



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR283369
Original Issued Date: 05/07/2021
Issued Date: 05/07/2021
Expiration Date: 05/07/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Diem Lynn, LLC

Phone Number: 617-523-0600 Email Address: jcapano@publicpolicylaw.com

Business Address 1: 75 North Main Street Business Address 2: #570

Business City: Randolph Business State: MA Business Zip Code: 02368

Mailing Address 1: 211 Lewis St Mailing Address 2:

Mailing City: Lynn Mailing State: MA Mailing Zip Code: 01902

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RPA201948

RMD INFORMATION

Name of RMD: New England Patient Network, LLC

Department of Public Health RMD Registration Number:

Operational and Registration Status: Obtained Provisional Certificate of Registration only

To your knowledge, is the existing RMD certificate of registration in good standing?: yes

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: Percentage Of Control: 100
Role: Executive / Officer Other Role:
First Name: Christopher Last Name: Mitchem Suffix:
Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: Percentage of Ownership: 100

Entity Legal Name: TDMA Holdings LLC Entity DBA: DBA City:

Entity Description: Massachusetts Limited Liability Company

Foreign Subsidiary Narrative:

Entity Phone: 360-609-0721 Entity Email: chris@hellodiem.com Entity Website:

Entity Address 1: 75 North Main Street Entity Address 2: #570

Entity City: Randolph Entity State: MA Entity Zip Code: 02368

Entity Mailing Address 1: 75 North Main Street Entity Mailing Address 2: #570

Entity Mailing City: Randolph Entity Mailing State: MA Entity Mailing Zip Code: 02368

Relationship Description: Diem Lynn LLC is a wholly owned subsidiary of TDMA Holdings LLC.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: VLF Management LLC Entity DBA:

Email: chris@hellodiem.com Phone: 604-687-2038

Address 1: 305 SE 3rd Avenue Address 2: Suite 201

City: Portland State: OR Zip Code: 97214

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of Capital Provided: \$219000 Percentage of Initial Capital: 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Christopher Last Name: Mitchem Suffix:

Marijuana Establishment Name: TDMA Orange LLC Business Type: Marijuana Cultivator

Marijuana Establishment City: Orange Marijuana Establishment State: MA

Individual 2

First Name: Christopher Last Name: Mitchem Suffix:

Marijuana Establishment Name: TDMA Orange LLC Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Orange Marijuana Establishment State: MA

Individual 3

First Name: Christopher Last Name: Mitchem Suffix:

Marijuana Establishment Name: TDMA LLC Business Type: Marijuana Retailer

Marijuana Establishment City: Worcester

Marijuana Establishment State: MA

Individual 4

First Name: Christopher

Last Name: Mitchem

Suffix:

Marijuana Establishment Name: DM Distribution LLC

Business Type: Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Randolph

Marijuana Establishment State: MA

Individual 5

First Name: Christopher

Last Name: Mitchem

Suffix:

Marijuana Establishment Name: Diem Orange

Business Type: Marijuana Cultivator

Marijuana Establishment City: Orange

Marijuana Establishment State: MA

Individual 6

First Name: Christopher

Last Name: Mitchem

Suffix:

Marijuana Establishment Name: Diem Orange

Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Orange

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 211-217 Lewis Street

Establishment Address 2:

Establishment City: Lynn

Establishment Zip Code: 01902

Approximate square footage of the establishment: 1450

How many abutters does this property have?: 180

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	Diem Plan to Remain Compliant with Local Zoning 3.23.20.pdf	pdf	5e78bfe5bddf0438d21d9b52	03/23/2020
Certification of Host Community Agreement	Lynn HCA Certification Form Signed.pdf	pdf	5e836030d29ad93571595e6b	03/31/2020
Community Outreach Meeting Documentation	Diem Lynn Community Outreach Meeting Attestation Packet 3.31.20.pdf	pdf	5e836767f0445c357cb06862	03/31/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact RFI 2 7.31.20.pdf	pdf	5f244802ca23a6644a5879ba	07/31/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Date generated: 09/24/2021

Individual Background Information 1

Role: Executive / Officer

Other Role:

First Name: Christopher

Last Name: Mithcem 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: TDMA Holdings, LLC

Entity DBA:

Entity Description: Limited liability company.

Phone: 360-609-0721

Email: chris@hellodiem.com

Primary Business Address 1: 75 North Main Street

Primary Business Address 2: #570

Primary Business City: Randolph

Primary Business State: MA

Principal Business Zip Code: 02638

Additional Information:

Entity Background Check Information 2

Role: Investor/Contributor

Other Role:

Entity Legal Name: VLF Management, LLC

Entity DBA:

Entity Description: Limited liability company.

Phone: 604-687-2308

Email: chris@hellodiem.com

Primary Business Address 1: 305 SE 3rd Avenue

Primary Business Address 2: Suite 201

Primary Business City: Portland

Primary Business State: OR

Principal Business Zip Code: 97214

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	Diem Lynn Operating Agreement.pdf	pdf	5e7a5edab3c49635509e8672	03/24/2020
Articles of Organization	Diem Lynn Art.Org. 3.24.20.pdf	pdf	5e7a5f0e554b033566cce4be	03/24/2020
Department of Revenue - Certificate of Good standing	Diem Lynn Certificate of Good Standing Mass DOR.pdf	pdf	5e85f450554b033566cd0514	04/02/2020
Secretary of Commonwealth - Certificate of Good Standing	Diem Certificate of Good Standing.jpg	jpeg	5e8ce4d8f0445c357cb081fa	04/07/2020
Secretary of Commonwealth - Certificate of Good Standing	Diem Lynn LLC DUA Certificate of Compliance.pdf	pdf	5ebbfad17d78332d19fc7b02	05/13/2020

No documents uploaded

Massachusetts Business Identification Number: 001396758

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Diem Lynn Business Plan-2.pdf	pdf	5e7cc05d9a385038d9d88a0c	03/26/2020
Proposed Timeline	Diem Lynn Proposed Timeline 3.24.20.pdf	pdf	5e7cc0aaf0445c357cb0565d	03/26/2020
Plan for Liability Insurance	Plan to Obtain Liability Insurance 3.24.20.pdf	pdf	5e7cc0c4172cbc3545973e0e	03/26/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Restricting Access to age 21 and older	Restricting Access to age 21 or older.pdf	pdf	5e8759311cdd2e3910a52bf5	04/03/2020
Plan for obtaining marijuana or marijuana products	Retail Plan for Obtaining Marijuana or Marijuana Products.pdf	pdf	5e875932b7c619391b8b96fa	04/03/2020
Security plan	Security Plan.pdf	pdf	5e875932d29ad93571596a8b	04/03/2020
Storage of marijuana	Storage of Marijuana.pdf	pdf	5e8759339a385038d9d8a7b6	04/03/2020
Transportation of marijuana	Transportation of Marijuana.pdf	pdf	5e875933172cbc3545975b2c	04/03/2020
Personnel policies including background checks	Personnel Policies Summary.pdf	pdf	5e8759545f1da0353e2b2e74	04/03/2020
Prevention of diversion	Prevention of Diversion.pdf	pdf	5e875955b3c49635509eaa55	04/03/2020
Quality control and testing	Procedures for Quality Control and Testing.pdf	pdf	5e875956b014bf38e46cddd0	04/03/2020
Record Keeping procedures	Record Keeping Procedure.pdf	pdf	5e8759572eba6d38ef165407	04/03/2020
Separating recreational from medical operations, if applicable	Colocate Separating Medical from Recreational Operations.pdf	pdf	5e875985554b033566cd0939	04/03/2020
Dispensing procedures	Dispensing Procedures.pdf	pdf	5e875987482e703583b7b437	04/03/2020
Inventory procedures	Inventory procedures summary.pdf	pdf	5e8759872b97cf38fa375a79	04/03/2020
Maintaining of financial records	Maintaining of Financial Records.pdf	pdf	5e875988f0445c357cb0740c	04/03/2020
Qualifications and training	Qualifications and Training RFI 1 5.4.20.pdf	pdf	5ebbf460e32c52d2bdd18a7	05/13/2020
Diversity plan	Diem Lynn Diversity Plan v2 7.31.20.pdf	pdf	5f244825ead5bc6434e39c7a	07/31/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

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

I Agree

Notification:

I 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: 9:00 AM	Monday To: 8:00 PM
Tuesday From: 9:00 AM	Tuesday To: 8:00 PM
Wednesday From: 9:00 AM	Wednesday To: 8:00 PM
Thursday From: 9:00 AM	Thursday To: 8:00 PM
Friday From: 9:00 AM	Friday To: 8:00 PM
Saturday From: 9:00 AM	Saturday To: 8:00 PM
Sunday From: 9:00 AM	Sunday To: 8:00 PM

Plan to Remain Compliant with Local Zoning

The purpose of this plan is to outline how Diem Lynn, LLC (“Diem”) is and will remain in compliance with local codes, ordinances and bylaws for the physical address of the marijuana establishment at 211-217 Lewis, Lynn, MA 01902 which shall include, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana.

211-217 Lewis Street is located in Business (BD) Zoning District and properly zoned pursuant to the City of Lynn Zoning Ordinance Section 22 Recreational Cannabis. In accordance with Section 22(a) the marijuana establishment is not located within 200 feet of any pre-existing public or private school providing education in kindergarten or any grades 1 through 12 licensed by the Department of Education. Also, pursuant to Section 22(b) the marijuana establishment is not located within 500 feet of another licensed cannabis establishment. There are no other codes, ordinances, or bylaws relative to the marijuana establishment.

Diem filed a petition with the Lynn City Council for permission to operate a marijuana cultivation and product manufacturing facility. Diem appeared for a public hearing with the City Council on February 11, 2020. On February 11th the City Council having received all pertinent data and special permit application documents moved to grant the Diem a special permit to operate the marijuana cultivation and product manufacturing facility. Under Section 12 Special Permits §12.3 Commencement all special permits issued terminate if substantial use or construction has not commenced within two years from ordination. Termination of a special permit will only result if substantial use or construction has not commenced within the two-year period.

In addition to Diem remaining compliant with existing Zoning Ordinances; Diem will continuously engage with City of Lynn officials to remain up to date with local zoning ordinances to remain fully compliant.

Host Community Agreement Certification Form

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

Applicant

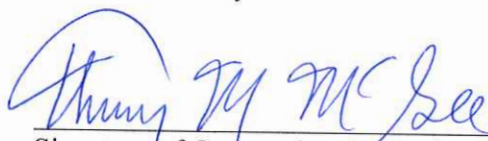
I, Chris Mitchem, (*insert name*) certify as an authorized representative of Diem Lynn LLC dba Diem (*insert name of applicant*) that the applicant has executed a host community agreement with Lynn, MA (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on March 10, 2020 (*insert date*).



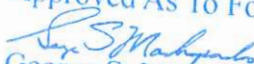
Signature of Authorized Representative of Applicant

Host Community

I, Thomas M. McGee, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for The City of Lynn (*insert name of host community*) to certify that the applicant and The City of Lynn (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on MARCH 10, 2020 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

Approved As To Form:

George S. Markopoulos
City Solicitor

Community Outreach Meeting Attestation Form

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

I, Chris Mitchem, (insert name) attest as an authorized representative of Diem Lynn, LLC (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on November 26th, 2019 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on November 12th, 2019 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on November 12th, 2019 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on November 8th, 2019 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).



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

CLASSIFIED

Attachment A

LEGALS

Lowell, MA 01851
(978) 256-1500
Oleary, S. Ann, 16-02/186
Item: October 29, November 5, 12, 2019

LEGAL NOTICE Lynn Conservation Commission

In accordance with the provisions of M.G.L. Chapter 39, Section 23B, and Chapter 31, Section 40, (the Wetlands Protection Act and the local By-Laws), the Lynn Conservation Commission will hold a public meeting on Tuesday, November 19, 2019 at 6:30 p.m., Room 303, Lynn City Hall, on the Notice of Intent of Patricia Ish, Massachusetts Dept. of Conservation and Recreation, 251 Causeway Street, Suite 700, Boston, MA for proposed work consisting of reconstruction of the existing Willis Fishing Pier located at the mouth of the Saugus River within the northeastern tip of an area known as South Harbor in Lynn, MA.

Mary Lester
Chairwoman

Item: November 12, 2019

LEGALS

BOARD OF SELECTMEN

Peter Spellos
Chairman

Item: November 12, 2019

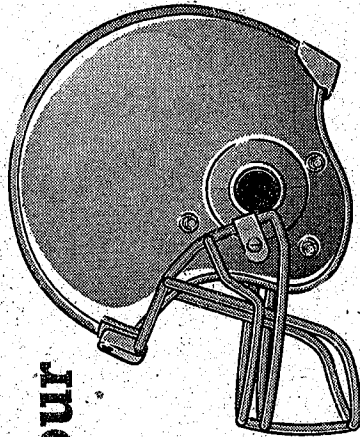
LEGAL NOTICE SAUGUS BOARD OF SELECTMEN PUBLIC HEARING

Notice is hereby given that the Saugus Board of Selectmen will conduct a public hearing for the purpose of determining the percentage of local tax levy FY 2020 to be borne by each class of taxable property within the Town of Saugus

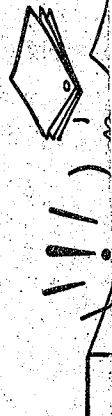
This hearing will be held in the Saugus Town Hall Auditorium, 298 Central Street, on 11/20/19 at 7:10 PM.

