



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR282034
Original Issued Date: 12/05/2019
Issued Date: 11/18/2021
Expiration Date: 12/05/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: GreenStar Herbals, Inc.

Phone Number: 847-308-2712
Email Address: mike.neville@gtigrows.com

Business Address 1: 200 Beacham Street
Business City: Chelsea
Business State: MA
Business Zip Code: 02150
Business Address 2:
Mailing Address 1: 325 W. Huron St.
Mailing City: Chicago
Mailing State: IL
Mailing Zip Code: 60654
Mailing Address 2: #700

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no
Priority Applicant Type: Not a Priority Applicant
Economic Empowerment Applicant Certification Number:
RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:
Department of Public Health RMD Registration Number:
Operational and Registration Status:
To your knowledge, is the existing RMD certificate of registration in good standing?:
If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership:
Percentage Of Control: 100

Role: Director	Other Role: Sole Director of GreenStar Herbals, Inc; Manager of GTI Core, LLC and VCP23, LLC; Director of GTI23, Inc. and Green Thumb Industries Inc.	
First Name: Benjamin	Last Name: Kovler	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 2

Percentage Of Ownership:	Percentage Of Control:	
Role: Manager	Other Role: Manager of GTI Core, LLC and VCP23, LLC; Director of GTI23, Inc. and Green Thumb Industries Inc.	
First Name: Anthony	Last Name: Georgiadis	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: Manager	Other Role: Manager of GTI Core, LLC and VCP23, LLC; Director of GTI23, Inc.	
First Name: Andrew	Last Name: Grossman	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: Director	Other Role: Director of Green Thumb Industries Inc.	
First Name: William	Last Name: Gruver	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 5

Percentage Of Ownership:	Percentage Of Control:	
Role: Director	Other Role: Director of Green Thumb Industries Inc.	
First Name: Wendy	Last Name: Berger	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 6

Percentage Of Ownership:	Percentage Of Control:	
Role: Director	Other Role: Director of Green Thumb Industries Inc.	
First Name: Glen	Last Name: Senk	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 7

Percentage Of Ownership:

Percentage Of Control:

Role: Director

Other Role: Director of Green Thumb Industries Inc.

First Name: Westley

Last Name: Moore

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 8

Percentage Of Ownership:

Percentage Of Control:

Role: Director

Other Role: Director of Green Thumb Industries Inc.

First Name: Swati

Last Name: Mylarapu

Suffix:

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100

Percentage of Ownership: 100

Entity Legal Name: GTI Core, LLC

Entity DBA:

DBA City:

Entity Description: Delaware Limited Liability Company

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: Sole shareholder of GreenStar

Entity with Direct or Indirect Authority 2

Percentage of Control: 100

Percentage of Ownership: 100

Entity Legal Name: VCP23, LLC

Entity DBA:

DBA City:

Entity Description: Delaware Limited Liability Company

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: Sole member of GTI Core, LLC

Entity with Direct or Indirect Authority 3

Percentage of Control: 100 Percentage of Ownership: 100

Entity Legal Name: GTI23, INC.

Entity DBA:

DBA City:

Entity Description: Delaware Corporation

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: Sole member of VCP23,LLC

Entity with Direct or Indirect Authority 4

Percentage of Control: 100 Percentage of Ownership: 100

Entity Legal Name: Green Thumb Industries Inc.

Entity DBA:

DBA City:

Entity Description: Publicly traded ultimate parent company

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: Sole shareholder of GTI23, Inc.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core,

Owner Last Name:

Owner Suffix:

LLC

Entity Legal Name: GTI Maryland, LLC

Entity DBA: RISE Maryland

Entity Description: Medical cannabis cultivation and dispensary license

Entity Phone: 312-471-6720

Entity Email:

Entity Website:

licensing@gtigrows.com

Entity Address 1: 13424 Pennsylvania Ave

Entity Address 2: Suite 302

Entity City: Hagerstown

Entity State: MD

Entity Zip Code: 21742

Entity Country: USA

Entity Mailing Address 1: 13424 Pennsylvania Ave

Entity Mailing Address 2: Suite 302

Entity Mailing City: Hagerstown

Entity Mailing State: MD

Entity Mailing Zip Code:

21742

Entity Mailing Country:

USA

Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: GTI Ohio, LLC Entity DBA:

Entity Description: Medical marijuana facility license

Entity Phone: 312-471-6720 Entity Email: Entity Website:
licensing@gtigrows.com

Entity Address 1: 325 W. Huron Street Entity Address 2:

Entity City: Chicago Entity State: IL Entity Zip Code: 60654 Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street Entity Mailing Address 2:

Entity Mailing City: Chicago Entity Mailing State: IL Entity Mailing Zip Code: Entity Mailing Country:
60654 USA

Business Interest in Other State 3

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: GTI Nevada, LLC Entity DBA: RISE Nevada

Entity Description: Marijuana cultivation, processing, and dispensary license holder

Entity Phone: 312-471-6720 Entity Email: Entity Website:
licensing@gtigrows.com

Entity Address 1: 325 W. Huron Street Entity Address 2:

Entity City: Chicago Entity State: IL Entity Zip Code: 60654 Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street Entity Mailing Address 2:

Entity Mailing City: Chicago Entity Mailing State: IL Entity Mailing Zip Code: Entity Mailing Country:
60654 USA

Business Interest in Other State 4

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: GTI Pennsylvania, LLC Entity DBA: RISE Pennsylvania

Entity Description: Medical marijuana cultivation, processing, and dispensary license holder

Entity Phone: 312-471-6720 Entity Email: Entity Website:
licensing@gtigrows.com

Entity Address 1: 325 W. Huron Street Entity Address 2:

Entity City: Chicago Entity State: IL Entity Zip Code: 60654 Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street Entity Mailing Address 2:

Entity Mailing City: Chicago Entity Mailing State: IL Entity Mailing Zip Code: Entity Mailing Country:
60654 USA

Business Interest in Other State 5

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: Advanced Grow Labs, LLC Entity DBA:

Entity Description: Medical Marijuana Producer license

Entity Phone: 312-471-6720

Entity Email:

licensing@gtigrows.com

Entity Website:

Entity Address 1: 325 W. Huron Street

Entity Address 2:

Entity City: Chicago

Entity State: IL

Entity Zip Code: 60654

Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

Business Interest in Other State 6

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core,
LLC

Owner Last Name:

Owner Suffix:

Entity Legal Name: GTI New Jersey, LLC

Entity DBA:

Entity Description: Alternative Treatment Center License

Entity Phone: 312-471-6720

Entity Email:

licensing@gtigrows.com

Entity Website:

Entity Address 1: 325 W. Huron Street

Entity Address 2:

Entity City: Chicago

Entity State: IL

Entity Zip Code: 60654

Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

Business Interest in Other State 7

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core,
LLC

Owner Last Name:

Owner Suffix:

Entity Legal Name: Integral Associates CA, LLC

Entity DBA:

Entity Description: Marijuana establishment

Entity Phone: 312-471-6720

Entity Email:

licensing@gtigrows.com

Entity Website:

Entity Address 1: 325 W. Huron Street

Entity Address 2:

Entity City: Chicago

Entity State: IL

Entity Zip Code: 60654

Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

Business Interest in Other State 8

Business Interest of an Owner or the Marijuana Establishment: Business Interest of the Marijuana Establishment

Owner First Name: GTI Core,
LLC

Owner Last Name:

Owner Suffix:

Entity Legal Name: Integral Associates Dena, LLC

Entity DBA:

Entity Description: Marijuana establishment

Entity Phone: 312-471-6720

Entity Email:

licensing@gtigrows.com

Entity Website:

Entity Address 1: 325 W. Huron Street

Entity Address 2:

Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 9

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Bluepoint Wellness of Westport, LLC		Entity DBA:	
Entity Description: Medical marijuana establishment			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 10

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: GTI Florida, LLC		Entity DBA:	
Entity Description: Medical Marijuana Treatment Center			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 11

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: 3C Compassionate Care Center, LLC		Entity DBA:	
Entity Description: Dispensary			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 12

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Evergreen Dispensary, LLC	Entity DBA:		
Entity Description: Dispensary			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 13

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: GTI Mundelein, LLC	Entity DBA:		
Entity Description: Dispensary			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 14

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: GTI Oglesby, LLC	Entity DBA:		
Entity Description: Cultivation and Production Operation Permit			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 15

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: GTI Rock Island, LLC	Entity DBA:		
Entity Description: Cultivation and Production Operation Permit			

Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 16

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: NH Medicinal Dispensaries, LLC		Entity DBA:	
Entity Description: Dispensary			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 17

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Chesapeake Alternatives, LLC		Entity DBA:	
Entity Description: Processing and Dispensary			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 18

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Meshow, LLC		Entity DBA:	
Entity Description: Dispensary			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 702 Pulaski Highway		Entity Address 2:	
Entity City: Joppa	Entity State: MD	Entity Zip Code: 21085	Entity Country: USA

Entity Mailing Address 1: 702 Pulaski Highway		Entity Mailing Address 2:	
Entity Mailing City: Joppa	Entity Mailing State: MD	Entity Mailing Zip Code: 21085	Entity Mailing Country: USA

Business Interest in Other State 19

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: CCLV Manufacturing Center LLC	Entity DBA:		
Entity Description: Marijuana establishment			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street	Entity Address 2:		
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 20

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: CCLV Production LLC	Entity DBA:		
Entity Description: Marijuana establishment			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street	Entity Address 2:		
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 21

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Desert Grown Farms	Entity DBA:		
Entity Description: Cultivation & Distributor			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street	Entity Address 2:		
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 22

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: Essence Entity DBA:

Entity Description: Dispensary

Entity Phone: 312-471-6720 Entity Email: Entity Website:
licensing@gtigrows.com

Entity Address 1: 325 W. Huron Street Entity Address 2:

Entity City: Chicago Entity State: IL Entity Zip Code: 60654 Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street Entity Mailing Address 2:

Entity Mailing City: Chicago Entity Mailing State: IL Entity Mailing Zip Code: Entity Mailing Country:
60654 USA

Business Interest in Other State 23**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner**

Owner First Name: GTI Core, Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: Essence Cannabis Dispensary Entity DBA:

Entity Description: Dispensary

Entity Phone: 312-471-6720 Entity Email: Entity Website:
licensing@gtigrows.com

Entity Address 1: 325 W. Huron Street Entity Address 2:

Entity City: Chicago Entity State: IL Entity Zip Code: 60654 Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street Entity Mailing Address 2:

Entity Mailing City: Chicago Entity Mailing State: IL Entity Mailing Zip Code: Entity Mailing Country:
60654 USA

Business Interest in Other State 24**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner**

Owner First Name: GTI Core, Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: Essence Henderson, LLC Entity DBA:

Entity Description: Dispensary

Entity Phone: 312-471-6720 Entity Email: Entity Website:
licensing@gtigrows.com

Entity Address 1: 325 W. Huron Street Entity Address 2:

Entity City: Chicago Entity State: IL Entity Zip Code: 60654 Entity Country: USA

Entity Mailing Address 1: 325 W. Huron Street Entity Mailing Address 2:

Entity Mailing City: Chicago Entity Mailing State: IL Entity Mailing Zip Code: Entity Mailing Country:
60654 USA

Business Interest in Other State 25**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner**

Owner First Name: GTI Core, Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: Essence Tropicana, LLC Entity DBA:

Entity Description: Dispensary**Entity Phone:** 312-471-6720**Entity Email:**

licensing@gtigrows.com

Entity Website:**Entity Address 1:** 325 W. Huron Street**Entity Address 2:****Entity City:** Chicago**Entity State:** IL**Entity Zip Code:** 60654**Entity Country:** USA**Entity Mailing Address 1:** 325 W. Huron Street**Entity Mailing Address 2:****Entity Mailing City:** Chicago**Entity Mailing State:** IL**Entity Mailing Zip Code:**

60654

Entity Mailing Country:

USA

Business Interest in Other State 26**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner****Owner First Name:** GTI Core,
LLC**Owner Last Name:****Owner Suffix:****Entity Legal Name:** Fiorello Pharmaceuticals, Inc.**Entity DBA:****Entity Description:** Manufacturing, Dispensary**Entity Phone:** 312-471-6720**Entity Email:**

licensing@gtigrows.com

Entity Website:**Entity Address 1:** 325 W. Huron Street**Entity Address 2:****Entity City:** Chicago**Entity State:** IL**Entity Zip Code:** 60654**Entity Country:** USA**Entity Mailing Address 1:** 325 W. Huron Street**Entity Mailing Address 2:****Entity Mailing City:** Chicago**Entity Mailing State:** IL**Entity Mailing Zip Code:**

60654

Entity Mailing Country:

USA

Business Interest in Other State 27**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner****Owner First Name:** GTI Core,
LLC**Owner Last Name:****Owner Suffix:****Entity Legal Name:** JG Retail Services NV LLC**Entity DBA:****Entity Description:** Dispensary (Adult-Use)**Entity Phone:** 312-471-6720**Entity Email:**

licensing@gtigrows.com

Entity Website:**Entity Address 1:** 325 W. Huron Street**Entity Address 2:****Entity City:** Chicago**Entity State:** IL**Entity Zip Code:** 60654**Entity Country:** USA**Entity Mailing Address 1:** 325 W. Huron Street**Entity Mailing Address 2:****Entity Mailing City:** Chicago**Entity Mailing State:** IL**Entity Mailing Zip Code:**

60654

Entity Mailing Country:

USA

Business Interest in Other State 28**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner****Owner First Name:** GTI Core,
LLC**Owner Last Name:****Owner Suffix:****Entity Legal Name:** Integral Production LLC**Entity DBA:** 46-5592116**Entity Description:** Production**Entity Phone:** 312-471-6720**Entity Email:**

licensing@gtigrows.com

Entity Website:**Entity Address 1:** 325 W. Huron Street**Entity Address 2:**

Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 29

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Integral Cultivation LLC		Entity DBA:	
Entity Description: Retail/Cultivation/Distribution/ Medical			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 30

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: KW Ventures Holdings, LLC		Entity DBA:	
Entity Description: Dispensary			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 31

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Southern CT Wellness & Healing LLC		Entity DBA:	
Entity Description: Dispensary (Medical)			
Entity Phone: 312-471-6720	Entity Email: licensing@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 32

