



### **Massachusetts Cannabis Control Commission**

#### Marijuana Retailer

**General Information:** 

License Number: MR282881

Original Issued Date: 06/05/2020

Issued Date: 06/17/2021

Expiration Date: 06/19/2022

#### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Frozen 4 Corporation

Phone Number: Email Address: bvirga@budmarys.com

617-990-6653

Business Address 1: 618 Columbia Road Business Address 2:

Business City: Dorchester Business State: MA Business Zip Code: 02125

Mailing Address 1: 8 Bayridge Lane Mailing Address 2:

Mailing City: Duxbury Mailing State: MA Mailing Zip Code: 02332

#### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a

DBE

#### PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: Economic Empowerment Priority

Economic Empowerment Applicant Certification Number: EEA201955

**RMD Priority Certification Number:** 

#### RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

To your knowledge, is the existing RMD certificate of registration in good

standing?:

If no, describe the circumstances below:

#### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 51 Percentage Of Control: 51

Role: Executive / Officer Other Role:

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First Name: Candace Last Name: Kattar Suffix:

Gender: Female User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: Percentage Of Control:

Role: Owner / Partner Other Role: Executive of the Partner Entity

First Name: David Last Name: Morgan Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: Percentage Of Control:

Role: Owner / Partner Other Role: Executive of the Partner Entity

First Name: Lukasz Last Name: Marut Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: Percentage Of Control:

Role: Owner / Partner Other Role: Executive of the Partner Entity

First Name: Benjamin Last Name: Virga 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: 49 Percentage of Ownership: 49

Entity Legal Name: Bud & Mary's, LLC Entity DBA: DBA

City:

**Entity Description: Partner Entity** 

Foreign Subsidiary Narrative:

Entity Phone: Entity Email: Entity Website:

Entity Address 1: Entity Address 2:

Entity City: Entity State: Entity Zip Code:

Entity Mailing Address 1: Entity Mailing Address 2:

Entity Mailing City: Entity Mailing State: Entity Mailing Zip Code:

Relationship Description: Bud and Mary's LLC is a limited liability company that was established in 2019 for the purpose of operating within the Massachusetts adult use marijuana industry. Bud & Mary's LLC has designated David Morgan, Benjamin Virga and Lukasz

Marut as the three executives to work with Frozen 4 Corp.

**CLOSE ASSOCIATES AND MEMBERS** 

No records found

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#### **CAPITAL RESOURCES - INDIVIDUALS**

No records found

**CAPITAL RESOURCES - ENTITIES** 

**Entity Contributing Capital 1** 

Entity Legal Name: Bud & Mary's, LLC Entity DBA:

Email: bvirga@frozen4llc.com Phone: 617-990-6653

Address 1: 1801 North American Street Address 2:

City: Philadelphia State: PA Zip Code: 19122

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of Capital Provided: \$56088.12 Percentage of Initial Capital: 1

Capital Attestation: Yes

**BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES** 

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Benjamin Last Name: Virga Suffix:

Marijuana Establishment Name: Frozen 4 LLC Business Type: Marijuana Cultivator

Marijuana Establishment City: Berkley Marijuana Establishment State: MA

Individual 2

First Name: David Last Name: Morgan Suffix:

Marijuana Establishment Name: Frozen 4 LLC Business Type: Marijuana Cultivator

Marijuana Establishment City: Berkley Marijuana Establishment State: MA

Individual 3

First Name: Lukasz Last Name: Marut Suffix:

Marijuana Establishment Name: Frozen 4 LLC Business Type: Marijuana Cultivator

Marijuana Establishment City: Berkley Marijuana Establishment State: MA

Individual 4

First Name: Benjamin Last Name: Virga Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

Individual 5

First Name: David Last Name: Morgan Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

Individual 6

First Name: Lukasz Last Name: Marut Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

Individual 7

First Name: Benjamin Last Name: Virga Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

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#### Individual 8

First Name: David Last Name: Morgan Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

Individual 9

First Name: Lukasz Last Name: Marut Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

Individual 10

First Name: Benjamin Last Name: Virga Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Marshfield Marijuana Establishment State: MA

Individual 11

First Name: David Last Name: Morgan Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Marshfield Marijuana Establishment State: MA

Individual 12

First Name: Lukasz Last Name: Marut Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Marshfield Marijuana Establishment State: MA

Individual 13

First Name: Benjamin Last Name: Virga Suffix:

Marijuana Establishment Name: Theory Farms LLC Business Type: Marijuana Cultivator

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

Individual 14

First Name: David Last Name: Morgan Suffix:

Marijuana Establishment Name: Theory Farms LLC Business Type: Marijuana Cultivator

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

Individual 15

First Name: Candace Last Name: Kattar Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Marshfield Marijuana Establishment State: MA

Individual 16

First Name: Candace Last Name: Kattar Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

Individual 17

First Name: Candace Last Name: Kattar Suffix:

Marijuana Establishment Name: Frozen 4 Corporation Business Type: Marijuana Transporter with Other Existing ME License

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

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#### Individual 18

First Name: Lukasz Last Name: Marut Suffix:

Marijuana Establishment Name: Theory Farms LLC Business Type: Marijuana Cultivator

Marijuana Establishment City: Bellingham Marijuana Establishment State: MA

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 985 Plain Street

Establishment Address 2:

Establishment City: Marshfield Establishment Zip Code: 02050

Approximate square footage of the establishment: 11500 How many abutters does this property have?: 79

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	Туре	ID	Upload
				Date
Certification of Host	985 Plain Street executed CCC Attestation form	pdf	5d54391fad2c7633c919a4ed	08/14/2019
Community Agreement	on HCA on 7 16 19.pdf			
Plan to Remain Compliant	F4C revised PLAN TO REMAIN COMPLIANT	pdf	5e4de48102a6e7045352e213	02/19/2020
with Local Zoning	WITH LOCAL ZONING ON MRN282881.pdf			
Community Outreach	3 11 20 REVISED community outreach related	pdf	5e691aa844a317443c1097a7	03/11/2020
Meeting Documentation	materials.pdf			

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.: \$1

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document	Document Name	Туре	ID	Upload
Category				Date
Other	Cook Family Charitable Foundation letter to F4CORP on	pdf	5d5439526e3bd533dbcff6f4	08/14/2019
	Marshfield for PPI to the CCC.pdf			
Plan for Positive	F4C PLAN FOR POSITIVE IMPACT submitted to the CCC on	pdf	5e2495b04121de06bd3dd946	01/19/2020
Impact	985P retail.pdf			
Other	C3RN letter to F4 on PPI for CCC applications.pdf	pdf	5e2495c6b846d306c4443ada	01/19/2020

#### ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

## INDIVIDUAL BACKGROUND INFORMATION Individual Background Information 1

Role: Other Role:

First Name: Benjamin Last Name: Virga Suffix:

RMD Association: Not associated with an RMD

Background Question: no

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#### Individual Background Information 2

Role: Other Role:

First Name: David Last Name: Morgan Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Other Role:

First Name: Lukasz Last Name: Marut Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 4

Role: Other Role:

First Name: Candace Last Name: Kattar Suffix:

RMD Association: Not associated with an RMD

Background Question: no

#### ENTITY BACKGROUND CHECK INFORMATION

**Entity Background Check Information 1** 

Role: Partner Other Role:

Entity Legal Name: Bud & Mary's, LLC Entity DBA:

**Entity Description: Partner Entity** 

Phone: 617-990-6653 Email: bvirga@budmarys.com

Primary Business Address 1: 1801 North American Street Primary Business Address 2:

Primary Business City: Philadelphia Primary Business State: PA Principal Business Zip Code: 19122

Additional Information:

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

<b>Document Category</b>	Document Name	Туре	ID	Upload
				Date
Articles of Organization	F4C ARTICLES OF ORG document for	pdf	5d54291dba4085341250a912	08/14/2019
	CCC.pdf			
Secretary of Commonwealth -	F4C Certificate of Good Standing from	pdf	5e2496517a1a100702175b62	01/19/2020
Certificate of Good Standing	MA Sec of State on 12 6 19.pdf			
Bylaws	F4C Draft corporate by laws.pdf	pdf	5e249652c1912d0730a53753	01/19/2020
Department of Revenue - Certificate	F4C MA DOR CERT OF GOOD STANDING	pdf	5e2496534c3b1606ec2b8ef3	01/19/2020
of Good standing	DATED 12 16 19.pdf			

#### Certificates of Good Standing:

Document Category	Document Name	Туре	ID	Upload Date
Department of Unemployment Assistance - Certificate of Good standing	F4C Cert of Good Standing from MA Dept of Unemployment Assistance dated 5 4 21.pdf	pdf	6096d8633bbe600765b4dcee	05/08/2021
Department of Revenue - Certificate	Frozen 4 Corp MA DOR Cert of Good	pdf	6096d864e067a90777b5097a	05/08/2021

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of Good standing	Standing dated 4 21 21.pdf			
Secretary of Commonwealth -	F4C Cert of Good Standing from MA Sec	pdf	60ae773c03be0807b0c6f308	05/26/2021
Certificate of Good Standing	of Commonwealth dated 2 8 21.pdf			

Massachusetts Business Identification Number: 832341577

Doing-Business-As Name: South Shore Buds

DBA Registration City: Marshfield

#### **BUSINESS PLAN**

Business Plan Documentation:

Document Category	Document Name	Туре	ID	Upload Date
Plan for Liability Insurance	F4C PLAN TO SECURE LIABILITY INSURANCE for retail app to CCC .pdf	pdf	5d54297df0e76e38a87d07dc	08/14/2019
Business Plan	F4C BUSINESS PLAN submitted to the CCC on 985P retail.pdf	pdf	5e249731bcf9aa06f389825a	01/19/2020
Proposed Timeline	F4C revised PROPOSED TIMELINE FOR MRN282881.pdf	pdf	5e4de2e1fe55e40432f71d24	02/19/2020
Proposed Timeline	REVISED F4C PROPOSED TIMELINE for retail renewal June 2021.pdf	pdf	6096d87d6f8420077bfc7e3f	05/08/2021
Business Plan	REVISED F4C BUSINESS PLAN FOR RETAIL APP renewal May 2021.pdf	pdf	6096d87e3fd8b2075df9dfc1	05/08/2021

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Туре	ID	Upload
				Date
Prevention of diversion	F4C DIVERSION for retail app to CCC .pdf	pdf	5d542a45385de033fc95f6e7	08/14/2019
Security plan	F4C SECURITY PLAN Attachment A for retail	pdf	5d542a51bc4ba7387cf50ec7	08/14/2019
	app to CCC .pdf			
Storage of marijuana	F4C STORAGE for retail app to CCC.pdf	pdf	5d542a5b17ec6d33f1154860	08/14/2019
Transportation of marijuana	F4C TRANSPORTATION for retail app to	pdf	5d542c08f0e76e38a87d07ee	08/14/2019
	CCC .pdf			
Qualifications and training	F4C QUALIFICATIONS AND TRAINING for retail	pdf	5d542c9db0555e33d0bd0190	08/14/2019
	app to CCC.pdf			
Plan for obtaining marijuana or	F4C Plan for obtaining marijuana for retail app	pdf	5d5d7d51c544c91e011c4c8c	08/21/2019
marijuana products	to CCC.pdf			
Personnel policies including	F4C PERSONNEL POLICIES to CCC on 985P	pdf	5e2497d63cc4ba0742ce5860	01/19/2020
background checks	retail.pdf			
Inventory procedures	F4C INVENTORY PROCEDURES to CCC on 985P	pdf	5e2497d74c3b1606ec2b8ef9	01/19/2020
	retail.pdf			
Diversity plan	F4C DIVERSITY PLAN to CCC on 985P retail.pdf	pdf	5e2497d9c72d2d074d8e24e3	01/19/2020
Restricting Access to age 21	F4C RESTRICTED ACCESS to CCC on 985P	pdf	5e2497f34121de06bd3dd94d	01/19/2020
and older	retail.pdf			
Record Keeping procedures	F4C RECORD KEEPING to CCC on 985P	pdf	5e2497f5b846d306c4443ade	01/19/2020

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	retail.pdf			
Quality control and testing	F4C QUALITY CONTROL to CCC on 985P retail.pdf	pdf	5e2497f6cc187d076e3cac6c	01/19/2020
Diversity plan	C3RN letter to F4 on PPI for CCC applications.pdf	pdf	5e4de31064339304b0900a40	02/19/2020
Dispensing procedures	revised DISPENSING PROCEDURES for RFI #1 on MRN282881.pdf	pdf	5e4de32202a6e7045352e207	02/19/2020
Maintaining of financial records	revised MAINTAINING OF FINANCIAL RECORDS for RFI #1 MRN282881.pdf	pdf	5e4de33581ae16046beca597	02/19/2020
Security plan	Revised SECURITY PLAN for RFI #1 on MRN282881.pdf	pdf	5e4de34361c9e9045a793ce0	02/19/2020
Inventory procedures	REVISED F4C INVENTORY PROCEDURES FOR RETAIL APP TO to CCC.pdf	pdf	6096d89bb15b2007955523bc	05/08/2021
Diversity plan	F4C Diversity Plan as of May 2021.pdf	pdf	6096d89d8f80610756a12def	05/08/2021
Dispensing procedures	REVISED F4C DISPENSING PROCEDURES FOR RETAIL APP TO CCC.pdf	pdf	6096d89e247e180786c96652	05/08/2021
Prevention of diversion	REVISED F4C DIVERSION FOR RETAIL APP FOR CCC.pdf	pdf	6096d89fe54b280786bb13ce	05/08/2021
Maintaining of financial records	REVISED F4C FINANCIAL RECORDS FOR RETAIL APP TO CCC .pdf	pdf	6096d8a03bbe600765b4dcf2	05/08/2021
Record Keeping procedures	REVISED F4C RECORD KEEPING FOR RETAIL APP TO CCC .pdf	pdf	6096d8c809011007a03d199e	05/08/2021
Quality control and testing	REVISED F4C QUALITY CONTROL FOR RETAIL APP TO CCC.pdf	pdf	6096d8c9954bd3079c690d77	05/08/2021
Plan for obtaining marijuana or marijuana products	REVISED F4C PLAN FOR OBTAINING MARIJUANA FOR RETAIL APP TO CCC.pdf	pdf	6096d8ca2e7a1d0770d09861	05/08/2021
Personnel policies including background checks	REVISED F4C PERSONNEL POLICIES FOR RETAIL APP TO CCC .pdf	pdf	6096d8cb6f8420077bfc7e43	05/08/2021
Qualifications and training	REVISED F4C QUALIFICATIONS AND TRAINING FOR RETAIL APP TO CCC.pdf	pdf	6096d8cc3fd8b2075df9dfc5	05/08/2021
Transportation of marijuana	REVISED F4C TRANSPORTATION FOR RETAIL APP TO CCC .pdf	pdf	6096d8e268436d078d6b33ab	05/08/2021
Restricting Access to age 21 and older	REVISED F4C RESTRICTED ACCESS 21 AND OVER FOR RETAIL APP TO CCC.pdf	pdf	6096d8e3031c12076ccf354f	05/08/2021
Security plan	REVISED F4C SECURITY PLAN FOR RETAIL APP TO CCC .pdf	pdf	6096d8e48ecb05074fe6ac8a	05/08/2021
Storage of marijuana	REVISED F4C STORAGE FOR RETAIL APP TO CCC.pdf	pdf	6096d8e5b15b2007955523c0	05/08/2021
Energy Compliance Plan	Compliance with Plans for Positive Impact & Diversity for MAY 2021 renewals.pdf	pdf	6096d8f3247e180786c96656	05/08/2021

#### MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

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#### **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.: | 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.:

Notification: I Understand

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

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 Agree

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

#### ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: All Massachusetts Adult-Use Marijuana operations were suspended under the cease and desist order given by CCC & Governor Baker due to COVID-19 restrictions and shut downs in March 2020 that lasted until May 2020; during this time, any hiring and construction activities on the facility were delayed and our provisional inspection for final licensure was not scheduled. Additionally, in May of 2020, Frozen 4 Corporation (F4C), due to COVID-19, lost its planned capital sources to complete the necessary fit out work and equipment purchases. Due to these factors, F4C is still in the planning and build-out phase and is not operational or manufacturing at this time. F4C has hired only Director level staff and we are unable to conduct a true analysis of the following as requested within the license renewal process:

Our Energy Compliance

Our Plan for Diversity Progress & Successes

Our Plan for Positive Impact Progress & Successes

Once F4C is staffed and operational we fully plan to collect and examine the data required to assess each of the Plans mentioned above to ensure we are meeting, and ideally surpassing, our stated goals. F4C will provide any and all information that is missing in this renewal application at the time of our first post provisional inspection, which we anticipate as being requested during the summer/fall of 2021.

## **COMPLIANCE WITH DIVERSITY PLAN**Diversity Progress or Success 1

Description of Progress or Success: All Massachusetts Adult-Use Marijuana operations were suspended under the cease and desist order given by CCC & Governor Baker due to COVID-19 restrictions and shut downs in March 2020 that lasted until May 2020; during this time, any hiring and construction activities on the facility were delayed and our provisional inspection for final licensure was not scheduled. Additionally, in May of 2020, Frozen 4 Corporation (F4C), due to COVID-19, lost its planned capital sources to complete the necessary fit out work and equipment purchases. Due to these factors, F4C is still in the planning and build-out phase and is not operational or manufacturing at this time. F4C has hired only Director level staff and we are unable to conduct a true analysis of the following as requested within the license renewal process:

**Our Energy Compliance** 

Our Plan for Diversity Progress & Successes

Our Plan for Positive Impact Progress & Successes

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Once F4C is staffed and operational we fully plan to collect and examine the data required to assess each of the Plans mentioned above to ensure we are meeting, and ideally surpassing, our stated goals. F4C will provide any and all information that is missing in this renewal application at the time of our first post provisional inspection, which we anticipate as being requested during the summer/fall of 2021.

#### **HOURS OF OPERATION**

Monday From: 10:00 AM Monday To: 9:00 PM

Tuesday From: 10:00 AM Tuesday To: 9:00 PM

Wednesday From: 10:00 AM Wednesday To: 9:00 PM

Thursday From: 10:00 AM Thursday To: 9:00 PM

Friday From: 10:00 AM Friday To: 9:00 PM

Saturday From: 10:00 AM Saturday To: 9:00 PM

Sunday From: 12:00 PM Sunday To: 8:00 PM

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## **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		
	e) certify as an authorized repraction that the applicant has executed (insert name of host configuration).	cuted a host
Signature of Authorized Representative of Applicant		
Host Community  1. Joseph E. Kelleher , (insert name)	e) certify that I am the contract	
have been duly authorized by the contracting authority for name of host community) to certify that the applicant and of host community) has executed a host community agreer 7/16/2019 (insert date).	Town of Marshfield	(insert (insert name 3(d) on
Signature of Contracting Authority or Authorized Representative of Host Community		

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

DATE: February 16th, 2020

RE: Revised Plan to remain compliant with Local Zoning for MRN282881

#### PLAN:

Frozen 4 Corporation ("F4C") will establish and operate a retail dispensary at 985 Plain Street in Marshfield, MA. The Marshfield Zoning Code allows cannabis establishment use by Special Permit within an Industrial District. F4C will comply with all applicable town regulations and bylaws in doing so. Article XII of the Marshfield bylaws pertains to zoning and special regulations, F4C shall comply with the Town of Marshfield's zoning bylaws and specifically, §305 Attachment 1 (Table of Use Regulations) and § 305-12.05, Recreational marijuana retailer.

The property located at 985 Plain Street lies entirely within a I-1 zone. As set forth in Section § 305 - 12.06, the Marshfield zoning bylaw allows F4C's proposed use in a I-1 zone. F4C has met with the selectmen, police chief, fire chief, town planner and building inspector as well as other appropriate department heads to ensure continued compliance. Mr. Virga, Mr. Marut and professionals designated by them will interact with the town and will be responsible for assuring the F4C's ongoing compliance.

F4C will apply for their special permit in March of 2020 and will have that Special Permit issued within 10-13 weeks from submission. This Special Permit process includes a full site plan review within it. Upon the issuance of it by the Town of Marshfield the Special Permit remains in effect and valid as long as the entity that applied for and received the Special Permit owns the property. If the property is sold to a new entity the Special Permit would need to undergo a review for transfer process as set forth by the Town's by-laws.



## 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,	Benjamin C. Virga , (insert name	e) attest as an authorized re	presentative of
	<u>Frozen 4 Corporation</u> (insert name of application) (insert name of applic	ant) that the applicant has sed applicants on commun	
1.	The Community Outreach Meeting was held on _	August 6th, 2019	(insert date).
2.	A copy of a notice of the time, place, and subject a address of the Marijuana Establishment, was publicity or town on July 26th & July 29th, 2019 (a days prior to the meeting. A copy of the newspaper clearly label the newspaper notice in the upper rigas part of this document).	ished in a newspaper of gen insert date), which was at lear notice is attached as Atta	neral circulation in the least seven calendar chment A ( <i>please</i>
3.	A copy of the meeting notice was also filed on Ju city or town clerk, the planning board, the contract		

- 3. A copy of the meeting notice was also filed on <u>July 24th, 2019</u> (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).





- 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
  - Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
- Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.



# **Attachment B**

7/24/2019

Received

JUL 2 4 2019

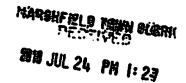
Marshlield Planning Dept.

Town of Marshfield
Office of the Planning Department
870 Moraine Street
Marshfield MA 02050

In accordance with 935 CMR 500.000 et seq., notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for August 6th, 2019 at 7:00pm at 1321 Ocean Street, Marshfield MA 02050. The proposed dispensary and product manufacturing Marijuana Establishment is anticipated to be located at 985 Plain Street in Marshfield, MA.