Debra Panetta, Chairman
Wendy L. Reed, Clerk
Item: November 5, 12, 2019

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favorite team
in Item Sports!**



The Daily Item
itemfive.com



Need to find an article?

LEGALS

and for the purpose of understanding the same, the following is a true and correct copy of the same as the same was recorded in the Registry of Deeds, dated November 19, 2019, at 10:00 A.M. Local Time upon the premises, all and singular the premises described in said mortgage, to wit:

the land in said Lynn, together with the buildings thereon, being the premises now known and numbered as 654 Western Avenue, bounded and described as follows:
NORTHWESTERLY by Western Avenue, 39.94 feet;
NORTHEASTERLY by land now or formerly of Cain, 83.59 feet;
SOUTHEASTERLY by land now or formerly of Powicki, 41.75 feet; and
SOUTHWESTERLY by other land of the grantor, 74.88 feet;
Be all said measurements more or less, or however otherwise bounded and described; being the premises shown as lot R on a sub-division of land in Lynn, Massachusetts by Albert D. Martin, Surveyor, dated November 29, 1954, and recorded with said Registry of Deeds, and containing 3,215 square feet of land according to said plan.

Granting to said Arthur E. Gagnon and Sylvia M. Gagnon an easement of way over a strip of parcel of land four feet in width on the easterly side of lot A Known numbered as 658 Western Avenue, Lynn, Massachusetts, and reserving an easement of way over a strip of land four (4) feet in width on the westerly side of lot B, known and numbered as 654 Western Avenue, Lynn, Massachusetts, establishing an easement of way bounded northerly by Western Avenue eight (8) feet and extending from said Western Avenue in southerly direction a distance of 74.88 feet, said easement to be used in common by the owners of lots A and B, as appurtenant to their adjoining estates for all purposes of a common driveway for the benefit of the owners and their tenants of lots Band A.

The description of the property contained in the mortgage shall control in the event of a typographical error in this publication.

For Mortgageor's Title see deed dated July 8, 1981, and recorded in Book 6839 at Page 5 with the Essex County (Southern District) Registry of Deeds.

TERMS OF SALE: Said premises will be sold and conveyed subject to all liens, encumbrances, unpaid taxes, tax titles, municipal liens and assessments, if any, which take precedence over the said mortgage above described.

TEN THOUSAND (\$10,000.00) Dollars of the purchase price must be paid in cash, certified check, bank treasurer's or cashier's check at the time and place of the sale by the purchaser. The balance of the purchase price shall be paid in cash, certified check, bank treasurer's or cashier's check within forty five (45) days after the date of sale.

Meeting Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Tuesday November 26, 2019 at 5:30 pm at the Lynn Police Department, 300 Washington Street, Lynn, MA 01902. The proposed Marijuana Retail Establishment is anticipated to be located at 211-217 Lewis Street, Lynn, MA 01902. There will be an opportunity for the public to ask questions.

Item: November 12, 2019

Smith, Costello & Crawford

Public Policy Law Group.

Attachment B

November 8, 2019

Dear Sir or Madam,

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Tuesday November 26, 2019 at 5:30 pm at the Lynn Police Department, 300 Washington Street, Lynn, MA 01902. The proposed Marijuana Retail Establishment is anticipated to be located at 211-217 Lewis Street, Lynn, MA 01902. There will be an opportunity for the public to ask questions.

RECEIVED
CITY CLERK'S OFFICE
2019 NOV 12 P 6:14
LYNN, MASS

RECEIVED
LYNN CITY COUNCIL
2019 NOV 12 P 6:19

50 Congress Street, Suite 420
Boston, MA 02109

www.publicpolicylaw.com

November 8, 2019

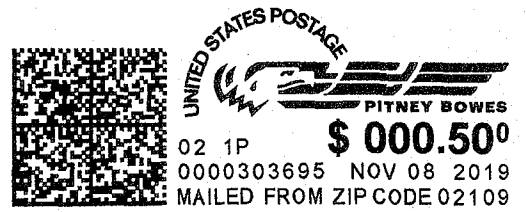
Dear Sir or Madam,

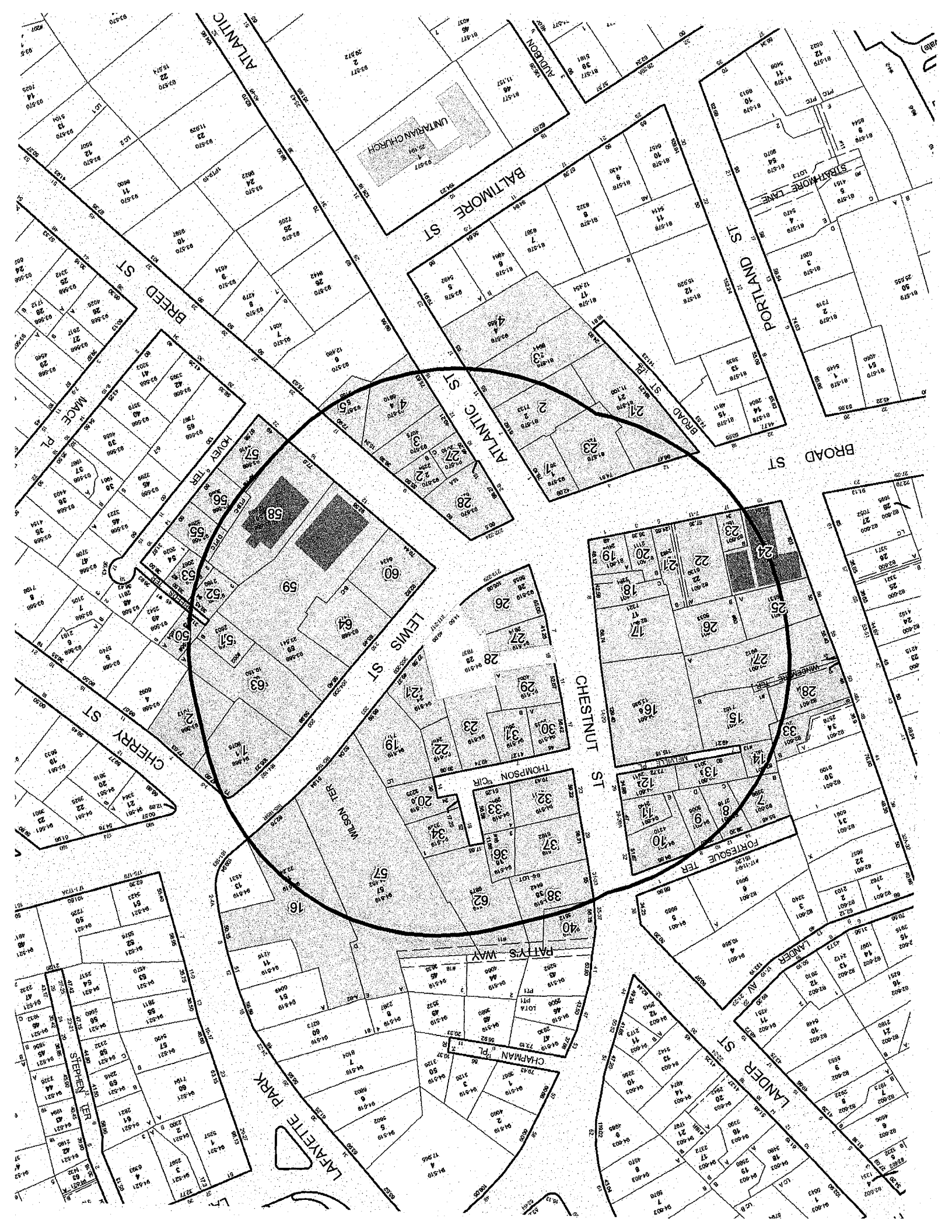
Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Tuesday November 26, 2019 at 5:30 pm at the Lynn Police Department, 300 Washington Street, Lynn, MA 01902. The proposed Marijuana Retail Establishment is anticipated to be located at 211-217 Lewis Street, Lynn, MA 01902. There will be an opportunity for the public to ask questions.

h, Costello
awford
olicy Law Group

i Street, Suite 420
02109

16 BREED STREET REALTY TR
SUTHERLAND CATHERINE & WI
133 PROSPECT ST
READING, MA 01867







300 foot Abutters List Report

Lynn, MA

November 08, 2019

Subject Property:

Parcel Number: 094-519-028
CAMA Number: 094-519-028
Property Address: 211 LEWIS ST

Mailing Address: CHUNG YUK CHUN CHUNG KIN TONG
JT
31 CLAYMASS RD
BRIGHTON, MA 02135

Abutters:

Parcel Number: 081-578-002
CAMA Number: 081-578-002-001
Property Address: 7 ATLANTIC ST

Mailing Address: RET A
7 ATLANTIC ST U3
LYNN, MA 01902

Parcel Number: 081-578-002
CAMA Number: 081-578-002-002
Property Address: 7 ATLANTIC ST

Mailing Address: KELLY M & MICHAEL A
8 RED ROCK ST
LYNN, MA 01902-2516

Parcel Number: 081-578-002
CAMA Number: 081-578-002-003
Property Address: 7 ATLANTIC ST

Mailing Address: 7 ATLANTIC ST U3
LYNN, MA 01902

Parcel Number: 081-578-002
CAMA Number: 081-578-002-004
Property Address: 7 ATLANTIC ST

Mailing Address: 7 ATLANTIC ST U4
LYNN, MA 01902

Parcel Number: 081-578-003
CAMA Number: 081-578-003-001
Property Address: 11 ATLANTIC ST

Mailing Address: 11 ATLANTIC ST U1
LYNN, MA 01902

Parcel Number: 081-578-003
CAMA Number: 081-578-003-002
Property Address: 11 ATLANTIC ST

Mailing Address: 11 ATLANTIC ST U2
LYNN, MA 01902

Parcel Number: 081-578-003
CAMA Number: 081-578-003-003
Property Address: 11 ATLANTIC ST

Mailing Address: JAMIE
105 OTIS ST
MEDFORD, MA 02155

Parcel Number: 081-578-003
CAMA Number: 081-578-003-004
Property Address: 11 ATLANTIC ST

Mailing Address: 11 ATLANTIC ST U4
LYNN, MA 01902

Parcel Number: 081-578-003
CAMA Number: 081-578-003-005
Property Address: 11 ATLANTIC ST

Mailing Address: 11 ATLANTIC ST U5
LYNN, MA 01902

Parcel Number: 081-578-021
CAMA Number: 081-578-021
Property Address: 8 BROAD ST

Mailing Address: 1125 BOYLSTON ST
CHESTNUT HILL, MA 02467



www.cai-tech.com

Data shown on this report is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this report.

11/8/2019

Page 1 of 9



300 foot Abutters List Report

Lynn, MA

November 08, 2019

Parcel Number: 081-578-023
CAMA Number: 081-578-023
Property Address: 4 BROAD ST

Mailing Address: A.....
PO BOX 45605
SOMERVILLE, MA 02145

Parcel Number: 081-601-019
CAMA Number: 081-601-019
Property Address: 1 BROAD ST

Mailing Address:
1 BROAD ST
LYNN, MA 01902

Parcel Number: 081-601-020
CAMA Number: 081-601-020
Property Address: 3 BROAD ST

Mailing Address:
3 BROAD ST
LYNN, MA 01902

Parcel Number: 082-601-007
CAMA Number: 082-601-007
Property Address: FORTESQUE TER

Mailing Address:
145 BEACON HILL BLVD
NORTH ANDOVER, MA 01845

Parcel Number: 082-601-008
CAMA Number: 082-601-008
Property Address: 12 FORTESQUE TER

Mailing Address:
145 BEACON HILL BLVD
NORTH ANDOVER, MA 01845

Parcel Number: 082-601-013
CAMA Number: 082-601-013
Property Address: 7 MELVILLE PL

Mailing Address:
7 MELVILLE PL
LYNN, MA 01902

Parcel Number: 082-601-014
CAMA Number: 082-601-014
Property Address: 13 MELVILLE PL

Mailing Address:
P O BOX 1
LYNN, MA 01903

Parcel Number: 082-601-015
CAMA Number: 082-601-015
Property Address: 1 WINDEMERE TER

Mailing Address:
1 WINDEMERE TER
LYNN, MA 01902

Parcel Number: 082-601-017
CAMA Number: 082-601-017
Property Address: 10 CHESTNUT ST

Mailing Address:
10 CHESTNUT ST
LYNN, MA 01902

Parcel Number: 082-601-018
CAMA Number: 082-601-018
Property Address: 8 CHESTNUT ST