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: GTI Core, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Summit Medical Compassion Center, Inc.	Entity DBA:		
Entity Description: Interest in management companies of licensee			
Entity Phone: 312-471-6720	Entity Email: drollman@gtigrows.com	Entity Website:	
Entity Address 1: 325 W. Huron Street		Entity Address 2:	
Entity City: Chicago	Entity State: IL	Entity Zip Code: 60654	Entity Country: USA
Entity Mailing Address 1: 325 W. Huron Street		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

DISCLOSURE OF INDIVIDUAL INTERESTS**Individual 1**

First Name: Benjamin	Last Name: Kovler	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 2

First Name: Benjamin	Last Name: Kovler	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 3

First Name: Benjamin	Last Name: Kovler	Suffix:
Marijuana Establishment Name: GreenStar Herbals, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Dracut and Maynard	Marijuana Establishment State: MA	

Individual 4

First Name: Benjamin	Last Name: Kovler	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 5

First Name: Benjamin	Last Name: Kovler	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 6

First Name: Anthony	Last Name: Georgiadis	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 7

First Name: Anthony	Last Name: Georgiadis	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 8

First Name: Anthony	Last Name: Georgiadis	Suffix:
Marijuana Establishment Name: GreenStar Herbals, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Maynard and Dracut	Marijuana Establishment State: MA	

Individual 9

First Name: Anthony	Last Name: Georgiadis	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 10

First Name: Anthony	Last Name: Georgiadis	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 11

First Name: Andrew	Last Name: Grossman	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 12

First Name: Andrew	Last Name: Grossman	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 13

First Name: Andrew	Last Name: Grossman	Suffix:
Marijuana Establishment Name: GreenStar Herbals, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Maynard and Dracut	Marijuana Establishment State: MA	

Individual 14

First Name: Andrew	Last Name: Grossman	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 15

First Name: Andrew	Last Name: Grossman	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 16

First Name: William	Last Name: Gruver	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 17

First Name: William	Last Name: Gruver	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 18

First Name: William	Last Name: Gruver	Suffix:
Marijuana Establishment Name: GreenStar Herbals, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Maynard and Dracut	Marijuana Establishment State: MA	

Individual 19

First Name: William	Last Name: Gruver	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 20

First Name: William	Last Name: Gruver	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 21

First Name: Wendy	Last Name: Berger	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 22

First Name: Wendy	Last Name: Berger	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 23

First Name: Wendy	Last Name: Berger	Suffix:
Marijuana Establishment Name: GreenStar Herbals, Inc.	Business Type: Marijuana Retailer	
Marijuana Establishment City: Maynard and Dracut	Marijuana Establishment State: MA	

Individual 24

First Name: Wendy	Last Name: Berger	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 25

First Name: Wendy	Last Name: Berger	Suffix:
Marijuana Establishment Name: Rise Holdings, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Holyoke	Marijuana Establishment State: MA	

Individual 26

First Name: Glen	Last Name: Senk	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 27

First Name: Glen	Last Name: Senk	Suffix:
Marijuana Establishment Name: Liberty Compassion, Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Clinton	Marijuana Establishment State: MA	

Individual 28

First Name: Glen **Last Name:** Senk **Suffix:**
Marijuana Establishment Name: GreenStar Herbals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Maynard and Dracut **Marijuana Establishment State:** MA

Individual 29

First Name: Glen **Last Name:** Senk **Suffix:**
Marijuana Establishment Name: Rise Holdings, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Holyoke **Marijuana Establishment State:** MA

Individual 30

First Name: Glen **Last Name:** Senk **Suffix:**
Marijuana Establishment Name: Rise Holdings, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Holyoke **Marijuana Establishment State:** MA

Individual 31

First Name: Wesley **Last Name:** Moore **Suffix:**
Marijuana Establishment Name: Liberty Compassion, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Clinton **Marijuana Establishment State:** MA

Individual 32

First Name: Wesley **Last Name:** Moore **Suffix:**
Marijuana Establishment Name: Liberty Compassion, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Clinton **Marijuana Establishment State:** MA

Individual 33

First Name: Wesley **Last Name:** Moore **Suffix:**
Marijuana Establishment Name: GreenStar Herbals, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Maynard and Dracut **Marijuana Establishment State:** MA

Individual 34

First Name: Wesley **Last Name:** Moore **Suffix:**
Marijuana Establishment Name: Rise Holdings, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Holyoke **Marijuana Establishment State:** MA

Individual 35

First Name: Wesley **Last Name:** Moore **Suffix:**
Marijuana Establishment Name: Rise Holdings, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Holyoke **Marijuana Establishment State:** MA

Individual 36

First Name: Swati **Last Name:** Mylarapu **Suffix:**
Marijuana Establishment Name: Liberty Compassion, Inc. **Business Type:** Marijuana Cultivator
Marijuana Establishment City: Clinton **Marijuana Establishment State:** MA

Individual 37

First Name: Swati **Last Name:** Mylarapu **Suffix:**
Marijuana Establishment Name: Liberty Compassion, Inc. **Business Type:** Marijuana Product Manufacture
Marijuana Establishment City: Clinton **Marijuana Establishment State:** MA

Individual 38

First Name: Swati Last Name: Mylarapu Suffix:
Marijuana Establishment Name: GreenStar Herbals, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Maynard and Dracut Marijuana Establishment State: MA

Individual 39

First Name: Swati Last Name: Mylarapu Suffix:
Marijuana Establishment Name: Rise Holdings, Inc. Business Type: Marijuana Cultivator
Marijuana Establishment City: Holyoke Marijuana Establishment State: MA

Individual 40

First Name: Swati Last Name: Mylarapu Suffix:
Marijuana Establishment Name: Rise Holdings, Inc. Business Type: Marijuana Product Manufacture
Marijuana Establishment City: Holyoke Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 200 Beacham Street

Establishment Address 2:

Establishment City: Chelsea Establishment Zip Code: 02150

Approximate square footage of the establishment: 15618 How many abutters does this property have?:
5

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Greenstar Herbals_HCA Certification Form_Chelsea_EXECUTED.pdf	pdf	5be45deb6906170d879388a3	11/08/2018
Plan to Remain Compliant with Local Zoning	GreenStar Herbals - Plan to Remain Compliant with Local Zoning (Chelsea).pdf	pdf	5bfdb209813a010d917ad909	11/27/2018
Community Outreach Meeting Documentation	Chelsea - Community Outreach attestation form with attachments.pdf	pdf	5d124e5f1dae681319cec481	06/25/2019

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$-1

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Other	GreenStar Herbals - Chelsea Chamber Foundation Donation Letter.pdf	pdf	5d126fabcf70e2b132b317446	06/25/2019
Other	GreenStar Herbals - GreenRoots Donation Letter.pdf	pdf	5d126fac69291617ba862329	06/25/2019
Plan for Positive Impact	GreenStar Herbals_Plan to Positively Impact Areas of Disproportionate Impact_UPDATED.pdf	pdf	5d63f9fc9d6f1dd58a05ea	08/26/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other Role:
First Name: Benjamin Last Name: Kovler Suffix:
RMD Association: RMD Owner
Background Question: no

Individual Background Information 2

Role: Other Role:
First Name: Anthony Last Name: Georgiadis Suffix:
RMD Association: RMD Owner
Background Question: no

Individual Background Information 3

Role: Other Role:
First Name: Andrew Last Name: Grossman Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 4

Role: Other Role:
First Name: William Last Name: Gruver Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 5

Role: Other Role:
First Name: Wendy Last Name: Berger Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 6

Role: Other Role:
First Name: Glen Last Name: Senk Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 7

Role: Other Role:
First Name: Westley Last Name: Moore Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 8

Role: Other Role:

First Name: Swati Last Name: Mylarapu Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	GreenStar Herbals - MA Secretary of the Commonwelath Certificate of Good Standing 11.5.18.pdf	pdf	5be468f1bcbac00d7d74ad51	11/08/2018
Articles of Organization	GreenStar Herbals - Articles of Organization.pdf	pdf	5be469006906170d879388cd	11/08/2018
Bylaws	GreenStar - Corporate Bylaws [EXECUTED].pdf	pdf	5be4690b813a010d917ac5f1	11/08/2018
Department of Revenue - Certificate of Good standing	GreenStar Herbals - DoR Certificate of Good Standing.pdf	pdf	5bfd6ff5fe03b20d5f695b2d	11/27/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Unemployment Assistance - Certificate of Good standing	COGS - Department of Unemployment Assistance.pdf	pdf	614a58cd179a26079c9e5f99	09/21/2021
Secretary of Commonwealth - Certificate of Good Standing	COGS - Secretary of the Commonwealth of Massachusetts.pdf	pdf	614b30b2f6892707b40e0d07	09/22/2021
Department of Revenue - Certificate of Good standing	COGS - Department of Revenue.pdf	pdf	614def98af787c692aac4876	09/24/2021

Massachusetts Business Identification Number: 001327773

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	GreenStar - Liability Insurance.pdf	pdf	614a5927c4d84107a32217d4	09/21/2021
Proposed Timeline	Timeline to Opening.pdf	pdf	614a5970e4062c07dab7ab08	09/21/2021
Business Plan	GreenStar - Chelsea - Business Plan.pdf	pdf	614ba965c12c6607a11aff35	09/22/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
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Diversity plan	GreenStar_Diversity Plan.pdf	pdf	5f68e16373481907b14c6d62	09/21/2020
Energy Compliance Plan	GreenStar - Energy.pdf	pdf	614a59a17736bf07c42f629b	09/21/2021
Qualifications and training	GreenStar - Qualifications and Training.pdf	pdf	614a59a510e8450793e1a737	09/21/2021
Maintaining of financial records	GreenStar - Maintaining Financial Records.pdf	pdf	614a59a87cede707aacb191f	09/21/2021
Dispensing procedures	GreenStar - Dispensing.pdf	pdf	614a59afc4d84107a32217de	09/21/2021
Quality control and testing	GreenStar - Quality Control.pdf	pdf	614a59bb7736bf07c42f629f	09/21/2021
Inventory procedures	GreenStar - Inventory Procedures.pdf	pdf	614a59be10e8450793e1a73b	09/21/2021
Transportation of marijuana	GreenStar - Transportation.pdf	pdf	614a59c4f076f507dc7e0a52	09/21/2021
Storage of marijuana	GreenStar - Storage.pdf	pdf	614a59ca3e5df507d5e58465	09/21/2021
Prevention of diversion	GreenStar - Preventing Diversion.pdf	pdf	614a59d4189f3a07c6863217	09/21/2021
Restricting Access to age 21 and older	GreenStar - Restricting Access.pdf	pdf	614a59e63e5df507d5e58469	09/21/2021
Plan for obtaining marijuana or marijuana products	GreenStar - Obtaining Marijuana.pdf	pdf	614a59e97cede707aacb1923	09/21/2021
Personnel policies including background checks	GreenStar - Personnel.pdf	pdf	614a59f2ed983707e971d5de	09/21/2021
Security plan	GreenStar - Security Plan.pdf	pdf	614a59fbc4d84107a32217e2	09/21/2021

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

Adequate Patient Supply Documentation:

Document Category	Document Name	Type	ID	Upload Date
	Adequate Patient Supply.pdf	pdf	5f6a5767e4c06f07e61d078f	09/22/2020

Reasonable Substitutions of Marijuana Types and Strains Documentation:

Document Category	Document Name	Type	ID	Upload Date
	Marijuana Types and Strains.pdf	pdf	5f7388c973481907b14c89f0	09/29/2020

ATTESTATIONS

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

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

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

Notification: I Understand

I certify that any changes in ownership or control, location, or name will be made pursuant to a separate process, as required under 935 CMR 500.104(1), and none of those changes have occurred in this application.: I 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: Measurement #1: Hiring and maintaining a labor force (across all GreenStar locations) in which at least fifty percent (50%) of individuals are residents of an area of disproportionate impact.

Progress: GreenStar is currently preparing to open its Chelsea establishment in November, which it anticipates will significantly increase the numbers of employees residing in an Area of Disproportionate Impact (including from Chelsea, Revere, and certain census tracts in Boston). Please see the enclosed job advertisements evidencing GreenStar's forthcoming hiring efforts.

Progress or Success Goal 2

Description of Progress or Success: Measurement #2: Documenting the number and subject matter of industry-specific educational seminars offered and performed, and to whom.

Progress: On July 14, 2021, GreenStar hosted an Educational Seminar following a job fair for interested applicants. This Educational Seminar was geared towards individuals who were interested in pursuing a career in the cannabis industry. The Educational Seminar featured a Cannabis 101 Presentation, an overview on Massachusetts Cannabis Law, and a Question/Answer portion for participants to ask any questions they may have. Please see the enclosed attachment for the advertisement placed in the Chelsea Record and the presentation.

A future educational seminar is scheduled in early October.

Progress or Success Goal 3

Description of Progress or Success: Measurement #3: Documenting the number and amount of any donations made to initiatives with goals to improve disproportionately impacted areas.

Progress:

On January 10, 2021, GreenStar made a donation of \$126 to the Lowell VFW – Post 662. A check copy is included.

On February 16, 2021, GreenStar made a donation of \$136.50 to the Lowell VFW – Post 662. A check copy is included.

On March 18, 2021, GreenStar made a donation of \$784 to the Lowell VFW – Post 662, specifically for the Veterans VCP Curaleaf Project. A check copy is included.

On May 18, 2021, GreenStar made a donation of \$2,500 to the Clean River Project. A check copy is included.

GreenStar has made a \$2,500 monetary donation to Green Roots, Inc., a Chelsea community-based non-profit organization dedicated to improving and enhancing the urban environment and public health in Chelsea and surrounding communities. GreenStar has made a \$2,500 monetary donation to the Chelsea Chamber of Commerce Charitable Foundation, Inc. Chelsea Chamber Foundation will use its donation to further its "Shades of Chelsea" project. A check copy is included.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: GreenStar is currently preparing to open its Chelsea establishment in November and is actively preparing to meet its goals of hiring over 40% women, 15% minorities, and 5% veterans as well as ensuring its facility celebrates individuals that identify as LGBTQ+ and persons with disabilities. Please see the enclosed job advertisements evidencing GreenStar's forthcoming hiring efforts.

GreenStar hosted one career fair and educational seminar in the City of Chelsea that was advertised in the Chelsea Record. Evidence of the

seminar and career fair is attached. A future educational seminar and career fair is scheduled in early October. Postings were also included on the "Hire a Veteran" website to amplify the number of Veterans hired. Please see the enclosed posting.