There will be an opportunity for the public to ask questions.

7/24/2019



Town of Marshfield
Office of the Town Clerk
870 Moraine Street
Marshfield MA 02050

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# Attachment C

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## THERE IS A \$25 PROCESSING FEE DUE UPON SUBMISSION OF REQUEST TO THE ASSESSORS' OFFICE PAYABLE TO "TOWN OF MARSHFIELD"

TOWN OF MARSHFIELD

#### 870 Moraine Street Marshfield, MA 02050 Tel. (781) 834-5557 ZONING BOARD OF APPEALS

TO:	ASSESSORS OFFICE	DATE:	ASSESSMENT
RE:	CERTIFICATION OF ABUTTERS FOR 2	BAHEARING Commun's	Meeting
THE FO	LLOWING IS THE MAP, BLOCK, & LOT S.	IDENTIFICATION FOR THE	SUBJECT LOT
MAP_C	OCIO BLOCK OCOZ	LOT 0005	
PETITIO	NER: Frozen y Corp.		
ADDRES	ss: 985 Plain ST.	wary tisig m	1A 02050
PROJEC	CTTYPE: COMMIN'TY Maret	ins Ben Vinga	n oan Ga
Signatur	e of Applicant or Representative:	5 (	,1+,790
Note: to	Assessors' Office: PLEASE PROVIDE 1 HA	RD COPY OF LIST	
	DO NOT WRITE BELOW LINE - FOR A	ASSESSORS' OFFICE USE O	NLY
TO:	ZONING BOARD OF APPEALS	DATE: July 19, 20,	79
FROM:	ASSESSORS OFFICE	Ş. U.	
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WHEN LIST IS READY, PLEASE CALL NANCI AT EXT. 222

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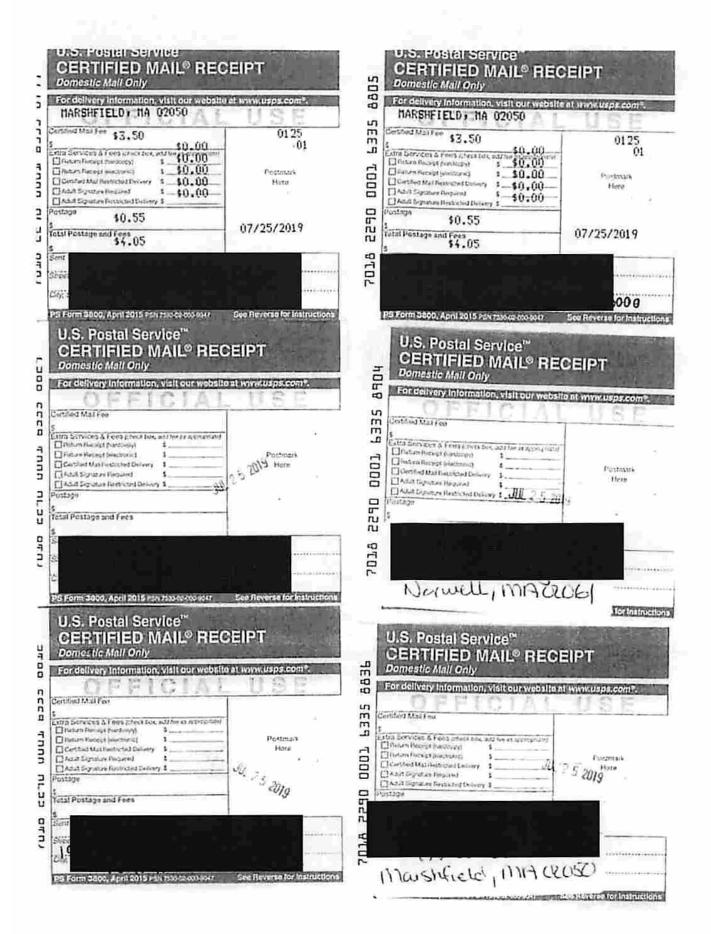
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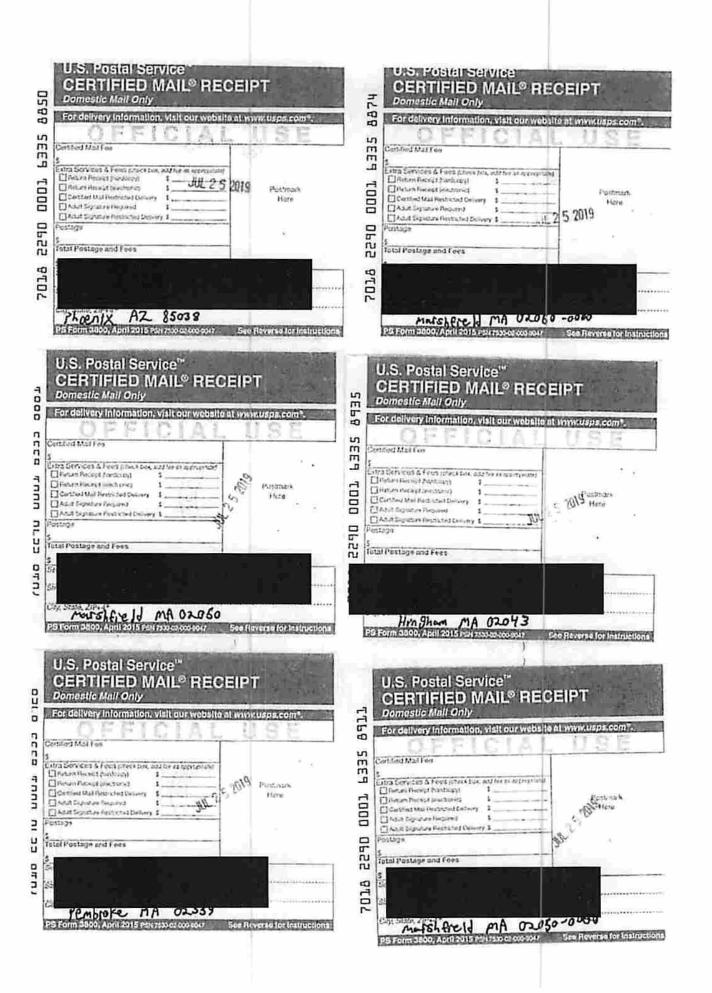
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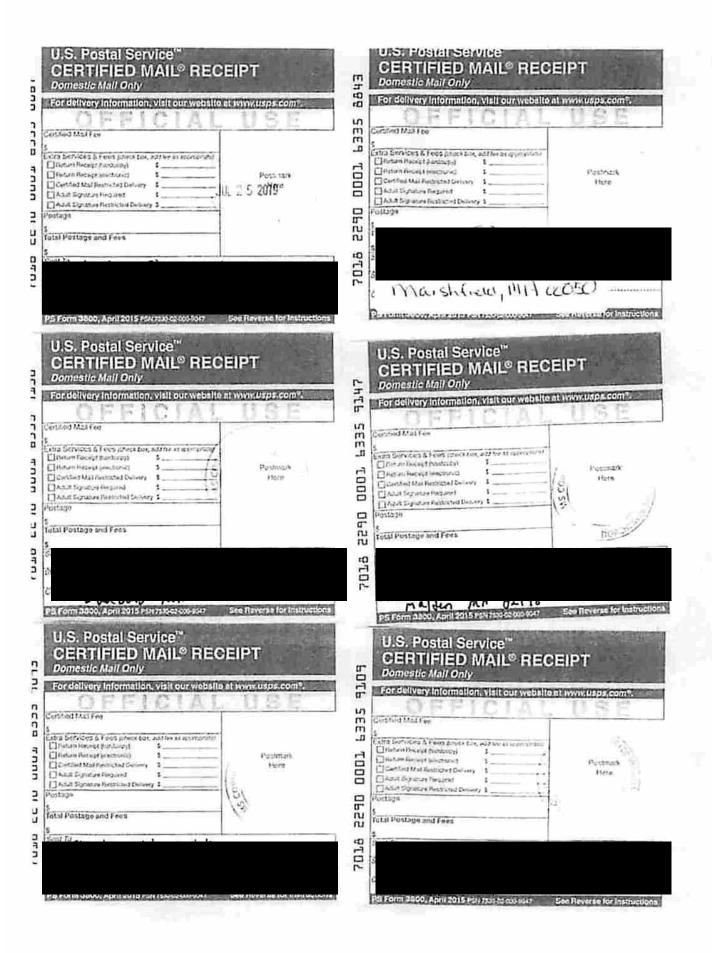
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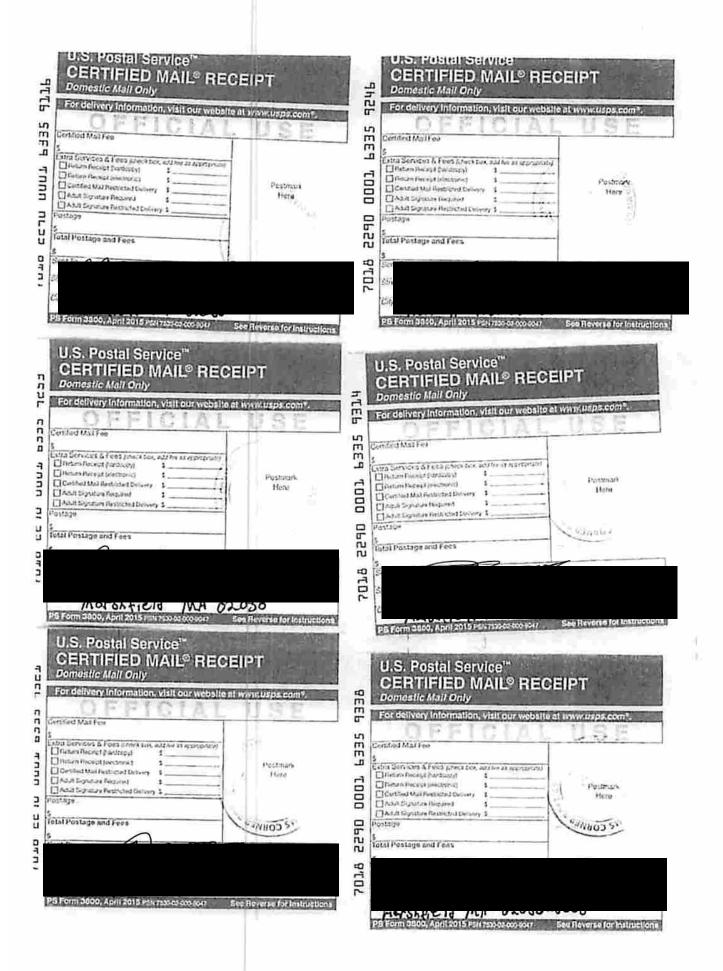
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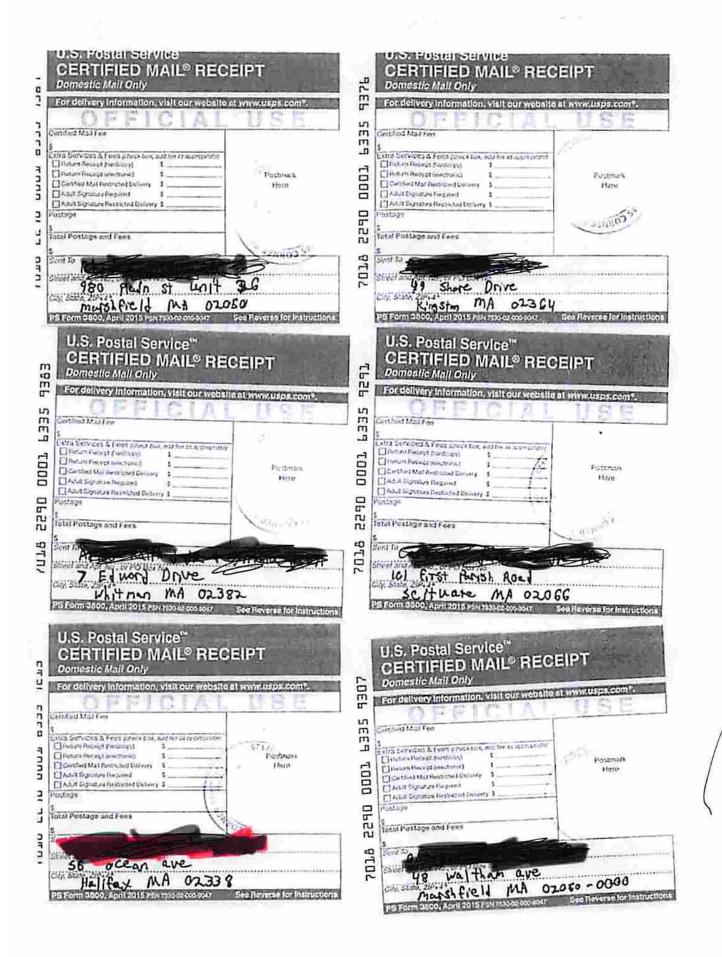
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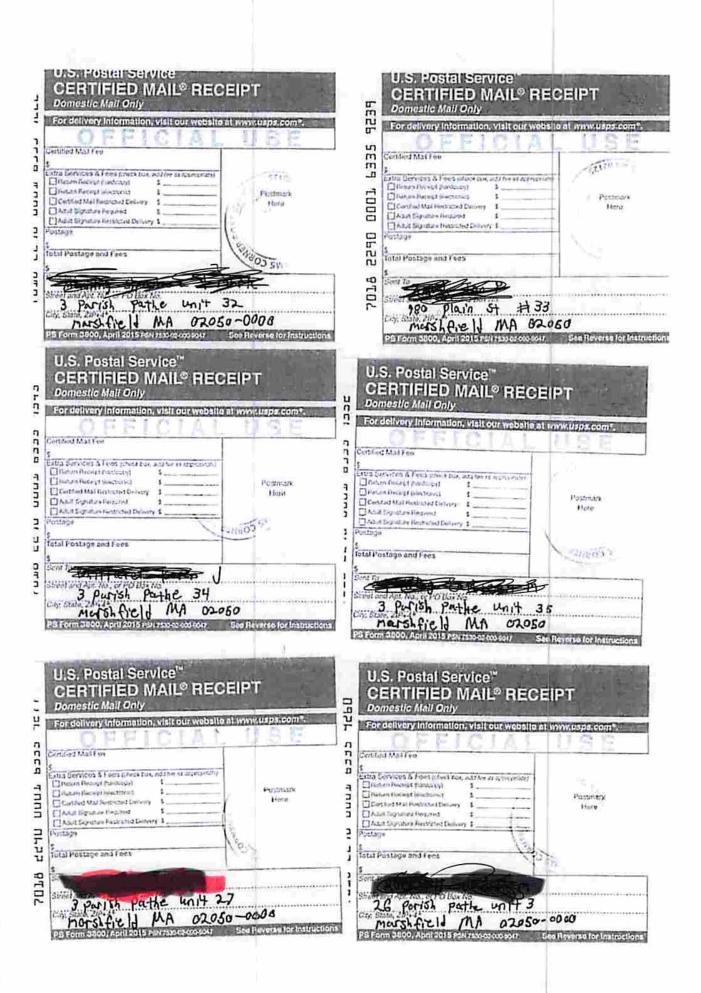