Mailing Address:
400 OLD LANI'ANA RD
CROSSVILLE, TN 38555

Parcel Number: 082-601-021
CAMA Number: 082-601-021
Property Address: 5 BROAD ST

Mailing Address:
61 PIEDMONT ST
LYNN, MA 01902

Parcel Number: 082-601-022
CAMA Number: 082-601-022
Property Address: 7 BROAD ST

Mailing Address:
825 BEACON ST SUITE 20
NEWTON, MA 02459



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Lynn, MA

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Parcel Number: 082-601-023
CAMA Number: 082-601-023-001
Property Address: 17 BROAD ST

Mailing Address: 17 BROAD ST U1
LYNN, MA 01902

Parcel Number: 082-601-023
CAMA Number: 082-601-023-002
Property Address: 17 BROAD ST

Mailing Address: 17 BROAD ST U2
LYNN, MA 01902

Parcel Number: 082-601-023
CAMA Number: 082-601-023-003
Property Address: 17 BROAD ST

Mailing Address: 17 BROAD ST U3
LYNN, MA 01902

Parcel Number: 082-601-024
CAMA Number: 082-601-024-001
Property Address: 19 BROAD ST

Mailing Address: 62 ESTES ST
LYNN, MA 01902

Parcel Number: 082-601-024
CAMA Number: 082-601-024-002
Property Address: 19 BROAD ST

Mailing Address: 19 BROAD ST U2
LYNN, MA 01902

Parcel Number: 082-601-025
CAMA Number: 082-601-025
Property Address: 58 ESTES ST

Mailing Address: 105A FERRY ST
MALDEN, MA 02148

Parcel Number: 082-601-026
CAMA Number: 082-601-026
Property Address: 60 ESTES ST

Mailing Address: 105A FERRY ST
MALDEN, MA 02148

Parcel Number: 082-601-027
CAMA Number: 082-601-027
Property Address: 56 ESTES ST

Mailing Address: 105A FERRY ST
MALDEN, MA 02148

Parcel Number: 082-601-028
CAMA Number: 082-601-028
Property Address: 50 ESTES ST

Mailing Address: 50 ESTES ST
LYNN, MA 01902

Parcel Number: 082-601-033
CAMA Number: 082-601-033
Property Address: 48 ESTES ST

Mailing Address: 48 A ESTES ST
LYNN, MA 01902

Parcel Number: 093-519-026
CAMA Number: 093-519-026
Property Address: 219 LEWIS ST

Mailing Address: 49 HARRINGTON ST
NEWTON, MA 02460

Parcel Number: 093-568-002
CAMA Number: 093-568-002
Property Address: 7 CHERRY ST

Mailing Address: 7 CHERRY ST
LYNN, MA 01902



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Parcel Number: 093-568-050
CAMA Number: 093-568-050
Property Address: 3 BREED TER

Mailing Address:
3 BREED TER
LYNN, MA 01902

Parcel Number: 093-568-051
CAMA Number: 093-568-051
Property Address: 202 LEWIS ST

Mailing Address:
202 LEWIS ST
LYNN, MA 01902

Parcel Number: 093-568-052
CAMA Number: 093-568-052
Property Address: 4 BREED TER

Mailing Address:
4 BREED TER
LYNN, MA 01902

Parcel Number: 093-568-053
CAMA Number: 093-568-053
Property Address: 2 BREED TER

Mailing Address:
2 BREED TER
LYNN, MA 01902

Parcel Number: 093-568-055
CAMA Number: 093-568-055
Property Address: 14 HOVEY TER

Mailing Address:
14 HOVEY TER
LYNN, MA 01905

Parcel Number: 093-568-056
CAMA Number: 093-568-056
Property Address: 6 HOVEY TER

Mailing Address:
JACQUELINE A P
6 HOVEY TERR
LYNN, MA 01902

Parcel Number: 093-568-057
CAMA Number: 093-568-057
Property Address: 22 BREED ST

Mailing Address:
22 BREED ST
LYNN, MA 01902

Parcel Number: 093-568-058
CAMA Number: 093-568-058
Property Address: 16 BREED ST

Mailing Address:
163 PROSPECT ST
READING, MA 01867

Parcel Number: 093-568-059
CAMA Number: 093-568-059
Property Address: 12 BREED ST

Mailing Address:
ADVENTISTS
34 SAWYER ST
LANCASTER, MA 01523

Parcel Number: 093-568-060
CAMA Number: 093-568-060
Property Address: 216 LEWIS ST

Mailing Address:
FEDERAL FOOD SHOPS INC
14 HOWARD STREET
ROCKLAND, MA 02370

Parcel Number: 093-568-063
CAMA Number: 093-568-063
Property Address: 200 LEWIS ST

Mailing Address:
FUGARTY THOMAS
11 VINCENT RD
LYNN, MA 01904-1101

Parcel Number: 093-568-064
CAMA Number: 093-568-064
Property Address: 208 LEWIS ST

Mailing Address:
PROPERTIES
1330 BOYLSTON ST
CHESTNUT HILL, MA 02467



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Lynn, MA

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Parcel Number: 093-570-002
CAMA Number: 093-570-002
Property Address: 9 BREED ST

Mailing Address:
175 COTTAGE ST APT 404
CHELSEA, MA 02150

Parcel Number: 093-570-003
CAMA Number: 093-570-003
Property Address: 12 ATLANTIC ST

Mailing Address:
12 ATLANTIC ST
LYNN, MA 01902-3115

Parcel Number: 093-570-004
CAMA Number: 093-570-004
Property Address: 16 ATLANTIC ST

Mailing Address:
16 ATLANTIC ST
LYNN, MA 01902

Parcel Number: 093-570-005
CAMA Number: 093-570-005
Property Address: 17 BREED ST

Mailing Address:
J TR
P O BOX 109
HATHORNE, MA 01937

Parcel Number: 093-570-027
CAMA Number: 093-570-027
Property Address: 10 ATLANTIC ST

Mailing Address:
10 ATLANTIC ST
LYNN, MA 01902

Parcel Number: 093-570-028
CAMA Number: 093-570-028
Property Address: 2 ATLANTIC ST

Mailing Address:
TR
16 PARSONS DR
SWAMPSCOTT, MA 01907-2930

Parcel Number: 093-578-001
CAMA Number: 093-578-001-001
Property Address: 1 ATLANTIC ST

Mailing Address:
OSHEA JEANNE TR
827 PLUM PL
COSTA MESA, CA 92627

Parcel Number: 093-578-001
CAMA Number: 093-578-001-002
Property Address: 1 ATLANTIC ST

Mailing Address:
MALABRICA RICHARD
125 PLEASANT ST
SWAMPSCOTT, MA 01907

Parcel Number: 093-578-001
CAMA Number: 093-578-001-003
Property Address: 1 ATLANTIC ST

Mailing Address:
1 ATLANTIC ST U3
LYNN, MA 01902

Parcel Number: 093-578-001
CAMA Number: 093-578-001-004
Property Address: 1 ATLANTIC ST

Mailing Address:
1 ATLANTIC ST U4
LYNN, MA 01902

Parcel Number: 093-578-001
CAMA Number: 093-578-001-005
Property Address: 1 ATLANTIC ST

Mailing Address:
1 ATLANTIC ST U5
LYNN, MA 01902

Parcel Number: 093-578-001
CAMA Number: 093-578-001-006
Property Address: 1 ATLANTIC ST

Mailing Address:
STANLEY P
1 ATLANTIC ST U6
LYNN, MA 01902



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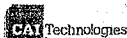


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Lynn, MA

November 08, 2019

Parcel Number:	093-578-004	Mailing Address:	2 GLEN TER
CAMA Number:	093-578-004		BEDFORD, MA 01730-2048
Property Address:	17 ATLANTIC ST		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	185 LEWIS ST U185-1
CAMA Number:	094-519-016-001		LYNN, MA 01902
Property Address:	185 LEWIS ST		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	185 LEWIS ST U185-2
CAMA Number:	094-519-016-002		LYNN, MA 01902
Property Address:	185 LEWIS ST		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	1 GRISWOLD ST
CAMA Number:	094-519-016-003		SAUGUS, MA 01906
Property Address:	185 LEWIS ST		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	18 PLEASANT ST
CAMA Number:	094-519-016-004		SWAMPSCOTT, MA 01907
Property Address:	185 LEWIS ST		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	900 BROADWAY
CAMA Number:	094-519-016-005		REVERE, MA 02151
Property Address:	185 LEWIS ST		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	37 EVERETT ST
CAMA Number:	094-519-016-006		LYNN, MA 01904
Property Address:	185 LEWIS ST		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	21 PINEHURST DR
CAMA Number:	094-519-016-007		BOXFORD, MA 01921
Property Address:	8 LAFAYETTE PK		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	21 PINEHURST DR
CAMA Number:	094-519-016-008		BOXFORD, MA 01921
Property Address:	8 LAFAYETTE PK		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	8 LAFAYETTE PK U3
CAMA Number:	094-519-016-009		LYNN, MA 01902
Property Address:	8 LAFAYETTE PK		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	138 HARTMAN RD
CAMA Number:	094-519-016-010		NEWTON, MA 02459
Property Address:	8 LAFAYETTE PK		
<hr/>			
Parcel Number:	094-519-016	Mailing Address:	8 LAFAYETTE PARK U 185R-5
CAMA Number:	094-519-016-011		LYNN, MA 01902
Property Address:	8 LAFAYETTE PK		



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Parcel Number: 094-519-016
CAMA Number: 094-519-016-012
Property Address: 8 LAFAYETTE PK

Mailing Address: ...LOS
8 LAFAYETTE PARK U185R-6
LYNN, MA 01902

Parcel Number: 094-519-016
CAMA Number: 094-519-016-013
Property Address: 8 LAFAYETTE PK

Mailing Address: ...A
1004 PINE BROOK DR
PEABODY, MA 01960

Parcel Number: 094-519-016
CAMA Number: 094-519-016-014
Property Address: 8 LAFAYETTE PK

Mailing Address: ...
138 HARTMAN RD
NEWTON, MA 02459

Parcel Number: 094-519-016
CAMA Number: 094-519-016-015
Property Address: 8 LAFAYETTE PK

Mailing Address: ...ST
... TR
21 PINEHURST DR
BOXFORD, MA 01921

Parcel Number: 094-519-016
CAMA Number: 094-519-016-016
Property Address: 8 LAFAYETTE PK

Mailing Address: ...
8 LAFAYETTE PK U185R10
LYNN, MA 01902

Parcel Number: 094-519-016
CAMA Number: 094-519-016-017
Property Address: 8 LAFAYETTE PK

Mailing Address: ...
KRISTEN EL
15 CURWEN RD
PEABODY, MA 01960

Parcel Number: 094-519-016
CAMA Number: 094-519-016-018
Property Address: 8 LAFAYETTE PK

Mailing Address: ...
SHERMAN WILLIAM A ET AL TR
21 PINEHURST DR
BOXFORD, MA 01921

Parcel Number: 094-519-019
CAMA Number: 094-519-019
Property Address: 203 LEWIS ST

Mailing Address: ...AN
48 STANLEY RD
SWAMPSCOTT, MA 01907

Parcel Number: 094-519-020
CAMA Number: 094-519-020
Property Address: 14 THOMPSON CIR

Mailing Address: ...
14 THOMPSON CIR
LYNN, MA 01902

Parcel Number: 094-519-021
CAMA Number: 094-519-021
Property Address: 205 LEWIS ST

Mailing Address: ...
P O BOX 120-245
BOSTON, MA 02112

Parcel Number: 094-519-022
CAMA Number: 094-519-022
Property Address: 15 THOMPSON CIR

Mailing Address: ...ETER W BESSUM DANIEL
K ET AL
15 THOMPSON CIR
LYNN, MA 01902-2403

Parcel Number: 094-519-023
CAMA Number: 094-519-023
Property Address: 9 THOMPSON CIR

Mailing Address: ...
9 THOMPSON CIR
LYNN, MA 01902



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Parcel Number: 094-519-027
CAMA Number: 094-519-027
Property Address: 7 CHESTNUT ST

Mailing Address:
7 CHESTNUT ST
LYNN, MA 01902

Parcel Number: 094-519-029
CAMA Number: 094-519-029
Property Address: 11 CHESTNUT ST

Mailing Address:
11 CHESTNUT ST
LYNN, MA 01902

Parcel Number: 094-519-030
CAMA Number: 094-519-030
Property Address: 17 CHESTNUT ST

Mailing Address:
MARSTERS NADJA COOPER TR
41 SARGENTS CT
LYNN, MA 01905

Parcel Number: 094-519-031
CAMA Number: 094-519-031
Property Address: 7 THOMPSON CIR

Mailing Address:
LENA T
7 THOMPSON CIR
LYNN, MA 01902

Parcel Number: 094-519-032
CAMA Number: 094-519-032-001
Property Address: 23 CHESTNUT ST

Mailing Address:
23 CHESTNUT ST U1
LYNN, MA 01902

Parcel Number: 094-519-032
CAMA Number: 094-519-032-002
Property Address: 23 CHESTNUT ST

Mailing Address:
23 CHESTNUT ST U1
LYNN, MA 01902

Parcel Number: 094-519-032
CAMA Number: 094-519-032-003
Property Address: 23 CHESTNUT ST