A future career fair and educational seminar is scheduled in early October.

HOURS OF OPERATION

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

Host Community Agreement Certification Form

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

Applicant

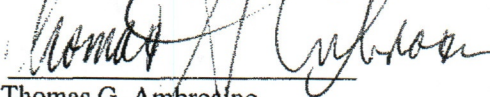
I, THOMAS E. Morey certify as an authorized representative of GreenStar Herbals, Inc. that the application has executed a host community agreement with City of Chelsea pursuant to G.L.c.94G§3(d) on September 21, 2018.



Signature of Authorized Representative of Applicant

Host Community- City of Chelsea

I, Thomas G. Ambrosino certify that I am the contracting authority or have been duly authorized by the contracting authority for City of Chelsea to certify that the applicant and the City of Chelsea has executed a host community agreement pursuant to G.L.c.94G§ 3(d) on September 21, 2018.



Thomas G. Ambrosino
City Manager



PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

GreenStar Herbals, Inc. (“GreenStar”) will remain compliant at all times with the local zoning requirements set forth in the City of Chelsea’s Zoning Ordinance, which is Chapter 34 of the Chelsea Code of Ordinances. In accordance with Chelsea’s Zoning Ordinance, GreenStar’s proposed Marijuana Retailer is located in the Industrial Zoning District which allows Marijuana Retailers by Special Permit.

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

As required by the Chelsea Zoning Ordinance, GreenStar will apply for a Special Permit from the local Special Permit Granting Authority: the Chelsea Zoning Board of Appeals. GreenStar will also apply for all other local permits and/or licenses required to operate a Marijuana Retailer at the proposed location, including any local license or licenses that must be obtained through the Chelsea Licensing Commission. GreenStar will comply with all conditions and standards set forth in any local permit or license required to operate a Marijuana Retailer at GreenStar’s proposed location.

GreenStar has already attended meetings with municipal officials to discuss its plans for a proposed Marijuana Retailer and has executed a Host Community Agreement with Chelsea. GreenStar will continue to work cooperatively with Chelsea’s various municipal departments, boards, and officials to ensure that its Marijuana Retailer remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

GreenStar has also retained the law firm Vicente Sederberg LLC as well as local counsel to assist with ongoing compliance with local zoning requirements.

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, Thomas Morey, (*insert name*) attest as an authorized representative of GreenStar Herbals, Inc. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on September 20, 2018 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on September 13, 2018 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on September 10, 2018 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on September 10, 2018 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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

LEGAL NOTICE

NOTICE OF HEARING
Case No. 2018-38
Notice is hereby given in accordance with Section 34-215 of Chapter 34 (Zoning) of the Code of Ordinances, City of Chelsea, Massachusetts, that a Public Hearing of the Chelsea Planning Board will be held on Tuesday, September 25, 2018

6:00 p.m.
Chelsea Senior Center
10 Riley Way - Chelsea, MA

With reference to the application of: YIM Forbes, LLC
For: Major Site Plan approval and Special Permit recommendation for Planned Development to construct six hundred thirty (630) residential units and retail and office buildings with nine hundred forty-nine (949) parking spaces at the premises known as: 1 Forbes Street.
All interested parties should attend the hearing or provide written comment to the Board. A copy of the application and petition is available for review at the Office of the City Clerk, 500 Broadway, Room 209, Chelsea, MA.

9/13/18, 9/20/18

LEGAL NOTICE

NOTICE OF HEARING
Case No. 2018-39
Notice is hereby given in accordance with Section 34-215 of Chapter 34 (Zoning) of the Code of Ordinances, City of Chelsea, Massachusetts, that a Public Hearing of the Chelsea Planning Board will be held on

not meet minimum zoning requirements for rear yard setbacks, number of off-street parking spaces and which also exceeds maximum lot coverage of the premises known as: 1001 and 1005 Broadway.
All interested parties should attend the hearing or provide written comment to the Board. A copy of the application and petition is available for review at the Office of the City Clerk, 500 Broadway, Room 209, Chelsea, MA.

9/13/18, 9/20/18

LEGAL NOTICE

Re: Zavala Corporation d/b/a Bella Villa
13-17 Fifth Street, Chelsea, MA 02150
Notice is hereby given that a continued public hearing will be held by the Chelsea Licensing Commission on Tuesday, September 25, 2018 at 6:00 p.m., at the Chelsea Public Library Auditorium, 569 Broadway, Chelsea, MA, relative to the status of the All Alcoholic Beverages License.
TRANSLATORS: Hearings are conducted in English. If needed, please bring a translator to the hearing.
CHELSEA LICENSING COMMISSION

9/13/18, 9/20/18

LEGAL NOTICE

Re: 180 Broadway Liquor, Inc. d/b/a Chelsea Liquor Mart
180-182 Broadway, Chelsea, MA 02150
Notice is hereby given that a public hearing will

LEGAL NOTICE

Community Outreach Meeting
Notice is hereby given that a COMMUNITY OUTREACH MEETING for a proposed Marijuana Establishment is scheduled for SEPTEMBER 20, 2018 AT 6 PM at 500 BROADWAY, THIRD FLOOR CITY COUNCIL CHAMBERS CHELSEA, MA 02150.

The location for the proposed Marijuana Cultivator and Retailer is 200 Beachman Street, Chelsea, MA 02150. There will be an opportunity for the public to ask questions. Please contact Jay Paul Satin, Esq., with any inquiries at (781) 289-2215, GreenStar Herbs.

Esta noticia es para informarles que Habrá una REUNION DE LA COMUNIDAD on donde es les informara de la propuesta para establecer un negocio de Marijuana. La reunion esta programada para el 20 SEPTEMBER 2018 AT 6:00 PM en el 500 BROADWAY, SACA DE CITY COUNCIL CHAMBERS EN EL TERCER PISO CHELSEA, MA 02150. La dirección propuesta para cultivar y vender Marijuana sera en la 200 Beachman Street, Chelsea, MA 02150. Durante la reunion el public tendrá la oportunidad de hacer preguntas. Por favor llamar a Lic. Jay Paul Satin, con cualquier pregunta (781) 289-2215, GreenStar Herbs.

9/13/18

LEGAL NOTICE

Emiliana Fiesta, LLC
at 35 Fourth Street, Chelsea, MA 02150.
TRANSLATORS: Hearings are conducted in English. If needed, please bring a translator to the hearing.
CHELSEA LICENSING COMMISSION
9/13/18, 9/20/18

LEGAL NOTICE

Re: Casa Mariachi Restaurant, Inc. d/b/a La Esquina Mariachi
170 Washington Avenue, Chelsea, MA 02150
Notice is hereby given that a public hearing will be held by the Chelsea

Licensing Commission on Tuesday, September 25, 2018 at 6:00 p.m., at the Chelsea Public Library Auditorium, 569 Broadway, Chelsea, MA, to consider a Restaurant, All Alcoholic Beverages and a Common Victualer license application to Casa Mariachi Restaurant, Inc. d/b/a La Esquina Mariachi at 170 Washington Avenue, Chelsea, MA 02150.
TRANSLATORS: Hearings are conducted in English. If needed, please bring a translator to the hearing.
CHELSEA LICENSING COMMISSION

9/13/18, 9/20/18

LEGAL NOTICE

Re: Fine Mart, LLC
260-266 Broadway, Chelsea, MA 02150
Notice is hereby given that a public hearing will be held by the Chelsea Licensing Commission on Tuesday, September 25, 2018 at 6:00 p.m., at the Chelsea Public Library Auditorium, 569

Re: Chelsea Liquor, Inc. d/b/a Heller's Liquor Mart
429 Broadway, Chelsea, MA 02150
Notice is hereby given that a public hearing will be held by the Chelsea Licensing Commission on Tuesday, September 25, 2018 at 6:00 p.m., at the Chelsea Public Library Auditorium, 569 Broadway, Chelsea, MA, relative to the Chelsea Police Department Incident Report #18-2565-OF.
TRANSLATORS: Hearings are conducted in English. If needed, please bring a translator to the hearing.
CHELSEA LICENSING COMMISSION
9/13/18, 9/20/18

LEGAL NOTICE

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT
PROBATE AND FAMILY COURT

24 New Chardon St.
Boston, MA 02114
CITATION GIVING
NOTICE OF PETITION FOR APPOINTMENT OF CONSERVATOR OR OTHER PROTECTIVE ORDER PURSUANT TO G.L.c. 190B, § 5-304 & § 5-405
Docket No. SU1801459PM

In the matter of: Laura J. Asci
Of Chelsea, MA
To the named Respondent and all other interested persons, a petition has been filed by Angelina T. Mottola of East Boston and Thomas J. McCarthy of East Boston, MA in the above captioned matter alleging that Laura J. Asci is in need of a Conservator or other protective order and requesting that Thomas J. McCarthy of East Boston, MA (or some other suitable person) be

date of 11/20/2018.
This is NOT a hearing date, but a deadline date by which you have to file the written appearance. If you object to the petition, if you fail to file the written appearance by the return date, action may be taken in this matter without further notice to you. In addition to filing the written appearance, you or your attorney must file a written affidavit stating the specific facts and grounds of your objection within 30 days after the return date.
IMPORTANT NOTICE
The outcome of this proceeding may limit or completely take away the above named persons right to make decisions about personal affairs or financial affairs or both. The above named person has the right to ask for a lawyer. Anyone may make this request on behalf of the above named person. If the above named person cannot afford a lawyer, one may be appointed at State expense.
WITNESS, Hon. Brian J. Dunn, First Justice of this Court.
Date: August 26, 2018
Felix D. Arroyo,
Register of Probate

9/13/18

LEGAL NOTICE

LEGAL NOTICE
NOTICE OF PUBLIC HEARING
CITY MANAGER EVALUATION

Notice is hereby given that the City of Chelsea acting through the Chelsea City Council and in accordance with the provisions of the City Charter of the City of Chelsea, Section 4-8, a Public Hearing will be

LEGAL NOTICE

LEGAL NOTICE
CITY OF CHELSEA
DEPARTMENT OF PUBLIC WORKS
NOTICE OF PUBLIC HEARING

The Department of Public Works will conduct a Public Hearing on Tuesday, October 2, 2018 in Chelsea City Hall, in the City Council Chambers third floor, 500 Broadway, Chelsea, at 6:00 pm on the following Petition: MOBILITE, LLC SUMMIT AVE and WARREN AVE. to attach additional transportation equipment to an existing 33' utility pole in the right-of-way located at Summit Avenue and Warren Avenue, with electricity connection. The public is invited to attend.
BERTRAM TAVERNA
DIRECTOR
9/13/18

9/20/18

LEGAL NOTICE

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT
PROBATE AND FAMILY COURT

Suffolk Division
24 New Chardon St.
Boston, MA 02114
(617) 780-0300
ORDER FOR SERVICE BY PUBLICATION AND MAILING
Docket No. SU1800526DR
Sonia Plona

vs. Shawn Plona
Upon motion of plaintiff(s) for an order directing the defendant(s) to appear, plead, or answer in accordance with Mass.R.Civ.P./Mass.R.Dom.Rel.P. Rule 4, it appearing to the



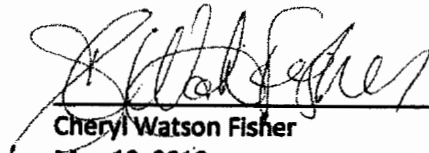
CITY OF CHELSEA, MA
Law Department

City Hall, 500 Broadway, Room 307 · Chelsea, MA 02150
Phone: 617.466-4150 · Fax: 617.466-4159

CHERYL WATSON FISHER
City Solicitor/School Counsel
cfisher@chelseama.gov

Elizabeth C. Caiazzi
Assistant City Solicitor
ecaiazzi@chelseama.gov
Strephon Treadway
Assistant City Solicitor
streadway@chelseama.gov
Nancy A. Slater
Legal Secretary
nslater@chelseama.gov
Pamela Johnson
Office Clerk
pamjohnson@chelseama.gov

I, Cheryl Watson Fisher, City Solicitor for the City of Chelsea, hereby attest and certify that the City of Chelsea received the attached Notice on September 10, 2018. I then provided copies to the City Council, staff to the Planning Board, Zoning Board and Licensing Board. The Notice was then posted on the City's official Bulletin Board where all meetings are posted.



Cheryl Watson Fisher
May 13, 2019

Community Outreach Meeting

Notice is hereby given that a

COMMUNITY OUTREACH MEETING

for a proposed Marijuana Establishment is scheduled

for **SEPTEMBER 20, 2018 at 6PM at**

500 BROADWAY

THIRD FLOOR CITY COUNCIL CHAMBERS,

CHELSEA, MA 02150

The location for the proposed

Marijuana Cultivator and Retailer is

200 Beacham Street, Chelsea, MA 02150

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

Please contact Jay Paul Satin, Esq. with any
inquiries at (781) 289-2215, GreenStar Herbals.

Esta noticia es para informarles que habra una

REUNION DE LA COMUNIDAD

en donde es les informara de la propuesta
para establecer un negocio de Marijuana.

Le reunion esta programada para

el 20 SEPTEMBER 2018 a 6:00PM en el

500 Broadway,

SALA DE CITY COUNCIL CHAMBERS

EN AL TERCER PISO, CHELSEA, MA 02150

La direccion propuesta para

cultivar y vender Marijuana sera en la

200 Beachman Street, Chelsea, MA 02150.

Durante la reunion el public tendra la oportunidad
de hacer preguntas.

Por favor llamar a Lic. Jay Paul Satin, con
cualquiera pregunta (781) 289-2215, GreenStar Herbals.

JAY PAUL SATIN

Attorney at Law

385 Broadway, Suite 202
Revere, Massachusetts 02151

jaysatin@hotmail.com

Telephone: (781) 289-2215

Facsimile: (781) 289-1200

September 10, 2018



CERTIFIED MAIL: 7014 0150 0001 0513 5894
and RETURN RECEIPT

RE: GreenStar Herbals / 200 Beacham St, Chelsea

Dear Sir or Madam:

As regard the above, enclosed please find: Community Outreach Meeting Notice.

If you should have any questions or concerns, please feel free to contact my office.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Jay Paul Satin" with a stylized flourish at the end.