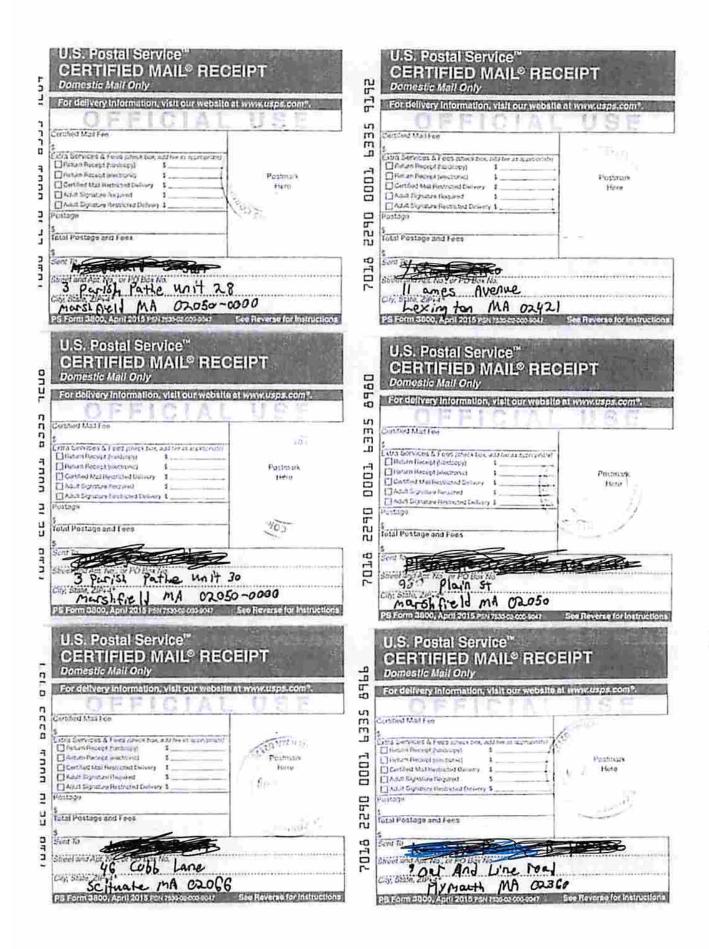


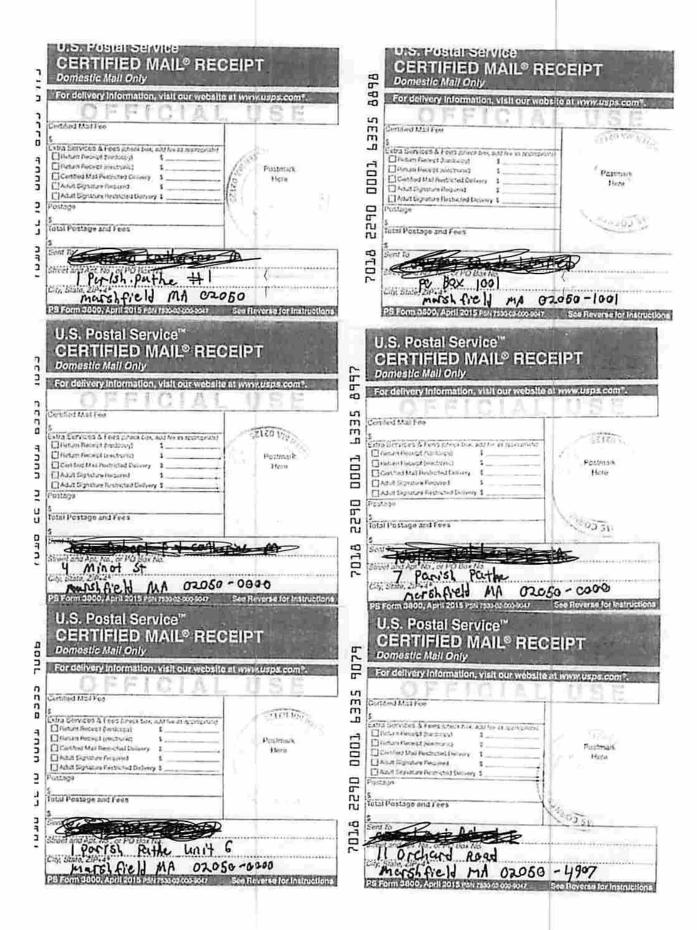


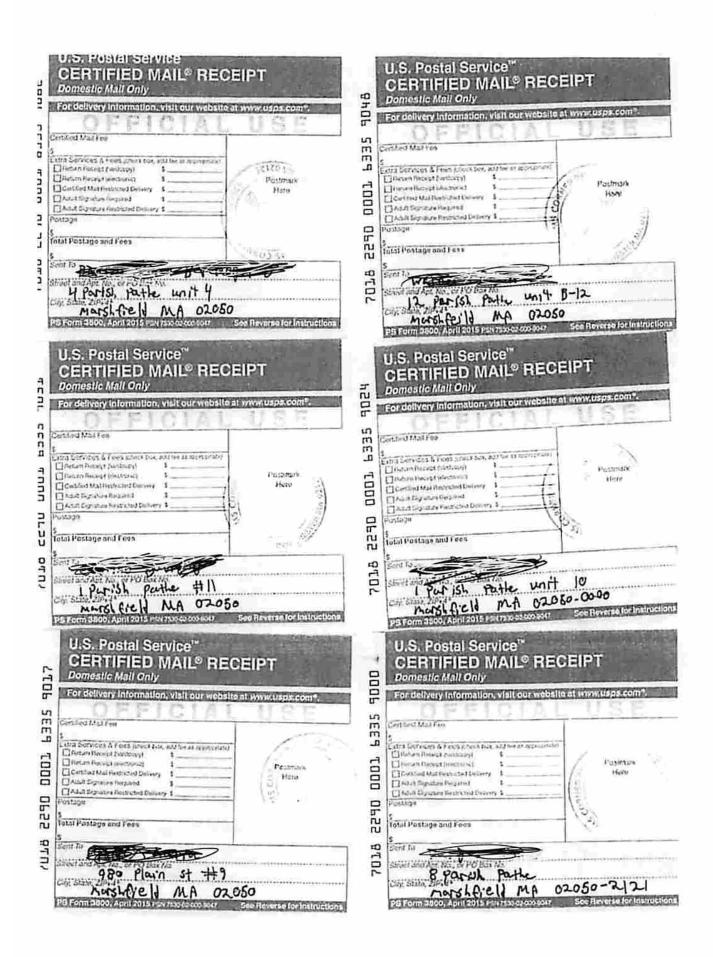


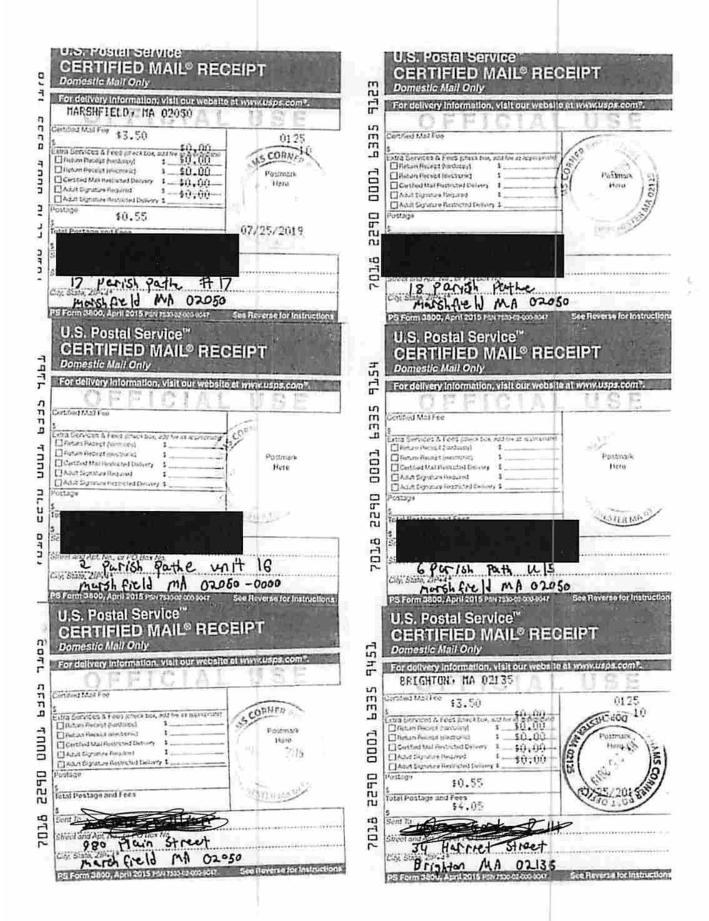


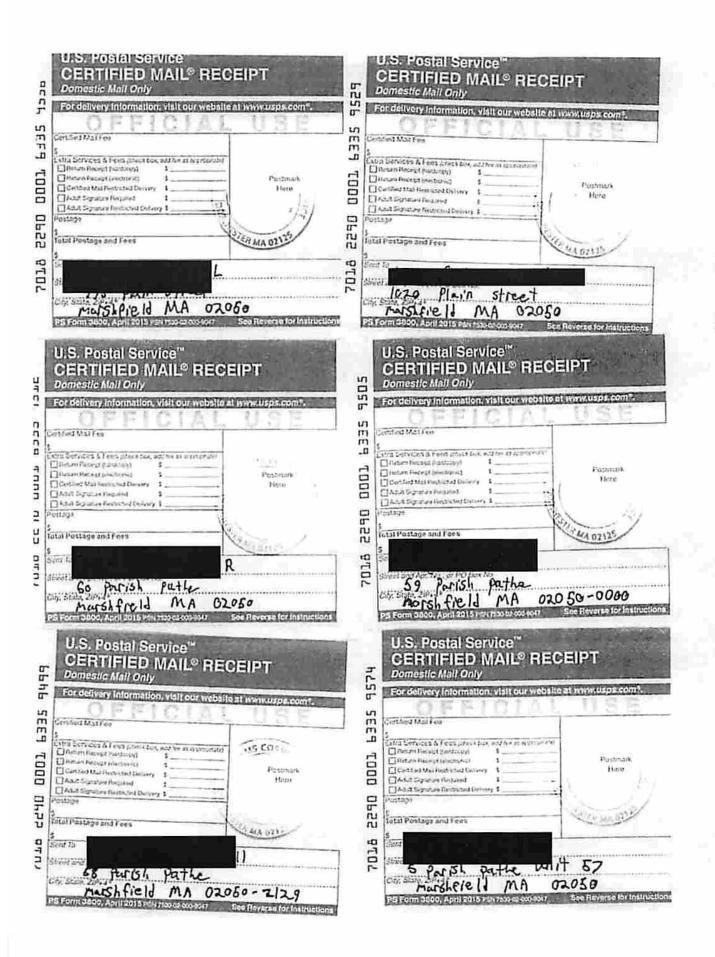


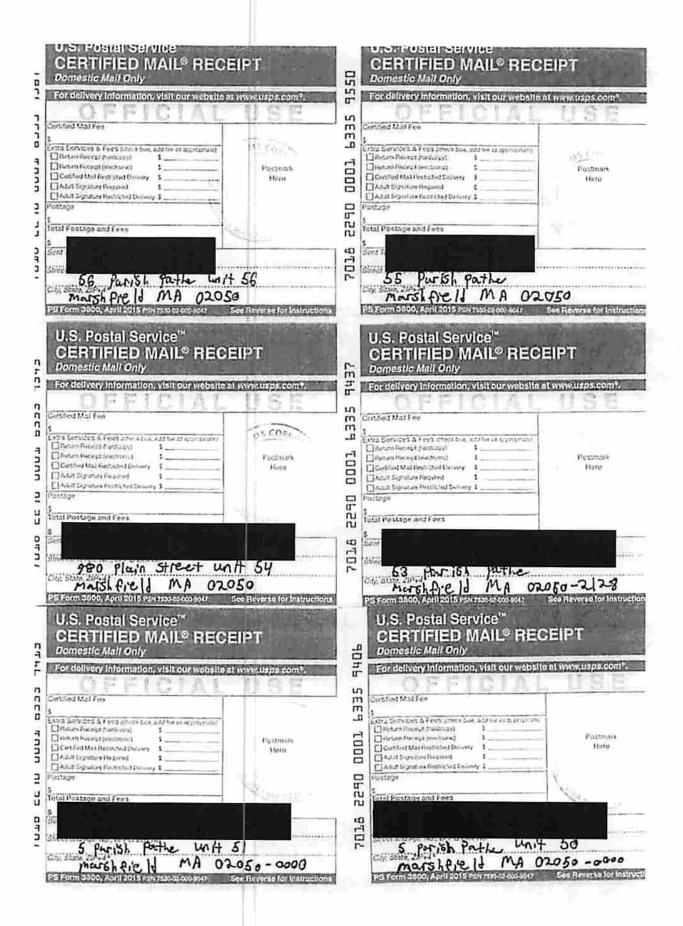


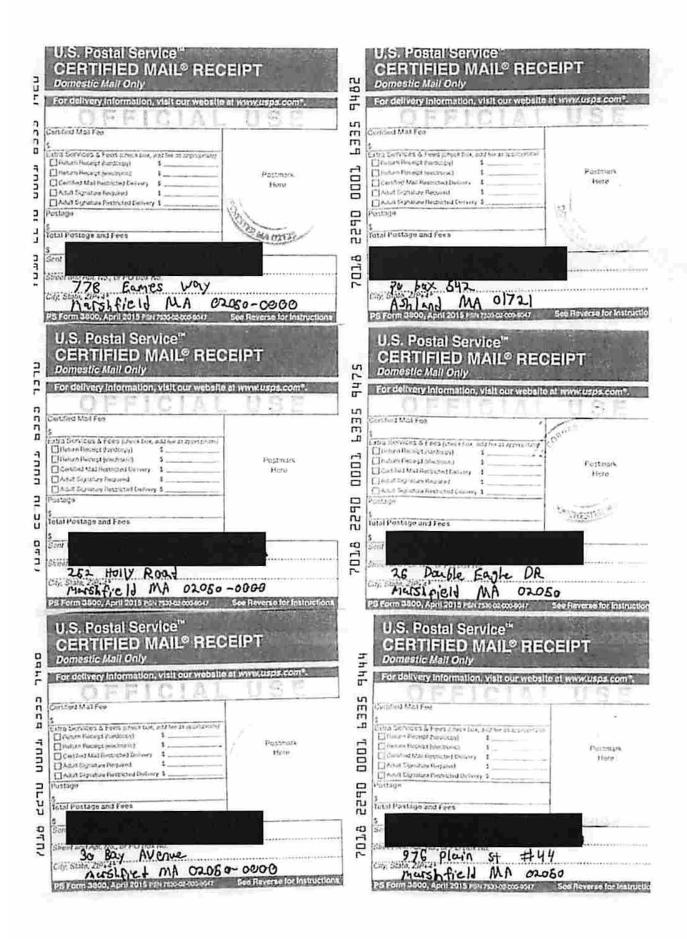












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MRVP application.
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ww.mass.gov/files/
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nts in need of a reaaccommodation to r application should Terry Champion at 47-4350 ext 701 or email at pion@quincyha.co

19488 \_edger 7/26/2019

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-800-FIGHT-MD ww.mdausa.org

### marijuana establishment LEGAL NOTICE

In accordance with 935 CMR 500.000 et seq., notice is hereby given that Community a Outreach Meeting for a proposed Marijuana Establishment is scheduled for August 6th, 2019 7:00pm at 1321 Ocean Street, Marshfield MA 02050. The proposed dispensary and product manufacturing Marijuana Establishment is anticipated to be located at 985 Plain Street in Marshfield, MA.

There will be an opportunity for the public to ask questions.

For questions please contact the Marshfield Town Administrators Office;

870 Moraine Street, Marshfield MA 02050 781-834-5563 - Phone

CN13819242 Patriot Ledger 7/26, 7/29



# **ANNOUNCEMENTS**

### **Cemetery Lots**

BLUE HILL CEMETERY
Braintree, MA.
Veterans sect (Marine),
single lot, 2 burial,
2 custom vaults, 2
matching markers,
\$3500.781-470-9799

BLUE HILL CEMETERY BRAINTREE, MA

Veterans single lot with 2 vaults. Section 28.

Great Value! \$3600/bo 781-820-3453. Email: sric98@yahoo.com

BLUE HILL Cemetery Braintree. Vets Sect. 28, 1883 & 84, 2 grave lots. \$3500, 508-776-7736.

Name	Value
Transaction ID	151420190724074708307176
Creation Time	07/24/19 07:47:08
Source	Manual Payments
Туре	Sale
Status	Pending
Result	Success
Total Amount	287.04
Tax	0.00
Auth Code	164604
Account Holder	
Account Type	AMEX
Token	058816057
Last Four	4006
Expiration	10/23
Email	
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Notes 1	13819242
Notes 2	
Notes 3	

Receipt for Community Outreach Meeting advertisement in the Patriot Ledger to run on both 7/26/19 and 7/29/19

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CN13819242 Patriot Ledger 7:26, 7:29



# Patriot Ledger approved ad proof for the 985 Plain St Community outreach meeting approved on 7 24 19 by BCV



## Town of Marshfield

#### Board of Selectmen

870 Moraine Street Marshfield, Massachusetts 02050 Tel: 781-834-5563 Fax: 781-834-5527

April 26, 2021

Benjamin Virga Frozen 4 Corporation 985 Plain Street Marshfield, MA 02050

Dear Mr. Virga,

I am writing in response to your request relative to the costs the Town of Marshfield has incurred relative to the operation of the Frozen 4 facility in the Town of Marshfield. In light of the fact that the facility is not yet in operation, the Town has not incurred any expenses that I am aware of at this time.

Thank you and we look forward to your facility's start-up in the coming year.

Sincerely,

Michael A. Maresco Town Administrator FROM: Frozen 4, Corporation

TO: Cannabis Control Commission

DATE: December 10, 2019

RE: Plan to positively impact areas of disproportionate impact

#### **Summary**

Frozen 4, Corp. ("F4C") is dedicated to positively impacting communities disproportionately affected by cannabis prohibition and enforcement, including impacted individuals and business enterprises (hereinafter described as "DPI communities"). In particular, F4C believes that marijuana establishments have an obligation, both legal and moral, to make significant contributions to support communities that have historically high rates of arrest, conviction, and incarceration related to marijuana crimes.

#### **Plan Goals**

F4C has adopted a Positive Impact Plan ("Plan") described herein for the purpose of positively impacting DPI communities. F4C has selected the town of Marshfield for its proposed marijuana establishment. While the town of Marshfield does not fall within an area of disproportionate impact as defined under 935 CMR 500.101(1)(a)(11), or as described in CCC's "Guidance for Identifying Areas of Disproportionate Impact" dated April 2018, F4C intends to positively impact the nearby DPI communities of Taunton and Brockton, as well as Massachusetts residents who have had prior drug convictions. Under the Plan F4C will establish the following goals:

 Hiring Prioritize the hiring of individuals that have previously resided in DPI communities such as Walpole and Mansfield; or those MA residents with prior drug convictions.

Goal Objective: F4C will hire and retain a staff comprised of 50% of Massachusetts residents who have had past drug convictions.

2. <u>Education and Training</u> Provide cannabis education, industry-specific technical training and mentoring services for individuals facing systemic barriers.

Goal Objective: On an annual basis F4C will conduct not less than 4 industry-specific job training programs for individuals expressing interest in the commercial adult-use cannabis industry.

Goal Objective: F4C will strive to hire and retain a staff that actively participates in on going education and training activities provided by F4C. While staff participation in these activities is not mandatory, F4C will strive to achieve an attendance rate of 30% of its staff members per activity.

3. <u>Skills and Capital</u> Reduce financial, capitalization and knowledge-based barriers to entry for individuals and businesses in the commercial adult-use cannabis industry.

Goal Objective: On an annual basis F4C will conduct not less than 4 seminars designed to promote financial literacy in the cannabis sector.

4. <u>Non-Profit Support</u> Support non-profit organizations aligned with F4C's goals of community support and inclusiveness for individuals residing in DPI communities such as Taunton and Brockton.

Goal Objective: F4C will ensure that not less than 60% of proceeds from the financial assistance fund is allocated to applicants from human services or economic development organizations.

#### **Plan Programs**

F4C will adopt not less than four programs designed to meet the goals articulated above. The company will evaluate the programs from time to time, and not less frequently than annually, to measure the degree to which the programs achieve F4C's stated goals.

- Hiring. F4C will create a hiring preference for those individuals that reside in or have previously resided in Taunton and Brockton. Additionally, F4C will create a hiring preference for any MA resident with a prior drug conviction. At least 4 times a year (i.e. quarterly), F4C will conduct community service days and participate in charity events within Taunton and Brockton. It is our goal to build relationships within regional chambers of commerce and workforce development agencies as well as, align with educational resources such as drug recovery programs so that we may better identify and hire employees that meet program characteristics.
- 2. Education and Training. At least quarterly, F4C will conduct industry-specific job training programs in and around Mansfield and Walpole for individuals expressing interest in the commercial adult-use cannabis industry. The programs will feature managers and staff with operational expertise, experts in plant science and agriculture, and people with finance, technology and accounting expertise within the marijuana sector. The program will be designed to provide cultivation, manufacturing, packaging and/or retail expertise to program participants. The program will also seek to raise awareness of educational and employment opportunities within the cannabis sector in Massachusetts. F4C will conduct such seminars at least quarterly for the first two years of operation and will assess thereafter the nature and frequency of such programs.
- 3. Skills and Capital. At least quarterly, F4C will offer seminars to individuals within the towns of Mansfield and Walpole designed to promote financial literacy in the cannabis sector. Among other things, the programs will be designed to: (i) inform participants in understanding and accessing sources of capital; (ii) educate participants in accounting, finance and technology relating to the cannabis sector; and (iii) offer mentorship opportunities and on-site technical training.
- 4. Non-Profit Support. F4C will provide financial assistance to non-profit and community-based organizations within Taunton, Brockton and other DPI communities. F4C will establish a fund derived from the operation of the business and adopt an application process through which non-profit and

community-based organizations can seek funding. F4C will prioritize applications from human services or economic development organizations such as The Cooke Family Charity Fund and C3RN (see attached letters).

#### Plan Measurement and Accountability

At least annually, F4C will create a written report that will evaluate the Plan and its success in advancing the goals of the Plan. In accordance with 935 CMR 500.103(4) (a), the report will detail the following:

- i. employment impacts;
- ii. number and subject matter of education and training events and seminars conducted;
- iii. number of individuals and businesses that participated in such events;
- iv. number and nature of mentorship relationships;
- v. aggregate data demonstrating the financial impacts of the Plan, including payroll, health care, tax, non-profit contribution, equity and debt performance; and demographic data reflecting specific positive impacts of the Plan on Mansfield and Walpole.

F4C will post the report on its website and will share the report with CCC and the community in a manner consistent with CCC regulation and Massachusetts law. Additionally, F4C will establish a timeline, organized by month and objective, to track F4C's progress toward the goals and objectives of the Positive Impact Plan. F4C will document the performance, in a writing suitable for submission to the CCC, not less than 90 days before its annual renewal date. That writing shall include a thorough analysis of the plans progress and a written plan for continuous improvement.

#### **Affirmative Statement**

In accordance with the Guidance on Required Positive Impact Plans and Diversity Plans (revised 2/25/19), F4C affirmatively states as follows:

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

MA SOC Filing Number: 201841843760 Date: 10/29/2018 8:55:00 AM



### The Commonwealth of Massachusetts William Francis Galvin

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

**Special Filing Instructions** 

Minimum Fee: \$250.00

#### **Articles of Organization**

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

Identification Number: 001352375

#### **ARTICLE I**

The exact name of the corporation is:

#### **FROZEN 4 CORPORATION**

#### **ARTICLE II**

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

#### NONE.

#### **ARTICLE III**

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

Class of Stock	Par Value Per Share Enter <b>0</b> if no Par		red by Articles or Amendments Total Par Value	Total Issued and Outstanding Num of Shares
CNP	\$0.00000	1,000	\$0.00	1,000

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

#### **ARTICLE IV**

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

#### NONE.

#### **ARTICLE V**

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

#### NONE.

#### **ARTICLE VI**

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

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

#### **ARTICLE VII**

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

Later Effective Date: Time:

#### **ARTICLE VIII**

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

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

Name: <u>BENJAMIN VIRGA</u>
No. and Street: 130 MYRICKS STREET

City or Town: BERKLEY State: MA Zip: 02779 Country: USA

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

Title	Individual Name	Address (no PO Box)
	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code
PRESIDENT	BENJAMIN VIRGA	8 BAYRIDGE LANE DUXBURY, MA 02332 USA
TREASURER	DAVID MORGAN	238 S. 3RD. STREET #1 PHILADELPHIA, PA 19106 USA
SECRETARY	LUKASZ MARUT	12 PERRY ROAD QUINCY, MA 02170 USA
CLERK	LUKASZ MARUT	12 PERRY ROAD QUINCY, MA 02170 USA
OFFICER	BENJAMIN VIRGA	8 BAYRIDGE LANE DUXBURY, MA 02332 USA
OFFICER	LUKASZ MARUT	12 PERRY ROAD QUINCY, MA 02170 USA
OFFICER	DAVID MORGAN	238 S. 3RD. STREET #1 PHILADELPHIA, PA 19106 USA
DIRECTOR	DAVID MORGAN	238 S. 3RD. STREET #1 PHILADELPHIA, PA 19106 USA

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

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

OWNERSHIP AND MANAGEMENT OF REAL PROPERTY				
f. The street address (post office boxes are not acceptable) of the principal office of the corporation:				
	<u>80 MYRICKS STR</u> <u>ERKLEY</u> S	REET State: <u>MA</u>	Zip: <u>02779</u>	Country: <u>USA</u>
g. Street address where the records of the corporation required to be kept in the Commonwealth are located (post office boxes are not acceptable):				
No. and Street: City or Town: which is X its principal office an office of its secretary/	130 MYRICKS BERKLEY  /assistant secretary	State: <u>M</u> an o	$\frac{A}{2}$ Zip: $\frac{0277}{2}$ Iffice of its transfer agegistered office	
Signed this 29 Day of October, 2018 at 8:55:54 AM by the incorporator(s). (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)  ANDREA F. NUCIFORO JR., ESQ., FOR NUCIFORO LAW GROUP, LLC OF MASSACHUSETTS				
© 2001 - 2018 Commonwealth of Mas All Rights Reserved	ssachusetts			

MA SOC Filing Number: 201841843760 Date: 10/29/2018 8:55:00 AM

#### THE COMMONWEALTH OF MASSACHUSETTS

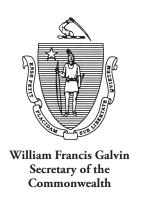
I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with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

October 29, 2018 08:55 AM

WILLIAM FRANCIS GALVIN

Heteram Frain Dalies

Secretary of the Commonwealth



# The Commonwealth of Massachusetts Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

Date: December 06, 2019

To Whom It May Concern:

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

#### **FROZEN 4 CORPORATION**

is a domestic corporation organized on October 29, 2018 , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

Secretary of the Commonwealth

William Navin Galetin

Certificate Number: 19120186950

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

Processed by:

### DRAFT BYLAWS FROZEN 4 CORPORATION

#### Article I: Offices

Section 1. Principal Office. The principal office of the Corporation shall be 618 Columbia Road, Dorchester, Massachusetts 02125.

Section 2. Other Offices. The Board of Directors may establish branch or subordinate offices at any time and at any place.

#### Article II: Purpose

To own and manage real and personal property, to apply for and maintain municipal and state licenses within the Commonwealth of Massachusetts and to engage in any and all activities in furtherance of, related to, or incidental to these purposes.

#### Article III: Shareholders

Section 1. Annual Meeting. A meeting will be held annually for the purpose of electing members of the Board of Directors (the "Directors") of the Corporation and for transacting such other business as may come before the meeting. The annual meeting will be held on a date and time designated by the Board of Directors.