Mailing Address:
23 CHESTNUT ST U1
LYNN, MA 01902

Parcel Number: 094-519-033
CAMA Number: 094-519-033
Property Address: 12 THOMPSON CIR

Mailing Address:
12 THOMPSON CIR
LYNN, MA 01902-2403

Parcel Number: 094-519-034
CAMA Number: 094-519-034
Property Address: 18 THOMPSON CIR

Mailing Address:
18 THOMPSON CIR
LYNN, MA 01902-2403

Parcel Number: 094-519-036
CAMA Number: 094-519-036
Property Address: 16 THOMPSON CIR

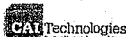
Mailing Address: JS
16 THOMPSON CIR
LYNN, MA 01902-2403

Parcel Number: 094-519-037
CAMA Number: 094-519-037
Property Address: 29 CHESTNUT ST

Mailing Address:
192 BENNINGTON ST
EAST BOSTON, MA 02128-1750

Parcel Number: 094-519-038
CAMA Number: 094-519-038
Property Address: 31 CHESTNUT ST

Mailing Address:
31 CHESTNUT ST
LYNN, MA 01902



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Parcel Number: 094-519-040
CAMA Number: 094-519-040
Property Address: 35 CHESTNUT ST

Mailing Address:
35 CHESTNUT ST
LYNN, MA 01902

Parcel Number: 094-519-057
CAMA Number: 094-519-057
Property Address: 189 LEWIS ST

Mailing Address:
HARBOR MGT
990 PARADISE RD STE 1A
SWAMPSCOTT, MA 01907-1388

Parcel Number: 094-519-062
CAMA Number: 094-519-062
Property Address: 11 PATTYS WAY

Mailing Address:
P O BOX 3621
PEABODY, MA 01961-3621

Parcel Number: 094-568-001
CAMA Number: 094-568-001
Property Address: 184 LEWIS ST

Mailing Address:
JEFFERSON C TR
P O BOX 231
SALEM, MA 01970

Parcel Number: 094-601-009
CAMA Number: 094-601-009
Property Address: 8 FORTESQUE TER

Mailing Address:
145 BEACON HILL BLVD
NORTH ANDOVER, MA 01845

Parcel Number: 094-601-010
CAMA Number: 094-601-010
Property Address: 32 CHESTNUT ST

Mailing Address:
145 BEACON HILL BLVD
NORTH ANDOVER, MA 01845

Parcel Number: 094-601-011
CAMA Number: 094-601-011
Property Address: 28 CHESTNUT ST

Mailing Address:
28 CHESTNUT ST
LYNN, MA 01902

Parcel Number: 094-601-012
CAMA Number: 094-601-012
Property Address: 26 CHESTNUT ST

Mailing Address:
DOUGLAS TR
P O BOX 285
LYNN, MA 01905

Parcel Number: 094-601-016
CAMA Number: 094-601-016
Property Address: 16 CHESTNUT ST

Mailing Address:
MAUREEN L
5 ANTONIO DR
PEABODY, MA 01960



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Plan for Positive Impact

Intent

As Diem Lynn, LLC (Diem) prepares for operations in Massachusetts, we strive to immerse our business into the surrounding community with the intent to understand and better serve the communities which we operate within. Diem operates under the notion that our success relies on having the most positive impact on our customers and the communities that welcomed this industry into its neighborhoods. Cannabis prohibition has had a disproportionate impact on numerous communities and Diem believes it has a responsibility and commitment to ensure its business is positively contributing to its community. While Diem and its affiliated entities are located in other areas of disproportionate impact, specifically Worcester, Diem Lynn, LLC will focus its efforts in Lynn as it has been identified as an area of disproportionate impact by the Cannabis Control Commission.

Purpose

In accordance with 935 CMR 500.101(1)(a)(11), Diem has created goals and a plan to ensure we have a positive impact on areas of disproportionate impact in Massachusetts. While the enrichment of the greater populace is desired, we aim to support and promote those in the community that have been disproportionately harmed by cannabis prohibition. Criminalization has had long-term ill effects, not only on the individuals arrested and incarcerated, but on their families and communities. We hope to bring opportunity and resources to empower the people in these areas of disproportionate impact.

Goals

The following goals and policies serve as a summary of the plan for positive impact that Diem will implement to maintain a symbiotic relationship with the communities our company operates within. Through these policies our business will fulfill the requirement that a marijuana establishment positively impact its host community and/or disproportionately impacted populations.

Proposed Initiative: Diem will make a minimum annual financial contribution of at least \$5,000 to the CultivatED program to help promote participation in the cannabis industry by those who were disproportionately harmed by marijuana prohibition. CultivatED is a jails-to-jobs cannabis program that focuses on issues such as expungement, education and employment for those harmed populations. Diem will provide money to CultivatED to support its mission and goals but will not offer any of its own programming through the CultivatED program. Attached, please find a letter from CultivatED acknowledging acceptance of funds from cannabis license holders.

Goal: Diem will make an annual financial contribution of at least \$5,000 to the CultivatED program which will in turn support the mission of empowering, educating,



and employing individuals from areas of disproportionate impact, as identified by the Massachusetts Cannabis Control Commission.

Metrics: Diem will maintain a record of its annual donations to the CultivatED program. Diem will keep records of feedback that we receive relative to the impact of our contributions, if any. This will in turn help us make decisions about adjustments that need to be made in the future and will be used to demonstrate success or progress of our goal upon Diem's annual renewal, to take place one year from the date of its provisional license.

Proposed Initiative: Diem will commit to provide employees with a minimum of 8 hours per year paid time to participate in a Diem-sponsored neighborhood clean-up initiative that serves identified areas of disproportionate impact. These clean-ups will take place at least once annually. Diem will focus their clean-ups in the City of Lynn throughout the City and in the area immediately surrounding the retail establishment. Employees will be notified of those clean-up days through a routine employee newsletter and/or public posting around Diem's marijuana establishments. While working with City officials, Diem has identified the area of Goldfish Pond as an area in Lynn in need of routine clean-up efforts. As such, Diem will focus our initial clean-up efforts in this area.

Goal: Diem is committed to serving the Lynn community by serving individuals and organizations through the contribution of employee volunteer time courtesy of the company with a goal of donating 8 hours per employee per year and hosting at least one clean-up day annually. Diem will have a goal of 85% participation in the Goldfish Pond neighborhood clean-up program by its employees each calendar year.

Metrics: Diem will maintain records of each employee who participates in the neighborhood clean-up program and the number of hours contributed by each employee. Diem will host two clean-up days annually, one in the Spring and one in the Fall. These clean-ups will take place once Diem obtains its Provisional License with both clean-up days taking place within the first year of its provisional license, prior to its annual renewal. Diem will then solicit feedback from each employee to learn about their experiences and determine whether adjustments should be made in the future with regards to this program. These metrics will be outlined in a comprehensive report that will be completed 60 days prior to our annual license renewal (one year from provisional licensure, and each year thereafter) to the Cannabis Control Commission. Diem will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments.

Conclusion

Diem will conduct continuous and regular evaluations of the charitable contributions and implementations of our goals including but not limited to the specific financial data and/or employee hours showing donations to or investments in specific causes; number of employees



hired, retained, or promoted that come from areas of disproportionate impact; and/or number and types of jobs created in the adult-use cannabis industry in geographic areas of disproportionate impact. We will elicit feedback from employees on their experiences and what organizations or charities they would like to see supported by Diem and at any point, retool policies and our plan for positive impact in order to better accomplish the goals set out by Diem. No actions take, or programs instituted by Diem will violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



MASS CultivatED

February 24, 2020

Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604

RE: Acceptance of Cannabis Funds

Dear Cannabis Control Commission:

It is with great pleasure that we inform you that we will be graciously accepting contributions from licensed Massachusetts cannabis companies in order to assist in funding our program, CultivatED.

CultivatED is a first in the nation jails to jobs cannabis program that focuses on issues such as expungement, education and employment for those who have been affected by the prohibition of cannabis in the Commonwealth. We are an innovative public-private partnership providing our fellows with a robust co-op education program, legal services, workforce preparedness training, and cannabis externships with livable wages and benefits. We work closely with organizations such as Greater Boston Legal Services, Roxbury Community College and the Urban League of Eastern Massachusetts to achieve our program goals.

We appreciate the opportunity to allow Massachusetts licensed cannabis companies to participate through their contributions. Please do not hesitate to contact us should you have any additional questions.

Sincerely,



Ryan Dominguez

**OPERATING AGREEMENT
OF
Diem Lynn LLC**

This **OPERATING AGREEMENT** (as amended from time to time, this “**Agreement**”) of Diem Lynn LLC (the “**Company**”) is made by TDMA Holdings LLC (the “**Member**”) effective as of August 9, 2019.

1. Formation of Limited Liability Company. The Company was formed on August 9, 2019 pursuant to the provisions of the Massachusetts Limited Liability Company Act, Massachusetts General Laws, Chapter 156C (the “Act”), by the filing of a Certificate of Organization of the Company with the office of the Secretary of the Commonwealth of Massachusetts. The rights and obligations of the Member and the administration of the Company shall be governed by this Agreement and the Act.

2. Member. TDMA Holdings LLC is the sole member of the Company. The principal office address of the Member is 75 North Main Street #570, Randolph, MA 02368.

3. Purpose. The Company may engage in any and all businesses or activities in which a limited liability company may be engaged under applicable law (including, without limitation, the Act).

4. Name. The name of the Company shall be Diem Lynn LLC.

5. Registered Office; Other Places of Business. The registered office of the Company in the Commonwealth of Massachusetts is 75 North Main St. #570, Randolph, MA 02368. The Company may have such other offices as the Member may designate from time to time.

6. Resident Agent. The agent for service of process in Massachusetts as of the effective date of this Agreement is Sira Grant, Smith Costello & Crawford, 50 Congress Street, Boston, MA 02109.

7. Term of Company. The Company commenced on the date the Certificate of Organization was properly filed with the Secretary of the Commonwealth of the Commonwealth of Massachusetts and shall exist in perpetuity or until its business and affairs are earlier wound up following proper dissolution.

8. Management of Company. All decisions relating to the business, affairs, and properties of the Company shall be made by the Member. The Member may appoint one or more managers and/or officers of the Company using any titles, and may delegate all or some decision-making duties and responsibilities to such persons. Any such managers and/or officers shall serve at the pleasure of the Member. To the extent delegated by the Member, managers and/or officers shall have the authority to act on behalf of, bind, and execute and deliver documents in the name and on behalf of the Company. In addition, unless otherwise determined the Member, any officer(s) so appointed shall have such authority and responsibility as is generally attributable to the holders of such officers in corporations incorporated under the laws of the Commonwealth of Massachusetts. No delegation of authority hereunder shall cause the Member to cease to be a Member.

9. Other Activities. The Member, its agents, representatives and affiliates may engage or invest in, and devote their time to, any other business venture or activity of any nature and description (independently or with others), whether or not such other activity may be deemed or construed to be in competition with the Company. The Company shall not have any right by virtue of this Agreement or the relationship created hereby in or to such other venture or activity (or to the income or proceeds derived therefrom), and the pursuit thereof, even if competitive with the business of the Company, shall not be deemed wrongful or improper.

10. Standards of Conduct. Whenever the Member is required or permitted to make a decision, take or approve an action, or omit to do any of the foregoing, then the Member shall be entitled to consider only such interests and factors, including its own, as it desires, and shall have no duty or obligation to consider any other interests or factors whatsoever. To the extent that the Member has, at law or in equity, duties (including, without limitation, fiduciary duties) to the Company or other person bound by the terms of this Agreement, the Member acting in accordance with the Agreement shall not be liable to the Company or any such other person for its good faith reliance on the provisions of this Agreement. The provisions of this Agreement, to the extent that they restrict the duties of the Member otherwise existing at law or in equity, replace such other duties to the greatest extent permitted under applicable law.

11. Limited Liability. Except as otherwise required by any non-waivable provision of the Act or other applicable law, the Member shall not be personally liable in any manner whatsoever for any debt, liability, or other obligation of the Company, whether such debt, liability, or other obligation arises in contract, tort, or otherwise.

12. Indemnification. The Company shall indemnify and hold harmless the Member to the full extent permitted by law from and against any and all losses, claims, demands, costs, damages, liabilities, expenses of any nature (including attorneys' fees and disbursements), judgments, fines, settlements, and other amounts (collectively, "**Costs**") arising from any and all claims, demands, actions, suits, or proceedings (civil, criminal, administrative, or investigative) (collectively, "**Actions**") in which the Member may be involved, or threatened to be involved as a party or otherwise, relating to the performance or nonperformance of any act concerning the activities of the Company. In addition, to the extent permitted by law, the Member may cause the Company to indemnify and hold harmless any managers and/or officers from and against any and all Costs arising from any or all Actions arising in connection with the business of the Company or by virtue of such person's capacity as an agent of the Company. Notwithstanding the foregoing, any and all indemnification obligations of the Company shall be satisfied only from the assets of the Company, and the Member shall have no liability or responsibility therefore.