Jay Paul Satin

JPS/jm
Encls.

JAY PAUL SATIN

Attorney at Law

385 Broadway, Suite 202
Revere, Massachusetts 02151

jaysatin@hotmail.com

Telephone: (781) 289-2215

Facsimile: (781) 289-1200

September 10, 2018



CERTIFIED MAIL: 7014 0150 0001 0513 5887
and RETURN RECEIPT

RE: GreenStar Herbals / 200 Beacham St, Chelsea

Dear Sir or Madam:

As regard the above, enclosed please find: Community Outreach Meeting Notice.

If you should have any questions or concerns, please feel free to contact my office.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Jay Paul Satin" with a stylized flourish and the initials "JPS" below it.

Jay Paul Satin

JPS/jm
Encls.

JAY PAUL SATIN

Attorney at Law

385 Broadway, Suite 212
Revere, Massachusetts 02151

jaysatin@hotmail.com

Telephone: (781) 289-2215

Facsimile: (781) 289-1200

September 10, 2018



CERTIFIED MAIL: 7014 0150 0001 0513 5924
and RETURN RECEIPT

RE: GreenStar Herbals / 200 Beacham St, Chelsea

Dear Sir or Madam:

As regard the above, enclosed please find: Community Outreach Meeting Notice.

If you should have any questions or concerns, please feel free to contact my office.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Jay Paul Satin" with the initials "(jm)" written below it.

Jay Paul Satin

JPS/jm
Encls.

JAY PAUL SATIN

Attorney at Law

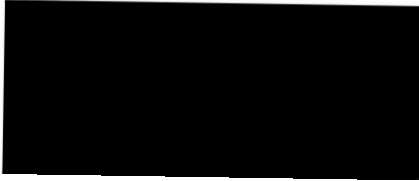
385 Broadway, Suite 202
Revere, Massachusetts 02151

jaysatin@hotmail.com

Telephone: (781) 289-2215

Facsimile: (781) 289-1200

September 10, 2018



CERTIFIED MAIL: 7014 0150 0001 0513 5917
and RETURN RECEIPT

RE: GreenStar Herbals / 200 Beacham St, Chelsea

Dear Sir or Madam:

As regard the above, enclosed please find: Community Outreach Meeting Notice.

If you should have any questions or concerns, please feel free to contact my office.

Thank you.

Jay Paul Satin

JPS/jm
Encls.

ATTACHMENT C

JAY PAUL SATIN

Attorney at Law

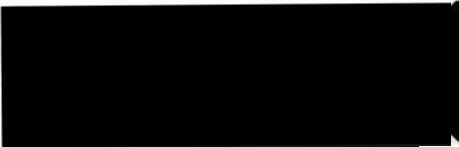
385 Broadway, Suite 202
Revere, Massachusetts 01951

jaysatin@hotmail.com

Telephone: (781) 289-2215

Facsimile: (781) 289-1200

September 10, 2018



CERTIFIED MAIL: 7014 0150 0001 0513 5900
and RETURN RECEIPT

RE: GreenStar Herbals / 200 Beacham St, Chelsea

Dear Sir or Madam:

As regard the above, enclosed please find: Community Outreach Meeting Notice.

If you should have any questions or concerns, please feel free to contact my office.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Jay Paul Satin" with a small "JMS" monogram below it.

Jay Paul Satin

JPS/jm
Encls.

Community Outreach Meeting

Notice is hereby given that a

COMMUNITY OUTREACH MEETING

for a proposed Marijuana Establishment is scheduled

for **SEPTEMBER 20, 2018 at 6PM at**

500 BROADWAY

THIRD FLOOR CITY COUNCIL CHAMBERS,

CHELSEA, MA 02150

The location for the proposed

Marijuana Cultivator and Retailer is

200 Beacham Street, Chelsea, MA 02150

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

Please contact Jay Paul Satin, Esq. with any
inquiries at (781) 289-2215, GreenStar Herbals.

Esta noticia es para informarles que habra una

REUNION DE LA COMUNIDAD

en donde es les informara de la propuesta
para establecer un negocio de Marijuana.

Le reunion esta programada para

el 20 SEPTEMBER 2018 a 6:00PM en el

500 Broadway,

SALA DE CITY COUNCIL CHAMBERS

EN AL TERCER PISO, CHELSEA, MA 02150

La direccion propuesta para

cultivar y vender Marijuana sera en la

200 Beachman Street, Chelsea, MA 02150.

Durante la reunion el public tendra la oportunidad
de hacer preguntas.

Por favor llamar a Lic. Jay Paul Satin, con
cualquiera pregunta (781) 289-2215, GreenStar Herbals.

September 21, 2021

City Manager Tom Ambrosino
Chelsea City Hall
500 Broadway
Chelsea, MA 02150

Re: Request for Records of Costs Related to GreenStar Herbals, Inc.

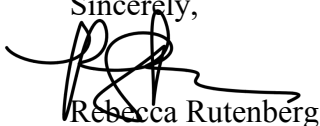
Dear City Manager Ambrosino:

Please be advised that as a requirement of GreenStar Herbals, Inc.'s license renewal for its marijuana establishment in the City of Chelsea, the Cannabis Control Commission (the "Commission") requires the establishment to submit, (1) documentation that it requested from its host community the records of any cost to the City, whether anticipated or actual, resulting from the licensee's operation within its borders, and (2) any response received from the host community in connection with such request, and if no response is received, an attestation to that effect.

Accordingly, please accept this correspondence as a formal request to the City to produce the records of any cost, whether anticipated or actual, resulting from the company's operation within the City. Please note that a copy of this correspondence along with any response received from the City, or barring receipt of any response, an attestation to that effect, shall be submitted to the Commission. As the City is aware, in accordance with M.G.L. c. 94G, § 3(d), any cost to the City imposed by the operation of a Marijuana Establishment shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

If we can provide additional information, please do not hesitate to ask.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebecca Rutenberg', with a stylized flourish extending to the right.

Rebecca Rutenberg
rebecca@vicentesederberg.com

Attestation Regarding Outreach re: Records of Municipal
Cost Relating to GreenStar Herbals, Inc's Operations

I, Anthony Georgiadis, an authorized representative of GreenStar Herbals, Inc. ("GreenStar") attest that a letter requesting the records of any municipal cost resulting from GreenStar's operation within the borders of its host municipality was sent to the GreenStar's host municipality on September 20, 2021. As of this date, no response has been received. GreenStar will update the Cannabis Control Commission should it receive a response.



Anthony Georgiadis

September 21, 2021

Date



Plan to Positively Impact Areas of Disproportionate Impact

Overview

GreenStar Herbals, Inc. (“GreenStar”) is dedicated to serving and supporting populations falling within areas of disproportionate impact, which the Cannabis Control Commission (the “Commission”) has identified as the following:

1. Past or present residents of the geographic “areas of disproportionate impact,” which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions.

To support such populations, GreenStar has created the following Plan to Positively Impact Areas of Disproportionate Impact (the “Plan”) and has identified and created goals/programs to positively impact past or present residents of the City of Chelsea, Massachusetts.

Goals

In order for GreenStar to positively impact Chelsea and its residents, GreenStar has established the following goals:

1. Reducing barriers to entry in the commercial adult-use cannabis industry by hiring and maintaining a labor force (across all GreenStar locations) in which at least fifty percent (50%) of individuals are residents of Chelsea or another area of disproportionate impact; and
2. Providing business assets towards endeavors in Chelsea that will have a positive impact on the members of the community.

Programs

GreenStar has developed specific programs to effectuate its stated goals to positively impact Chelsea residents. Such programs will include the following:

1. Instituting a preferential hiring program for Chelsea residents and residents of other areas of disproportionate impact, which will include ongoing outreach at Chelsea-based career fairs at least once annually, and posting available positions in the Chelsea Record, and other such appropriate publications and mediums to attract residents of Chelsea;
2. Conducting at least one (1) industry-specific educational seminar annually on marijuana retailing and marijuana business management for Chelsea residents; and
3. Providing a monetary donation of at least two thousand five hundred dollars (\$2,500.00) at least once annually to a non-profit organization with goals to improve Chelsea that will



have a positive impact on members of the Chelsea community (specific information related to GreenStar's past and future donations is included below).

Measurements

The Director of Operations will administer the Plan and be responsible for developing measurable outcomes to ensure GreenStar continues to meet its commitments. Such measurable outcomes, in accordance with GreenStar's goals and programs described above, include:

- Hiring and maintaining a labor force (across all GreenStar locations) in which at least fifty percent (50%) of individuals are residents of Chelsea or another area of disproportionate impact;
- Documenting the number and subject matter of industry-specific educational seminars offered and performed, and to whom; and
- Documenting the number and amount of any donations made to initiatives with goals to improve disproportionately impacted areas.

Beginning upon receipt of GreenStar's first "Commence Operations" designation from the Commission to operate a marijuana establishment in the Commonwealth, GreenStar will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Director of Operations will review and evaluate GreenStar's measurable outcomes no less than twice annually to ensure that GreenStar is meeting its commitments. Such evaluation will include a staffing analysis, which will include a comprehensive review of GreenStar's personnel files. The staffing analysis will include the number of individuals from Chelsea or another area of disproportionate impact who were hired and retained for a period of no less than six (6) months. GreenStar is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

In the event that GreenStar is not meeting its commitments, GreenStar will conduct an employee survey to solicit company-wide input on the successes of existing positive impact programs and ways to better serve the needs of Chelsea residents. In addition, GreenStar will increase the number of industry-specific educational seminars it offers from one (1) to two (2) annually.

Donations to Non-Profit Organizations

Moreover, in furtherance of GreenStar's goal of providing business assets towards endeavors in Chelsea that will have a positive impact on the members of the community, GreenStar has already begun to demonstrate its commitment to serving and supporting Chelsea by making a donation of five thousand dollars (\$5,000.00) to the Chelsea Chamber of Commerce Charitable Foundation, Inc. (the "Chelsea Chamber Foundation") on June 21, 2019, which the Chelsea



Chamber Foundation will use to further its “Shades of Chelsea” project intended to remove blight and improve Chelsea’s downtown. Additionally, GreenStar will make a future annual donation of at least two thousand five hundred dollars (\$2,500.00) to GreenRoots, Inc. (“GreenRoots”), a Chelsea community-based non-profit organization dedicated to improving and enhancing the urban environment and public health in Chelsea and surrounding communities. Documentation related to the Chelsea Chamber Foundation’s and GreenRoots’ willingness to accept donations from GreenStar is attached.

Acknowledgements

- As identified above, GreenStar has donated to the Chelsea Chamber Foundation and acknowledges that the Chelsea Chamber Foundation was contacted regarding and has received the donation described herein.
- Furthermore, GreenStar intends to donate to GreenRoots and acknowledges that GreenRoots has been contacted and will receive the donation described herein.
- GreenStar will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.
- Any actions taken, or programs instituted, by GreenStar will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.



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

William Francis Galvin
Secretary of the
Commonwealth

Date: November 05, 2018

To Whom It May Concern :

I hereby certify that according to the records of this office,
GREENSTAR HERBALS, INC.

is a domestic corporation organized on **May 15, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

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

Secretary of the Commonwealth

Certificate Number: 18110069610

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

Processed by:



The Commonwealth of Massachusetts William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

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

Identification Number: 001327773

ARTICLE I

The exact name of the corporation is:

GREENSTAR HERBALS, INC.

ARTICLE II

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

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CNP	\$0.00000	275,000	\$0.00	0

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.

ARTICLE V

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

ARTICLE VI

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

A. LIMITATION OF DIRECTOR LIABILITY. EXCEPT AS REQUIRED BY APPLICABLE LAW, NO DIRECTOR OF THE CORPORATION SHALL HAVE ANY PERSONAL LIABILITY TO THE CORPORATION OR ITS STOCKHOLDERS FOR MONETARY DAMAGES FOR BREACH OF FIDUCIARY DUTY AS A DIRECTOR. THE PRECEDING SENTENCE SHALL NOT ELIMINATE OR LIMIT THE LIABILITY OF A DIRECTOR FOR ANY ACT OR OMISSION OCCURRING PRIOR TO THE DATE UPON WHICH SUCH PROVISION BECOMES EFFECTIVE. B. INDEMNIFICATION. THE CORPORATION SHALL, TO THE EXTENT PERMITTED BY G.L.C. 156D, INDEMNIFY ALL PERSONS WHO HAVE SERVED OR MAY SERVE AT ANY TIME AS OFFICERS OR DIRECTORS OF THE CORPORATION AND THEIR HEIRS, EXECUTORS, ADMINISTRATORS, SUCCESSORS, AND ASSIGNS, FROM AND AGAINST ANY AND ALL LOSS AND EXPENSE, INCLUDING AMOUNTS PAID IN SETTLEMENT BEFORE OR AFTER SUIT IS COMMENCED, AND REASONABLE ATTORNEY'S FEES, ACTUALLY AND NECESSARILY INCURRED AS A RESULT OF ANY CLAIM, DEMAND, ACTION, PROCEEDING, OR JUDGMENT THAT MAY HAVE BEEN ASSERTED AGAINST ANY SUCH PERSONS, OR IN WHICH THESE PERSONS ARE MADE PARTIES BY REASON OF THEIR BEING OR HAVING BEEN OFFICERS OR DIRECTORS OF THE CORPORATION. THIS RIGHT OF INDEMNIFICATION SHALL NOT EXIST IN RELATION TO MATTERS AS TO WHICH IT IS ADJUDGED IN ANY ACTION, SUIT OR PROCEEDING THAT THESE PERSONS ARE LIABLE FOR NEGLIGENCE OR MISCONDUCT IN THE PERFORMANCE OF DUTY. THE INDEMNIFICATION RIGHTS PROVIDED HEREIN (I) SHALL NOT BE DEEMED EXCLUSIVE OF ANY OTHER RIGHTS TO WHICH THOSE INDEMNIFIED MAY BE ENTITLED UNDER ANY LAW, AGREEMENT, VOTE OF SHAREHOLDERS OR OTHERWISE; AND (II) SHALL INURE TO THE BENEFIT OF THE HEIRS, EXECUTORS AND ADMINISTRATORS OF SUCH PERSONS ENTITLED TO INDEMNIFICATION. THE CORPORATION MAY, TO THE EXTENT AUTHORIZED FROM TIME TO TIME BY THE BOARD OF DIRECTORS, GRANT INDEMNIFICATION RIGHTS TO OTHER EMPLOYEES OR AGENTS OF THE CORPORATION OR OTHER PERSONS SERVING THE CORPORATION AND SUCH RIGHTS MAY BE EQUIVALENT TO, OR GREATER OR LESS THAN, THOSE SET FORTH HEREIN. C. PARTNERSHIP. THE CORPORATION MAY BE A PARTNER TO THE MAXIMUM EXTENT PERMITTED BY LAW. D. MINIMUM NUMBER OF DIRECTORS. THE BOARD OF DIRECTORS MAY CONSIST OF ONE OR MORE INDIVIDUALS, NOTWITHSTANDING THE NUMBER OF SHAREHOLDERS. E. SHAREHOLDER ACTION WITHOUT A MEETING BY LESS THAN UNANIMOUS CONSENT. ACTION REQUIRED OR PERMITTED BY CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS TO BE TAKEN AT A SHAREHOLDERS' MEETING MAY BE TAKEN WITHOUT A MEETING BY SHAREHOLDERS HAVING NOT LESS THAN THE MINIMUM NUMBER OF VOTES NECESSARY TO TAKE THE ACTION AT A MEETING AT WHICH ALL SHAREHOLDERS ENTITLED TO VOTE ON THE ACTION ARE PRESENT AND VOTING. F. AUTHORIZATION OF DIRECTORS TO MAKE, AMEND OR REPEAL BYLAWS. THE BOARD OF DIRECTORS MAY MAKE, AMEND OR REPEAL THE BYLAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH BY VIRTUE OF AN EXPRESS PROVISION IN CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS, THE ARTICLES OF ORGANIZATION OR THE BYLAWS REQUIRES ACTION BY THE SHAREHOLDERS.