Section 2. Special Meetings. Special meetings of the Shareholders may be called at any time by the Board of Directors, by the President, or by Shareholders entitled to cast in total not less than forty (40%) percent of the votes at that meeting. If a special meeting becomes called by anyone other than the Board of Directors, the person calling the meeting will make a written request to the Corporation specifying the time and date of the meeting and the general nature of the business proposed to be transacted.

Section 3. Place of Meeting. Shareholders' meetings will be held at any place within or outside the Commonwealth of Massachusetts at a place to be determined at the Board of Directors discretion. If no designation of the location gets made for any annual or special meeting of the Shareholders, the meetings shall be held at the corporation's principal place of business.

Section 4. Notice. Written notice of any Shareholder meeting will be given not less than ten (10) days before the date of the meeting to each Shareholder entitled to vote at that meeting. The notice shall state the place, date, and hour of the meeting. If, for a special meeting, the notice shall state the purpose of the meeting. A mailed notice is effective when deposited in the United States mail with postage prepaid and the proper address of the Shareholder as appearing on the records of the Corporation.

Section 5. Quorum and Required Vote. A supermajority of the outstanding voting shares (two-thirds), whether represented in person or by proxy, shall constitute a quorum entitled to take action at a meeting of Shareholders. Without a quorum, a majority of the represented Shareholders may adjourn the meeting to another time without further notice.

Section 6. Consent of Shareholders in Lieu of Meeting. Any action to be taken at any annual or special meeting of Shareholders may be taken without a meeting, without prior notice, and without a vote, if a signed consent in writing, setting forth the action so taken, gets presented by the holders of outstanding shares having not less than the minimum number of

shares that would be necessary to authorize or pass such an action were a meeting otherwise called and all votes cast.

Section 7. Restrictions on Sale of Shares. No Shareholder may sell or transfer any shares without the Board of Director consent.

#### Article IV: Directors

Section 1. Powers. The Board of Directors will manage the business and affairs of the Corporation by or under the Board.

Section 2. Number and Tenure. The Board will consist of one or more Directors, all of whom shall be natural persons who shall be elected for a term of three years. Each Director shall hold office until a successor becomes elected and qualified. Directors do not need to be Shareholders. Any Director may resign at any time upon notice given in writing to the Corporation. The authorized number of Directors shall be three (3) until changed by a duly adopted amendment to the Bylaws adopted by the vote or written consent of a super majority (two-thirds) of the outstanding Shareholders.

Section 3. Vacancies. A vacancy in the Board of Directors will exist if a Director resigns, dies, or becomes removed by the Shareholders; or when a court of appropriate jurisdiction declares the Director of unsound mind or enters a felony conviction against a Director; or if the Director is found not to be suitable for service by the Massachusetts Cannabis Control Commission; or when the authorized number of Directors increases.

Section 4. Regular Meetings. By resolution, the Board may give the time and place, either within or outside the Commonwealth of Massachusetts, for the holding of regular Board meetings without any notice other than that of the resolution.

Section 5. Special Meetings. Special meetings of the Board of Directors may be called for any purpose at any time by the chairman of the Board, the President, or a majority of Directors.

Section 6. Quorum. All of the authorized number of Directors will be considered a quorum to transact business. A unanimous vote of the Directors shall be required for any action by the Directors.

Section 7. Notice of Meetings. Any regular meeting of the Board may be held without notice of the date, time, and place of the meeting. Any special meeting of the Board may be preceded by at least a two (2)-day notice of the date, time, and place of the meeting. The Board may give this notice personally, by mail, electronic mail, or by any other method allowed by law. Notice is effective at the earliest of: (a) receipt; (b) delivery to the proper address or telephone number as shown in the Corporation's records; or (c) five (5) days after its deposit in the United States mail, with postage prepaid and the correct address noted.

Section 8. Waiver of Notice. Notice of a meeting need not be given to any Director who signs a written waiver delivered to the Corporation for inclusion in the minutes or for filing with the corporate records.

Section 9. Action by Directors Without A Meeting. Any action required or permitted to be taken at a meeting of the Board may be taken without a meeting if all members of the Board consent to it in writing.

Section 10. Presence through Communications Equipment. Unless otherwise provided by law or by the articles of organization, Directors may participate in any meeting of the board of Directors by means of a conference telephone or similar electronic or communications equipment by mean of which all persons participating in the meeting can hear each other at the same time, and participation by such means shall constitute presence in person at a meeting.

Section 11. Initial Directors. David Morgan, Candace Kattar and Benjamin Virga shall each serve as the initial Directors.

#### Article V: Officers

Section 1. Officers. The Officers of the Corporation will consist of the President, the Vice President, the Treasurer, and the Secretary. Officers shall be elected for three years and shall hold office until their successors become elected and qualified. An appointee may hold one or more offices. Candace Kattar shall initially serve as President, Benjamin C. Virga shall initially serve as Vice President. David Morgan shall initially serve as Treasurer. Luke Marut shall initially serve as Secretary.

Section 2. Removal and Resignation. Any Officer or agent appointed by the Board may be removed by the Board at any time with or without cause. Any Officer may resign at any time by giving written notice to the Corporation.

Section 3. Vacancies. The Board may fill a vacancy due to resignation, removal, disqualification, death, or otherwise.

Section 4. President. The President shall preside at all meetings of Shareholders and Directors, have the general management and supervision of the affairs of the Corporation, and shall perform all other duties as determined by the Board.

Section 5. Vice President. The Vice President shall preside at all meetings of the Shareholders and Directors in the absence of the President and shall assist the President in the general management and supervision of the affairs of the Corporation, and shall perform all other duties as determined by the Board.

Section 6. Treasurer. The Treasurer shall have the custody of all moneys and securities of the Corporation and shall keep accurate financial records for the Corporation.

Section 7. Secretary. The Secretary shall issue notices for all meetings except for notices for special meetings of the Shareholders and special meeting of the Directors; shall prepare the minutes of the meetings of the Shareholders and meetings of the Board; and shall keep a record of Shareholders at the principal office.

#### Article VI: Liability

Section 1. No Personal Liability. The Directors and the Officers of the Corporation shall not be personally liable for any debt, liability or obligation of the Corporation for or arising out of a breach of fiduciary duty as an officer or director notwithstanding any provision of law imposing such liability; provided, however, that the foregoing shall not eliminate or limit the liability of an Officer or Director to the extent that such liability is imposed by applicable law for acts or omissions not in good faith or which involve intentional misconduct, recklessness, or a knowing violation of the law.

Section 2. Corporate Obligations. All persons, corporations or other entities extending credit to, contracting with, or having any claim against, the Corporation, may look only to the funds and property of the Corporation for the payment of any such contract or claim, or for the payment of any debt, damages, judgment or decree, or of any money that may otherwise become due or payable to them from the Corporation.

Section 3. Indemnification. The Corporation shall, to the extent legally permissible, indemnify any person serving or who has served at any time as a director, executive director, president, vice president, treasurer, assistant treasurer, clerk, assistant clerk or other officer of the Corporation, or at its request as a director or officer of any organization, or at its request in any capacity with respect to any employee benefit plan, and may indemnify an employee or other agent who has so served, against all liabilities and expenses, including, without limitation, amounts paid in satisfaction of judgments, in compromise or as fines and penalties, and counsel fees, reasonably incurred by him in connection with the defense or disposition of any action, suit or other proceeding, whether civil or criminal, in which s/he may be involved or with which s/he may be threatened, while in office or thereafter, by reason of his being or having been such a director or officer, except with respect to any matter as to which he shall have been adjudicated in any proceeding not to have acted in good faith; provided, however, that as to any matter disposed of by a compromise payment by such person, pursuant to a consent decree or otherwise, no indemnification either for said payment or for any other expenses shall be provided unless such compromise and indemnification shall be approved by a majority vote of the Board.

#### **Article VII: Amendments**

These Bylaws may be adopted, altered, amended or repealed, in whole or in part, by a vote of all of the Directors then in office.

#### Article VIII: Powers

Section 1. Statement of Powers. By and through the Board, the Corporation shall have the power to do any and all lawful acts which may be necessary or convenient to affect the purpose for which the Corporation is organized, and to assist other organizations or persons whose activities further accomplish, foster or attain such purposes. The Corporation shall have the power: (i) to issues securities, including common and preferred shares and other securities derivative thereto; (ii) to lease, sell, mortgage, transfer, in such manner and on such terms as they may deem advisable, all property, real or personal; (iii) to acquire, by purchase or otherwise, and retain for whatever period they shall think proper, all kinds of real and personal property and every kind of investment, including cash, securities and other property; (iv) to execute agreements and contract in furtherance of the business of the Corporation; (v) to settle, compromise or pay any claims, including taxes, in accordance with law; to secure, hold and maintain municipal and state licenses and permits; (vi) to collect rents and other proceeds from real estate not specifically devised and to pay all carrying charges thereon and make such repairs thereto as they deem proper without the necessity of obtaining leave of any court; and (vii) to conduct any business activity permitted under the laws of the Commonwealth of Massachusetts.

Section 2. Investments. The Corporation shall have the right to retain all or any part of any securities or property acquired by it in whatever manner, and to invest and reinvest any funds held by it, according to the judgment of the Directors, without being restricted to the class of investments, provided, however, that no action shall be taken by or on behalf of the Corporation if such action is a prohibited transaction under Massachusetts law.

Section 3. Loans. No moneys shall be borrowed on behalf of the Corporation and no evidences of such indebtedness shall be issued in its name unless authorized by a resolution of the Board of Directors. Such authority may be general or confined to specific instances.

Section 4. Deposits. All funds of the Corporation, not otherwise employed, shall be deposited from time to time to the credit of the Corporation in such banks, investment firms or other depositories as the Board of Directors shall select.

Section 5. Audits. Within three (3) months after the close of the Corporation's fiscal year, the Corporation may elect to prepare reviewed financial statements in accordance with generally accepted accounting principles (GAAP). The Corporation shall make these statements available to all Shareholders and, if required by law, to the Massachusetts Department of Public Health and the Massachusetts Cannabis Control Commission.

Section 6. Insurance. The Corporation may purchase and maintain insurance (including but not limited to insurance for legal expenses and costs incurred in connection with defending any claim, proceeding or lawsuit) on behalf of any person who is or was a director, officer, employee, fiduciary or agent of the Corporation or who, while serving in this role, is or was serving at the request of the Corporation as a director, officer, partner, trustee, employee, fiduciary or agent of any other foreign or domestic Corporation, partnership, joint venture, trust, employee benefit plan, or other enterprise, against any liability asserted against him or incurred by him in any such capacity, or arising out of his status as such. In addition, the Corporation shall maintain liability insurance coverage in compliance with 935 CMR 500.000 et seq., or any other provision of Massachusetts law or regulation.

#### Article IX: Anti-Trust Policy

The Corporation shall comply fully with all federal and state antitrust laws which prohibit companies from working together to restrict competition. The Corporation and its directors and officers are informed about antitrust laws and recognize possible antitrust issues or questions. While competitors in the Massachusetts cannabis industry may collaborate, such competitors may not unlawfully restrict competition within the industry. The Corporation shall not engage in any anti-competitive activities. Furthermore, to ensure against inadvertent violations of applicable antitrust laws and except to ensure that prices are affordable for the Corporation's patients, and to prevent diversion, directors, officers and employees shall not discuss with competitors:

- 1. Pricing strategies for cannabis products or related products and services;
- 2. Establishment of market monopolies for products or services;
- 3. Refusal to deal with a company because of pricing or distribution practices for cannabis products or related products or services;
- 4. Strategies or plans to give business or remove business from a specific company.

Furthermore, directors, officers, and employees shall not engage in any actions or understandings arising in the context of the Corporation's activities which appear to be anti-competitive in purpose or inconsistent with this policy.

#### **Article X: Severability**

The invalidity or un-enforceability of any provisions of these Bylaws shall not affect the validity or enforceability of any other provision of these Bylaws, which shall remain in full force and effect.

#### **Article XI: Dissolution**

Dissolution of the Corporation will comply with Massachusetts law. The Directors may authorize a petition for the dissolution of the Corporation. A super majority (two thirds) vote will be required for such dissolution. Articles of Dissolution will be filed with the Massachusetts Secretary of State. All outstanding annual reports will be filed with the Massachusetts Secretary of State. A letter to the Massachusetts Department of Revenue on the Corporation's letterhead will be sent stating that the Corporation is dissolving. All outstanding business will be completed. All outstanding debts will be paid, and all assets transferred or liquidated in accordance with law. Any remaining funds in the Corporation will be distributed as per the direction of the Directors at the meeting authorizing the dissolution.

In the event that the dissolution also requires one or more dispensary, cultivation, product manufacturing, transportation or other licensed location to close, cease conducting business or dissolve, the board of directors shall vote to take the following actions: (i) written notice to the Massachusetts Cannabis Control Commission; (ii) written notice to the town in which such business is located; and (iii) destruction or removal of any remaining cannabis products in a manner consistent with 935 CMR 500.000 et seq.

#### **ARTICLE XII: Miscellaneous Provisions**

Section 1. Fiscal Year. Except as from time to time otherwise determined by the Board of Directors, the fiscal year of the corporation shall end on the last day of December in each year.

Section 2. Seal. The Board of Directors shall have power to adopt and alter the seal of the corporation.

Section 3. Execution of Instruments. All deeds, leases, transfers, contracts, bonds, notes and other obligations to be entered into by the corporation in the ordinary course of its business without Director action, may be executed on behalf of the corporation by the President and the Treasurer.

Section 4. Resident Agent. The Board of Directors may appoint a resident agent upon whom legal process may be served in any action or proceeding against the corporation. Said resident agent shall be either an individual who is a resident of and has a business address in Massachusetts, a corporation organized under the laws of Massachusetts, or a corporation organized under the laws of any other state of the United States, which has qualified to do business in, and has an office in, Massachusetts.

Section 5. Corporate Records. The original, or attested copies, of the Articles of Organization, By-laws and records of all meetings of the incorporators and stockholders, and the stock and transfer records, which shall contain the names of all stockholders and the record address and the amount of stock held by each, shall be kept in Massachusetts at the principal office of the corporation, or at an office of its transfer agent, Secretary or resident agent, and shall be open at all reasonable times to the inspection of any stockholder for any proper purpose, but not to secure a list of stockholders for the purpose of selling said list or copies thereof or of using the same for a purpose other than in the interest of the applicant, as a stockholder, relative to the affairs of the corporation.

Section 6. Articles of Organization. All references in these By-laws to the Articles of Organization shall be deemed to refer to the Articles of Organization of the corporation, as amended and in effect from time to time.

Section 7. Amendments. The power to make, amend or repeal By-laws shall be in the stockholders, provided, however, that the Directors may make, amend or repeal the By-laws (other than the provisions of this Section 7 of Article XII) in whole or in part, except with respect to any provisions thereof which by law, the Articles of Organization or these By-laws requires action by the stockholders. Not later than the time of giving notice of the meeting of stockholders next following the making, amending or repealing by the Directors of any By-law, notice thereof stating the substance of such change shall be given to all stockholders entitled to vote on amending the By-laws. Any amendment or repeal of these By-laws by the Directors and any By-law adopted by the Directors may be amended or repealed by the stockholders.

As set forth above, these Bylaws have been adopted by a vote of the Board as per Article and affirmed by the Board of Directors of the Corporation on this day of			
2019.			
Candace Kattar	_		
Benjamin Virga	_		
	_		
David Morgan			

Letter ID: L2122403904 Notice Date: December 16, 2019 Case ID: 0-000-821-276

#### CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

#### - <sup>լ</sup>եսկանիային ինկանին հանդարանում ինականի անհանակու

BENJAMIN VIRGA FROZEN 4 CORPORATION 618 COLUMBIA RD DORCHESTER MA 02125-3414

#### Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, FROZEN 4 CORPORATION 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

and b. Glor

Edward W. Coyle, Jr., Chief

Collections Bureau

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

**DATE:** August 7, 2019

RE: Plan for Obtaining Liability Insurance Coverage

#### PLAN:

Frozen 4 Corporation ("F4C") will obtain liability insurance in compliance with 935 CMR 500.105(10)(a).

The policy will provide coverage of no less than \$1 million dollars per occurrence and \$2 million dollars aggregate, annually, and product liability coverage for not less than \$1 million per occurrence and \$2 million in aggregate, annually. The deductible shall be no more than \$5,000 per occurrence.

F4C also anticipates securing D&O liability coverage at prevailing rates. F4C also anticipates securing commercial auto coverage at prevailing rates, including enhanced coverage for optional bodily injury, for any F4C vehicles used to transport of product.

F4C will retain the services of a local insurance agent and legal counsel to review and adjust coverages from time to time to meet the needs of the company, to ensure compliance with CCC regulation, and to adequately protect F4C 's assets, personnel and customers.

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

DATE: December 18th, 2019

RE: Detailed Summary of Business Plan for Adult Use Marijuana

**Establishment** 

#### **BUSINESS PLAN**

#### **The Company**

Frozen 4 Corporation ("F4C" or "company") is a community-based cannabis establishment located at 985 Plain Street in Marshfield, Massachusetts. The company was formed in 2018 solely for the purpose of securing local and state permits necessary to establish a marijuana cultivation, processing and packaging facility in Massachusetts. With the enactment of chapter 55 in July 2017, the company now seeks a certificate of registration issued by the Massachusetts Cannabis Control Commission ("CCC") to allow participation in the adult use market.

F4C intends to sell adult use cannabis and cannabis products under CCC supervision and in accordance with Massachusetts law and 935 CMR 500.000 et seq. The company has secured the necessary local permits from the town of Marshfield, and has completed the required local outreach and host community agreement process. F4C anticipates participation in the adult use market in Q2 2020.

#### **The Brand**

All products will be sold under the name <u>Frozen 4</u> and F4C will assure its use and protection as a premium and recognizable name for cannabis products throughout Massachusetts.

#### **Customers**

The mission of F4C is to provide high quality cannabis products to adults intending to use the products in a manner consistent with Massachusetts law. F4C will implement security processes to verify that all customers have achieved the age of 21 years. The company shall focus on customer safety and experience, and will adhere strictly to CCC regulations, as amended from time to time.

#### **Management**

Key members of the management team include:
David Morgan, CEO
Benjamin C. Virga, COO
Lukasz Marut, General Manager

#### **Operations**

F4C will adopt and maintain standard operating procedures ("SOPs"). The SOPs will conform to Massachusetts law and regulation, and shall control the performance of all F4C management, visitors, contractors and staff. At least annually, F4C will review and assess the SOPs, and will revise such SOPs in order to conform company performance to the applicable regulations and industry best practices.

Corporate and business operations will occur at 985 Plain Street in Marshfield, Massachusetts. The facility shall be comprised of one 11,500 sq ft +/- space. The company will offer 20-40 products, ranging from flower to vaper to infused edibles. The establishment will feature robust security features, the latest product manufacturing technology, highly trained staff, and CCC-compliant security, inventory and storage protocols.

Subject to local approval and consistent with CCC regulation, hours of operation shall be as follows:

 Monday
 8:00am - 7:00pm

 Tuesday
 8:00am - 7:00pm

 Wednesday
 8:00am - 7:00pm

 Thursday
 8:00am - 7:00pm

 Friday
 8:00am - 7:00pm

 Saturday
 8:00am - 5:00pm

 Sunday
 8:00am - 5:00pm

#### **Revenue Projections**

F4C intends to earn gross sales of \$21 million in the adult use market over the course of it's first year of operation. The company will derive gross sales from the controlled retail sale of marijuana products, marijuana infused products and non marijuana accessories. The company aspires to increase revenue by three to five percent per year over the subsequent three years. The company anticipates profitability in Q1 2021.

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

**DATE:** May 8th, 2021

RE: Detailed Summary of Business Plan for Adult Use Marijuana

**Establishment** 

#### **BUSINESS PLAN**

#### The Company

Frozen 4 Corporation ("F4C" or "company") is a community-based cannabis establishment located at 985 Plain Street in Marshfield, Massachusetts. The company was formed in 2018 solely for the purpose of securing local and state permits necessary to establish a marijuana cultivation, processing and packaging facility in Massachusetts. With the enactment of chapter 55 in July 2017, the company now seeks a certificate of registration issued by the Massachusetts Cannabis Control Commission ("CCC") to allow participation in the adult use market.

F4C intends to sell adult use cannabis and cannabis products under CCC supervision and in accordance with Massachusetts law and 935 CMR 500.000 et seq. The company has secured the necessary local permits from the town of Marshfield, and has completed the required local outreach and host community agreement process. F4C anticipates participation in the adult use market in Q3 2021.

#### **The Brand**

All products will be sold under the brand name "South Shore Buds." F4C has developed the brand, and will assure its use and protection as a premium and recognizable brand for cannabis products throughout Massachusetts.

#### **Customers**

The mission of F4C is to provide high quality cannabis products to adults intending to use the products in a manner consistent with Massachusetts law. F4C will implement security processes to verify that all customers have achieved the age of 21 years. The company shall focus on customer safety and experience, and will adhere strictly to CCC regulations, as amended from time to time.

#### Management

Key members of the management team include: Benjamin C. Virga, CEO David Morgan, CFO Lukasz Marut, Director of Products
Andrea Barone, Director of Compliance
Marissa Lederman, Director of Retail Operations
Mary-Frances Pinedo, Director of Inventory &
Data Management

#### **Operations**

F4C will adopt and maintain standard operating procedures ("SOPs"). The SOPs will conform to Massachusetts law and regulation, and shall control the performance of all F4C management, visitors, contractors and staff. At least annually, F4C will review and assess the SOPs, and will revise such SOPs in order to conform company performance to the applicable regulations and industry best practices.