13. Dissolution and Winding Up. The Company shall dissolve and its business and affairs shall be wound up pursuant to a written instrument executed by the Member. In such event, after satisfying creditors, all remaining assets shall be distributed to the Member.

14. Amendments. This Agreement may be amended or modified from time to time only by a written instrument executed by the Member.

15. Governing Law. The validity and enforceability of this Agreement shall be governed by and construed in accordance with the laws of Massachusetts without regard to other principles of conflicts of law.

IN WITNESS WHEREOF, the Member hereto has duly executed this Agreement effective as of the above stated date.

MEMBER

TDMA Holdings LLC

By: _____

Name: Chris Mitchem

Title: President



The Commonwealth of Massachusetts William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter)

Identification Number: 0013967581. The exact name of the limited liability company is: DIEM LYNN LLC

2a. Location of its principal office:

No. and Street: 75 NORTH MAIN STREET
#570City or Town: RANDOLPH State: MA Zip: 02368 Country: USA

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

No. and Street: 75 NORTH MAIN STREET
#570City or Town: RANDOLPH State: MA Zip: 02368 Country: USA

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

ORGANIZING IN ORDER TO APPLY FOR A LICENSE WITH THE CANNABIS CONTROL COMMISSION

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: SIRA GRANT
No. and Street: C/O SMITH COSTELLO & CRAWFORD
50 CONGRESS STREET, SUITE 420City or Town: BOSTON State: MA Zip: 02109 Country: USAI, SIRA GRANT resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

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

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

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

Title	Individual Name	Address (no PO Box)

	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code
SOC SIGNATORY	CHRISTOPHER MITCHEM	220 NW 8TH AVE, STE 343 PORTLAND, OR 97209 USA

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

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

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 9 Day of August, 2019,
SIRA GRANT, ESQ.
(The certificate must be signed by the person forming the LLC.)

THE COMMONWEALTH OF MASSACHUSETTS

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

August 09, 2019 10:55 AM

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



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

mass.gov/dor

Letter ID: L1051443776
Notice Date: March 30, 2020
Case ID: 0-000-649-559



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



CHRIS MITCHEM
DIEM LYNN LLC
75 N MAIN ST # 570
RANDOLPH MA 02368-4605

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

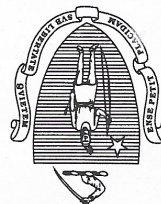
Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

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

Edward W. Coyle, Jr., Chief
Collections Bureau

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

William Francis Galvin
Secretary of the
Commonwealth



March 31, 2020

TO WHOM IT MAY CONCERN:

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

DIEM LYNN LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on August 9, 2019.

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation; 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: **NONE**

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

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **NONE**

In testimony of which,

I have herunto affixed the

Great Seal of the Commonwealth

on the date first above written.

William Francis Galvin
Secretary of the Commonwealth



Processed By: BOD



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE

Charles D. Baker
GOVERNOR

Karyn E. Polito
LT. GOVERNOR



207875938

Rosalin Acosta
SECRETARY

Richard A. Jeffers
DIRECTOR

Diem Lynn LLC
305 SE 3RD AVE
STE 201
PORTLAND, OR 97214

EAN: 22164848
May 12, 2020

Certificate Id:37982

The Department of Unemployment Assistance certifies that as of 5/12/2020 ,Diem Lynn LLC is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189.

This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director

Department of Unemployment Assistance

DIEM

Business Plan



Lynn, MA

2020

Executive Summary

Diem Cannabis is expanding its operations into the emerging recreational marijuana market of Massachusetts. Diem's management team has proven its ability to build out a vertically integrated business model in Oregon and aims to do the same in Massachusetts. Diem will build three retail locations, a production facility, and a product manufacturing facility in Massachusetts. The Diem team is optimistic about the opportunity for marijuana retail in MA and believes a partnership will be incredibly beneficial for the state, its municipalities, and its citizens.

Diem has built its corporate structure for scalability. Diem will be led by an executive team based out of Portland, OR. This executive team will carry national responsibilities in the business functions of finance, human resources, legal, regulatory, marketing, and operations. Each state will feature a local team of leaders required to execute on expansion and buildout strategies. Each state will have its own corporate entity rolling into Diem's national holding company.

Diem's leadership team has spent significant time and resources developing its brand. Diem's brand voice, unique design characteristics, professionalism, expertise, and inclusive approach will set the company apart from the competition in Massachusetts.

In the cannabis business, financial controls are paramount, especially when dealing with investors. Diem's leadership team will expand its excellent controls currently in place in Oregon, and add new ones as necessary.

Diem has entered into a Host Community Agreement with the City of Worcester for an Adult-use Retail Marijuana Dispensary at 74 Grafton Street, of which it now holds a Provisional License from the Cannabis Control Commission, as well holds a Host Community Agreement with the Town of Orange for a Marijuana Cultivation and Product Manufacturing facility, of which it also holds Provisional Licensure, pursuant to Massachusetts General Law Chapter 94G and 935 CMR 500 regulations. Moreover, Diem has recently obtained a Special Permit from the Lynn City Council and subsequently entered into a Host Community Agreement with the City's Mayor's office for marijuana retail operations contingent upon final licensure from the Cannabis Control Commission.

Diem has partnered with the following firms for the completion of the Massachusetts project at large, with plans to partner with several more local ancillary businesses:

Nadeau Corporation - General Contractor
GJO Associates - Architectural and Engineering
Johnson Controls - Security Contractor
Graves Engineering - Civil Engineering
Public Policy Law Group - Lynn/Boston Legal Counsel

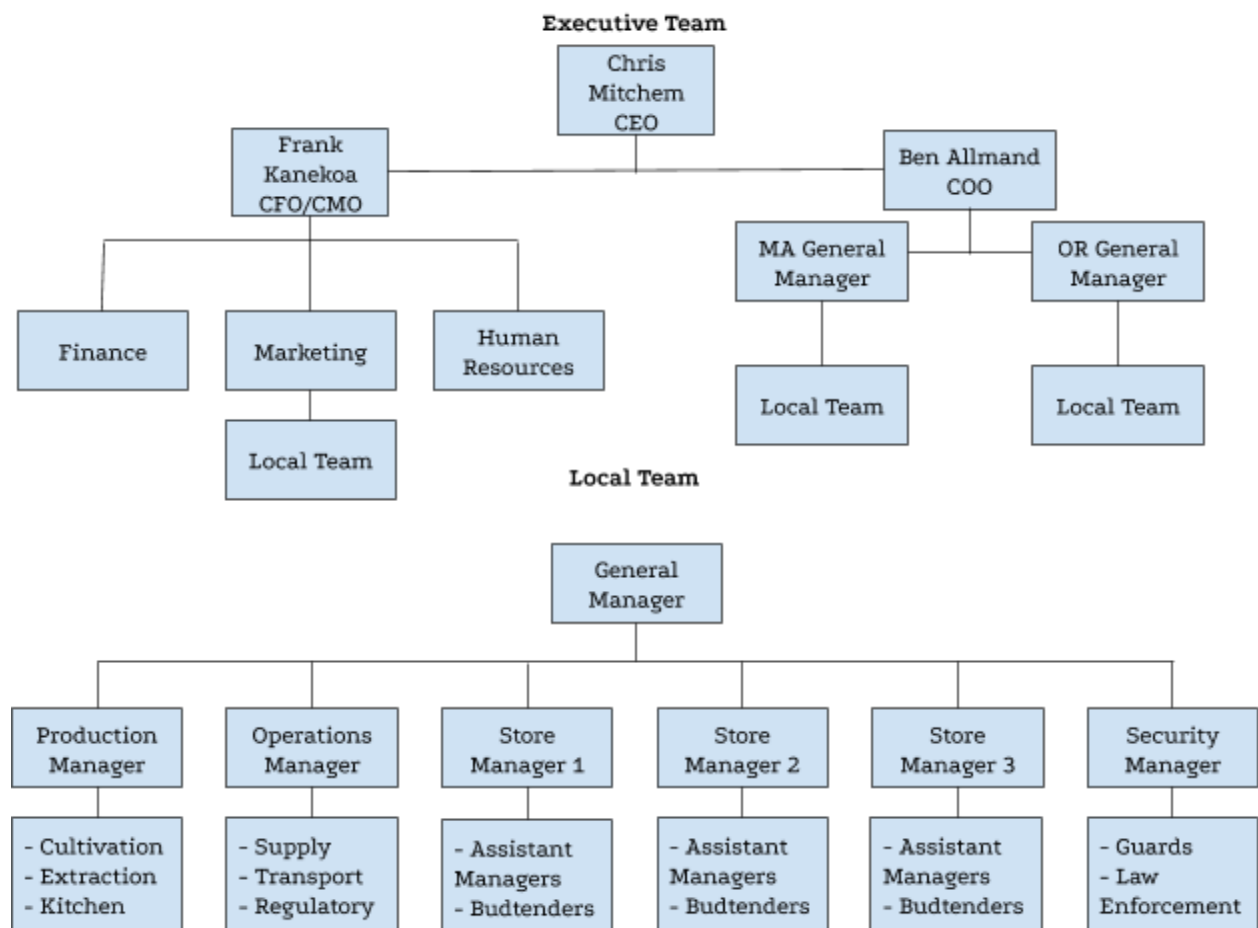
Diem Lynn, LLC
211-217 Lewis St,
Lynn, MA 01902

Corporate Structure and Governance

Organization Overview

Diem is a bootstrapped startup that grew quickly in Oregon with very little capital. This company has proven that it can do a lot with a little, and there are no plans to change the entrepreneurial mentality of Diem's culture. Diem co-founders understand the need to bring on talented people to scale the business into Massachusetts and has come up with an organizational structure to facilitate that.

The idea behind this structure is utilizing an executive team that acts as a national "shared services" group, supporting local teams in different states. Shared services are functions that can be expanded nationally from a centralized location. While many services can be supported by the executive team, each state will require people on the ground to run the business. Each state or "local team" will consist of a General Manager, Operations Manager, Security Manager, Production Manager, and a Retail Manager (for each retail location). A visual representation of this structure is shown below.



Leadership Roles and Responsibilities

To remain as efficient as possible and to execute well, Diem has developed easy to understand job descriptions and performance metrics for each role. Local Team job descriptions are included in Diem's Massachusetts Operations Manual.

Chief Executive Officer: Identifies business opportunities, sets strategic targets, builds company culture, hires the right talent to execute on strategic targets, and guides the team through execution. This role is held by Chris Mitchem.

Chief Operations Officer: The COO manages daily business operations including manufacturing, inventory, supply chain, and the employees in those functional areas. This role is held by Ben Allmand

Chief Marketing Officer: Grows top line revenue and proliferates the Diem brand using graphic design, web programming, SEO, social media, advertising, strategic partnerships, product innovation, and budtender sales training. This role is currently held by Frank Kanekoa.

Chief Financial Officer: Bank account and cash management, investor relations, accounts payable, accounts receivable, forecasting, financial reporting, financial law compliance, tax planning. This role is held by Frank Kanekoa.

HR Manager: State and federal labor law compliance, onboarding and termination, talent development, recruiting, employee reviews, employee engagement. This role will report to the CFO and CEO.

General Manager: The General Manager of each state will basically be a dedicated CEO of that particular state. The GM identifies business opportunities, sets strategic targets, builds company culture, hires the right talent to execute on strategic targets and guides the team through execution. GM's will report directly to the CEO.

Production Manager: The production manager is the head of the farm and manufacturing facilities. The production manager's goal is to produce as much high quality product as possible in a calendar year. In addition, the production manager must be able to respond to demand fluctuations as they arise, and pivot production to different offerings as needed based on feedback from the local team. The production manager is also a people manager and is responsible for the hiring, engagement, and performance of the farm and manufacturing team. This role reports directly to the local General Manager.