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: THOMAS MOREY
No. and Street: 310 FLAGG HILL ROAD
City or Town: BOXBOROUGH State: MA Zip: 01719 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	THOMAS MOREY	310 FLAGG HILL ROAD BOXBOROUGH, MA 01719 USA
TREASURER	THOMAS MOREY	310 FLAGG HILL ROAD BOXBOROUGH, MA 01719 USA
SECRETARY	THOMAS MOREY	310 FLAGG HILL ROAD BOXBOROUGH, MA 01719 USA
DIRECTOR	THOMAS MOREY	310 FLAGG HILL ROAD BOXBOROUGH, MA 01719 USA

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

December

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

RETAIL

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

No. and Street: 310 FLAGG HILL ROAD
City or Town: BOXBOROUGH State: MA Zip: 01719 Country: USA

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

No. and Street: 310 FLAGG HILL ROAD
City or Town: BOXBOROUGH State: MA Zip: 01719 Country: USA

which is

☒ its principal office ☐ an office of its transfer agent
☐ an office of its secretary/assistant secretary ☐ its registered office

Signed this 15 Day of May, 2018 at 2:15:20 PM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

THOMAS MOREY

THE COMMONWEALTH OF MASSACHUSETTS

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

May 15, 2018 02:08 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**BYLAWS
OF
GREENSTAR HERBALS, INC.**

BYLAWS OF GREENSTAR HERBALS, INC.

ARTICLE I: GENERAL

Section 1.1 Name and Purposes. The name of the Corporation is GreenStar Herbals, Inc. (the “Corporation”). The purpose of the Corporation shall be as set forth in the Corporation’s Articles of Organization as adopted and filed with the Office of the Secretary of State of the Commonwealth of Massachusetts (as now in effect or as hereafter amended or restated from time to time, the “Articles of Organization”) pursuant to Chapter 156D of the Massachusetts General Laws, as now in effect and as hereafter amended, or the corresponding provision(s) of any future Massachusetts General Law (“Chapter 156D”).

Section 1.2 Articles of Organization. These Bylaws (“Bylaws”), the powers of the Corporation and its shareholders and Board of Directors, and all matters concerning the conduct and regulation of the business of the Corporation, shall be subject to the provisions in regard thereto that may be set forth in the Articles of Organization. In the event of any conflict or inconsistency between the Articles of Organization and these Bylaws, the Articles of Organization shall control.

Section 1.3 Corporate Seal. The Board of Directors may adopt and alter the seal of the Corporation. The seal of the Corporation, if any, shall, subject to alteration by the Board of Directors, bear its name, the word “Massachusetts” and the year of its incorporation.

Section 1.4 Fiscal Year. The fiscal year of the Corporation shall commence on January 1, and end on the following December 31 of each year, unless otherwise determined by the Board of Directors.

Section 1.5 Location of Principal Office of the Corporation. The principal office of the Corporation shall be located at such place within the Commonwealth of Massachusetts as shall be fixed from time to time by the Board of Directors, and if no place is fixed by the Board of Directors, such place as shall be fixed by the President.

ARTICLE II: SHAREHOLDERS

ARTICLE I

ARTICLE II

Section II.1 Place of Meeting. Meetings of the shareholders shall be held at any place within or without the Commonwealth of Massachusetts that may be designated by the Board of Directors. Absent such designation, meetings shall be held at the principal office. The Board of Directors may, in its discretion, determine that the meeting may be held solely by means of remote electronic communication. If authorized by the Board of Directors, and subject to any guidelines and procedures adopted by the Board of Directors, shareholders not physically present at a meeting of shareholders may participate in a meeting of shareholders by means of electronic transmission by and to the Corporation or electronic video screen communication, and may be considered present in person and may vote at a meeting of shareholders, whether held at a designated place or held solely by means of electronic

transmission by and to the Corporation or electronic video screen communication, subject to the conditions imposed by applicable law.

Section 1.6 Annual Meeting. The annual meeting of shareholders of this Corporation shall be held on such date and at such time as may be designated from time to time by the Board of Directors. At the annual meeting, Directors shall be elected, and any other business may be transacted that is within the power of the shareholders and allowed by law; *provided, however*, that, unless the notice of meeting, or the waiver of notice of such meeting, sets forth the general nature of any proposal to (i) approve or ratify a contract or transaction with a Director or with a corporation, firm, or association in which a Director has an interest; (ii) amend the Articles of Organization of this Corporation; (iii) approve a reorganization or merger involving this Corporation; (iv) elect to wind up and dissolve this Corporation; or (v) effect a plan of distribution upon liquidation otherwise than in accordance with the liquidation preferences of outstanding shares with liquidation preferences, no such proposal may be approved at an annual meeting.

Section 1.7 Special Shareholders' Meetings. Special meetings of the shareholders, for any purpose whatsoever, may be called at any time by the President, the Board of Directors, or by shareholders entitled to cast not less than ten percent (10%) of the corporation's voting power. Any person entitled to call a special meeting of shareholders (other than the Board of Directors) may make a written request to the Chair of the Board (if any), President, or Secretary, specifying the general purpose of such meeting and the date, time and place of the meeting, which date shall be not less than thirty-five (35) days nor more than sixty (60) days after the receipt by such officer of the request. Within twenty (20) days after receipt of the request, the officer receiving such request forthwith shall cause notice to be given to the shareholders entitled to vote at such meeting, stating that a meeting will be held on the date and at the time and place requested by the person or persons requesting a meeting and stating the general purpose of the meeting. If such notice is not given twenty (20) days after receipt by the officer of the request, the person or persons requesting the meeting may give such notice. No business shall be transacted at a special meeting unless its general nature shall have been specified in the notice of such meeting, provided, however, that any business may be validly transacted if the requirements for such validity, as provided in Section 2.12 of these Bylaws, are met.

Section 1.8 Shareholder Nominations and Proposals. For business (including, but not limited to Director nominations) to be properly brought before an annual or special meeting by a shareholder, the shareholder or shareholders of record intending to propose the business (the "**Proposing Shareholder**") must have given written notice of the Proposing Shareholder's nomination or proposal, either by personal delivery or by the United States mail to the Secretary of the Corporation. In the case of an annual meeting, the Proposing Shareholder must give such notice to the Secretary of the Corporation no earlier than one hundred-twenty (120) calendar days and no later than ninety (90) calendar days before the date such annual meeting is to be held. If the current year's meeting is called for a date that is not within thirty (30) days of the anniversary of the previous year's annual meeting, notice must be received not later than ten (10) calendar days following the day on which public announcement of the date of the annual meeting is first made. In no event will an adjournment or postponement of an annual

meeting of shareholders begin a new time period for giving a Proposing Shareholder's notice as provided above.

For business to be properly brought before a special meeting of shareholders, the notice of meeting sent by or at the direction of the person calling the meeting must set forth the nature of the business to be considered. A shareholder or shareholders who have made a written request for a special meeting pursuant to Section 2.03 of these Bylaws may provide the information required for notice of a shareholder proposal under this Section simultaneously with the written request for the meeting submitted to the Secretary or within ten (10) calendar days after delivery of the written request for the meeting to the Secretary.

A Proposing Shareholder's notice shall include as to each matter the Proposing Shareholder proposes to bring before either an annual or special meeting:

- (a) The name(s) and address(es) of the Proposing Shareholder(s).
- (b) The classes and number of shares of capital stock of the Corporation held by the Proposing Shareholder.
- (c) If the notice regards the nomination of a candidate for election as Director:
 - (i) The name, age, business, and residence address of the candidate;
 - (ii) The principal occupation or employment of the candidate; and
 - (iii) The class and number of shares of the Corporation beneficially owned by the candidate.
- (d) If the notice is in regard to a proposal other than a nomination of a candidate for election as Director, a brief description of the business desired to be brought before the meeting and the material interest of the Proposing Shareholder of such proposal.

Section 1.9 Notice of Shareholders' Meeting. Except as otherwise provided by law, written notice stating the place, day, and hour of the meeting, and, in case of a special meeting, the nature of the business to be transacted at the meeting, shall be given at least ten (10) days (or, if sent by third class mail, thirty (30) days) and not more than sixty (60) days before the meeting. In the case of an annual meeting, notice will include matters the Corporation's Board of Directors intends, at the time of the giving of the first of such notices, to present to the shareholders for action, and in the case of a meeting at which Directors are to be elected, the names of nominees that the Board of Directors, at the time of the giving of the first of such notices, intends to present to the shareholders for election. Proof that notice was given shall be made by affidavit of the Secretary, assistant Secretary, transfer agent, or Director, or of the person acting under the direction of any of the foregoing, who gives such notice, and such proof of notice shall be made part of the minutes of the meeting. Such affidavit shall be prima facie evidence of the giving of such notice. It shall not be necessary to state in a notice of any meeting

of shareholders as a purpose thereof any matter relating to the procedural aspects of the conduct of such meeting.

Notice shall be given personally, by electronic transmission, or by mail, by or at the direction of the Secretary, or the officer or person calling the meeting, to each shareholder entitled to vote at the meeting. If remote participation in the meeting has been authorized by the Board of Directors, the notice shall also provide a description of the means of any electronic transmission by and to the Corporation or electronic video screen communication by which shareholders may be considered present and may vote and otherwise participate at the meeting.

If mailed, the notice shall be deemed to be given when deposited in the United States mail addressed to the shareholder at the shareholder's address as it appears on the share transfer records of the Corporation, with postage thereon prepaid. Notice may be given to the shareholder by electronic transmission with the consent of the shareholder. Notice by electronic transmission is deemed given when the notice satisfies any of the following requirements:

- (a) Transmitted to a facsimile number provided by the shareholder for the purpose of receiving notice.
- (b) Transmitted to an electronic mail address provided by the shareholder for the purpose of receiving notice.
- (c) Posted on an electronic network, with a separate notice sent to the shareholder at the address provided by the shareholder for the purpose of alerting the shareholder of a posting.
- (d) Communicated to the shareholder by any other form of electronic transmission consented to by the shareholder.

Notice shall not be given by electronic transmission to a shareholder after either (i) the Corporation is unable to deliver two (2) consecutive notices to such shareholder by such means or (ii) the inability to deliver such notices to such shareholder becomes known to any person responsible for giving such notices. Any person entitled to notice of a meeting may file a written waiver of notice with the Secretary either before or after the time of the meeting. The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person objects, at the beginning of the meeting, to the lawfulness of the convening of the meeting and except that attendance is not a waiver of any right to object to conducting business at a meeting that is required to be included in the notice of the meeting, but not so included.

Section 1.10 Persons Entitled to Vote. Except as otherwise provided by law, and except when a record date has been fixed, only persons in whose names shares entitled to vote stand on the stock records of the Corporation at the close of business on the business day next preceding the day on which notice is given shall be entitled to notice of a shareholders' meeting, or to vote at such meeting. In the event notice is waived, only persons in whose names shares entitled to vote stand on the stock records of the Corporation at the close of business on the business day next preceding the day on which the meeting is held shall be entitled to vote. If no record date has been fixed, the record date shall be:

(a) For determining shareholders entitled to give consent to action by the Corporation without a meeting, the day on which the first written consent is given.

(b) For determining shareholders for any other purpose, the later of (i) the day on which the Board of Directors adopts the resolution relating thereto, or (ii) the sixtieth (60th) day prior to the date of such other action.

Section I.11 Fixing the Record Date. The Board of Directors may fix a time in the future as a record date to determine the shareholders entitled to notice of, and to vote at, any meeting of shareholders or give written consent to action by the Corporation without a meeting or entitled to receive any dividend or distribution, or to any change, conversion, or exchange of shares.

A record date fixed under this Section 2.07 may not be more than sixty (60) days or less than ten (10) days before the meeting or more than sixty (60) days before any other action requiring a determination of shareholders. When a record date is so fixed, only shareholders of record at the close of business on that date are entitled to notice of and to vote at the meeting or to receive the dividend, distribution, or allotment of rights, or to exercise the rights, as the case may be, notwithstanding any transfer of any shares on the books of the Corporation after the record date. In the event any meeting of shareholders is adjourned for more than forty-five (45) days from the date set for the original meeting, the Board shall fix a new record date for purposes of giving notice of, and determining the holders of shares entitled to vote at, such adjourned meeting.

Section I.12 Quorum of and Action by Shareholders. The presence at a meeting in person or by proxy of the persons entitled to vote a majority of the voting shares constitutes a quorum for the transaction of business. The shareholders present at a duly called or held meeting at which a quorum is present may continue to do business until adjournment notwithstanding the withdrawal of such number of shareholders so as to leave less than a quorum, if any action taken, other than adjournment, is approved by at least a majority of the shares required to constitute a quorum, except as otherwise provided by law. Except as otherwise provided by law, herein or in the Articles of Organization, the affirmative vote of a majority of the shares represented at a meeting at which a quorum is present, shall be the act of the shareholders.