Corporate and business operations will occur at 985 Plain Street in Marshfield. The facility shall be comprised of one 5,500 sq ft +/- building. The company will offer 30-50 products, ranging from flower to vaporizers to infused edibles. The establishment will feature robust security features, the latest retail sales technology, highly trained staff, and CCC-compliant security, inventory and storage protocols.

Subject to local approval and consistent with CCC regulation, hours of operation shall be as follows:

Monday	10:00am - 9:00pm
Tuesday	10:00am - 9:00pm
Wednesday	10:00am – 9:00pm
Thursday	10:00am – 9:00pm
Friday	10:00am - 9:00pm
Saturday	10:00am - 9:00pm
Sunday	12:00pm - 8:00pm

#### **Revenue Projections**

F4C intends to earn gross sales of \$21 million in the adult use market over the course of its first year of operation. The company will derive gross sales from the controlled retail sale of marijuana products, marijuana infused products and non marijuana accessories. The company aspires to increase revenue by three to five percent per year over the subsequent three years. The company anticipates profitability in Q2 2022.

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

**DATE:** August 7, 2019

RE: Qualifications and Training

#### PLAN:

Employee training is a critical component of F4C's operation and success. The company's executive team is responsible for the development and execution of the F4C training plan. Pursuant to 935 CMR 500.105(1), training is tailored to the roles, responsibilities and job functions of each Marijuana Establishment agent, and includes at a minimum a Responsible Vendor Program as described under 935 CMR 500.105(2) (b).

No employee or consultant may work on-site prior to receiving required orientation training. No employee or consultant may work on-site if any training module is 8 weeks or more past due. F4C shall maintain records of responsible vendor training program compliance, for each employee, for four years, and shall make such records available to inspection by the Commission upon request during normal business hours.

F4C does not discriminate in hiring or operating decisions. All managers and supervisors must comply with all applicable EEOC and MCAD guidelines when managing personnel issues. All F4C policies and practices are designed to prevent discriminate based on race, color, height or weight, gender, sexual orientation, religious affiliation, marital status, disability or medical condition.

F4C will hire its staff in accordance with a staffing plan reviewed approved by its executive team and the Commission in connection with F4C's final certificate of registration. The staffing plan will adhere to all goals detailed within the Diversity Plan as well as the Plan for Positive Impact. All executives and officers will disclose education and employment history, as required by the Commission and Massachusetts law, and will continue to update such information from time to time as required by Massachusetts law and regulation.

All Marijuana Establishment agents must be 21 years of age or older, and must satisfy the background and CORI checks required by Massachusetts law and regulation.

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

DATE: December 10, 2019

RE: Summary of Personnel Policies and Procedures

#### **Executive Management**

<u>Chief Executive Officer</u>: The CEO shall provide overall leadership and vision for F4C. The CEO will work with and support the executive management team and employees to ensure that F4C is setting reasonable business and community benchmarks, achieving its goals and fulfilling its mission. CEO duties shall include the following:

- Develop, oversee and execute a staffing plan and certain hiring protocols;
- Develop and implement personnel policies and procedures;
- Develop protocols to attract, hire, advance, discipline and terminate employees and volunteers as needed to support F4C's operations;
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Ensure compliance with all workplace policy laws and requirements;
- Ensure compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- Prepare and amend from time to time a plan to ensure ongoing compliance with the provisions of 935 CMR 500.101(1)(c)(7);
- Prepare and amend from time to time a set of detailed written operating procedures to ensure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Keep and maintain all F4C records, and making such records available for inspection by the Commission, upon its request, in accordance with 935 CMR 500.105(9);
- Working with the executive management team and the GM, to implement a plan to prevent the diversion of product in accordance with the applicable regulations, including 935 CMR 500.101 and 935 CMR 500.105;
- Ensure that such anti-diversion plan incorporate the use of video monitoring, employee training, written guidance to employees, executive supervision and physical inspection of the premises, among other tactics;
- Working with the executive management team and the GM, to implement a
  diversity plan to promote equity among minorities, women, veterans, people
  with disabilities, and people of all gender identities and sexual orientations;
- Ensure that each member of the executive management team shall attest by his signature that he has read and understands the requirements of 935 CMR 500.000 et seq., and shall keep a copy of such attestation within the books and records of F4C;
- Lead F4C's interactions with state regulators and municipal officials; and

 Working as the team leader with other executives and employees, to review F4C's business and community objectives, and implement plans to achieve those objectives.

<u>Chief Security Officer</u>: The CSO is responsible for implementing security policies and procedures for F4C. The CSO will maintain, implement, review and amend such policies as required by the business.

CSO duties shall include the following:

- Ensure compliance with all provisions of 935 CMR 500.110;
- Review and ensure proper maintenance of all security apparatus, including physical, human and technological security methods and equipment;
- Interact with state inspectors and municipal law enforcement authorities;
- Train and supervise security staff;
- Develop a plan for educating employees on the strict anti-diversion policy at F4C;
- Develop, review and supervise the process through which F4C will report security incidents;
- Prepare reports, in written and electronic form, relative to the maintenance of security at F4C, and generate any reports required by regulation to be provided to state regulators or law enforcement;
- Maintain current list of all authorized and registered employees working for F4C;
- Maintain current list of all employees authorized to access designated areas of the facility;
- Lead a working group comprised of the CEO, GM and any other designated personnel to ensure that current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of F4C employees and assets;
- Ensure that all personnel complete and satisfy all background checks requirements prior to performing any F4C functionality; and
- Provide staffing, shift change and general oversight of security operations.
- In the event of any suspected diversion incident, perform an internal audit, referencing video surveillance, and product tracking software, to locate the time, place and agent involved with the discrepancy, and document and report in accordance with 935 CMR 500.110(1)(m).

<u>Chief Financial Officer:</u> The CFO is responsible for handing all financial aspects of the company, including the following tasks:

- Maintenance of financial records including purchase orders;
- Profit and loss projections;
- Cash management and financial reporting;
- Budget management;
- Payroll funding and management;

- Hiring of tax, accounting, payroll, legal and other professional services;
- Generating reports regarding gross sales, on a daily, monthly and annual basis, in a form and manner determined by the CEO.

#### Employees<sup>1</sup>

<u>General Manager:</u> The GM shall supervise all logistical operations, including the handling, transfer, storage and transportation of products. The GM shall serve as a supervisor to all aspects of the facility. GM duties shall include the following:

- ensure that all equipment, fixture and furniture is in working order;
- ensure that employees comply with all security protocols;
- participate in developing and supervising all logistics, in collaboration with the CEO and other executives and employees, as required by 935 CMR 500.101(1)(c) (7);
- in collaboration with the CEO and other members of the executive management team, assuring that F4C remain compliant with all general operational requirements as set forth at 935 CMR 500.105; and
- reporting to the CEO and other members of the executive management team with respect to general operations.

<u>Marijuana Establishment Agent:</u> EAs participate in a variety of retail sales, security, inventory, and cleanliness functions. EAs operate under the direction of the General Manager. EA duties shall include the following:

- assuring accurate and efficient use of F4C's sale tracking system in compliance with 935 CMR 500.105(8);
- at the direction of the GM, complete all EA training as required by 935 CMR 500.105(2);
- after packaging for sale and transportation, EAs will be responsible for collecting the selected product from the product storage area and scanning the barcode into the POS system;
- weighing and packaging the product and placing the product into an approved child-resistant package in compliance with 935 CMR 500.105(5);
- generating and affixing a label to the product, and confirming that the label reflects the date, strain name, cannabinoid profile, and all applicable warnings as required by 935 CMR 500.105;
- all EAs must comply with 935 CMR 500.105(3), requirements for safe handling of marijuana.

<sup>1</sup> As used in these Personnel Policies and Procedures, the term "employee" shall mean all registered agents, board members, directors, employees, executives, managers and volunteers or associated with any F4C facility, as further defined at 935 CMR 500.030(1), but shall not include third-party contractors. The pronouns "he" and "his" will refer to persons of both genders.

#### Security

<u>Associate Security Agent</u>: ASAs monitor F4C's security systems. ASAs shall perform the following duties:

- Monitor alarm systems, doors, interior and exterior video cameras, motion sensors and related technology;
- Assure that all employees and others accessing the facility have the appropriate credentials and identification;
- Assure that only properly authorized individuals are able to gain access to the facility;
- Lead F4C's response in the event of fire, theft, intrusion or other threat to health and safety at the facility;
- Respond and investigate security situations and alarm calls;
- Clearly document the incident and details surrounding the incident in a written report for the CSO;
- Monitor all employee entrances to the facility;
- Maintain log books; and
- Provide escorted access as required in restricted areas.

<u>Compliance Specialist</u>: The Compliance Specialist shall administer background checks and suitability determinations for all F4C employees. Compliance Specialist duties shall include the following:

- In collaboration with the CSO, implementing and administering background checks on all employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- In collaboration with the CSO, CCO, CPO, and CEO, uphold the regulations set forth by the commission in 935 CMR 500.000, including routine compliance walk throughs of the facility to be completed not less than once per quarter;
- Reviewing background checks prior to any employee commencing work, and prior to any employee being granted access to any F4C facility in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.100;
- Registering each employee with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04 for purposes of determining suitability;
- For purposes of further ensuring employee suitability, the CSO shall:
  - a. Review any and all conditions, offenses, and violations occurring in Massachusetts or any other state, whether under state law or under the laws of the United States, or the law of any military, territorial or Native American tribal authority, or any other jurisdiction.
  - b. Review any and all criminal disqualifying conditions, offenses, and violations;
  - c. Where applicable, review all look back periods for criminal offenses and violations included in 935 CMR 500.802 commencing upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.

- d. Exclude from consideration any juvenile dispositions as a factor for determining suitability.
- e. Analyze all background checks to Massachusetts law, including but not limited to 935 CMR 500.800, inclusive of all tables and exhibits.
- f. Not less frequently than quarterly, review Massachusetts law and CCC regulations and guidances to determine any change in recommended best practice.
- g. Administer the F4C background check protocol, in accordance with Massachusetts law and regulation, and any guidance provided by the CCC from time to time, including 935 CMR 500.802 and related tables.
- Determine whether grounds exist for Mandatory Disqualification or h. Presumptive Negative Suitability Determination and, in the event a Presumptive Negative Suitability Determination is made, F4C will consider the following factors: (i) time since the incident; (ii) age of the subject at the time of the incident; (iii) nature and specific circumstances of the incident; (iv) sentence imposed and length, if any, of incarceration, if criminal; (v) penalty or discipline imposed, including damages awarded, if civil or administrative; (vi) relationship of offense or incident to nature of work to be performed; (vii) number of offenses or incidents; (viii) whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered; (ix) if criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and (x) any other relevant information, including information submitted by the subject.

Upon finding an adverse determination, a Compliance Specialist shall:

- Report the adverse finding to the CSO immediately;
- Within seven (7) days of such determination, provide the applicant a copy of the background screening report and a final adverse determination letter providing the applicant with instruction relative to the right to dispute the contents of the report and rights to supplement or pursue an appeal to the Suitability Review Commission;
- Document such adverse determination in compliance with all requirements set forth in 935 CMR 500 et seq.; and
- Maintain such determination within F4C personnel records.

#### <u>Inventory</u>

<u>Inventory Manager:</u> At least weekly, the IM shall record an inventory count, and shall report same to the CCO and CEO. Additional IM duties shall include the following:

- Develop and implement comprehensive inventory controls;
- Develop and implement comprehensive reporting policies to meet internal and external reporting requirements;
- Maintain all inventory records;
- Staffing and supervising all AIAs;
- Handle, store, label and track all inventory; and
- Working with the CCO and CSO, implement safe and compliant transportation protocols, including but not limited to compliance with 500.050(5)(a).

<u>Associate Inventory Agents</u>: AIAs support the daily functionality of the Inventory Manager. AIA duties shall include:

- Maintaining all records relating to inventory, including storage, transfer, audit, package, inventory levels and demand, and other records as required by the business;
- Documenting the acquisition, sale, disposal and ending inventory counts on a daily and monthly basis;
- Ensuring that product is properly packaged, stored, labeled, maintained and recorded within F4C's electronic and physical systems; and
- Ensuring proper storage and disposal of waste in accordance with 935 CMR 500.105(12).

#### **Personnel Records**

Personnel records for each employee will be maintained for at least twenty-four (24) months after employee separation from the company. Personnel records shall include, but not be limited to, the following:

- Job description stating duties, authority, responsibilities, qualifications, and supervision;
- Employment agreement, if any;
- Documents related to employee training, including training regarding privacy and confidentiality requirements, and a signed statement of the employee indicating the date, time, and place of such training;
- Documentation relating to compensation, including a statement of graduated compensation by date and pay rate;
- Performance evaluations;
- Disciplinary records, if any;
- Documents relating to background investigation, including CORI reports; and
- All materials required by the Commission pursuant to 935 CMR 500.030(2).

Personnel records will be kept in a secure location to maintain confidentiality and be accessible only to the CEO, CSO, or designees, all of whom shall be members of the executive management team.

#### **Professional Conduct**

#### Standards of Conduct

F4C is committed to maintaining an environment conducive to the health and well-being of customers, employees and the community. F4C shall endeavor to provide a workplace free from harassment, bullying or discrimination. F4C will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity or any other trait or characteristic protected by law. Harassment or discrimination on the basis of any protected trait or characteristic is contrary to F4C's values and shall provide grounds for discipline, up to and including termination. F4C policies shall prohibit any physical or verbal conduct that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an employee's work performance; or
- Adversely affects an employee's employment opportunities.

All F4C employees shall maintain the highest degree of professional behavior. Harassment or discrimination by or against employees is strictly prohibited, and the CEO shall promptly address any offending conduct.

F4C is committed to maintaining a work environment that is alcohol, smoke and drug free. F4C has adopted this policy to provide a work environment that promotes the safety and productivity of its employees, agents, and visitors.

#### At-Will Employment

Unless otherwise specified in a signed writing executed by the CEO and the employee, employment at F4C shall be at-will. The employer and employee alike may terminate the work relationship at any given moment and for any legitimate purpose. Each party reserves the right to end the employment.

#### Workplace Attire

Workplace attire must be suitable for each specific role and task. The CEO and the executive team shall determine appropriate attire, and shall ensure compliance with all workplace attire requirements.

#### **Business Hours**

The facility shall have the following hours of operation:

Monday: 10:00 am - 10:00 pm Tuesday: 10:00 am - 10:00 pm Wednesday: 10:00 am - 10:00 pm Thursday: 10:00 am - 10:00 pm Friday: 10:00 am - 10:00 pm Saturday: 9:00 am - 10:00 pm Sunday: 9:00 am - 10:00 pm

Emergency contact information:

Benjamin C. Virga, COO

Phone: 617-990-6653

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Lukasz Marut, GM

Phone: 857-385-6801

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#### **Compensation and Employment Practices**

#### **Standard Employment Practices**

F4C offers competitive wage and benefits packages, and shall develop a workplace culture that values work-life balance, transparent and accessible management, and a work ethic consistent with the cannabis program in Massachusetts.

#### Compensation

Compensation shall be negotiated on an individual basis. F4C shall determine compensation based on the prevailing wage in the marketplace. Compensation shall account for skill, experience, education, work history and other lawful criteria as determined by F4C. The CEO and the executive management team shall determine compensation rates. F4C shall at all times comply with applicable state and federal law in determining employee compensation.

#### Compliance with Law and Regulation

F4C's written policies shall adhere to applicable federal and state laws, including but not limited to the Family and Medical Leave Act, the Consolidated Omnibus Budget Reconciliation Act, the Equal Employment Opportunity Act, the Employee Retirement Income Security Act, the Americans with Disabilities Act, 935 CMR 500.000 et. seq., and with laws pertaining to holidays, work hours, personal time, paid time off, confidentiality and workplace safety. The executive management team oversees company compliance, and the CEO shall implement company policies and procedures.

#### Work Schedules

Work schedules shall be part-time or full-time. Schedules will be set and classified according to the demands of the business. F4C shall develop and implement work schedules that provide necessary duty and personnel coverage. F4C shall determine work schedules to ensure adequate coverage on a daily basis, and to diminish the likelihood of duplicate staffing or overtime coverage.

#### Performance Reviews

At least annually, all employees shall receive performance reviews. A written review, in a form determined by the CEO, shall accompany each employee review. Such review shall be signed by the employee, and shall be retained in the personnel files of the company. As determined by the CEO, reviews shall provide a reasonable evaluation of employee performance, and may include scoring metrics, narrative content and other performance methodologies.

#### Vacation, Paid Leave and Family Leave Policies

F4C leave policies will comport with all applicable state and federal statutes. All full-time employees will receive two 40-hour weeks of paid vacation annually. Leave must be requested at least two weeks in advance and approved by the CEO or designee. F4C anticipates observing all national holidays, and will elect on an annual basis whether to observe state holidays.

#### **Disciplinary Policy**

F4C has adopted a disciplinary policy designed to provide a graduated series of corrective actions. This policy, called the "Steps" policy, is intended to improve employee performance, promote the maintenance of a cohesive and productive workplace, and prevent recurring adverse behaviors. In addressing disciplinary matters, F4C shall apply the steps described below:

#### Step 1: Individual Advice and Counsel

A member of the executive management team shall individually discuss the subject conduct with the employee. The executive shall identify the offending conduct, and clearly outline company expectations for resolution.

#### Step 2: Written Warning

Within seven (7) days of the discussion described in Step 1, the executive will prepare a document characterizing the discussion, and will provide a copy of the document to the employee. The employee will sign the document, a copy of which F4C will maintain in the personnel file.

#### Step 3: Final Written Warning

Should the offending conduct persist or reoccur, a member of the executive management team will prepare a document characterizing the offending

conduct, and will provide a copy of the document to the employee. The document may include witness statements or reference other evidence. The document will state "Final Warning" in prominent text. The employee will sign the document, a copy of which F4C will maintain in the personnel file. If the executive finds the offending conduct problematic, disruptive and/or harmful, or implicants the health or safety of other employees, the executive may recommend to the CEO that the employee be removed from the workplace. The CEO shall act on any such recommendation within forty-eight (48) hours.

# Step 4: Termination of Employment

The last step is termination of employment. F4C reserves the right terminate if, notwithstanding the steps set forth above, employee conduct fails to comport with F4C policies and procedures. F4C reserves the right to terminate without prior notice or disciplinary action. The CEO must approve termination in writing, a copy of which F4C will maintain in the personnel file.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor shall anything in this policy be construed as modifying or altering the at-will employment relationship established between F4C and its employees.

# Conduct Not Subject to "Steps" Disciplinary Policy

Illegal behavior is not subject to the "Steps" policy, and may be reported to local law enforcement. Intoxication, physical harassment, sexual harassment, bullying, theft, diversion of marijuana or marijuana products, engaging in unsafe practices or misappropriation of intellectual property and like behaviors shall not be subject to the "Steps" policy and may be grounds for immediate termination.

Any agent or employee who has been convicted of or entered into a guilty plea for a felony charge for distribution of a drug to a minor shall not be subject to the "Steps" policy and shall be grounds for immediate termination.

# Separation of Employment

A separating employee may contact the CEO or other supervising authority to schedule an exit interview. F4C reserves the right to refuse any such interview. The interview, if any, shall occur on or after the employee's last day of work.

### Company Property

A separating employee must return all company property at the time of separation, including but not limited to uniforms, cell phones, keys, computers, and identification cards. Failure to return items may result in deductions from final paycheck. An employee may be required to sign a wage deduction authorization form to facilitate the deduction of the cost of unreturned items from the final paycheck.

# Termination of Employee Benefits

An employee separating from F4C is eligible to receive benefits as long as the appropriate procedures are followed as stated above. Two weeks' notice must be given, and the employee must work the full two work weeks. Accrued vacation leave will be paid in the last paycheck. Accrued sick leave will be paid in the last paycheck.

# COBRA Health Insurance

Health insurance terminates on the last day of the month of employment, unless employee requests immediate termination of benefits. F4C shall provide information about employee rights under the Consolidated Omnibus Budget Reconciliation Act (COBRA) relative to the continuation of health insurance coverage.

TO: Cannabis Control Commission

DATE: December 10, 2019

RE: Summary of Diversity Plan

### **Diversity Mission**

To encourage the entire community to participate in the Frozen 4 Corporation ("F4") mission, and to establish specific, measurable goals to promote equity for the above-listed groups in the operation of F4's proposed Marijuana Establishment.

### **Vision**

We strive to build a staff that reflects the racial, ethnic and cultural diversity of the community and our country. We will build lasting relationships with people from diverse backgrounds and will aspire to be a leader in promoting inclusion, equity and community engagement. We believe that our commitment to promoting diversity will inspire exceptional employee performance, enhance patient and customer experience and contribute to financial viability.

#### **Five Key Elements**

- 1. Establish ambitious goals for staff diversity
- 2. Recruit, hire and retain a diverse staff
- 3. Increase staff awareness of the importance of inclusion and diversity
- 4. Conduct continuous outreach designed to engage diverse members of the community
- 5. Measure engagement and participation against the diversity goals

#### Plan Summary

### Element No. 1: Establish Ambitious Goals

F4 will strive to develop and maintain a diverse pool of candidates for participation in the business of cultivation. Our intent is to build a workforce that is reflective of the demographics of our community. Our workforce will include minorities, women, veterans, people with disabilities, and LGBTQ+ in numbers at least equal to those present within the community at large, if not more. We will conduct an analysis of the community using public and private resources and will endeavor to improve our understanding of the community.