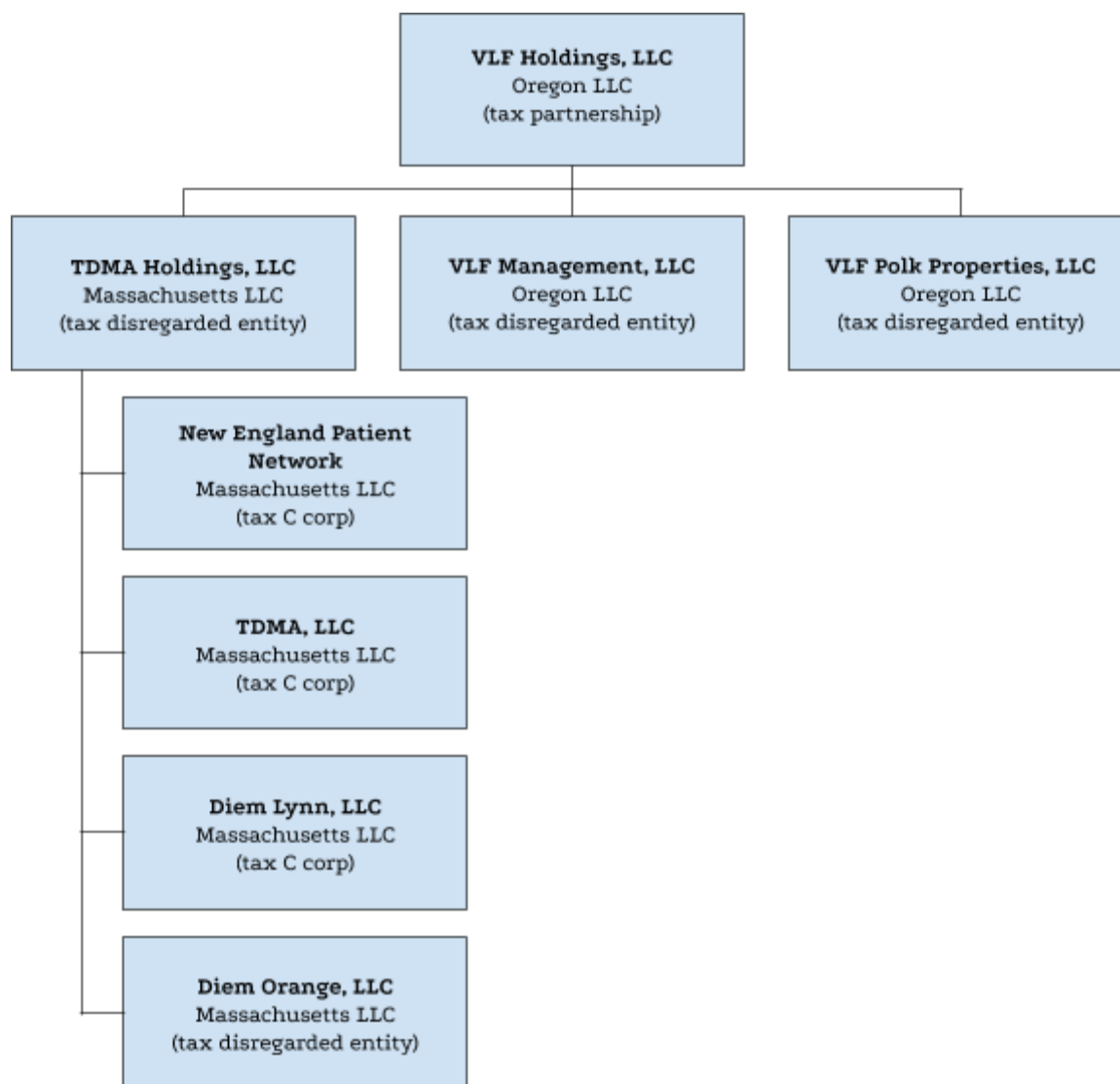
Operations Manager: The Operations Manager makes sure that Diem's local dispensaries have the right amount of products in stock when needed and is not

overstocked. The Operations Manager floats between dispensary locations within the state and manages inventory in partnership with Retail Managers. The Operations Manager forecasts demand, develops supply relationships with vendors, and regulates supply from Diem's vertically integrated farm and manufacturing facilities. In addition, in the marijuana industry inventory seed to sale tracking compliance is of vital importance, and the Operations Manager will have local responsibility for this function. This role reports directly to the local General Manager.

Store Manager: The retail manager is responsible for day to day retail store operations. This includes budtender hiring, engagement, and performance management, running site specific sales and promotions, customer service management, site display and cleanliness, local competitive analysis against other shops in town, cash management, and security management. This role reports directly to the local General Manager.

Security Manager: The Security Manager (SM) will be responsible for implementing the Security Plan, or managing a designee who will be responsible for a subset of tasks, managing and acting as the primary contact for all security vendors, ensuring that all security procedures are followed related to facility access, emergency response, transportation, training, hiring and supervising security officers, third-party background checks, prohibiting the access of minors to the premises, and other procedures specified in Diem's Operations. The Security Manager will regularly report to the General Manager.

Entities with Direct Authority - Organizational Chart



Diem Lynn, LLC d/b/a Diem (“Diem Lynn”) is a Massachusetts limited liability company that is in good standing with the Secretary of State’s office. Diem Lynn is a wholly-owned subsidiary of TDMA Holdings, LLC (“Diem Massachusetts”), a Massachusetts limited liability company that is in good standing with the Secretary of State’s office; Diem Massachusetts is a wholly-owned subsidiary of VLF Holdings LLC (“Diem Holding”), a limited liability company organized under Oregon law and currently in existence. As such, the control structure listed here applies to Diem Holding, Diem Massachusetts, and Diem Lynn.

Operating Plan

Operations management is the art of combining people and processes together, a skill-set in which Diem's founding team have decades worth of experience. The approach to operations management is to clearly define roles and responsibilities, create feedback mechanisms for regular communication, proceduralize operations processes for replication and scalability, and continuously improve the operation systematically. The outline below shows how Diem's operations will be run.

Executive Team

The executive team will provide strategic direction, capital, and constraints to the local team. The executive team also provides the organizational shared services of legal, human resources, regulatory, finance, and marketing. Below is the process they will follow.

1. The executive team will have a weekly national call for the entire organization on which metrics will be reviewed, group problem solving will occur, and direction will be provided. The intent is for local managers to interact with the executive team and each other on a regular basis to facilitate group learning and camaraderie. The weekly communication will cover the following:
 - a. Revenue and profit of the previous week
 - b. Updates from executive team
 - c. Updates from local team
 - d. Specific project updates
 - e. Recognition for good work
 - f. Team building
 - g. Open forum for questions and concerns
2. The COO will have one on one calls with each General Manager and executive team members weekly. These one on one's will be focused both on professional development and on tactical problem solving.
3. Members of the executive team will visit each local team quarterly for team building, problem-solving, and to generally check in on local operations in person. The executive team will also visit each state informally as needed.
4. The executive team will have a dedicated cloud-based dashboard that will detail job descriptions, goals, metrics, and other key business information that should be shared with the national team.
5. The executive team will have access to Diem's Business Plan and will be engaged in the company's strategy at large.

Local Team

The local team, led by the General Manager, will execute on the executive team's objectives using the following process.

1. The General Manager will have weekly local calls with the local team where

he/she will pass information along from the national call and provide local direction and problem solving.

2. The local GM will have weekly one on one calls with each member of his/her team to work on professional development and tactical issues.
3. The General Manager will spend at least one day at each business unit per month. This means a full day at each dispensary being a budtender, one full day at the farm working with the production team, and one full day at the manufacturing plant working with the extraction team. It is vital for the GM to lead from the front and understand what is happening with his/her team, with the market, and with Diem's customers.
4. The local team will be guided by a cloud-based dashboard with job descriptions, metrics, goals, and procedures. Metrics will be tracked weekly.

Process Scalability

The entire organization will be guided by a set of national procedures with localized adjustments where needed. Since most key business functions will be managed at the executive level, Diem, its shareholders, and its stakeholders can expect coordinated approaches to operations nationwide. This is a "cookie cutter" approach to operations management. For example, the HR procedure for hiring in Massachusetts will be the same as in other states, with the addition of amendments required by the state. These procedures are included in the Management and Operations Manual

Continuous Improvement

Both the executive team and the local teams will be incentivized to create procedures for the processes they develop, and continuously improve those processes and update the procedures accordingly. Continuous improvement ensures that the organization continues to adapt to a rapidly evolving environment.

Performance Incentives

Teams will be paid annual bonuses based on their performance. Incentivizing good work is vital to getting the most out of people. The team will have company based metrics and local metrics that are tracked for bonus potential. Bonuses will be paid out as a percentage of salary, with the percentage on a sliding scale based on performance.

Annual Reviews

Each employee and manager will receive an annual performance review scoring them on their performance. This review will be a continuance of conversations managers have with their people regularly, and nothing in the performance review should be a surprise, it is a summary of everything discussed throughout the year. Employees will be rated on a scale from 1 to 5, and all of the employee ratings will be stored in a database so Diem can identify top talent for management positions.

Tools and Services List

The organization will use a common set of tools, service providers, and software to facilitate learning, align procedures nationally, and leverage economies of scale to lower costs. These include:

1. Flowhub (POS) management
2. Flowhub inventory management
3. Flowhub integrated POS package featuring (per register): Cash drawer, zebra receipt printer, iPad, label printer.
4. METRC state compliance seed to sale tracking software (where available)
5. Google cloud services (file storage, sheets, docs, slides, email, music, conferencing)
6. Dutchie online and in store menu software
7. Android OS company phones as these sync with google cloud services
8. Todoist task management software
9. Pipedrive wholesale sales management software
10. Quickbooks finance management software
11. Bench finance reporting software
12. Gusto human resources management and payroll software
13. Pillar payment merchant services solutions
14. Diem's custom website tailored to localities
15. Diem's custom online menu and delivery management software
16. Onboarding and termination boilerplate documents and procedures
17. Insurance coverage facilitated by Leonard Adams Insurance
18. Security provided by Johnson Controls.
19. Mainstem packaging company for standard, child safe, and custom packaging
20. Pantheon web hosting services
21. Cloud based cash logs in google sheets
22. Cloud based menu management logs in google sheets
23. Grasshopper phone line management software

Finance Plan

Frank Kanekoa is the CFO and is accountable for the creation, administration, and development of a financial and operational strategy, metrics tied to that strategy, and the ongoing development and monitoring of control systems designed to preserve company assets and report accurate financial results. He leverages third party financial teams and in-house personnel to deliver on the office's principal accountabilities, which are:

Planning

1. Assist in formulating the company's future direction and supporting tactical initiatives
2. Monitor and direct the implementation of strategic business plans
3. Develop financial and tax strategies
4. Manage the capital request and budgeting processes
5. Develop performance measures that support the company's strategic direction

Financial Information

1. Oversee the issuance of financial information to shareholders and stakeholders. This information will be reported to shareholders and stakeholders on a quarterly basis, and it includes a profit and loss statement, balance sheet, and cash flow statement.
2. Report financial results to the executive team, and board of directors. Revenue results will be reported weekly and profit results will be reported monthly. Month-end closing of the books will occur no later than the 5th of every month.

Funding

1. Monitor cash balances and cash forecasts
2. Establish debt and equity financing
3. Invest funding

Third Parties

1. Participate in conference calls with the investment community
2. Maintain banking relationships
3. Represent the company with investment bankers and investors

Operations

1. Participate in developing and determining key strategic decisions
2. Manage the accounting, investor relations, legal, and tax departments
3. Oversee the financial operations of all companies
 1. Cash management procedures
 2. Debit processing
 3. Refunds and Returns
 4. Accounts Payable and Receivable
4. Manage any third parties to which bookkeeping, accounting, or finance functions have been outsourced
5. Oversee the company's transaction processing systems
6. Implement operational best practices

Operating Policies

Diem has developed operating policies and procedures over the past three years. These will allow us to scale. Diem does not depend on tribal knowledge passed from individual to individual, rather, procedures are created to capture and expand the team's knowledge as knowledge is procured. Diem's policies and procedures are working documents constantly evolving as new processes are developed and existing processes are finely tuned.

Diem Senior Management and Executives shall receive and hold MA Business Plans in addition to all other documents hereto. Diem Management level employees (Retail, Production, Manufacturing, Operations, Financial, and Marketing Managers) shall receive Diem's Management Operations Manual, Diem's Management Packet of compiled templates for job descriptions, attestations and acknowledgments of company policies and regulations, tax forms, and the Employee Handbook. Diem's Management and Operations Manual and Management Packets are the key elements to employee on-boarding and scalability.

Diem has established operating policies for compliance with MA municipal and state laws and regulations. The policies are included in the Company's Management and Operations profile in this application accordingly.

