafe practices with regard to Rebelle operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all board of directors, members, and executives of Rebelle, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Rebelle's website.
- Policies and procedures for the handling of cash on Rebelle premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
 - Rebelle shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or

town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

Rebelle will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

MAINTAINING OF FINANCIAL RECORDS

Community Growth Partners Boston, LLC's ("Rebelle") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Rebelle.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Prohibiting the use of software or other methods to manipulate or alter sales data;
 - Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - If Rebelle determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
 - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500; and

- If co-located with a medical marijuana treatment center, maintaining and providing the Commission on a biannual basis accurate sales data collected by the licensee during the six (6) months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(15).
- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- License Renewal Records
 - Rebelle shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

QUALIFICATIONS AND TRAINING

Community Growth Partners Boston, LLC (“Rebelle”) will ensure that all employees hired to work at a Rebelle facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner. Rebelle will maintain a list of anticipated positions and their qualifications.

Qualifications

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Rebelle will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that Rebelle discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent’s employment will be terminated, and Rebelle will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Rebelle’s agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. A Rebelle Agent will receive a total of eight (8) hours of training annually. A minimum of four (4) hours of training will be from Responsible Vendor Training Program (“RVT”) courses established under 935 CMR 500.105(2)(b). Any additional RVT over four (4) hours may count towards the required eight (8) hours of training.

Non-RVT may be conducted in-house by Rebelle or by a third-party vendor engaged by the Rebelle. Basic on-the-job training in the ordinary course of business may also be counted towards the required eight (8) hour training.

All Rebelle Agents that are involved in the handling or sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission.

Basic Core Curriculum

Rebelle Agents must first take the Basic Core Curriculum within 90 days of hire, which includes the following subject matter:

- Marijuana's effect on the human body, including:
 - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
 - The amount of time to feel impairment;
 - Visible signs of impairment; and
 - Recognizing the signs of impairment.

- Diversion prevention and prevention of sales to minors, including best practices.
- Compliance with all tracking requirements.
- Acceptable forms of identification. Training must include:
 - How to check identification;
 - Spotting and confiscating fraudulent identification;
 - Common mistakes made in identification verification.
 - Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
- Other key state laws and rules affecting Rebelle Agents which shall include:
 - Conduct of Rebelle Agents;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Local and state licensing and enforcement, including registration and license sanctions;
 - Incident and notification requirements;
 - Administrative, civil, and criminal liability;
 - Health and safety standards, including waste disposal;
 - Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
 - Permitted hours of sale;
 - Licensee responsibilities for activities occurring within licensed premises; xix. Maintenance of records, including confidentiality and privacy; and
 - Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

Rebelle will encourage administrative employees who do not handle or sell marijuana to take the “Responsible Vendor” program on a voluntary basis to help ensure compliance. Rebelle’s records of Responsible Vendor Training Program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

After successful completion of the Basic Core Curriculum, each Rebelle Agent involved in the handling or sale of marijuana will fulfill the four-hour RVT requirement every year thereafter for Rebelle to maintain designation as a Responsible Vendor. Once the Rebelle Agent has completed the Basic Core Curriculum, the Agent is eligible to take the Advanced Core Curriculum. Failure to maintain Responsible Vendor status is grounds for action by the Commission.

ENERGY COMPLIANCE PLAN

Community Growth Partners Boston, LLC (“Rebelle”) is currently exploring potential energy-use reduction opportunities such as natural lighting and energy efficiency measures and a plan for implementation of such opportunities. Rebelle will update this plan as necessary and will further provide relevant documentation to the Commission during Architectural Review and during inspections processes.

Potential Energy-Use Reduction Opportunities

Rebelle is considering the following potential opportunities for energy-use reduction and plans for implementation of such opportunities.

1. Natural Lighting;
2. Energy efficient exterior wall construction, which may include batt insulation, continuous rigid insulation, and air and vapor barriers; and
3. Plumbing fixtures that are Water Sense rated for reduced water consumption.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, Rebelle will continue to evaluate energy-use reduction opportunities.

Renewable Energy Generation Opportunities

Rebelle is in the process of considering opportunities for renewable energy generation (including wind and solar options). Rebelle’s preliminary examination of renewable energy generation has determined that the upfront costs of such options are too expensive at this time, although Rebelle may reconsider at a future date. Rebelle will also consult with its architects and engineers when designing the facility to determine the building’s capacity for renewable energy options (e.g. whether or not the roof can support the weight of solar panels). Nevertheless, our team is dedicated to consistently strive for sustainability and emissions reduction.

Strategies to Reduce Electric Demand

Rebelle is considering the following strategies to reduce electric demand:

1. Exterior and interior glazing on windows such that maximum natural daylight can enter the building without compromising security, reducing the reliance on artificial light during daytime hours;
2. Lighting fixtures that are energy efficient and used with Energy Star rated bulbs; and
3. Room lighting and switching will have occupancy sensors to reduce electrical consumption when rooms are unoccupied.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, Rebelle will continue to evaluate strategies to reduce electric demand.

Opportunities for Engagement with Energy Efficiency Programs

Rebelle also plans on engaging with energy efficiency programs offered by Mass Save and the Massachusetts Clean Energy Center and will coordinate with municipal officials to identify other

potential energy saving programs and initiatives. Rebelle will also coordinate with its utility companies to explore any energy efficiency options available to Rebelle.

DIVERSITY PLAN

Statement of Purpose

Community Growth Partners Boston, LLC d/b/a Rebelle (“Rebelle”) is committed to promoting equity in its Marijuana Establishment operations throughout the Commonwealth. Through this commitment, Rebelle seeks to retain current employees, hire local residents and adopt diversity goals and programs that allow for meaningful participation of women, minorities, veterans, people with disabilities, and people who identify as LGBTQ+.

Goals

In order for Rebelle to promote equity for the above-listed groups in its operations, Rebelle has established the following goals:

- Hiring such that Rebelle’s staff is comprised of at least the following:
 - a. 30% women;
 - b. 20% minorities;
 - c. 5% LGBTQ+;
 - d. 5% veterans; and
 - e. 5% people with disabilities.
- Schedule (1) annual diversity and inclusion training on cultural sensitivity and recognizing unconscious bias, including learning about multicultural environments, how to foster inclusion and belonging, and intercultural competence.

Programs

Rebelle has developed specific programs to effectuate its stated goals to promote diversity and equity in its operations, which will include the following:

- Engaging in hiring efforts such that jobs are posted (as they become available, but not less than annually) with publications and job resource websites focused on diversity hiring, including Blackjobs.com, United Latino Job Bank, LatPro.com, Black Career Network, HBCU Connect, Asian Hires, NAAAP Career Center, iHispano, Diversity Inc., and Diversity Job Board.
- Rebelle will schedule an annual diversity and inclusion training to be attended by 100% of its employees. It will identify an internal or external training program.

Measurements

The Human Resources Department will administer the Plan and will be responsible for developing measurable outcomes to ensure Rebelle continues to meet its commitments. Such measurable outcomes, in accordance with Rebelle’s employee demographics.

- Documenting any job advertisements placed with publications and job resource websites focused on diversity hiring; and;
- Documenting employee demographics.
- Diversity and inclusion training attendance and dates of completion will be recorded in Rebelle’s learning management platform.

Beginning upon receipt of Rebelle's provisional license from the Commission; Rebelle will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Human Resources Department will review and evaluate Rebelle's measurable outcomes no less than twice annually to ensure that Rebelle is meeting its commitments. Rebelle is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

- Rebelle 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 Rebelle will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.