F4 will establish goals to secure a diverse and qualified group of employees. These goals will include, at a minimum, the following:

- F4 will hire not less than 60 employees within the first 12 months after receipt of its approval to commence operations;
- F4 will assure that not less than 50% of its employees will be diverse. F4 intends to target each demographic in percentages at least equal to the following: women (50%); minorities (20%); veterans (15%); LGBTQ (10%); people with disabilities (10%);

- F4 will count the number of individuals hired who are minorities, women, veterans, people with disabilities, and LGBTQ+, and will assess this number from the total number of individuals hired to ensure that at least 50% of all individuals hired fall within this goal;
- F4 will ensure that all of its employees, including minorities, women, veterans, people with disabilities, and LGBTQ+, are notified of and encouraged to apply for a promotion should a vacancy occur; and
- F4 will count the number of promotions earned by minorities, women, veterans, people with disabilities, and LGBTQ+, and will assess this number from the total number of available promotions to ensure that at least 50% of all individuals promoted fall within this goal.

### Element No. 2: Recruit, Hire and Retain a Diverse Staff

In order to attract and retain a diverse staff, the company will engage in the activities listed below:

- F4 has formed a partnership with C3RN and has provided financial support to this certified non-profit. C3RN and F4 will work together to recruit, hire and train as diverse a staff as possible for all aspects of F4's cannabis business.
- Propose new partnerships with culturally diverse institutions, including the Bristol Community College and Taunton Area School to Career Inc., with a focus on conducting targeted recruiting and hiring initiatives for candidates that will diversify the staff;
- At least 4 times a year (i.e. quarterly), provide specific opportunities for success, including job training, mentoring programs, and opportunities for promotion, provided further that all employees shall be eligible for mentoring and promotional opportunities;
- At least twice a year, offer business-relevant seminars to introduce diverse sectors of the workforce to technical skills (e.g. plant science, cultivation techniques, etc.) and analytical skills (e.g. financial accounting, inventory management, etc.), provided further that such seminars shall be available to not less than 200 individuals per seminar;
- Gather, compile and share demographic data, and reflect on any patterns or trends which appear in the data;
- Host career fairs at least 4 times a year (i.e. quarterly), in underrepresented and minority communities;
- Use online resources such as indeed.com, zip recruiter.com and social media platforms to cast a wide search for diverse employees;
- At least monthly, create and distribute internal workplace newsletters to encourage current employees to recommend individuals that might advance the diversity and business performance objectives of the company;
- Contract with suppliers that demonstrate a commitment to diversity and inclusion;
   and

- Establish procedures for diversity orientation and annual continuing education for all management and staff;
- Develop a consistent process for identifying, screening and interviewing candidates on issues relating to diversity and equity;
- Analyze exit surveys, and develop recommendations to improve retention and quality of staff;
- Implementation of a process to provide orientation to all new administrators on the topic of diversity/equity; and
- Organize social and networking events each twice a year in an effort to build relationships and increase retention.

# Element No. 3: Increase Staff Awareness

In order to increase staff awareness of the importance of inclusion and diversity, the company will:

- Conduct quarterly reviews of the business to search for and remove barriers for people of diverse backgrounds, to ensure they have access to opportunities within the company;
- Develop collaborative workplace processes to provide first-hand experiences;
- Utilize instructional materials aligned to the company's business objectives in order to provide all employees with an understanding of how cultural differences might affect or enhance participation in the workplace;
- Create an environment of trust between management and staff as well as amongst peers and practices within the business;
- Hold an annual employee training to maintain awareness and to continue to promote diversity within the company; and
- Develop a process and procedure to properly document and resolve any matters that may impact the diversity plan.

#### Element No. 4: Conduct Continuous Outreach

In order to engage diverse members of the community, the company will:

- Encourage community participation in activities sponsored by the company, including community events, street fairs, job fairs, chamber of commerce events and the like;
- Participate in events sponsored by the host community;
- Engage in honest conversation with management and staff on a semiannual basis about issues that impact a diverse population; and
- Use print and electronic communication tools, including web and social media, to share information about the opportunities for employment and participation within the company.

#### Element No. 5: Measurement

In order to measure outcomes against the diversity goals of the company, F4 will:

- At least annually evaluate the then-current process used for recruiting, hiring and retaining staff to determine whether the diversity plan is still effective;
- Collect and analyze data, including demographic information related to the composition of the workforce, and whether the company's plan is achieving its diversity objectives;
- Measure the number of individuals from the above-referenced demographic groups who were hired and retained after the issuance of a license;
- Measure the number of promotions for people falling into the above-referenced demographic groups since initial licensure;
- Measure the number of positions created since initial licensure;
- Measure the number and subject matter of trainings held, and track the number of individuals falling into the above-listed demographics in attendance;
- Document the number and natures of employment outreach and community events and the individuals that attended, and retain copies of any materials distributed at such events;
- Publish such employment data, and at least annually, share that data with management, staff and the CCC;
- Establish a timeline, organized by month, to track F4's progress in meeting its diversity goals;
- Document F4's performance, in a writing suitable for submission to the CCC, within 90 days of its annual renewal date; and
- Develop a written plan for continuous improvement.

#### Affirmative Statement

In accordance with the Guidance on Required Positive Impact Plans and Diversity Plans (revised 2/25/19), Frozen 4 Corporation affirmatively states as follows: (1) The applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

TO: Cannabis Control Commission

DATE: December 10, 2019

RE: Restricting access to people under the age of 21

#### PLAN:

Prior to gaining access to the facility at 985 Plain Street, individuals must show a photo identification to a camera that is monitored by a security guard to ensure that the individual is over the age of 21 years. F4C security agents will be equipped with an electronic scanner that will detect any counterfeit ID. All F4C security agents will need to complete the Responsible Vendor Training Program in a manner determined by the Commission.

F4C will also work with town officials, including the police department to assure that no diversion to minors occurs. F4C will work with the police department to ensure that Mass. Gen. Laws Ch. 161 Sec. 95 pertaining to loitering is strictly enforced.

In compliance with 935 CMR 500.105(4)(b)(2-4), F4C will not market, advertise or brand in a manner that might target or attract individuals under the age of 21 years. Additionally, all employees, visitors, vendors, and agents must be 21 years of age or older with valid proof of identification.

TO: Cannabis Control Commission

DATE: December 10, 2019

RE: Record keeping procedures

#### PLAN:

With guidance from its CEO and CFO, Frozen 4, Corp. ("F4C") will maintain all records in compliance with 935 CMR 500.105 (8) and (9). F4C will maintain all records in accordance with generally accepted accounting principles.

All digital records will be redundantly backed up to a cloud-based encrypted secure server, thereby ensuring the integrity of F4C records in the event of a technological failure. The server will be maintained by a third-party IT company. Paper documentation will be stored in secure, fireproof cabinets available only to authorized F4C personnel and the CCC upon request.

# **Product Inventory Records**

F4C will use NexTec in conjunction with Metrc to maintain real-time inventory and historical inventory data. NexTec software and inventory control system meets the requirements of 935 CMR 500.105(8) including, at a minimum, marijuana in any phase of development such as incoming raw material; marijuana ready for processing; finished marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

NexTec seed-to-sale software allows F4C maintain detailed records regarding current inventory, past production and sales, dispensary records and other data relative to product manufacturing, packaging, testing, sale, storage and security. NexTec seed-to-sale software will allow appropriate F4C staff members to reference detailed records regarding current and past inventory and transportation of marijuana or MIPs. NexTec will accurately and efficiently track and record any additional data relative to inventory, sale and security.

All product tracking records will indicate the date of inventory, a summary of the inventory findings, and the names, signatures, and titles of the dispensary agents who conducted the inventory.

Inventory and vendor history will be securely maintained and updated using NexTec inventory tracking software. Inventory and vendor documentation

received in paper form will be maintained and secured in a limited access area, available only to authorized F4C personnel and the CCC upon request.

F4C will maintain all lab test results for at least one year. All such results shall be available to the CCC at all times.

# **Personnel Records**

Employee records will be regularly maintained to satisfy the requirements outlined in 935 CMR 500.105(9)(d).

Each staff member shall have a personnel file maintained in a confidential by authorized F4C personnel. F4C will maintain that file for at least twelve (12) months after termination of the agent's affiliation with F4C. The file shall include, at a minimum, the following:

- i. All materials submitted to the CNB pursuant to 935 CMR 500.030(2);
- ii. Documentation of varication of references;
- ii. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- iii. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- iv. Documentation of periodic performance evaluations;
- v. A record of any disciplinary action taken;
- vi. Notice of completed responsible vendor training program;
  - viii. All background check reports obtained in accordance with 935 CMR 500.030.

F4C shall maintain a record of all personnel policies and procedures including employee handbooks and management and operation records.

# Financial and Other Business Records

F4C shall maintain all corporate records, including provisional and final certificates, insurance policies and declarations, accounting information, host community agreements, evidence of equipment acquisition, ownership and disposition and other corporate records documentation. In accordance with 935 CMR 500.105(9)(e), F4C shall maintain record or the follow items:

- 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, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment.

F4C's corporate records shall also include third-party laboratory agreements, documents pertaining to municipal permitting and compliance, corporate annual reports and other filings with the Massachusetts Secretary of State.

F4C shall maintain, in electronic form in a manner consistent with traditional business accounting practices, documents pertaining to F4C's business operation. These records shall include at minimum:

- A balance sheet;
- Income statements;
- Cash flow statements;
- A statement of all monetary transactions;
- A chart of accounts, including check ledger;
- A collection of payables;
- A collection of receivables;
- Payroll records and any other evidence of compensation;
- Any other records that BRI determines to maintain in the ordinary course of business.

Provisional certificates, final certificates and any other certifications of the establishment shall be posted in a conspicuous place on the near the main entrance of the establishment.

All records will be securely maintained and shall be available upon request to the CCC.

In the event of closure, F4C shall maintain all records must be kept for at least two years in a form and location acceptable to the CCC.

# **Record of Standard Operating Procedures**

Standard operating procedures related to F4C's operations will be updated on an ongoing basis, and not less frequently that annually. The standard operating procedures shall include, at a minimum, the following:

- Security measures in compliance with 935 CMR 500.110;
- Agent security policies, including personal safety and crime prevention techniques;
- Hours of operation and after-hours contact information, which will be provided to the CCC, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- Storage of marijuana and marijuana products in compliance with 935 CMR 500.105(11);
- Description of the various strains of marijuana to be processed or sold;
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
- Workplace health and safety policies, including a provision that the workplace shall be free to alcohol, smoking, or any form of harassment, intimidation or violence;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
  - Diverted marijuana, which will be reported the Police Department and to the CCC;
  - Engaged in unsafe practices with regard to F4C's operations; or
  - Been convicted of any felony in Massachusetts or like violation in any other state or under the laws of the United States.
- Procedures for the handling of cash on premises including but not limited to storage, collection frequency and transport to financial institution(s);
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old; and

 Policies and procedures to prevent unauthorized access to the premises; including but not limited to unauthorized access by any individual under the age of 21.

#### **Incident Reporting Records**

Within seven days, F4C will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report.

Incident reports shall describe the incident in question, and shall indicate F4C's investigation and resolution of the incident. All related documents, including photos and surveillance video related to the incident, will be maintained by F4C for not less than one year or the duration of an open investigation, whichever is longer, and be made available to the CNB and law enforcement authorities upon request.

# **Security Records**

A current list of authorized agents and service personnel that have access to the surveillance room will be available to the CCC upon request.

Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the CCC upon request and will be retained for at least ninety (90) days.

F4C will maintain a visitor sign-in and sign-out record at the facility entrance. The record will include visitors' name, address, firm name if applicable, date, time in and out, and the name of any authorized agents who will be escorting the visitor.

# **Waste Disposal Records**

In Accordance with 935 CMR 500.105(12)(d) F4C shall keep and maintain waste disposal records. All waste disposal shall be documented by no fewer than two F4C agents. The agents shall witness and document how the solid waste or organic material containing Marijuana is handled on-site including, but not limited to, the grinding up, mixing, storage and removal from the Marijuana Establishment. When Marijuana Products or waste is disposed

or handled, F4C shall create and maintain an electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names and signatures of the two F4C agents present during the disposal or handling. All waste disposal records shall be stored and maintained for at least three years unless specifically instructed otherwise by the CCC.

TO: Cannabis Control Commission

DATE: December 10, 2019

RE: Quality Control and Testing Procedures

PLAN:

# **General Policies**

Frozen 4 Corporation ("F4C") intends to provide Massachusetts consumers with adult use cannabis of the highest quality. F4C will do so by implementing strict operational controls, maintaining a sanitary and secure environment, and utilizing a commission approved independent testing laboratory.

All areas of the facility at 985 Plain Street including the entrances, storage areas, employee areas, and perimeter will be monitored daily for signs of contaminants such as mold, fungus and pests. All areas will be cleaned and maintained to varying degrees on a daily, weekly and monthly basis. If contamination occurs, F4C staff will remedy the contamination, relying on their individual expertise and on peer support, and executive direction.

F4C will meet or exceed sanitary guidelines required by 935 CMR 500.160. Staff will use locker rooms to transition into uniforms and store personal belongings before entering the facility.

In compliance with 935 CMR 500.105(3)(b)(4), F4C will adopt policies to instruct agents on how to move and where to store items during times of maintenance or sanitation. Under no circumstances will agents be permitted to remove items without permission. Under no circumstances will agents be permitted to store equipment, utensils or products on the floor or in any other unauthorized manner.

All agents shall be trained in accordance with the requirements for food handlers specified in 105 CMR 300.000. Specifically, any agent working in direct contact with marijuana shall conform to sanitary practices while on duty, including; (i) maintaining adequate personal cleanliness; and (ii) washing hands appropriately.

All of F4C's storage containers will be light shielding, airtight and secure to protect the finished products and the agents handling them. Storage and transportation of products will always occur under conditions that protect products against physical, chemical, and microbial contamination, as well as against deterioration of finished products or containers. Containers will be monitored for cleanliness and serviced as necessary.

# Structure and Utilities

F4C, with the assistance of its building and engineering team, will select interior materials such as floors, walls and ceilings that promote ease of cleaning and repair. In accordance with 935 CMR 500.105(3)(b)(6), F4C will keep each area of the facility clean and in good repair.

F4C's water source will be capable of providing a safe, potable, and adequate supply of water to meet or exceed the needs of the facility. F4C will ensure that plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility. Plumbing shall properly convey sewage and liquid disposable waste from the facility.

Along with the aid of third-party contractors, F4C will ensure there will be no cross-connections between the potable and waste water lines. F4C will strive to provide its agents and employees with areas to accommodate day to day needs. These areas may include but not limited to; break rooms, locker area, meeting rooms and readily accessible toilet facilities that are maintained in a sanitary condition and always in good repair.

F4C shall install hand-washing facilities within production areas and where good sanitary practices require employees to wash and sanitize their hands. Additionally, F4C shall provide employees with adequate, readily accessible toilet facilities. In accordance with 935 CMR 500.105(12) and 935 CMR 500.105(3) F4C shall ensure that all litter and waste is properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests.

F4C shall clean, maintain and sanitize all contact surfaces, as necessary to protect against contamination. F4C will ensure that any and all toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana.

Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination.

# **Quality Control**

F4C will maintain strict quality control policies, in doing so F4C shall ensure that only the leaves and flowers of the female marijuana plant are processed in a safe and sanitary manner as follows:

 All marijuana plant material and products shall be well cured and generally free from seeds and stems;

- All marijuana plant material and products shall be free of dirt, sand, debris, or any other foreign matter;
- All marijuana plant material and products shall be free of contamination by mold, rot, other fungus, and bacterial diseases;
- All marijuana plant material and products shall be prepared and handled on food-grade stainless steel tables; and
- All marijuana plant material and products shall be packaged in a secure area in accordance with 935 CMR 500.105(3).

F4C will not market or sell any marijuana product that is not capable of being tested by an Independent Testing Laboratory. F4C shall notify the CCC within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary.



Date: October 13, 2019

To: Benjamin Virga, Frozen 4 Corporation

From: Cannabis Community Care and Research Network (C3RN) and Cannabis Center of

Excellence (501c3)

Subject: Requested Letter for Donations

To the Cannabis Control Commission,

The Cannabis Community Care and Research Network (C3RN) is a Public Benefit Corporation that established a Cannabis Center of Excellence (501c3) that Frozen 4 Corporation intends to donate to.

C3RN has been in contact with and are willing to accept the donations that Frozen 4 Corporation intends to provide.

Marion McNabb, DrPH MPH

CEO

Cannabis Community Care and Research Network (C3RN)

TO: Cannabis Control Commission

DATE: February 20th, 2020

RE: Revised plan Maintaining Financial Records

#### PLAN:

F4C has adopted operating policies and procedures to ensure that financial records are accurate and maintained in compliance with 935 CMR 500.000. Financial records shall be maintained using the following principles:

#### Revenue

Any revenues earned by F4C will be tracked by LeafLogix and can be periodically exported. The CFO or a person working at his direction will provide and monitor all bookkeeping on a day-to-day basis, utilizing a financial tracking software that integrates with LeafLogix. F4C anticipates retaining a separate tax service to handle quarterly and annual tax filings.

On a day-to-day basis LeafLogix will track and record all sales from each order and delivery. At the close of business each day, F4C shall reconcile the daily sales from each order sheet or delivery manifest and shall record and initial this data into an electronic sales binder supported by LeafLogix.

### Confidentiality

Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the CCC may access this information to carry out its official duties.

### **Financial Record-keeping**

F4C shall adhere to the record-keeping requirements set forth at 935 CMR 500.105(9), including the following:

- Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles;
- 2. Maintaining a balance sheet reflecting all assets and liabilities;
- 3. Maintaining a record of all monetary transactions;
- 4. Maintaining a chart of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Tracking all compensation paid to each employee, including any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any;
- 6. Recording all sales to reflect the quantity, form, and cost of marijuana products sold, pursuant to CMR 500.140(6), including:
- Utilizing LeafLogix in conjunction with the CCC approved seed-to-sale software, Metrc,
- In consultation with the DOR, and a sales recording module approved by DOR;
- Complying with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding record-keeping requirements;

 Maintaining such records that would allow for the CCC and the DOR to audit and examine the books and records in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.

F4C will also separately maintain the following business records: (i) Declarations of insurance coverage and maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16); (ii) Records of all fees paid under 935 CMR 500.005 or any other section of the CCC's regulations; and (iii) Records of all fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the CCC's regulations.

F4C will use a POS system at all retail locations that is approved by the CCC and DOR. The POS equipment will be analyzed and inspected monthly, where findings of the inspection will be recorded and kept for reference, to ensure that no other software has been installed for the purpose of manipulating sales data. If the inspection determines that there has been software or alternate methods installed/utilized to manipulate sales data, the CCC will immediately be notified and F4C will cooperate with any investigation or recommended actions of the CCC.

F4C will also adopt separate accounting practices at POS for marijuana and non-marijuana sales

**TO: Cannabis Control Commission** 

**DATE: May 4th, 2021** 

RE: Revised Diversity Plan for May 2021 Renewals

# **Diversity Mission**

To encourage the entire community to participate in the Frozen 4 Corporation ("F4C") mission, and to establish specific, measurable goals to promote equity for minorities, women, veterans, LGBTQ+ and people with disabilities in the operation of F4C Delivery.

#### Vision

We strive to build a staff that reflects the racial, ethnic and cultural diversity of the community and our country. We will build lasting relationships with people from diverse backgrounds and will aspire to be a leader in promoting inclusion, equity and community engagement. We believe that our commitment to promoting diversity will inspire exceptional employee performance, enhance patient and customer experience and contribute to financial viability.

# **Five Key Elements**

- 1. Establish Ambitious Goals For Staff Diversity
- 2. Recruit, hire and retain a diverse staff
- 3. Increase staff awareness of the importance of inclusion and diversity
- 4. Conduct continuous outreach designed to engage diverse members of the community
- 5. Measure Engagement and participation against the diversity goals

# **Plan Summary**

#### Element No. 1: Establish Ambitious Goals.

F4C will strive to develop and maintain a diverse pool of candidates for participation in
the business of cultivation. Our intent is to build a workforce that is reflective of the
demographics of our community. Our workforce will include minorities, women, veterans,
people with disabilities, and members of the LGBTQ+ community in numbers at least
equal to those present within the community at large, if not more. We will conduct an

analysis of the community using public and private resources and will endeavor to improve our understanding of the community.

- F4C will establish goals to secure a diverse and qualified group of employees.
   These goals will include, at a minimum, the following.
- F4C will assure that not less than 50% of its employees will be representative of our diversity inclusions. F4C intends to target each demographic in percentages at least equal to the following: women (50%); minorities (20%); veterans (15%); LGBTQ (10%); people with disabilities (10%);
- F4C will count the number of individuals hired who are minorities, women, veterans, people with disabilities, and members of the LGBTQ+ community, and will assess this number from the total number of individuals hired to ensure that at least 50% of all individuals hired fall within this goal;
- F4C will ensure that all of its employees, including minorities, women, veterans, people with disabilities, and members of the LGBTQ+ community, are notified of and encouraged to apply for a promotion should a vacancy occur; and
- F4C will count the number of promotions earned by minorities, women, veterans, people with disabilities, and members of the LGBTQ+ community, and will assess this number from the total number of available promotions to ensure that at least 50% of all individuals promoted fall within this goal.