Project Management

Diem's Local and Executive teams have extensive Massachusetts construction management experience that the company seeks to leverage in order to bring Diem Lynn's proposed retail location up to code with all local, state, and international Building, Fire, and Energy codes, as well as a retail floor plan that is compliant with CMR regulations associated with Adult-use Marijuana Establishments (935 CMR 500). The following table depicts completed project tasks and prospective project tasks for the proposed retail establishment:

Completed Project Tasks	Team	Owner
Form wholly-owned subsidiary for location - Diem Lynn, LLC	Business Development	Legal
Identify compliantly zoned location for a marijuana establishment	Business Development	DIEM
Conduct property due-diligence on the location for feasibility	Business Development	DIEM
Secure Property with an LOI	Business Development	DIEM
Host Community Outreach Meeting	Business Development	DIEM

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Lynn, MA 01902

Apply for Special Permit	Business Development	Legal
Go before the Municipal Marijuana sub committee	Business Development	DIEM
Go before the Special Permit Granting Authority	Business Development	DIEM
Obtain a Special Permit	Business Development	Legal
Apply for Municipal HCA	Business Development	Legal
Enter into a Municipal HCA (5-year term)	Business Development	Legal
Enter into a Lease Agreement	Business Development	DIEM
Apply for a Provisional License from CCC	Business Development	Legal
Prospective Project Tasks	Team	Owner
Source Responsible Vendor Training Program	Business Development	DIEM
Obtain Provisional License from CCC	Business Development	DIEM
Submit Architectural Plans to the CCC	Business Development	DIEM
CCC Post-Provisional Inspection	Business Development	DIEM
Send Security and Floor plan to City Chief of Fire and Police	Business Development	DIEM
Obtain dba Certification from Lynn	Business Development	DIEM
Field Measure Facility	Construction Management	Architect
Civil Site Planning/Surveying	Construction Management	Civil Engineer
Exterior Renderings	Construction Management	Architect
Preliminary Floor Planning	Construction Management	Architect
Floor Plan w/ Security	Construction Management	Security Contractor
Architectural/Engineering Final Building Design & Planning	Construction Management	Architect/Engineers
Apply for a Building Permit	Construction Management	General Contractor
Obtain Building Permit	Construction Management	General Contractor
Subcontractor Bidding	Construction Management	General Contractor
Buildout Budget	Construction Management	General Contractor
Value Engineering Exercises	Construction Management	General Contractor
Start Construction Phase	Construction Management	General Contractor
General Demolition	Construction Management	Subcontractor
Interior framing	Construction Management	Framing subcontractor
Electrical Rough-In	Construction Management	Electrical subcontractor
Security Rough-In	Construction Management	Security Contractor
Plumbing, Framing, Electrical Rough-In Inspection	Construction Management	DIEM
Preliminary Site Work	Construction Management	DIEM
Preliminary Flooring work	Construction Management	DIEM

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Lynn, MA 01902

Gas Rough-in	Construction Management	Plumber subcontractor
Insulation finishes	Construction Management	Insulator subcontractor
Insulation Inspection	Construction Management	Insulator subcontractor
Sheetrock Phase 1	Construction Management	Sheetrock subcontractor
Install electric panel	Construction Management	Energy Electrical
Electrical Service Inspection	Construction Management	Electrical subcontractor
Gas Final Inspection	Construction Management	Plumber subcontractor
Water service flush	Construction Management	Site work subcontractor
Water test (1 week turnaround)	Construction Management	Plumber subcontractor
Floor leveling	Construction Management	DIEM
Window install	Construction Management	Window subcontractor
Vestibule install	Construction Management	Window subcontractor
Sheetrock Phase 2	Construction Management	Sheetrock subcontractor
Electrical outlet install	Construction Management	Electrical subcontractor
Security System wiring	Construction Management	Security Contractor
Install door frames	Construction Management	Sheetrock subcontractor
Install doors	Construction Management	Door subcontractor
Install sinks	Construction Management	Plumber subcontractor
Install floor tile	Construction Management	DIEM
Install toilets	Construction Management	Plumber subcontractor
Install drinking fountain	Construction Management	Plumber subcontractor
Plumber install backflow meter	Construction Management	Plumber subcontractor
Plumber install water meter	Construction Management	Plumber subcontractor
Schedule plumbing final inspection	Construction Management	Plumber subcontractor
Plumbing Final Inspection	Construction Management	Plumber subcontractor
Fencing (dumpster and security) install	Construction Management	Sitework subcontractor
Complete Site Work	Construction Management	Sitework subcontractor
Paint parking lines	Construction Management	Sitework subcontractor
Schedule DPW Final Inspection	Construction Management	DIEM
DPW Final Inspection	Construction Management	DIEM
Install acoustic ceiling panels	Construction Management	Acoustical subcontractor
Install mini-split in the vault	Construction Management	HVAC subcontractor
Install thermostats	Construction Management	HVAC subcontractor
Complete sheetrock (pre ductwork cut-ins)	Construction Management	HVAC subcontractor

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Lynn, MA 01902

Install ductwork cut-ins	Construction Management	HVAC subcontractor
HVAC is installed and operational	Construction Management	HVAC subcontractor
Schedule mechanical final inspection	Construction Management	HVAC subcontractor
Mechanical Final Inspection	Construction Management	HVAC subcontractor
Mechanical inspection passed	Construction Management	HVAC subcontractor
Security system finish	Construction Management	Security Contractor
Lighting install	Construction Management	Electrical subcontractor
Fire alarm system installation	Construction Management	Electrical subcontractor
Exit sign install	Construction Management	Electrical subcontractor
POS Station install	Construction Management	DIEM
Electrical underneath POS stations	Construction Management	Electrical subcontractor
Schedule electrical final inspection	Construction Management	Electrical subcontractor
Electrical Final Inspection	Construction Management	Electrical subcontractor
Plumbing/Mechanical Engineering inspection	Construction Management	Architect
Electrical engineering inspection	Construction Management	Architect
Structural engineering inspection	Construction Management	Architect
Schedule architect commissioning	Construction Management	Architect
Stucco Finishes	Construction Management	Mason subcontractor
Architect Commissioning	Construction Management	Architect
Fire extinguisher installation	Construction Management	DIEM
Sign install	Construction Management	DIEM
Schedule low voltage inspection	Construction Management	DIEM
Low Voltage Inspection	Construction Management	Security Contractor
Schedule fire department final inspection	Construction Management	DIEM
Schedule final building inspection	Construction Management	DIEM
Final Building Inspector/Fire Inspection	Construction Management	DIEM
Obtain Certificate of Occupancy	Construction Management	DIEM
Site Work - Handicap Pole	Construction Management	Site work subcontractor
Wall Painting finishes - Back of House	Construction Management	Painting subcontractor
Wall Painting finishes - Front of House	Construction Management	Painting subcontractor
Floor Painting finishes - Back of House	Construction Management	Painting subcontractor
Floor Painting finishes - Front of House	Construction Management	Painting subcontractor
POS painting	Construction Management	DIEM
Vinyl graphics application	Construction Management	Vinyl subcontractor

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Security Finishes	Construction Management	Security Contractor
Obtain Certificate of Occupancy	Construction Management	DIEM
Construction invoice settling	Finance Department	DIEM
Build sub domain on hellodiem.com location specific	Marketing Management	DIEM
Local SEO and online listings	Marketing Management	DIEM
Local Press Releases	Marketing Management	DIEM
Local branding collateral	Marketing Management	DIEM
Internet Service Installation	Operations Management	ISP
Local Opex Budgeting	Operations Management	DIEM
Install store menus and tablets	Operations Management	DIEM
Complete Agent Registration for Management	Operations Management	DIEM
Local Metrc License onboarding	Operations Management	DIEM
Local SOP Optimization	Operations Management	DIEM
CPR/1st Aid training	Operations Management	DIEM
Establish supply chain relationships	Operations Management	DIEM
Dispensary Flow Exercises	Operations Management	DIEM
Compile chemical safety data sheet	Operations Management	DIEM
Certify new scales with City of Lynn	Operations Management	DIEM
Recruit local staff and onboard accordingly	Operations Management	DIEM
Establish compliant employee files for establishment	Operations Management	DIEM
Purchase start-up inventory	Operations Management	DIEM
Execute employee operational training	Operations Management	DIEM
Security Audit	Operations Management	DIEM
Inventory Audit	Operations Management	DIEM



Plan for Obtaining Liability Insurance

I. Purpose

The purpose of this plan is to outline how Diem Lynn, LLC (“Diem”) will obtain and maintain the required General Liability and Product Liability insurance coverage as required pursuant to 935 CMR 500.105(10), or otherwise comply with this requirement.

II. Research

Diem has engaged with multiple insurance providers offering General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10). We will work with our current cannabis insurance broker in Oregon, Leonard Adams Insurance (<https://www.lacoinsurance.com>) to procure insurance in Massachusetts. The insurance providers for our Oregon operations are not restricted to covering Oregon alone, and will be able to provide adequate coverage required in 935 CMR 500.105 (10).

III. Plan

1. Once Diem receives its Provisional Marijuana Establishment License, we will engage with our insurance provider who is experienced in the legal marijuana industry.
 - a. Diem 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.
 - b. The deductible for each policy will be no higher than \$5,000 per occurrence.
2. In the event that Diem cannot obtain the required insurance coverage, Diem will place a minimum of \$250,000 in an escrow account. These funds will be used solely for the coverage of liabilities.
 - a. Diem will replenish this account within ten business days of any expenditure.
3. Diem will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission and make these reports available to the Commission up request.



Compliance Summary

Upon entry into the premise of Diem Lynn, LLC (“Diem”) by an individual, a Diem agent shall immediately inspect the individual’s proof of identification. An individual shall not be admitted to the premise unless the retailer has verified that the individual is 21 years of age or older by offering proof of identification.

Diem’s management team is responsible for ensuring that all persons who enter the facility or are otherwise associated with the operations of Diem are 21 years of age or older.

To verify an individual’s age, a Diem Agent must receive and examine from the individual one of the following authorized government issued ID cards: Massachusetts issued driver’s license; Massachusetts issued ID card; Out-of-state driver’s license or ID card (with photo); Passport; or U.S. Military ID. To verify the age of the individual the Agent will use an Age Verification Smart ID Scanner that will be supplied by Diem. If for any reason the identity of the customer or the validity of the ID is in question, the individual will not be granted access to the facility.

Diem will train all Retail and Security Agents on the verification and identification of individuals. All Agents will enroll in and complete the Responsible Vendor Training Program when it is available. This curriculum will include: Diversion prevention and prevention of sales to minors; and Acceptable forms of identification, including how to check identification, spotting false identification, provisions for confiscating fraudulent identifications, and common mistakes made in verification.

Diem will have limited access areas identified with clear signage designating the access point for authorized personnel only, pursuant to 935 CMR 500.110(4). Identification badges will be required to be worn at all times by Diem employees while at the facility or engaged in transportation. Diem will positively identify all individuals seeking access to the facility to limit access solely to individuals 21 years or age or older.

While at the facility or transporting marijuana for the facility all Diem Agents must carry their valid Agent Registration Card issued by the Commission. All Diem Agents are verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card. All outside vendors, contractors and visitors shall be required to wear visitor badges prior to entering limited access areas and shall be displayed at all times. Visitors shall be logged in and out and be escorted while at the Diem facility. The visitor log will be available for inspection by the Commission at all times. All visitor badges will be returned to Diem upon exit.

The following individuals shall be granted immediate access to the facility: Representatives of the Commission in the course of responsibilities authorized by Chapter 334 of the Acts of 2016, as amended by Chapter 55 of the Acts of 2017 or 935 CMR 500.000; representatives of other state agencies in the Commonwealth; emergency responders in the course of responding to an emergency; and law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

All Limited Access areas will be clearly described by the filing of a diagram of the registered premises, as determined by the Commission, reflecting, where applicable, entrances and exits, walls, partitions, vegetation, flowering, processing, production, storage, disposal and retail sales areas. Access to Limited Access areas will be restricted to employees, agents or volunteers specifically permitted by Diem, agents of the Commission, state and local law enforcement and



Compliance Summary

emergency personnel. All Diem employees will visibly display an employee identification badge issued by Diem at all times while Diem's Marijuana Establishments or transporting marijuana.



Compliance Summary

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

Management is primarily responsible for seeing that equal employment opportunity policies are implemented, but all members of the staff share the responsibility for ensuring that, by their personal actions, the policies are effective and apply uniformly to everyone. Any employee, including managers, determined by Diem to be involved in discriminatory practices are subject to disciplinary action and may be terminated. Diem strives to maintain a work environment that is free from discrimination, intimidation, hostility, or other offenses that might interfere with work performance. In keeping with this desire, we will not tolerate any unlawful harassment of employees by anyone, including any manager, co-worker, vendor or clients.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of Diem that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. Diem will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; and key state and local laws.

All Diem policies will include a staffing plan and corresponding records in compliance with 935 CMR 500.105(1)(h) and ensure that all employees are aware of the alcohol, smoke, and drug-free workplace policies in accordance with 935 CMR 500.105(1)(j). Diem will also implement policies to ensure the maintenance of confidential information pursuant to 935 CMR 500.105(1)(k). Diem will enforce a policy for the immediate dismissal of agents for prohibited offenses including but not limited to diversion of marijuana, unsafe practices, or a conviction or guilty pleas for a felony charge of distribution to a minor according to 935 CMR 105(1)(l).

All Diem employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All marijuana establishment agents will complete a training course administered by Diem and complete a Responsible Vendor Program in compliance with 935 CMR 500.105(2)(b). Employees will be required to receive a minimum of eight hours of on-going training annually pursuant to 935 CMR 500.105(2)(a).



Compliance Summary

Pursuant to 935 CMR 500.160, Diem Lynn, LLC (“Diem”) will not sell or market any marijuana product that is not capable of being tested by Independent Testing Laboratories, including testing of marijuana products and environmental media. Diem will implement a written policy for responding to laboratory results that indicate contaminant levels that are above acceptable levels established in DPH protocols identified in 935 CMR 500.160(1) and subsequent notification to the Commission of such results. Results of any tests will be maintained by Diem for at least one year. All transportation of marijuana to or from testing facilities shall comply with 935 CMR 500.105(13) and any marijuana product returned to Diem by the testing facility will be disposed of in accordance with 935 CMR 500.105(12). Diem will never sell or market adult use marijuana products that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

In accordance with 935 CMR 500.130(2), Diem will prepare, handle and store all edible marijuana products in compliance with the sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*. In addition, Diem’s policies include requirements for handling of marijuana, pursuant to 935 CMR 500.105(3), including sanitary measures that include, but are not limited to: hand washing stations; sufficient space for storage of materials; removal of waste; clean floors, walls and ceilings; sanitary building fixtures; sufficient water supply and plumbing; and storage facilities that prevent contamination.