Section I.13 Adjourned Meetings and Notice Thereof. Any shareholders' meeting, annual or special, whether or not a quorum is present, may be adjourned from time to time by a vote of the majority of the shares present, in person or proxy. When a meeting is adjourned for forty-five (45) days or more, or if a new record date for the adjourned meeting is fixed by the Board of Directors, notice of the adjourned meeting shall be given to such shareholders of record entitled to vote at the adjourned meeting, as in the case of any original meeting. When a meeting is adjourned for less than forty-five (45) days, and a new record date is not fixed by the Board of Directors, it shall not be necessary to give any notice of the time and place of the adjourned meeting, means of electronic transmission or electronic video screen communication, if any, or of the business to be transacted thereat other than by announcement at the meeting at which the adjournment is taken, provided only business that might have been transacted at the original meeting may be conducted at such adjourned meeting.

Section 1.14 Conduct of Meetings. The Board of Directors may adopt by resolution rules and regulations for the conduct of meetings of the shareholders as it shall deem appropriate. At every meeting of the shareholders, the President, or in his or her absence or inability to act, a Director or officer designated by the Board of Directors shall serve as the presiding officer. The Secretary or, in his or her absence or inability to act, the person whom the presiding officer of the meeting shall appoint secretary of the meeting, shall act as secretary of the meeting and keep the minutes thereof.

The presiding officer shall determine the order of business and, in the absence of a rule adopted by the Board of Directors, shall establish rules for the conduct of the meeting. The presiding officer shall announce the close of the polls for each matter voted upon at the meeting, after which no ballots, proxies, votes, changes, or revocations will be accepted. Polls for all matters before the meeting will be deemed to be closed upon final adjournment of the meeting.

Section 1.15 Voting of Shares. Unless otherwise provided by law or in the Articles of Organization, each shareholder entitled to vote is entitled to one (1) vote for each share of Common Stock. Any holder of shares entitled to vote on any matter may vote part of such shares in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal. If a shareholder fails to specify the number of shares such shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares such shareholder is entitled to vote.

Section 1.16 Consent of Absentees. The transactions of any meeting of shareholders, however called or noticed, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice, or a consent to the holding of such meeting, or an approval of the minutes thereof. The waiver, notice, or consent need not specify the business transacted or purpose of the meeting, except as required by Chapter 156D. All such waivers, consents, or approvals shall be filed with the corporate records or made a part of the minutes of the meeting.

Section 1.17 Voting by Proxy or Nominee. Every person entitled to vote or execute consents may do so either in person or by one (1) or more agents authorized by a written proxy executed by the person or such person's duly authorized agent and filed with the Secretary of the Corporation. A proxy is not valid after the expiration of eleven (11) months from the date of its execution, unless the person executing it specifies therein the length of time for which it is to continue in force. Except as set forth below, any proxy duly executed is not revoked, and continues in full force and effect, until an instrument revoking it, or a duly executed proxy bearing a later date, executed by the person executing the prior proxy and presented to the meeting is filed with the Secretary of the Corporation, or unless the person giving the proxy attends the meeting and votes in person, or unless written notice of the death or incapacity of the person executing the proxy is received by the Corporation before the vote by such proxy is counted. A proxy that states on its face that it is irrevocable will be irrevocable for the period of time specified in the proxy, if held by a person (or nominee of a person) specified by law to have sufficient interest to make such proxy irrevocable and only so long as he shall have such interest, subject to G.L. c. 156D, § 7.22.

Section 1.18 Action by Shareholders Without a Meeting. Any action, that, under any provision of Chapter 156D may be taken at a meeting of the shareholders, may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, shall be signed by the holders of the outstanding shares having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all shares are entitled to vote thereon were present and voted; *provided, however*, that unless the consents of all shareholders entitled to vote have been solicited in writing, notice shall be given (in the same manner as notice of meetings is to be given), and within the time limits prescribed by law, of such action to all shareholders entitled to vote who did not consent in writing to such action; and *provided, further*, that Directors may be elected by written consent only if such consent is unanimously given by all shareholders entitled to vote, except that action taken by shareholders to fill one or more vacancies on the Board other than a vacancy created by the removal of a Director, may be taken by written consent of a majority of the outstanding shares entitled to vote.

ARTICLE III: DIRECTORS

ARTICLE II

Section II.1 Number of Directors; Identity of Initial Directors. The authorized number of Directors of the Corporation shall be one (1) until changed by an amendment to these Bylaws duly adopted in accordance with these Bylaws by the vote or written consent of a majority of the outstanding shares entitled to vote. The initial Director shall be Thomas Morey.

Section II.2 Powers. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, the Board of Directors, except such powers expressly conferred upon or reserved to the shareholders, and subject to any limitations set forth by law, by the Articles of Organization or by these Bylaws.

Without limiting the generality of the foregoing, and subject to the same limitations, it is hereby expressly declared that the Directors shall have the power and, to the extent required by law the duty to:

(a) Appoint and remove at pleasure of the Board, all officers, managers, management companies, agents, and employees of the Corporation, prescribe their duties in addition to those prescribed in these Bylaws, supervise them, fix their compensation, and require from them security for faithful service. Such compensation may be increased or diminished at the pleasure of the Directors.

(b) Conduct, manage, and control the affairs and business of the Corporation; make rules and regulations not inconsistent with the Articles of Organization or applicable law or these Bylaws; make all lawful orders on behalf of the Corporation; and prescribe in the manner of executing the same.

(c) Incur indebtedness and borrow money on behalf of the Corporation and designate from time to time the person or persons who may sign or endorse checks,

drafts, or other orders of payment of money, notes, or other evidences of indebtedness, issued in the name of, or payable to, the Corporation, and prescribe the manner of collecting or depositing funds of the Corporation, and the manner of drawing checks thereon.

(d) Appoint by resolution of a majority of the authorized number of Directors an executive committee and other committees and delegate to the executive committee any of the powers and authorities of the Board in the management of the business and affairs of the Corporation, except the powers to (i) fill vacancies on the Board or any committee, (ii) fix compensation of Directors; (iii) adopt, amend, or repeal these Bylaws; (iv) amend or repeal resolutions of the Board that are expressly non-amendable or not able to be repealed; (v) declare a dividend or distribution to shareholders or authorize the repurchase of the Corporation's shares except at a rate, in a periodic amount or within a range, determined by the Board; (vi) establish other committees of the Board; or (vii) approve any action that in addition to Board approval requires shareholder approval. The executive committee shall be composed of one (1) or more Directors. The provisions of these Bylaws regarding notice and meetings of Directors shall apply to all committees.

(e) Authorize the issuance of stock of the Corporation from time to time, upon such terms as may be lawful.

(f) Prepare an annual report to be sent to the shareholders after the close of the fiscal or calendar year of this Corporation, which report shall comply with the requirements of law. To the extent permitted by law, the requirements that an annual report be sent to shareholders and the time limits for sending such reports are hereby waived, the Directors, nevertheless, having the authority to cause such report to be sent to shareholders.

Section II.3 Term of Office. Directors shall hold office until the next annual meeting of shareholders and until their successors are elected.

Section II.4 Vacancies and Newly Created Directorships. A vacancy on the Board of Directors exists in case of the occurrence of any of the following events:

(a) The death, resignation, or removal of any Director.

(b) The removal or declaration of vacancy by the Board of Directors of a Director who has been declared of unsound mind by a court order or convicted of a felony.

(c) The Director is a member who is divested from ownership of the marijuana business resulting from a decision by either the state or local licensing authority.

(d) The authorized number of Directors is increased.

(e) At any annual, regular, or special meeting of shareholders at which any Director is elected, the shareholders fail to elect the full authorized number of Directors to be voted for at that meeting.

All vacancies (other than vacancies created by removal of a Director) may be filled by the approval of the Board of Directors or, if there is less than a quorum of Directors, by (i) a vote of the majority of the remaining Directors at a meeting held pursuant to notice or waivers of notice complying with G.L. c. 156D, (ii) unanimous written consent or (iii) a sole remaining Director. Each Director so elected shall hold office until his successor is elected at an annual, regular, or special meeting of the shareholders. The shareholders may, by vote or written consent of a majority of outstanding shares entitled to vote in the election of Directors, elect a Director at any time to fill any vacancy not filled by the Directors. The shareholders may, by vote of a majority of outstanding shares entitled to vote in the election of Directors or unanimous written consent, elect a Director at any time to fill any vacancy created by removal of a Director, except that a vacancy created pursuant to clause (b) of this Section may be filled by the Board of Directors. If the Board of Directors accepts the resignation of a Director tendered to take effect at a future time, the Board or the shareholders may elect a successor to take office when the resignation becomes effective. A reduction of the authorized number of Directors does not remove any Director prior to the expiration of that Director's term of office.

Section II.5 Removal. The Board of Directors may declare vacant the office of a Director who has been declared of unsound mind by an order of the court or convicted of a felony, or who has been barred from ownership of a marijuana business by a final decision of an applicable state or local licensing authority, or otherwise in a manner provided by law.

Any or all of the Directors may be removed from office at any duly called meeting without cause by a vote of the shareholders entitled to elect them. If one (1) or more Directors are so removed at a meeting of shareholders, the shareholders may elect new Directors at the same meeting.

Section II.6 Resignation. A Director may resign effective on giving written notice to the President, unless the notice specifies a later effective date.

Section II.7 Meetings of Directors.

(a) Regular Meetings. A regular annual meeting of the Board shall be held immediately after, and at the same place as, the annual meeting of shareholders for the purpose of electing officers and transacting any other business. The Board may provide for other regular meetings from time to time by resolution.

(b) Special Meetings. Special meetings of the Board for any purpose or purposes may be called at any time by at least one (1) Director. Notice of the time and place of special meetings shall be delivered by mail, electronic delivery or orally. If notice is mailed, it shall be deposited in the United States mail at least four (4) days before the time of the meeting. In the case the notice is delivered either orally or by electronic delivery, notice shall be delivered at least forty-eight (48) hours before the time of the meeting. Any oral notice given personally or by telephone may be communicated either to the Director or to a person at the office of the Director whom the person giving

notice has reason to believe will promptly communicate it to the Director. The notice need not specify the purpose of the meeting nor the place if it is to be held at the principal office of the Corporation.

(c) **Place of Meetings.** Meetings of the Board may be held at any place within or without the Commonwealth of Massachusetts that has been designated in the notice. If a place has not been stated in the notice or there is no notice, meetings shall be held at the principal office of the Corporation unless another place has been designated by a resolution duly adopted by the Board.

Section II.8 Electronic Participation. Members of the Board may participate in a meeting through conference telephone, electronic video screen communication, or other electronic transmission by and to the Corporation. Participation in a meeting by conference telephone or electronic video screen communication constitutes presence in person as long as all Directors participating can communicate with one another. Participation by other electronic transmission by and to the Corporation (other than conference telephone or electronic video screen communication) constitutes presence in person at the meeting as long as participating Directors can communicate with other participants concurrently, each Director has the means to participate in all matters before the Board, including the ability to propose or object to a specific corporate action, and the Corporation implements some means of verifying that each person participating is entitled to participate and all votes or other actions are taken by persons entitled to participate.

Section II.9 Quorum of and Action by Directors. A majority of the authorized number of Directors constitutes a quorum of the Board for the transaction of business. Every act or decision done or made by a majority of the Directors present at a meeting duly held at which a quorum is present is the act of the Board of Directors, unless G.L. c. 156D or the Articles of Organization require a greater number. A meeting at which a quorum is initially present may continue to transact business notwithstanding the withdrawal of Directors, if any action is approved by at least a majority of the Directors who constitute the required quorum for such meeting. A quorum of the Directors may adjourn any Directors' meeting to meet again at a stated time and place. In the absence of quorum, a majority of the Directors present may adjourn from time to time. Notice of the time and place of a meeting that has been adjourned for more than twenty-four (24) hours shall be given to the Directors not present at the time of the adjournment.

Section II.10 Compensation. Directors may receive compensation for their services, and the Board of Directors may authorize payment of a fixed fee and expenses of attendance, if any, for attendance at any meeting of the Board of Directors or committee thereof. A Director shall not be precluded from serving the Corporation in any other capacity and receiving compensation for services in that capacity. The Directors may, from time to time, establish compensation policies of the Corporation consistent with this Section 3.10.

Section II.11 Action by Directors Without a Meeting. Any action required or permitted to be taken by the Board of Directors or any committee thereof under G.L. c. 156D may be taken without a meeting if, prior or subsequent to the action, a consent or consents thereto by all of the Directors in office, or all the committee members then appointed, is filed

with the Secretary to be filed with the minutes of the proceedings of the Board of Directors. Such action by written consent shall have the same force and effect as a unanimous vote of such Directors.

Section II.12 Committees of the Board of Directors. The Board of Directors, by resolution adopted by a majority of authorized Directors, may designate one (1) or more committees, each consisting of one (1) or more Directors, to serve at the pleasure of the Board and to exercise the authority of the Board of Directors to the extent provided in the resolution establishing the committee and permitted by law. The Board of Directors may adopt governance rules for any committee consistent with these Bylaws. The provisions of these Bylaws applicable to meetings and actions of the Board of Directors shall govern meetings and actions of each committee, with the necessary changes made to substitute the committee and its members for the Board of Directors and its members.

A committee of the Board of Directors does not have the authority to:

- (a) Approve actions that require approval of the shareholders or the outstanding shares.
- (b) Fill vacancies on the Board or in any committee.
- (c) Fix compensation of the Directors for serving on the Board or on any committee.
- (d) Amend or repeal bylaws or adopt new bylaws.
- (e) Amend or repeal any resolution of the Board of Directors that by its terms is not so amendable or repealable.
- (f) Make a distribution to shareholders, except at a rate, in a periodic amount or within a price range set forth in the Articles of Organization or determined by the Board.
- (g) Appoint other committees or Board members.

The Board of Directors, by resolution adopted by the majority of authorized Directors, may designate one (1) or more Directors as alternate members of any committee who may replace any absent or disqualified member at any meeting of the committee or for the purposes of any written action by the committee.