### Element No. 2: Recruit, Hire and Retain a Diverse Staff:

In order to attract and retain a diverse staff, F4C will engage in the activities listed below:

- F4C has formed a partnership with and will be providing financial support to the Cannabis Center for Excellence (CCE) non-profit. CCE and F4C will work together to recruit, hire and train a diverse staff in all aspects of F4C's cannabis business.
- Propose new partnerships with culturally diverse institutions, including Bristol Community College and Taunton Area School to Career Inc., with a focus on conducting targeted recruiting and hiring initiatives for candidates that will diversify the staff;
- At least 4 times a year (i.e. quarterly), provide specific opportunities for success within our diverse community, including job training, mentoring programs, and opportunities for promotion, provided further that all employees shall be eligible for mentoring and promotional opportunities;
- At least twice a year, offer business-relevant seminars to introduce diverse sectors of the
  workforce to technical skills (e.g. plant science, cultivation techniques, etc.) and
  analytical skills (e.g. financial accounting, inventory management, etc.), provided further
  that such seminars shall be available to not less than 200 individuals per seminar;

- Gather, compile and share demographic data, and reflect on any patterns or trends which appear in the data;
- Host career fairs at least 4 times a year (i.e. quarterly), in underrepresented and minority communities;
- Use online resources such as indeed.com, ziprecruiter.com and social media platforms to cast a wide search for diverse employees;
- At least monthly, create and distribute internal workplace newsletters to encourage current employees to recommend individuals that might advance the diversity and business performance objectives of the company;
- Contract with suppliers that demonstrate a commitment to diversity and inclusion;
- Establish procedures for diversity orientation and annual continuing education for all management and staff;
- Develop a consistent process for identifying, screening and interviewing candidates on issues relating to diversity and equity;
- Analyze exit surveys, and develop recommendations to improve retention and quality of staff:
- Implementation of a process to provide orientation to all new administrators on the topic of diversity/equity. Training topics will include, but not be limited to the following:
- Organize social and networking events each twice a year in an effort to build relationships and increase retention.

#### Element No. 3: Increase Staff Awareness

In order to increase staff awareness of the importance of inclusion and diversity, F4C will:

- Conduct quarterly reviews of the business to search for and remove barriers for people
  of diverse backgrounds, to ensure they have access to opportunities within the company;
- Develop collaborative workplace processes to provide first-hand experiences;
- Utilize instructional materials aligned to the company's business objectives in order to provide all employees with an understanding of how cultural differences might affect or enhance participation in the workplace;
- Create an environment of trust between management and staff as well as amongst peers and practices within the business;

- Hold an annual employee training to maintain awareness and to continue to promote diversity within the company. These trainings will see F4C focusing on a variety of topics, some of which are listed below;
  - Prevention of sexual orientation, gender, age and racial biases on institutional and individual levels
  - o Procedural overviews of EEO principled hiring, firing, and dispute management
  - Strategy for community and workplace civic engagement to build diverse & inclusive relationships
  - Privilege in leadership; closing the gap by maintaining a diverse management team
  - Improving corporate culture through analysis of how effectively F4C's core values integrate issues of cultural competency
- Develop a process and procedure to properly document and resolve any matters that may impact the diversity plan.

#### Element No. 4: Conduct Continuous Outreach

In order to engage diverse members of the community, F4C will:

- Encourage community participation in activities sponsored by the company, including community events, street fairs, job fairs, chamber of commerce events and the like;
- Participate in events sponsored by the host community;
- Engage in honest conversation with management and staff on a semiannual basis about issues that impact a diverse population; and
- Use print and electronic communication tools, including web and social media, to share information about the opportunities for employment and participation within the company.

#### Element No. 5 : Measurement

In order to measure outcomes against the diversity goals of the company, F4C will:

- At least annually evaluate the then-current process used for recruiting, hiring and retaining staff to determine whether the diversity plan is still effective;
- Collect and analyze data, including demographic information related to the composition of the workforce, and whether the company's plan is achieving its diversity objectives;

- Measure the number of individuals from the above-referenced demographic groups who were hired and retained after the issuance of a license;
- Measure the number of promotions for people falling into the above-referenced demographic groups since initial licensure;
- Measure the number of positions created since initial licensure;
- Measure the number and subject matter of trainings held, and track the number of individuals falling into the aforementioned demographic categories in attendance;
- Document the number and natures of employment outreach and community events and the individuals that attended, and retain copies of any materials distributed at such events;
- Publish such employment data, and at least annually, share that data with management, staff and the CCC;
- Establish a timeline, organized by month, to track F4C's progress in meeting its diversity goals;
- Document F4C's performance, in a writing suitable for submission to the CCC, within 90 days of its annual renewal date; and
- Develop a written plan for continuous improvement.

#### **Affirmative Statement**

In accordance with the Guidance on Required Positive Impact Plans and Diversity Plans (revised 2/25/19), Frozen 4 Corporation affirmatively states as follows: (1) The applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

TO: Cannabis Control Commission

DATE: April 20, 2021

**RE:** Maintaining Financial Records

#### **PLAN:**

F4C has adopted operating policies and procedures to ensure that financial records are accurate and maintained in compliance with 935 CMR 500.000. Financial records shall be maintained using the following principles:

#### Revenue

Any revenues earned by F4C will be tracked by Flowhub and can be periodically exported. The CFO or a person working at his direction will provide and monitor all bookkeeping on a day-to-day basis, utilizing a financial tracking software that integrates with Flowhub. F4C anticipates retaining a separate tax service to handle quarterly and annual tax filings.

On a day-to-day basis Flowhub will track and record all sales from each order and delivery. At the close of business each day, F4C shall reconcile the daily sales from each order sheet or delivery manifest and shall record and initial this data into an electronic sales binder supported by Flowhub.

### **Confidentiality**

Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the CCC may access this information to carry out its official duties.

# **Financial Record-keeping**

F4C shall adhere to the record-keeping requirements set forth at 935 CMR 500.105(9), including the following:

- 1. Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles;
- 2. Maintaining a balance sheet reflecting all assets and liabilities;
- 3. Maintaining a record of all monetary transactions;

- 4. Maintaining a chart of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Tracking all compensation paid to each employee, including any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any;
- 6. Recording all sales to reflect the quantity, form, and cost of marijuana products sold, pursuant to CMR 500.140(6), including:
  - Utilizing Flowhub in conjunction with the CCC approved seed-to-sale software,
     Metrc,
  - In consultation with the DOR, and a sales recording module approved by DOR;
  - Complying with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding record-keeping requirements;
  - Maintaining such records that would allow for the CCC and the DOR to audit and examine the books and records in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.

F4C will also separately maintain the following business records: (i) Declarations of insurance coverage and maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16); (ii) Records of all fees paid under 935 CMR 500.005 or any other section of the CCC's regulations; and (iii) Records of all fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the CCC's regulations.

TO: Cannabis Control Commission

DATE: April 22, 2021

RE: Record keeping procedures

#### PLAN:

With guidance from its CEO and CFO, F4C will maintain all records in compliance with 935 CMR 500.105 (8) and (9).

Inventory and vendor history will be securely stored and updated using Flowhub. Inventory and vendor documentation received in paper form will be maintained and secured in a limited access area, available only to authorized F4C personnel.

Flowhub and Metrc seed-to-sale software will allow appropriate F4C staff members to reference detailed records regarding current and past inventory and transportation of marijuana or MIPs. Flowhub will accurately and efficiently track and record any additional data relative to inventory, sale and security.

Employee records will be regularly maintained to satisfy the requirements outlined in 935 CMR 500.105(9)(d). Corporate documents, accounting information and other required documentation, as expressed in 935 CMR 500.105(9)(e) will be securely maintained in a locked fireproof file cabinet and available upon request from the CCC. Provisional certificates, final certificates and any other certifications of the establishment shall be posted in a conspicuous place on the sales floor of the establishment.

All digital records will be redundantly backed up to a cloud-based encrypted secure server, thereby ensuring the integrity of F4C records in the event of a technological failure. The server will be maintained by a third-party IT company.

Where necessary, paper documentation will be stored in secure, fireproof cabinets located available only to authorized F4C personnel.

TO: Cannabis Control Commission

DATE: April 22, 2021

**RE:** Quality Control and Testing Procedures

PLAN:

### **General Policies**

Frozen 4 Corporation ("F4C") intends to provide Massachusetts consumers with adult use cannabis of the highest quality. F4C will do so by implementing strict operational controls, maintaining a sanitary and secure environment, and utilizing a commission approved independent testing laboratory.

All areas of the facility at 985 Plain Street including the sales floor, entrances, storage areas, employee areas, and perimeter will be monitored daily for signs of contaminants such as mold, fungus and pests. All areas will be cleaned and maintained to varying degrees on a daily, weekly and monthly basis. If contamination occurs, F4C staff will remedy the contamination, relying on their individual expertise and on peer support, and executive direction.

F4C will meet or exceed sanitary guidelines required by 935 CMR 500.160. Staff will use locker rooms to transition into uniforms and store personal belongings before entering the retail area.

In compliance with 935 CMR 500.105(3)(b)(4), F4C will adopt policies to instruct agents on how to move and where to store items during times of maintenance or sanitation. Under no circumstances will agents be permitted to remove items without permission. Under no circumstances will agents be permitted to store equipment, utensils or products on the floor or in any other unauthorized manner.

All of F4C's storage containers will be light shielding, air tight and secure to protect the finished products and the agents handling them. Storage and transportation of products will always occur under conditions that protect products against physical, chemical, and microbial contamination, as well as against deterioration of finished products or containers. Containers will be monitored for cleanliness and serviced as necessary.

#### **Structure and Utilities**

F4C, with the assistance of its building and engineering team, will select interior materials such as floors, walls and ceilings that promote ease of cleaning and repair. In accordance with 935 CMR 500.105(3)(b)(6), F4C will keep each area of the facility clean and in good repair.

F4C's water source will be capable of providing a safe, potable, and adequate supply of water to meet or exceed the needs of the facility. F4C will ensure that plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to

required locations throughout the facility. Plumbing shall properly convey sewage and liquid disposable waste from the facility.

Along with the aid of third-party contractors, F4C will ensure there will be no cross-connections between the potable and waste water lines. F4C will strive to provide its agents and employees with areas to accommodate day to day needs. These areas may include but not limited to; break rooms, locker area, meeting rooms and readily accessible toilet facilities that are maintained in a sanitary condition and always in good repair.

TO: Cannabis Control Commission

FROM: Frozen 4 Corporation

DATE: April 21, 2021

**RE:** Summary of Personnel Policies and Procedures

# **Executive Management**

<u>President</u>: The President shall provide overall leadership and vision for F4C. The President will work with and support the executive management team and employees to ensure that F4C is setting reasonable business and community benchmarks, achieving its goals and fulfilling its mission. President duties shall include the following:

- Develop protocols to attract, hire, advance, discipline and terminate employees and volunteers as needed to support F4C's operations;
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Ensure compliance with all workplace policy laws and requirements;
- Ensure compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- Prepare and amend from time to time a plan to ensure ongoing compliance with the provisions of 935 CMR 500.101(1)(c)(7);
- Keep and maintain all F4C records, and making such records available for inspection by the Commission, upon its request, in accordance with 935 CMR 500.105(9);
- Working with the executive management team to implement a plan to prevent the diversion of product in accordance with the applicable regulations, including 935 CMR 500.101 and 935 CMR 500.105;
- Ensure that such anti-diversion plan incorporate the use of video monitoring, employee training, written guidance to employees, executive supervision and physical inspection of the premises, among other tactics;
- Working with the executive management team to implement a diversity plan to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations;
- Ensure that each member of the executive management team shall attest by his signature that he has read and understands the requirements of 935 CMR 500.000 et seq., and shall keep a copy of such attestation within the books and records of F4C;
- Lead F4C's interactions with state regulators and municipal officials; and
- Working as the team leader with other executives and employees, to review F4C's business and community objectives, and implement plans to achieve those objectives.

<u>Director of Compliance</u>: The Director of Compliance will assess, design, implement and evaluate compliance programs and initiatives for all of F4's facilities. They will conduct internal audits and inspections to support corporate initiatives and state and local regulations. The Director of

Compliance will maintain, implement, review and amend security and compliance policies as required by the business.

Director of Compliance duties shall include the following:

- Provide feedback, coaching and performance management to employees when necessary, and in line with the company's core competencies and core values.
- Assist in the design, floor plan and Equipment selection in the extraction and MIP department.
- Assist the Director of Products, cultivation, extraction and MIP personnel to design and implement new products and document SOPs.
- Create and update SOPs throughout the company for compliance with regulations and optimal operational workflow.
- Create and document testing workflows both internally and with 3rd party vendors for all cannabis products.
- Develop policies, strategies and procedures related to regulatory compliance in coordination with department heads and organization leaders; implement policies, strategies and procedures as directed
- Implement preventative measures and corrective action in the event of compliance concerns
- Lead and conduct audits including development of SOP's, perform audit work steps, document and report findings, and develop and implement appropriate corrective actions
- Take a proactive compliance view of the organization and provide preventative measures to ensure the organization is compliant with all regulatory requirements
- Collect and analyze data to define and understand problems and perform research to identify root causes
- Evaluate and perform alternative procedures to make timely and appropriate recommendations as necessary
- Perform qualitative and quantitative data analyses to build presentations for organization leaders
- Interface with regulatory agencies to ensure organization is in compliance with all federal, state and local regulations
- Motivate team members and represent compliance department across entire organization with effective communication
- Establish and develop strong relationships across the organization, providing a consultative approach to communicate compliance initiatives
- Participate on regulatory stakeholder, industry and other relevant work groups
- Comply with regulations and requirements associated with health, safety and environmental protections

- Ensure the correct use of safety devices and protective equipment as required and report any hazards, accidents or injuries as required by company policy
- Other duties as assigned (related to compliance matters) as directed by the CEO, COO or CFO
- Ensure compliance with all provisions of 935 CMR 500.110;
- Review and ensure proper maintenance of all security apparatus, including physical, human and technological security methods and equipment;
- In the event of any suspected diversion incident, perform an internal audit, referencing video surveillance, and product tracking software, to locate the time, place and agent involved with the discrepancy, and document and report in accordance with 935 CMR 500.110(1)(m)

<u>Director of Products</u>: The Director of Products is responsible for the supervision and coordination of all staff related work involved in the cultivating, extracting and processing of all Bud & Mary's (B&M) products as well as helping to create and then implementing all SOP's for all of the Cultivation and Product Manufacturing facilities within B&M's operations. Director of Products duties shall include the following:

- Provide feedback, coaching and performance management to employees when necessary, and in line with the company's core competencies and core values
- To learn and help develop the long-term vision for the company's product; a key driver of planning, strategy, and product innovation
- Optimize the overall operations of a typical infused product manufacturing facility
- Collaborate deeply with engineering throughout the product development process
- Assist in the creation and implementation all of the specific SOP's required for the cultivation and product manufacturing aspects of F4 in coordination with the Director of Compliance
- Work with the Director of Compliance to create and implement a staff training program
  to educate all new hires on the compliance related aspects of their day to day work
- Work closely with sales data and other F4 teams to design efficient, creative solutions for consumer products
- Design and carry out initiatives that drive revenue and user retention
- Take ownership of our growth key performance indicators (KPIs) and work closely with our engineering, sales, marketing, and customer success teams to achieve company growth targets
- Cultivate a deep understanding of technology trends, as well as industry insights and the competitive landscape
- Work with the CEO, COO and CFO to create realistic quarterly and annual production level goals for all product lines within the cultivation and product manufacturing divisions of B&M

- Assist in launching new products and maintaining efficient processes for successful projects
- Assist with demand-based production schedules and quality control
- Interact and ensure smooth transition from sourcing to packing operations meeting all internal company and customer quality standards
- Work with Production staff to produce finished goods, including vape products, edibles, concentrates and other infused cannabis products while maintaining safety, quality and capacity standards
- Assist with developing policies guiding productivity, quality, and cost efficiency of plant operations
- Utilize systems to collect metrics, analyze productivity and set performance targets that will meet revenue and cost goals
- Ensure robust plant safety, security procedures and training are in place to follow all required regulations
- Perform all duties as assigned and the business demands

<u>Director of Retail:</u> The Director of Retail shall manage all retail day-to-day operations, including the training and education of all retail staff, and handling, transfer, storage of products within the retail space. The Director of Retail shall serve as a supervisor to all aspects of the retail facility. Director of Retail duties shall include the following:

- Develop, oversee and execute a staffing plan and certain hiring protocols;
- Develop and implement personnel policies and procedures;
- Prepare and amend from time to time a set of detailed written operating procedures to ensure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Prepare and amend from time to time a plan to ensure ongoing compliance with the provisions of 935 CMR 500.101(1)(c)(7);
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Ensure compliance with all workplace policy laws and requirements;
- Ensure that all equipment, fixture and furniture is in working order;
- Ensure that employees comply with all security protocols;
- Participate in developing and supervising all logistics, in collaboration with the Director of Inventory & Data Management, CEO and other executives and employees, as required by 935 CMR 500.101(1)(c)(7);
- In collaboration with the CEO and other members of the executive management team, assuring that F4C remains compliant with all general operational requirements as set forth at 935 CMR 500.105; and
- Reporting to the CEO and other members of the executive management team with respect to general operations.

<u>Director of Inventory & Data Management:</u> The Director of Inventory and Data Management will be responsible for the framework, policies and procedures regarding the inventorying, storage and tracking of all cannabis plants and products at all B&M locations. The Director of Inventory & Data Management duties shall include:

- Providing feedback, coaching and performance management to employees when necessary and in line with the company's core competencies and values.
- In collaboration with the Director of Compliance, Director of Retail, President and CEO, upholding the regulations set forth by the Cannabis Control Commission in 935 CMR 500.105(8-9)
- Coordinating with the Director of Compliance and Director of Retail to create and implement SOPs and establish best practices/policies to conduct inventory audits (monthly, quarterly) and cycle counts (monthly) and any other inventory related SOPs
- In collaboration with the Director of Compliance help to design, implement and manage the initial home delivery operations of the company.
- Communicating with the CEO, President and Director of Products to provide updates on inventory, reporting, planning and sales forecasting
- Presenting concise inventory reports to appropriate executive team members
- Maintaining all records relating to inventory including storage, transfer, audits, packaging, current and historical stock levels, product demand, and other records as required by both the Company and the state of Massachusetts
- Implementing compliant documentation and tracking protocols for the acquisition, sale, disposal, and ending inventory counts on a daily/monthly basis
- Establishing protocols and building out a team to ensure that all cannabis product is properly packaged, stored, labeled, maintained, and recorded within electronic (METRC) and physical inventory systems
- Generating shipping/receiving manifests for dispensary orders
- Coordination with Director of Retail and the Director of Products to ensure that product stock is adequate for direct customer demand and all distribution channels
- Training staff and reviewing regulations consistently to ensure the team has a clear understanding of requirements.
- Evaluating suppliers to achieve cost-effective deals and maintaining trust within a working relationship
- Placing orders to replenish stock, avoiding excess surplus or inefficiencies through working with other departments to communicate needs, and finding additional cost savings in multiple categories
- Working with the dispensary employees to ensure best inventory practices
- Keeping records of adjustments and reasons for data analysis
- Performing other duties related to inventory and data matters or as the business demands per direction of the CEO, COO or CFO

<u>Chief Financial Officer:</u> The CFO is responsible for handing all financial aspects of the company, including the following tasks:

- Maintenance of financial records including purchase orders;
- Profit and loss projections;
- Cash management and financial reporting;
- Budget management;
- Payroll funding and management;
- Hiring of tax, accounting, payroll, legal and other professional services;
- Generating reports regarding gross sales, on a daily, monthly and annual basis, in a form and manner determined by the CEO.

# Employees<sup>1</sup>

Retail Supervisor: The Retail Supervisor is responsible for overseeing, assisting and coaching all retail employees and ensuring smooth, compliant and consistent operations throughout their shifts. The Retail Supervisor should be a highly motivated critical thinker and hands-on individual that takes initiative to problem solve and support all staff members. The Retail Supervisor will work closely with management to support, develop and implement best practices and communicate flaws in daily processes. The Supervisor will be trained to work in all areas of the dispensary and may cover different positions as needed. The ability to keep a positive and supportive attitude while working in an occasionally stressful environment is paramount to the success of this position, as the Supervisor may be the direct contact between Budtenders, Inventory Specialists, Security, Delivery and Management. This position reports to the Director of Retail. Duties include:

- Maintaining a positive and courteous attitude and high level of professionalism at all times
- Providing leadership to all departments
- Opening and closing duties such as counting the safe, starting and closing cash drawers, creating bank deposits and ensuring enough change is available for registers
- Monitoring staff arrivals to ensure all positions are on time for their scheduled shifts
- Relaying information to Budtenders regarding new products added to the menu
- Assisting with setup of products on the sales floor as needed
- Assisting the Inventory Specialist with digitally and physically moving cannabis products from the vault to the sales floor
- Merchandising of non-cannabis products
- Monitoring par levels of both cannabis products and non-cannabis merchandise

<sup>&</sup>lt;sup>1</sup> As used in these Personnel Policies and Procedures, the term "employee" shall mean all registered agents, board members, directors, employees, executives, managers and volunteers or associated with any F4C facility, as further defined at 935 CMR 500.030(1), but shall not include third-party contractors. The pronouns "he" and "his" will refer to persons of both genders.