Pursuant to 935 CMR 500.105(11)(a)-(e), Diem will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. Diem will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. Diem storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest. The Diem storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

Diem has a Quality Manager who will oversee the manufacturing at the Diem facility to maintain strict compliance with DPH regulations and protocols for quality control and analytical testing. In accordance with 935 CMR 500.160 Diem grow areas are monitored for temperature, humidity, and CO2 levels this monitoring helps reduce the risk of crop failure. Ethical pest management procedures are utilized to naturally maintain a pest free environment alongside our True Living Organics (“TLO”) growing method.

All Marijuana Infused Products (“MIPs”) are produced using good manufacturing practices and safe practices for food handling to ensure quality and prevention of contamination.

All Diem agents whose job includes contact with marijuana or nonedible marijuana products is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*. All Diem agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including personal cleanliness and thorough handwashing. The hand-washing facilities will be adequate and convenient with running water at a suitable



Compliance Summary

temperature and conform with all requirements of 935 CMR 500.105(3)(b)(3).

Diem will provide sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations, in accordance with 935 CMR 500.105(3)(b)(4). Litter and waste will be properly removed and disposed of and the operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12). The floors, ceilings and walls will be constructed in a way that allows them to be adequately cleaned and in good repair. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition in compliance with 935 CMR 500.105(3)(b)(9). All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products.

Pursuant to 935 CMR 500.105(3)(b)(11), Diem's water supply will be sufficient for necessary operations able to meet our needs. The plumbing requirements of 935 CMR 500.105(3)(b)(12) will be met through adequate size and design and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Diem facility. Diem will also provide our employees with adequate, readily accessible toilet facilities that are maintained in sanitary condition and in good repair. All products that can support the rapid growth of undesirable microorganisms will be held in a manner that prevents the growth of these microorganisms.

Our quality assurance manager will ensure all batches of Marijuana and MIPs will be tested, by an independent testing laboratory pursuant to 935 CMR 500.160. All products shall be tested for the cannabinoid profile and for contaminants as specified by the Department, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides.

Environmental media will be tested in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Department of Public Health pursuant to 935 CMR 500.160(1). All testing results will be maintained by Diem for no less than one year in accordance with 935 CMR 500.160(3).

Samples that pass testing will be packaged for use or utilized in MIPs.

Samples that fail testing will be reported and destroyed. Pursuant to 935 CMR 500.160(9), no marijuana product shall be sold or marketed for sale that has not first been tested and deemed to comply with the Independent Testing Laboratory standards.



Compliance Summary

Diem Lynn, LLC (“Diem”) records will be available to the Cannabis Control Commission (“CCC”) upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection, in addition to written operating procedures as required by 935 CMR 500.105(1), inventory records as required by 935 CMR 500.105(8) and seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).

Diem will also keep all waste disposal records as required by 500.105(12), including record keeping procedures. Diem will ensure that at least 2 Marijuana Establishment Agents witness and document how the marijuana waste is disposed or otherwise handled in accordance with 935 CMR 500.105(12). When the marijuana products or waste is disposed or handled, Diem will create and maintain a written or electronic record of the date, the type, and quantity disposed or handled, the manner of disposal or other handling, the location of the disposal or other handling, and the names of the Agents present during the disposal or handling, with their signatures. Diem will keep these records for at least 3 years.

Personnel records will also be maintained, in accordance with 935 CMR 500.105(9)(d), including but not limited to, job descriptions for each employee, organizational charts, staffing plans, personnel policies and procedures and background checks obtained in accordance with 935 CMR 500.030. Personnel records will be maintained for at least 12 months after termination of the individual’s affiliation with Diem, in accordance with 935 CMR 500.105(9)(d)(2). Additionally, business will be maintained in accordance with 935 CMR 500.104(9)(e) as well as waste disposal records pursuant to 935 CMR 500.104(9)(f), as required under 935 CMR 500.105(12).

Following the closure of the Marijuana Establishment, all records will be kept for at least two years at the expense of Diem and in a form and location acceptable to the Commission, pursuant to 935 CMR 500.105(9)(g). In accordance with 935 CMR 500.105(9), records of Diem will be available for inspection by the Commission upon request. Diem’s records will be maintained in accordance with generally accepted accounting principles. Diem will have all required written records and available for inspection, including all written operating procedures as required by 935 CMR 500.105(1) and business records as outlined by 935 CMR 500.105(9)(e).



Compliance Summary

Diem Lynn, LLC (“Diem”) does not intend to sell medical marijuana or marijuana products to registered qualifying patients at this time. As a result, Diem will not need to separate its recreational operations from its medical operations because it will only be conducting retail recreational operations.



Compliance Summary

Diem Lynn, LLC (“Diem”) policy is to maintain financial records in accordance with 935 CMR 500.105(9)(e). The records will include manual or computerized records of assets and liabilities, monetary transactions; books of accounts, which shall 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, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the non-profit corporation.

Diem will conduct monthly sales equipment and data software checks and initiate reporting requirements for discovery of software manipulation as required by 935 CMR 500.140(6)(d). Diem will not utilize software or other methods to manipulate or alter sales data in compliance with 935 CMR 500.140(5)(c). Diem will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Diem will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Diem determines that software had been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data we will: disclose the information to the Commission; cooperate with the Commission in an investigation relative to data manipulation; and take other action as directed by the Commission to comply with the applicable regulations. Pursuant to 935 CMR 500.140(6)(e), Diem will comply with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements.

Diem will implement separate accounting practices for marijuana and non-marijuana sales pursuant to 935 CMR 500.140(6)(f).

Following the closure of Diem, all records will be kept for at least two years at the expense of Diem and in a form and location acceptable to the Commission, in accordance with 935 CMR 500.105(9)(g). Financial records shall be kept for a minimum of three years from the date of the filed tax return, in accordance with 830 CMR 62C.25.1(7) and 935 CMR 500.140(6)(e).



Compliance Summary

Pursuant to 935 CMR 500.105(2)(a) Diem Lynn, LLC (“Diem”) will ensure all dispensary agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function. Dispensary agents will be trained for one week before acting as a dispensary agent. At a minimum, staff shall receive eight hours of on-going training annually. New dispensary agents will receive employee orientation prior to beginning work with Diem. Each department managed will provide orientation for dispensary agents assigned to their department. Orientation will include a summary overview of all the training modules.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of Diem that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. Diem will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; and key state and local laws.

All employees will be registered as agents, in accordance with 935 CMR 500.030. All Diem employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All registered agents of Diem shall meet suitability standards of 935 CMR 500.800. Pursuant to 935 CMR 500.105(2) Diem will ensure that employees are trained on job specific duties prior to performing job functions.

Training will be recorded and retained in dispensary agents file. In accordance with 935 CMR 500.105(2) Responsible Vendor Program documentation must be retained for four (4) years. Training records will be retrained by Diem for at least one year after agents’ termination. Dispensary agents will have continuous quality training and a minimum of 8 hours annual on-going training.



Compliance Summary

Intent

At Diem Lynn, LLC (Diem), we are proud to be equal opportunity employers. We strive to immerse our business into the surrounding community to create a diverse workforce and give back to the people that foster the local commonwealth. Each Diem facility (retail, cultivation, manufacturing) promotes diversity and inclusivity throughout its hiring and recruitment processes to maintain a company culture of anti-discrimination and a place for everyone to succeed. We wholeheartedly support and will hold charity events and make donations toward promoting diversity and bringing awareness to social causes. Diem has always been a company with the mission to include anyone and everyone in the many opportunities this growing industry has to offer.

Purpose

To promote diversity is to provide safe and inclusive space for everyone to partake in the same opportunities and pool of resources, no matter their background. Our intent is to understand and therefore better serve the communities to which we operate within. We utilize local leaders and members to build a relationship with the people to find the most variant talent for all the roles we can offer. Diem is committed to promoting racial and gender equity and include minorities, women, veterans, LGBTQ+ individuals, people with disabilities, and other communities in the makeup of our workforce. We create and embrace policies to ensure equal opportunity and promotion for all employees to enhance the company's diverse cultural intellect and awareness.

Goals

The following goals and policies serve as the diversity plan that Diem utilizes to maintain a discrimination-free and inclusive environment within all company operations. Through these policies we can recruit skilled people from diverse backgrounds and support each individual's talents through career development to align everyone's goals.

Goal 1: Recruit a diverse workforce that is as inclusive as possible with a goal of having a workforce made up of at least 50% women, 25% minorities, and 10% of individuals who are LGBTQ+, have disabilities and/or are veterans.

Programs: Diem will use all the resources available to it to accomplish our goal of recruiting a diverse workforce. Like our other retail entity, Diem will participate in local job fairs, such as those hosted by the MassCBA, and advertise employment opportunities using diverse publications and mediums such as the Daily Item and web-based platforms like indeed.com. Diem will seek to participate in at least one job fair annually and will advertise employment opportunities as needed. Diem will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana



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establishments. To ensure that our workplace is inclusive, Diem will require all hiring managers to undergo training to address bias and cultural sensitivity.

Outcome Measure: Diem will measure how the diversity of new hires at Diem compares favorably to the local community in Lynn. Diem will also look at the percentages of women, minorities, and individuals who are LGBTQ+, have disabilities and/or are veterans annually. Diem will track retention rates and employee's satisfaction in addition to the diverse makeup of our workforce.

Measurement Frequency and Metrics: Diem will assess the demographic percentages of its workforce annually to assess its progress of meeting its goal of recruiting a diverse workforce. Diem will assess and review its progress within a year of the issuance of its provisional license and then annually after that time. Based upon this yearly review, Diem will determine its progress and be able to demonstrate proof of success or progress to the Commission upon the yearly renewal of its license.

Goal 2: Create a safe, accepting, and respectful work environment with a goal of having 100% employee participation in Diem's inclusive training.

Programs: To accomplish this goal, Diem will require inclusive training that focuses on promoting equity among people of color, particularly Black, African American, Latinx, and Indigenous people, women, Veterans, persons with disabilities, and LGBTQ+ people, in the operation of the Marijuana Establishment. for all employees including specific training aimed at employees in management positions. Employees will also be asked to fill out satisfaction surveys which gauge Diem's work environment on an annual basis and any departing employees will be asked to participate in an exit interview to get feedback on the establishment's culture.

Outcome Measure: Diem will collect and consider the feedback from the surveys to given to all employees. The surveys will be aimed at measuring employee satisfaction and elicit feedback on how Diem can improve the company culture. Workers leaving employment of Diem will be asked to participate in an exit interview with management. This exit interview will give the employee an opportunity share their perspective and experience in the workplace to determine whether or not Diem is meeting its goal. These comments will be documented and considered by management staff.

Measurement Frequency and Metrics: Diem will review its records annually to ensure that it has met its goal of 100% employee participation in its inclusive training. Diem will also administer 2 satisfaction surveys annually and conduct a review of these surveys within a month of administering them. Diem and its management team will identify ways to improve its work environment to individuals and identify any aspects of its culture that needs to be changed to meet this goal. Exit interviews and feedback from departing employees will be assessed as they take place and Diem will annually review its plan to demonstrate proof of success or progress upon the yearly renewal of its license.

Goal 3: Ensure that all participants in our supply chain and ancillary services are committed to the same goals as we are to promote equity and diversity in this industry. Diem will have a goal



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of at least 15% of the participants in its supply chain and ancillary services identifying as being owned and/or managed by minorities, women, veterans, people with disabilities, and/or LGBTQ+ individuals.

Programs: To accomplish this goal, Diem will prioritize working with businesses in our supply chain and required ancillary services that are owned and/or managed by minorities, women, veterans, people with disabilities, and/or LGBTQ+ individuals. Diem will prioritize working with diverse businesses in our supply chain by reviewing offers from minorities, women, veterans, people with disabilities, and/or LGBTQ+ individuals owned business prior to any other service or contract offered.

Outcome Measure: Diem will measure how many of its ancillary services and participants in its supply chain are owned and/or managed by minorities, women, veterans, people with disabilities and/or people of all gender identities and sexual orientations and calculate the percentage of services and members of its supply chain who meet this requirement. Diem's goal will be to work with a greater percentage of business who identify as one of the targeted groups as compared to businesses who do not.

Measurement Frequency and Metrics: Diem will ask suppliers and ancillary services if they would identify themselves as a business that is owned or managed by one of the targeted groups and give priority to these businesses. Diem will assess these percentages annually and be prepared to demonstrate proof of success or progress upon the yearly renewal of its license.

Conclusion

Diem will conduct continuous and regular evaluations of the implementations of our goals and at any point, retool its policies and plan in order to better accomplish the goals set out in this plan. While no specific organizations have yet been identified as a recipient of a financial donation, which may help in furthering Diem's goals within this diversity plan, we will contact and receive approval that a donation can be accepted prior to making any donation, financial or otherwise. Any actions taken, or programs instituted, by the applicant will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.