The designation of a committee of the Board of Directors and the delegation thereto of authority shall not operate to relieve the Board of Directors, or any member thereof, of any responsibility imposed by law.

ARTICLE IV: OFFICERS

ARTICLE III

Section III.1 Positions and Election. The officers of the Corporation shall be elected by the Board of Directors and shall be a President, a Secretary and a Treasurer. At the discretion of the Board of Directors, the Corporation may also have other officers, including but not limited to one (1) or more Vice Presidents or assistant Vice Presidents, one (1) or more assistant Secretaries, a Chief Financial Officer and a Chief Operations Officer, as may be appointed by the Board of Directors, with such authority as may be specifically delegated to such officers by the Board of Directors. Any two (2) or more offices may be held by the same person.

Officers shall be elected annually at the meeting of the Board of Directors held after each annual meeting of shareholders. Each officer shall serve until a successor is elected and qualified or until the earlier death, resignation or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board of Directors.

Section III.2 Removal and Resignation. Any officer elected or appointed by the Board of Directors may be removed with or without cause by the affirmative vote of the majority of the Board of Directors. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Any officer chosen by the Board of Directors may resign at any time by giving written notice to the Corporation. Unless a different time is specified in the notice, the resignation shall be effective upon its receipt by the President, the Secretary, or the Board.

Section III.3 Powers and Duties of Officers. The powers and duties of the officers of the Corporation shall be as provided from time to time by resolution of the Board of Directors or by direction of an officer authorized by the Board of Directors to prescribe the duties of other officers. In the absence of such resolution, the respective officers shall have the powers and shall discharge the duties customarily and usually held and performed by like officers of corporations similar in organization and business purposes to the Corporation subject to the control of the Board of Directors.

ARTICLE V: INDEMNIFICATION OF DIRECTORS AND OFFICERS

ARTICLE IV

Section IV.1 Indemnification of Officers or Directors. The Corporation shall, to the extent permitted by G.L. c. 156D, indemnify all persons who have served or may serve at any time as officers or Directors of the Corporation and their heirs, executors, administrators, successors, and assigns, from and against any and all loss and expense, including amounts paid in settlement before or after suit is commenced, and reasonable attorney's fees, actually and necessarily incurred as a result of any claim, demand, action, proceeding, or judgment that may have been asserted against any such persons, or in which these persons are made parties by reason of their being or having been officers or Directors of the Corporation. This right of indemnification shall not exist in relation to matters as to which it is adjudged in any action, suit or proceeding that these persons are liable for negligence or misconduct in the performance of duty.

Section IV.2 Non-Exclusivity of Indemnification Rights and Authority to Insure. The foregoing rights of indemnification and advancement of expenses shall be in addition to and not exclusive of any other rights to which any person may be entitled pursuant to any agreement with the Corporation, or under any statute, provision of the Articles of Organization or any action taken by the Directors or shareholders of the Corporation.

The Corporation may buy and maintain insurance to protect itself and any agent against any expense asserted against them or incurred by an agent, whether or not the Corporation could indemnify the agent against the expense under applicable law or the provisions of this Article V.

ARTICLE VI: SHARE CERTIFICATES AND TRANSFER

ARTICLE V

Section V.1 Share Certificates. Shares of the Corporation may, but need not, be represented by certificates. Each certificate issued shall bear all statements or legends required by law to be affixed thereto. For all shares issued or transferred without certificates, the Corporation shall within a reasonable time after such issuance or transfer send the shareholder a written statement of the information required on share certificates pursuant to G.L. c. 156D, § 6.25(b) & (c) and § 6.27. Shareholders can request and obtain a statement of rights, restrictions, preferences, and privileges regarding classified shares or a class of shares with two (2) or more series, if any, from the Corporation's principal office. Each certificate issued shall bear all statements or legends required by law to be affixed thereto.

Every certificate for shares shall be signed by (i), the President, or a Vice President and (ii) the Chief Financial Officer, an assistant Treasurer, the Secretary, or any assistant Secretary.

Section V.2 Transfers of Shares. Transfer of shares of the Corporation shall be made only on the books of the Corporation by the registered holder thereof or by such other person as may under law be authorized to endorse such shares for transfer, or by such shareholder's attorney thereunto authorized by power of attorney duly executed and filed with the Secretary or transfer agent of the Corporation. Except as otherwise provided by law, upon surrender to the Corporation or its transfer agent of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment, or authority to transfer, it shall be the duty of the Corporation to issue a new certificate to the person entitled thereto, cancel the old certificate and record the transaction upon its books.

Section V.3 Registered Shareholders. The Corporation may treat the holder of record of any shares issued by the Corporation as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth of Massachusetts or giving proxies with respect to those shares.

Section V.4 Lost, Stolen, or Destroyed Certificates. The Board of Directors may issue a new share certificate in place of any certificate it previously issued that the shareholder alleges to have been lost, stolen or destroyed provided that the shareholder or the

shareholder's legal representative of the lost, stolen or destroyed certificate shall give the Corporation a bond or other adequate security sufficient to indemnify the Corporation against any potential claim against the Corporation because of the alleged loss, theft or destruction of any such certificate or the issuance of such new certificate.

ARTICLE VII: CORPORATE RECORDS AND INSPECTION

ARTICLE VI

Section VI.1 Records. The Corporation shall maintain adequate and correct books and records of account, minutes of the proceedings of the shareholders, Board of Directors and committees of the Board of Directors, and a record of its shareholders, including names and addresses of all shareholders and the number and class of shares held, along with any other records required by law. The Corporation shall keep such record of its shareholders at its principal office, as fixed by the Board of Directors from time to time, or at the office of its transfer agent or registrar. The Corporation shall keep its books and records of account and minutes of the proceedings of the shareholders, Board of Directors and committees of the Board of Directors at its principal office, or such other location as shall be designated by the Board of Directors from time to time.

Section VI.2 Inspection of Books and Records. The Corporation's accounting books and records and minutes of proceedings of the shareholders, Board of Directors and committees of the Board of Directors shall, to the extent provided by law, be open to inspection of Directors, shareholders and voting trust certificate holders, in the manner provided by law.

Section VI.3 Certification and Inspection of Bylaws. The Corporation shall keep in its principal office the original or a copy of these Bylaws as amended or otherwise altered to date, which shall be open to inspection by the shareholders at all reasonable times during office hours.

ARTICLE VIII: MISCELLANEOUS

ARTICLE VII

Section VII.1 Checks, Drafts, Etc. All checks, drafts or other instruments for payment of money or notes of the Corporation shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the Board of Directors.

Section VII.2 Fiscal Year. The fiscal year of the Corporation shall commence on January 1 of each year.

Section VII.3 Conflict with Applicable Law or Articles of Organization. Unless the context requires otherwise, the general provisions, rules of construction, and the definitions of G.L. c. 156D shall govern the construction of these Bylaws. These Bylaws are adopted subject to any applicable law and the Articles of Organization. Whenever these Bylaws may conflict with any applicable law or the Articles of Organization, such conflict shall be resolved in favor of such law or the Articles of Organization.

Section VII.4 Invalid Provisions. If any one or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

Section VII.5 Emergency Management of the Corporation. In anticipation of or during an emergency, as defined in G.L. c. 156D, § 3.03(d), the Board, in order to conduct the ordinary business affairs of the Corporation, shall modify procedures, including, but not limited to, calling a board meeting, quorum requirements for such board meeting, and designation of additional or substitute Directors; *provided*, that such modifications may not conflict with the Articles of Organization.

In anticipation of or during an emergency, the Corporation shall be able to take any and all of the following actions to conduct the Corporation's ordinary business affairs and operations:

- (a) Modify lines of succession to accommodate the incapacity of any Director, officer, employee or agent resulting from the emergency.
- (b) Relocate the principal office, or designate alternative principal offices or regional offices.
- (c) Give notice to Directors in any practicable matter under the circumstances, including but not limited to publication and radio, when notice of a board meeting cannot be given in a manner prescribed by these Bylaws.
- (d) Deem that one (1) or more officers present at a board meeting is a Director as necessary to achieve a quorum for that meeting.

Section VII.6 Reports. The Corporation shall provide all shareholders with notice of the availability of annual financial reports of the Corporation before the earlier the annual meeting of shareholders or one hundred and twenty (120) days after the close of the fiscal year. Such financial reports shall be prepared and provided to shareholders upon request in compliance with G.L. c. 156D, § 16.20.

Section VII.7 Advisement of Counsel. THE CULTIVATION, PRODUCTION AND SALE OF CANNABIS IS ILLEGAL UNDER FEDERAL LAW. NEITHER PARTY, NOR ATTORNEYS FOR THE CORPORATION, HAVE MADE ANY REPRESENTATION TO THE CONTRARY.

ARTICLE IX: AMENDMENT OF BYLAWS

ARTICLE VIII

Section VIII.1 Amendment by Shareholders. Shareholders may adopt, amend or repeal these Bylaws by the vote or written consent of the holders of a majority of the outstanding shares entitled to vote, except as otherwise provided by law, these Bylaws or the Articles of Organization.

Section VIII.2 Amendment by Directors. Subject to the rights of shareholders as provided in Section 9.01, and the statutory limitations of G.L. c. 156D, the Board of Directors may adopt, amend, or repeal these Bylaws.

[SIGNATURE PAGE TO FOLLOW]

**CERTIFICATE OF SECRETARY
OF
GreenStar Herbals, Inc., a Massachusetts corporation**

The undersigned, Thomas Morey, hereby certifies that he is the duly elected and acting Secretary of GreenStar Herbals, Inc., a Massachusetts corporation (the "**Corporation**"), and that the foregoing Bylaws were adopted as the Bylaws of the Corporation as of SEPT 26, 2018, and that the same do now constitute the Bylaws of the Corporation.

IN WITNESS WHEREOF, the undersigned has executed this certificate on behalf of the Corporation as of this 26 day of SEPT, 2018.

GreenStar Herbals, Inc.

By: 

Name: Thomas Morey

Title: Secretary



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

mass.gov/dor

Letter ID: L0659580544
Notice Date: November 20, 2018
Case ID: 0-000-656-185



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



GREENSTAR HERBALS INC.
310 FLAGG HILL RD
BOXBOROUGH MA 01719-2106

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

Use the confirmation code below to print another copy of this letter or to review your submission.
Confirmation Code: r3phtj

PLAN FOR OBTAINING LIABILITY INSURANCE

GreenStar Herbals, Inc. (“GreenStar Herbals”) has contracted with an insurance provider to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually. The policy deductible is no higher than \$5,000 per occurrence. GreenStar Herbals will continue to consider additional coverage based on availability and cost-benefit analysis.

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



GreenStar Herbals, Inc.

Business Plan

June 25, 2019

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1. EXECUTIVE SUMMARY

1.1 Mission Statement and Message from the CEO

GreenStar Herbals, Inc. (“**GreenStar**”) is a Marijuana Establishment (“**ME**”) committed to creating a safe and clean community environment that provides consistent, high quality cannabis to consumers who are 21 years of age or older.

GreenStar was established by Thomas Morey after a highly successful 25-year career in the computer networking field, partnering with and building Cabletron Systems into a Fortune 500 corporation. Mr. Morey, in his role as President and Chief Executive Officer of GreenStar, has decided to embark on this new and exciting challenge. With the emerging cannabis industry in Massachusetts, Mr. Morey felt he was well positioned to be successful in this new industry by utilizing his vast business and managerial experience to develop the company into a first-class, high-end entity.

GreenStar embarked on assembling the strongest, most experienced team in the industry. With its team’s combined experience, GreenStar believes it is extremely well positioned to provide the City of Chelsea with a professionally run, high-end boutique style retail dispensary, with world-class security, that is easily and safely accessible from a major roadway, with ample parking, and significant revenues and benefits for Chelsea. GreenStar will provide the City with a business that the community and the people who reside there can be proud of.

1.2 License Type

GreenStar is applying for a Certificate of Registration from the Massachusetts Cannabis Control Commission (the “**Commission**”) to operate a Marijuana Establishment (“**ME**”) Marijuana Retailer in Chelsea, Massachusetts.

1.3 Product

In addition to traditional sativa, indica, and hybrid cannabis flower, GreenStar will offer a wide range of products that will allow GreenStar to serve customers with a wide variety of needs. Products that GreenStar intends to offer include, but will not be limited to:

1. Concentrates;
2. Topical salves;
3. Creams and lotions;
4. Patches;
5. Oral mucosal and sublingual dissolving tablets;
6. Tinctures;
7. Sprays;
8. Inhalation ready to use CO2 extracted hash oils;
9. Pre-dosed oil vaporizers; and
10. Ingestion capsules.

1.4 What Drives Us

GreenStar's goals include:

1. Serving customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting local communities in offsetting the cost of GreenStar's operations within their communities;
3. Hiring employees and contractors from within the communities served;
4. Hiring employees and contractors from communities that have been particularly harmed by the war on drugs;
5. Hiring employees from economically distressed communities and giving them the space and knowledge to flourish professionally within GreenStar and the cannabis industry as a whole;
6. Having a diverse and socially representative pool of employees;
7. Empowering the next generation of entrepreneurs and leaders through hiring, training, and teaching;
8. Running an environmentally friendly ME in the Commonwealth of Massachusetts through energy efficient operations; and
9. Selling marijuana products that are safe, effective, consistent, and high quality.

2. COMPANY DESCRIPTION

2.1 Structure

GreenStar is a Massachusetts domestic for-profit corporation interested in applying for a Certificate of Registration from the Massachusetts Cannabis Control Commission (the “**Commission**”) to operate a ME in the Commonwealth.

GreenStar will file, in a form and manner specified by the Commission, an application for licensure as a Marijuana Retailer ME that consists of three packets: an Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

2.2 Operations

GreenStar will be located in Chelsea and has leased a facility in the City. The facility is well positioned and matches the ideal picture of a community dispensary store. The facility was previously used for commercial purposes and remains in good condition. GreenStar plans to initially launch retail establishments in Chelsea and Dracut, and anticipates pursuing a third retail location elsewhere in Massachusetts.

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

GreenStar will track all marijuana and marijuana products in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed that is not tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

GreenStar will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles. Records will be maintained for at least 12 months.

GreenStar will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence.

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

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste,

and liquid waste containing marijuana will be disposed of in compliance with all applicable state and federal requirements.