- Monitoring and updating menu descriptions for accuracy as needed on all platforms (POS, Dutchie, paper menus)
- Assisting Inventory Specialist with fulfillment of kiosk express orders and pre-orders
- Assisting Inventory Specialist with receiving, organizing and storing new product shipments both physically and digitally
- Participating in weekly communications meetings with management
- Performing audits of cannabis products, accessories and other merchandise as needed
- Performing sales transactions during peak business hours
- Covering Budtender, Greeter and Inventory Specialist's lunch breaks as needed
- Answering phone and web inquiries
- Handling returns and exchanges at the POS
- Completing RVT training as mandated by 935 CMR 500.105(2)

<u>Senior Budtender:</u> The Senior Budtender leads by example and works with Supervisors and Management to guide the Budtender team throughout daily operations. Senior Budtenders are expected to have superior knowledge of all cannabis products and accessories sold in the retail environment and possess the ability to educate other staff members on new products and accessories added to the menu. The Senior Budtender has a clear understanding of all policies, procedures and state regulations for dispensing cannabis products and ensures that the Budtender team stays compliant and knowledgeable. This position reports to the Director of Retail. Duties include:

- Welcoming customers warmly upon entrance to the store
- Maintaining a positive and professional attitude at all times
- Overseeing the POS area and assisting Budtenders with questions
- Verifying customer's state issued ID before each transaction
- Guiding customers through their purchases by answering menu and accessory questions accurately as to build a lasting relationship with clientele
- Packaging products at the point of sale in an approved child-resistant package in compliance with 935 CMR 500.105(5)
- Contributing positively to the culture and ideals of the company
- Keeping a clean, organized and compliant product storage area and register
- Using computers, tablets or other technology to complete sales transactions in compliance with 935 CMR 500.105(8)
- Restocking accessories and other supplies for sales displays and POS
- Performing daily inventory audits on cannabis products and accessories
- Continuing education and RVT training as required by 935 CMR 500.105(2)
- Daily opening and closing duties such as stocking, counting cash drawers and deposits, organizing products compliantly, dusting, sweeping and mopping
- Answering phone and web inquiries

- Being a team player and assisting fellow employees when needed
- Ensure compliance with 935 CMR 500.105(3), requirements for safe handling of marijuana.

Express Budtender: Express Budtenders process all pre-order and in-store express kiosk orders made by our customers in an expedited manner to create the fastest positive experience for our customers. Express Budtenders are expected to have superior knowledge of all cannabis products and accessories sold in the retail environment along with exceptional customer service skills. Understanding of all policies, procedures and state regulations for dispensing cannabis products along with excellent product knowledge and maintaining an efficient service speed are the most important components to the job. This position reports to the Director of Retail. Duties include:

- Welcoming customers warmly upon entrance to the store
- Maintaining a positive and professional attitude at all times
- Verifying customer's state issued ID before each transaction
- Verifying customer's pre-packaged orders for accuracy and working with the Inventory
   Specialist to quickly fix any incorrect products that may have been gathered
- Quickly and efficiently addressing any customer inquiries regarding orders
- Contributing positively to the culture and ideals of the company
- Keeping a clean, organized and compliant product storage area and register
- Using computers, tablets or other technology to complete sales transactions, in compliance with 935 CMR 500.105(8)
- Restocking accessories and other supplies for sales displays and POS areas
- Performing daily inventory audits on cannabis products and accessories
- Continuing education and RVT training as required by management and State regulations, as required by 935 CMR 500.105(2)
- Daily opening and closing duties such as stocking, counting cash drawers and deposits, organizing products compliantly, dusting, sweeping and mopping
- Answering phone and web inquiries
- Being a team player and assisting fellow employees when needed
- Packaging sales orders compliantly for exit, in compliance with 935 CMR 500.105(5)
- Working with the Inventory Specialist to reallocate products from pre orders that do not get picked up on the same day the order was placed
- Ensure compliance with 935 CMR 500.105(3), requirements for safe handling of marijuana.

<u>Greeter/Security Associate:</u> The Greeter/Security Associate is the first employee the customer will encounter upon every visit to our dispensary. The Greeter/Security Associate must present a friendly and outgoing demeanor while welcoming each customer and facilitating a compliant

guest check in procedure. The Greeter/Security Associate helps with customer inquiries while managing the order and wait time of the outside and/or inside customer queue and is responsible for simultaneously keeping close surveillance of the parking lot and building perimeter. The Greeter/Security Associate is expected to have a basic knowledge of all cannabis products and accessories sold in the retail environment along with strong interpersonal and customer service skills. The Greeter/Security Associate must understand all policies, procedures and state regulations to ensure no persons under the age of 21 are allowed entrance to the dispensary. This position reports to the Director of Retail. Duties include:

- Welcoming customers warmly upon entrance to the store
- Maintaining a positive and professional attitude at all times
- Verifying customer's state issued ID with The Nug to ensure all Government issued ID's are valid and no entrance to persons under the age of 21 is permitted
- Guiding customers through their purchases by answering menu and accessory questions before customers get to the POS for faster transaction times
- Contributing positively to the culture and ideals of the company
- Keeping the sales floor clean and merchandise organized
- Restocking accessories and other supplies for sales displays and POS area
- Keeping parking lot and sidewalk areas clean and free of debris and trash throughout the shift
- Monitoring parking lot and store perimeter for loitering or any activities that could be deemed concerning or non compliant
- Managing the flow of traffic in and out of the parking lot and assisting incoming cars with locating open parking spots
- Assuring that customers parked in designated pre-order pickup spots have a pre-order confirmation email before entrance to the store
- Performing daily inventory audits on cannabis products and accessories
- Continuing education and RVT training as required by management and State regulations
- Daily opening and closing duties such as picking up debris or trash from parking lot and sales floor, stocking, organizing products compliantly, dusting, sweeping and mopping
- Answering phone and web inquiries
- Being a team player and assisting fellow employees when needed

<u>Inventory Specialist:</u> The Inventory Specialist is the gatekeeper between the products stored in the vault and products moved to the sales floor. It is critical that the Inventory Specialist have exemplary attention to detail, organization skills and the ability to multitask. The Inventory Specialist will perform daily audits, assist in opening and closing product setup of the sales floor, fulfill express kiosk and pre-order sales, enter new product orders into both METRC and the POS system, and assist management with reporting. Understanding all State regulations regarding

the labeling and packaging of cannabis products and ensuring compliance in all aspects pertaining to the inventory are the most important components of this job. The Inventory Specialist must be a self motivator and someone who takes initiative to identify, report and fix inaccuracies or problem solve and investigate discrepancies within the physical inventory and digital tracking systems. This position reports to the Director of Inventory & Data. Duties include:

- Maintaining a positive and professional attitude at all times
- Performing daily audits of the product vault
- Assisting in opening and closing setup of the sales floor products
- Moving products digitally and physically from the vault to the sales floor to refresh inventory levels throughout the day
- Fulfilling customer's kiosk express orders and Dutchie pre-orders in an accurate and timely manner
- Ensuring all product and POS system menus have matching current and accurate testing information, pictures and product descriptions
- Receiving, inspecting for damage, counting, organizing and storing new product deliveries compliantly upon arrival
- Inspecting all inventory labels and packaging to ensure compliance
- Using a digital scale to weigh incoming and outgoing shipments
- Preparing and storing delivery manifests
- Storing and recording quarantined and to-be-destroyed cannabis products compliantly in accordance with 935 CMR 500.105(12)
- Working closely with management to ensure product par levels are maintained and expiration dates of products are monitored
- Generating labels for both cannabis products and accessories to be scanned into the POS system
- Dusting, sweeping or mopping as needed to ensure a clean and orderly vault
- Completing METRC and RVT training as required by 935 CMR 500.105(2)

<u>Security Manager</u>: This position is responsible for assisting the President and the Director of Compliance with the design and implementation of the security policies and procedures for F4. The Security Manager will maintain, implement, review, and amend such policies as required by the business due to growth, development and/or revised CCC based guidelines. The Security Manager will work closely with the Director of Compliance and Director of Retail on all aspects of F4's Security based policies and procedures. This position directly reports to the President of B&M. Duties include:

- Monitor alarm systems, doors, interior and exterior video cameras, motion sensors and related technology;
- Assure that all employees and others accessing the facility have the appropriate credentials and identification;

- Assure that only properly authorized individuals are able to gain access to the facility;
- Lead F4C's response in the event of fire, theft, intrusion or other threat to health and safety at the facility;
- Respond and investigate security situations and alarm calls;
- Clearly document incidents and details surrounding the incident in a written report for the Director of Compliance;
- Monitor all employee entrances to the facility;
- Maintain log books; and
- Provide escorted access as required in restricted areas. Maintain a friendly, courteous and compassionate demeanor at all times. Adhere to company mission statement, core values, and core competencies while maintaining high ethical standards and professionalism
- Provide feedback, coaching and performance management to employees when necessary, and in line with the company's core competencies and core values
- Ensure compliance with all provisions of 935 CMR 500.110
- Review and ensure proper maintenance of all security apparatus, including physical, human, and technological security methods and equipment
- Interact with state inspectors and municipal law enforcement authorities
- Train and supervise security associates. Provide feedback, coaching and performance management to employees when necessary, and in line with the company's core competencies and core values
- Help to design and then implement a comprehensive plan for educating employees on the strict-anti diversion policy
- Develop, review, and supervise the process for reporting security incidents
- Prepare reports, in written and electronic form, relative to the maintenance of security at the company and generate any reports required by regulation to be provided to state regulators or law enforcement
- Maintain current list of all authorized and registered employees
- Maintain current list of all employees authorized to access designated areas of the facility
- Participate in a working group with the COO, Director of Compliance, and other
  designated personnel to ensure that current policies and procedures are properly
  implemented, integrated, effective, and relevant to ensure the safety of employees and
  assets
- Confirm with the Director of People Operations that all personnel complete and satisfy all background checks and requirements prior to performing any company functionality
- Provide staffing, shift change, and general oversight of security operations
- In the event of any suspected diversion incident, perform an internal audit, referencing video surveillance and product tracking software to locate the time, place, and agent

- involved with the discrepancy- document and report in accordance with 935 CMR 500.110 (1)(m)
- Perform all duties as assigned and the business demands

### **Personnel Records**

Personnel records for each employee will be maintained for at least twelve (12) months after employee separation from the company. The following records will be kept within locked file cabinets within the retail store or at our Headquarters, unless specified otherwise:

- 1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions
- 2. A personnel record for each marijuana establishment Agent.
  - a. Such records shall be maintained during employment and for at least 12 months after termination of an individual's affiliation with F4 and shall include, at a minimum, the following:
    - All materials submitted to the Commission pursuant to 935 CMR 500.030(2)
    - ii. Documentation of reference verification
    - iii. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
    - iv. Documentation of all required training and acknowledgments. This includes training regarding privacy and confidentiality requirements and the signed statement of the individual indicating the date, time, and place he or she received said training with the topics discussed as well as the name and title of presenters
    - v. Documentation of periodic performance evaluations
    - vi. A record of any disciplinary action taken
    - vii. Notice of completed responsible vendor training and eight-hour related duty training.

#### **Professional Conduct**

## **Standards of Conduct**

F4C is committed to maintaining an environment conducive to the health and well-being of customers, employees and the community. F4C shall endeavor to provide a workplace free from harassment, bullying or discrimination. F4C will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity or any other trait or characteristic protected by law. Harassment or discrimination on the basis of any protected trait or characteristic is contrary to F4C's values and

shall provide grounds for discipline, up to and including termination. F4C policies shall prohibit any physical or verbal conduct that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an employee's work performance; or
- Adversely affects an employee's employment opportunities.

All F4C employees shall maintain the highest degree of professional behavior. Harassment or discrimination by or against employees is strictly prohibited, and the CEO shall promptly address any offending conduct.

## **At-Will Employment**

Unless otherwise specified in a signed writing executed by the CEO and the employee, employment at F4C shall be at-will. The employer and employee alike may terminate the work relationship at any given moment and for any legitimate purpose. Each party reserves the right to end the employment.

## Workplace Attire

The following are a list of policies as it relates to work attire to be followed by all employees while working in the retail store:

- NO OPEN-TOED SHOES/SANDALS
- 2. PROHIBITED CLOTHING:
  - a. Sweatpants
  - b. Tank tops
  - c. Shirts with holes or tears
  - d. Clothing with offensive messages or graphics
  - e. Bare midriffs
  - f. Skirts/dresses above knee length
  - g. See-through clothing
  - h. Clothing with large brand names displayed

Yoga pants and fashionable ripped jeans are acceptable.

## **Business Hours**

The retail facility shall have the following hours of operation:

Monday: 10:00 am – 9:00 pm

Tuesday: 10:00 am - 9:00 pm Wednesday: 10:00 am - 9:00 pm Thursday: 10:00 am - 9:00 pm Friday: 10:00 am - 9:00 pm Saturday: 10:00 am - 9:00 pm Sunday: 12:00 pm - 8:00 pm

Emergency contact information:

Benjamin C. Virga, President & CEO

Phone: 617-990-6653

Email: <a href="mailto:bvirga@budmarys.com">bvirga@budmarys.com</a>

Andrea Barone, Director of Compliance

Phone: 203-907-5724

Email: abarone@budmarys.com

Marissa Lederman, Director of Retail

Phone: 781-962-2266

Email: mlederman@budmarys.com

## **Compensation and Employment Practices**

## **Standard Employment Practices**

F4C offers competitive wage and benefits packages, and shall develop a workplace culture that values work-life balance, transparent and accessible management, and a work ethic consistent with the cannabis program in Massachusetts.

#### Compensation

Compensation shall be negotiated on an individual basis. F4C shall determine compensation based on the prevailing wage in the marketplace. Compensation shall account for skill, experience, education, work history and other lawful criteria as determined by F4C. The CEO and the executive management team shall determine compensation rates. F4C shall at all times comply with applicable state and federal law in determining employee compensation.

## Compliance with Law and Regulation

F4C's written policies shall adhere to applicable federal and state laws, including but not limited to the Family and Medical Leave Act, the Consolidated Omnibus Budget Reconciliation Act, the Equal Employment Opportunity Act, the Employee Retirement Income Security Act, the

Americans with Disabilities Act, 935 CMR 500.000 et. seq., and with laws pertaining to holidays, work hours, personal time, paid time off, confidentiality and workplace safety. The executive management team oversees company compliance, and the CEO shall implement company policies and procedures.

## **Work Schedules**

Work schedules shall be part-time or full-time. Schedules will be set and classified according to the demands of the business. F4C shall develop and implement work schedules that provide necessary duty and personnel coverage. F4C shall determine work schedules to ensure adequate coverage on a daily basis, and to diminish the likelihood of duplicate staffing or overtime coverage.

## **Performance Reviews**

At least annually, all employees shall receive performance reviews. A written review, in a form determined by the CEO, shall accompany each employee review. Such review shall be signed by the employee, and shall be retained in the personnel files of the company. As determined by the CEO, reviews shall provide a reasonable evaluation of employee performance, and may include scoring metrics, narrative content and other performance methodologies.

### Vacation, Paid Leave and Family Leave Policies

F4C leave policies will comply with all applicable state and federal statutes. All full-time employees will receive two 40-hour weeks of paid vacation annually. Leave must be requested at least two weeks in advance and approved by the CEO or designee. F4C anticipates observing all national holidays, and will elect on an annual basis whether to observe state holidays.

#### Disciplinary Policy

F4C has adopted a disciplinary policy designed to provide a graduated series of corrective actions. This policy, called the "Steps" policy, is intended to improve employee performance, promote the maintenance of a cohesive and productive workplace, and prevent recurring adverse behaviors. In addressing disciplinary matters, F4C shall apply the steps described below:

### Step 1: Individual Advice and Counsel

A member of the executive management team shall individually discuss the subject conduct with the employee. The executive shall identify the offending conduct, and clearly outline company expectations for resolution.

## Step 2: Written Warning

Within seven (7) days of the discussion described in Step 1, the executive will prepare a document characterizing the discussion, and will provide a copy of the document to the

employee. The employee will sign the document, a copy of which F4C will maintain in the personnel file.

### Step 3: Final Written Warning

Should the offending conduct persist or recur, a member of the executive management team will prepare a document characterizing the offending conduct, and will provide a copy of the document to the employee. The document may include witness statements or reference other evidence. The document will state "Final Warning" in prominent text. The employee will sign the document, a copy of which F4C will maintain in the personnel file. If the executive finds the offending conduct problematic, disruptive and/or harmful, or threatens the health or safety of other employees, the executive may recommend to the CEO that the employee be removed from the workplace. The CEO shall act on any such recommendation within forty-eight (48) hours.

# Step 4: Termination of Employment

The last step is termination of employment. F4C reserves the right to terminate if, notwithstanding the steps set forth above, employee conduct fails to comply with F4C policies and procedures. F4C reserves the right to terminate without prior notice or disciplinary action. The CEO must approve termination in writing, a copy of which F4C will maintain in the personnel file.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor shall anything in this policy be construed as modifying or altering the at-will employment relationship established between F4C and its employees.

## Conduct Not Subject to "Steps" Disciplinary Policy

Illegal behavior is not subject to the "Steps" policy, and may be reported to local law enforcement. Intoxication, physical harassment, sexual harassment, bullying, theft, misappropriation of intellectual property and like behaviors shall not be subject to the "Steps" policy and may be grounds for immediate termination.

## Separation of Employment

A separating employee may contact the CEO or other supervising authority to schedule an exit interview. F4C reserves the right to refuse any such interview. The interview, if any, shall occur on or after the employee's last day of work.

#### Company Property

A separating employee must return all company property at the time of separation, including but not limited to uniforms, cell phones, keys, computers, and identification cards. Failure to return items may result in deductions from final paycheck. An employee may be required to sign a wage deduction authorization form to facilitate the deduction of the cost of unreturned items from the final paycheck.

## <u>Termination of Employee Benefits</u>

An employee separating from F4C is eligible to receive benefits as long as the appropriate procedures are followed as stated above. Two weeks' notice must be given, and the employee must work the full two work weeks. Accrued vacation leave will be paid in the last paycheck. Accrued sick leave will be paid in the last paycheck.

## **COBRA Health Insurance**

Health insurance terminates on the last day of the month of employment, unless the employee requests immediate termination of benefits. F4C shall provide information about employee rights under the Consolidated Omnibus Budget Reconciliation Act (COBRA) relative to the continuation of health insurance coverage.

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

DATE: April 22, 2021

RE: Qualifications and Training

## **PLAN:**

Employee training is a critical component of F4C's operation and success. The company's executive team is responsible for the development and execution of the F4C training plan. Pursuant to 935 CMR 500.105(1), training is tailored to the roles, responsibilities and job functions of each Marijuana Establishment agent, and includes at a minimum a Responsible Vendor Program as described under 935 CMR 500.105(2)(b).

No employee or consultant may work on-site prior to receiving required orientation training. No employee or consultant may work on-site if any training module is 8 weeks or more past due. F4C shall maintain records of responsible vendor training program compliance, for each employee, for four years, and shall make such records available to inspection by the Commission upon request during normal business hours.

F4C does not discriminate in hiring or operating decisions. All managers and supervisors must comply with all applicable EEOC and MCAD guidelines when managing personnel issues. All F4C policies and practices are designed to prevent discriminate based on race, color, height or weight, gender, sexual orientation, religious affiliation, marital status, disability or medical condition.

F4C will hire its staff in accordance with a staffing plan reviewed and approved by its executive team and the Commission in connection with F4C's final certificate of registration. The staffing plan will adhere to all goals detailed within the Diversity Plan as well as the Plan for Positive Impact. All executives and officers will disclose education and employment history, as required by the Commission and Massachusetts law, and will continue to update such information from time to time as required by Massachusetts law and regulation.

All Marijuana Establishment agents must be 21 years of age or older, and must satisfy the background and CORI checks required by Massachusetts law and regulation.

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

DATE: April 22, 2021

RE: Restricting access to people under the age of 21

## PLAN:

Prior to gaining access to the facility at 985 Plain Street, individuals must show a photo identification to a security associate equipped with an ID verification device (The Nug by Flowhub) to ensure that the individual is over the age of 21 years. All F4C security agents will need to complete the Responsible Vendor Training Program in a manner determined by the Commission.

F4C will also work with town officials, including the police department to assure that no diversion to minors occurs. F4C will work with the police department to ensure that Mass. Gen. Laws Ch. 161 Sec. 95 pertaining to loitering is strictly enforced.

In compliance with 935 CMR 500.105(4)(b)(2-4), F4C will not market, advertise or brand in a manner that might target or attract individuals under the age of 21 years.

FROM: Frozen 4 Corporation

TO: Cannabis Control Commission

**DATE:** April 26th, 2021

RE: Plans for Positive Impact & Diversity for renewal of #MR282881

All Massachusetts Adult-Use Marijuana operations were suspended under the cease and desist order given by CCC & Governor Baker due to COVID-19 restrictions and shut downs in March 2020 that lasted until May 2020; during this time, any hiring and construction activities on the facility were delayed and our provisional inspection for final licensure was not scheduled. Additionally, in May of 2020, Frozen 4 Corporation (F4C), due to COVID-19, lost its planned capital sources to complete the necessary fit out work and equipment purchases. Due to these factors, F4C is still in the planning and build-out phase and is not operational or manufacturing at this time. F4C has hired only Director level staff and we are unable to conduct a true analysis of the following as requested within the license renewal process:

- 1. Our Energy Compliance
- 2. Our Plan for Diversity
  - a. Progress & Successes
- 3. Our Plan for Positive Impact
  - a. Progress & Successes

Once F4C is staffed and operational we fully plan to collect and examine the data required to assess each of the Plans mentioned above to ensure we are meeting, and ideally surpassing, our stated goals. F4C will provide any and all information that is missing in this renewal application at the time of our first post provisional inspection, which we anticipate as being requested during the early summer of 2021.