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

Prior to commencing operations, GreenStar will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of GreenStar.

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

2.3 Security

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

GreenStar's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs.

A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Chelsea Police Department. These surveillance cameras will remain operational even in the event of a power outage.

The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only GreenStar's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity.

All agents and visitors will be required to visibly display an ID badge, and GreenStar will maintain a current list of individuals with access.

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

GreenStar will have security personnel on-site during business hours.

2.4 Benefits to the Municipality

GreenStar looks forward to working cooperatively with the City of Chelsea (which approved

2016 Ballot Question 4 legalizing adult use marijuana with approximately 55% of the vote) to ensure that GreenStar operates as a responsible, contributing member of the Chelsea community. GreenStar anticipates establishing a mutually beneficial relationship with Chelsea in exchange for the City allowing GreenStar to site and operate there. The City stands to benefit in various ways, including but not limited to the following:

- Jobs:
 - A Marijuana Retailer facility will likely add an estimated 12-15 jobs, in addition to hiring qualified, local contractors and vendors.
- Monetary Benefits:
 - A Host Community Agreement with significant monetary donations will provide the City with additional financial benefits beyond local property taxes.
- Access to Quality Product:
 - GreenStar will allow qualified consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants.
- Control:
 - In addition to the Commission, the Chelsea Police Department and other municipal departments will have oversight over GreenStar's security systems and processes.
- Responsibility:
 - GreenStar is comprised of experienced professionals who will be thoroughly background checked and scrutinized by the Commission.

2.5 Zoning

The address for GreenStar's ME is 200 Beacham Street, Chelsea, MA 02150, and this location complies with all Chelsea zoning requirements.

In accordance with Chelsea's Zoning Ordinance, the proposed property is located in Chelsea's Industrial Zoning District, which allows Marijuana Retailers by special permit. In accordance with the Commission's regulations, the property is not located within 500 feet of a public or private school providing education to children in kindergarten or grades 1 through 12.

3. MARKET RESEARCH

3.1 Industry

GreenStar's proposed location is in Chelsea. Surrounding areas include Boston, Everett, Revere, and Winthrop.

3.2 Customers

In Massachusetts, marijuana sales are expected to increase from \$106 million in 2017 to \$457 million in 2018, and eventually to \$1.4 billion in 2025, according to New Frontier Data.

3.3 Competitors

GreenStar's competitors will include any licensed, operational adult-use marijuana retailers in the surrounding communities, but currently there are none.

3.4 Competitive Advantage

GreenStar's competitive advantages over its competition include its team's combined experience and the locations of its proposed facilities.

In every business, there is competition. However, the retail cannabis industry is known to be particularly competitive. GreenStar possesses several strengths which will separate it from the competition. The industry is rapidly growing, and customers are scrutinizing the quality of cannabis dispensed, the service offered, the location of the dispensary, the discounts offered for the products, and to some extent, the branding of the business.

GreenStar Herbals has retained Vicente Sederberg LLP as its state regulatory and compliance counsel. Vicente Sederberg is a full-service, national law firm specializing in the marijuana industry. Headquartered in Denver, Colorado, Vicente Sederberg also has offices in Boston, Jacksonville, and Los Angeles. Vicente Sederberg's attorneys have more than three decades of combined experience representing clients in the marijuana industry and working on marijuana policy reform, including helping to draft Amendment 64 that established the legal market in Colorado and Question 4 that legalized adult-use marijuana in Massachusetts.

In Massachusetts, Vicente Sederberg represents companies like GreenStar that are applying for Marijuana Establishment licenses and routinely advises clients on licensing and regulatory issues. GreenStar has also retained local counsel to assist with real estate, zoning and permitting matters in Chelsea.

Additional competitive advantages include:

1. A premiere real estate location that is positioned to attract the strong patronage that will ensure a positive financial impact for the City of Chelsea and its residents. The existing building will be renovated, with no expenses spared, into an aesthetically pleasing, high-end boutique facility.
2. GreenStar will employ a state-of-the-art, world class security system and plan, which features on-site security officers, alarm systems, video and electronic access control features.

GreenStar is committed to establishing an on-going dialogue and monitoring process with the Chelsea Police Department. GreenStar's security will be second to none and a model for the industry.

3. GreenStar offers rock solid financials with no debt or outsider investors, this ensures the City of Chelsea a fast-track build-out and expedited opening of the facility without delays allowing for a rapid revenue stream for the City. Established banking is set up to ensure safe deposits of all daily sales transactions that results in consistent and uninterrupted business. GreenStar's established banking relationship with Century Bank ensures safe deposits of all daily sales allowing for consistent and uninterrupted business operations. The financial stability of GreenStar also provides assurances for a well-funded, successful operation providing significant benefits, financial and otherwise, to the City and its residents.
4. GreenStar will provide superior quality products meeting the highest of industry standards and guaranteeing no supply issues, thus allowing for a steady and robust revenue stream.
5. A positive impact will be guaranteed for the community by GreenStar through a lucrative financial Host Community Agreement, as well as voluntary community service hours by our employees. Informational, educational offerings will be provided by GreenStar including community outreach programs and cooperative programs in association with existing community programs and groups. Lastly, GreenStar anticipates 12-15 newly created jobs will be available to Chelsea residents.
6. GreenStar's goal and commitment is to ensure the City of Chelsea that GreenStar's facility, and the company itself, will be a model of success and cooperation in this new and exciting industry. It promises to provide a safe, secure and successful operation that will not only be financially beneficial to the City, but will also become a business the City can respect and be proud of.

3.5 Regulations

GreenStar is a Marijuana Establishment, consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

GreenStar will be registered to do business in the Commonwealth as a domestic business corporation or another domestic business entity, and will maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth and Department of Revenue.

GreenStar will apply for all state and local permits and approvals required to renovate and operate the facility.

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

4. PRODUCT / SERVICE

4.1 Product & Service

GreenStar's core product sold as a Marijuana Retailer will be marijuana, which will come in a variety of strains and product types. GreenStar will also engage in the sale of marijuana infused products including concentrates, topical salves, creams and lotions, patches, oral mucosal and sublingual dissolving tablets, tinctures, sprays, inhalation ready to use C02 extracted hash oils, pre-dosed oil vaporizers and ingestion capsules.

4.2 Pricing Structure

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

5. MARKETING & SALES

5.1 Growth Strategy

GreenStar's plan to grow the company includes:

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

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

5.2 Communication

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

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

In compliance with 935 CMR 500.000 *et seq.*, GreenStar may share information with customers through:

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

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

5.3 Sales

GreenStar will sell its products and services by engaging customers with knowledgeable in-store personnel.

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

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

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

5.4 Logo

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

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

An image of the logo can be found below:





DIVERSITY PLAN

Overview

GreenStar Herbals, Inc. ("GreenStar") is dedicated to promoting equity in its operations for diverse populations, which the Cannabis Control Commission (the "Commission") has identified as the following:

1. Minorities;
2. Women;
3. Veterans;
4. People with disabilities; and
5. People who identify as LGBTQ+.

To support such populations, GreenStar has created the following Diversity Plan (the "Plan") and has identified and created goals/programs to promote equity in GreenStar's operations.

Goals

In order for GreenStar to promote equity for women, minorities, and veterans in its operations, GreenStar has established the following goals:

- Having GreenStar's staff comprised of individuals from the following demographics:
 - At least 40% of staff will be Women;
 - At least 15% of staff will be Minorities; and
 - At least 5% of staff will be Veterans;

Programs

In order to ensure not only a diverse workforce, but also promote equity in its operations, GreenStar has developed specific programs which will include the following:

1. Recruiting for Diversity
 - a. Participating in at least two (2) career fairs per year in underrepresented and minority communities, which will be advertised in The Chelsea Record; and
 - b. Advertising employment opportunities, as they become available but not less than quarterly, that are tailored to individuals falling into the above-listed diverse populations on DiversityWorking.com and HirePurpose.com.
2. GreenStar "Success Program"

Green Star has developed a Success Program that will promote equity and ensure that individuals from the above-listed diverse populations are provided with opportunities and the tools they need to succeed in the cannabis industry. Twice a year, GreenStar will host educational seminars for individuals from the above-listed diverse populations;

educational seminars will be able to accommodate no fewer than twenty (20) such individuals per seminar. The subject matters of the educational seminars will include marijuana retailing¹ and marijuana business management.² GreenStar will publicize such educational seminars in The Chelsea Record.

Measurements

The Director of Operations will administer the Plan and be responsible for developing measurable outcomes to ensure GreenStar continues to meet its commitments. Such measurable outcomes, in accordance with GreenStar's goals and programs described above, include:

- Documentation supporting GreenStar's goals of having at least 40% of staff comprised of women; 15% of staff comprised of minorities; and 5% of staff comprised of veterans;
- The number of job postings on DiversityWorking.com and HirePurpose.com (not less than quarterly);
- The number of candidates from the above-listed diverse populations interviewed;
- The number of candidates from the above-listed diverse populations hired;
- The number of employees from the above-listed diverse populations retained for at least six (6) months; and
- The number and demographics of individuals that participate in GreenStar's Success Program (including documentation of the topics covered).

Beginning upon receipt of GreenStar's first Provisional License designation from the Commission to operate a marijuana establishment in the Commonwealth, GreenStar will begin to utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Director of Operations will review and evaluate GreenStar's measurable outcomes no less than twice annually to ensure that GreenStar is meeting its commitments.

In the event that GreenStar is not meeting its commitments, GreenStar will issue a survey to poll its workforce to solicit company-wide input on the successes and failures of existing diversity initiatives. Additionally, GreenStar will increase the number of educational seminars offered through its Success Program from two (2) to three (3) seminars per year.

Acknowledgements

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

¹ Topics for marijuana retailing will include inventory tracking; product storage; limiting access to those 21 and older; and sales transactions.

² Topics for marijuana business management will include marketing and branding strategies and requirements; wholesaling from cultivators and product manufacturers; financial records and accounting; and employee management.

ENERGY COMPLIANCE PLAN

GreenStar Herbals, Inc. (“GreenStar Herbals”) is currently exploring potential energy-use reduction opportunities such as natural lighting and energy efficiency measures and a plan for implementation of such opportunities.

Potential Energy-Use Reduction Opportunities

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

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

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

Renewable Energy Generation Opportunities

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

Strategies to Reduce Electric Demand

GreenStar Herbals is considering the following strategies to reduce electric demand:

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

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

Opportunities for Engagement with Energy Efficiency Programs

GreenStar Herbals also plans on engaging with energy efficiency programs offered by Mass Save and the Massachusetts Clean Energy Center and will coordinate with municipal officials to identify other potential energy saving programs and initiatives. GreenStar Herbals will also

coordinate with its utility companies to explore any energy efficiency options available to GreenStar Herbals.

QUALIFICATIONS AND TRAINING

GreenStar Herbals, Inc. (“GreenStar Herbals”) will continue to ensure that all employees hired to work at a GreenStar Herbals facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

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

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

Training

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

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

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

Basic Core Curriculum

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

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

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

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

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

MAINTAINING OF FINANCIAL RECORDS

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

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

- Additional written business records are kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- License Renewal Records
 - GreenStar Herbals shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

QUALITY CONTROL AND TESTING

Quality Control

GreenStar Herbals, Inc. (“GreenStar Herbals”) will continue to comply with the following sanitary requirements:

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

11. GreenStar Herbals will continue to ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet GreenStar Herbals' needs;
12. GreenStar Herbals' plumbing is of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing properly conveys sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. GreenStar Herbals provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. GreenStar Herbals holds all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. GreenStar Herbals stores and transports finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

GreenStar Herbals will continue to ensure that GreenStar Herbals' facility is always maintained in a sanitary fashion and comply with all applicable sanitary requirements.

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

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

Testing

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

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

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

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

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

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

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

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of GreenStar Herbals' marijuana at a laboratory providing marijuana testing services complies with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12),

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

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

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

Quality Control Samples

Quality Control Samples provided to employees may not be consumed on GreenStar Herbals' Premises nor may they be sold to another licensee or Consumer. Quality Control Samples will be tested in accordance with 935 CMR 500.160: Testing of Marijuana and Marijuana Products. GreenStar Herbals will limit the Quality Control Samples provided to all employees in a calendar month period to the following aggregate amounts:

1. Five grams of Marijuana concentrate or extract, including but not limited to tinctures;
2. Five hundred milligrams of Edibles whereby the serving size of each individual sample does not exceed five milligrams and otherwise satisfies the potency levels set forth in 935 CMR 500.150(4): Dosing Limitations; and
3. Five units of sale per Cannabis product line and no more than six individual Cannabis product lines. For purposes of 935 CMR 500.130(8): Vendor Samples, a Cannabis product line shall mean items bearing the same Stock Keeping Unit Number.

If Quality Control Samples are provided as Vendor Samples pursuant to 935 CMR 500.130(8), they are assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission, and further, shall be designated as "Quality Control Sample."

Quality Control Samples have a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size containing at minimum the following information:

1. A statement that reads: “QUALITY CONTROL SAMPLE NOT FOR RESALE”;
2. The name and registration number of the Marijuana Product Manufacturer;
3. The quantity, net weight, and type of Marijuana flower contained within the package; and
4. A unique sequential, alphanumeric identifier assigned to the Production Batch associated with the Quality Control Sample that is traceable in the Seed-to-sale SOR.

Upon providing a Quality Control Sample to an employee, GreenStar Herbals will record:

1. The reduction in quantity of the total weight or item count under the unique alphanumeric identifier associated with the Quality Control Sample;
2. The date and time the Quality Control Sample was provided to the employee;
3. The agent registration number of the employee receiving the Quality Control Sample; and
4. The name of the employee as it appears on their agent registration card.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), GreenStar Herbals, Inc. (“GreenStar Herbals”) is only accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a GreenStar Herbals agent will immediately inspect the person’s proof of identification and determine the person’s age, in accordance with 935 CMR 500.140(2).

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

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

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

GreenStar Herbals, Inc. (“GreenStar Herbals”) will continue to securely maintain personnel records, including registration status and background check records. GreenStar Herbals keeps, at a minimum, the following personnel records:

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

Agent Personnel Records

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

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

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

Agent Background Checks

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

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

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

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

Personnel Policies and Training

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

GreenStar Herbals possess a policy for the immediate dismissal of any dispensary agent who has:

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