



Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC282527
Original Issued Date: 10/22/2020
Issued Date: 05/11/2023
Expiration Date: 05/11/2024

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Grow One Inc.

Phone Number: 978-479-0134
Email Address: irenetarshi13@gmail.com

Business Address 1: 60 Dix Street
Business City: Lowell
Business State: MA
Business Zip Code: 01852
Business Address 2:
Mailing Address 1: 362 North End Boulevard
Mailing City: Salisbury
Mailing State: MA
Mailing Zip Code: 01952
Mailing Address 2:

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

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

PRIORITY APPLICANT

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

RMD INFORMATION

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

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100
Role: Owner / Partner
Percentage Of Control: 100
Other Role:

First Name: Irene	Last Name: Tarshi	Suffix:
Gender: Female	User Defined Gender:	

What is this person's race or ethnicity?: Middle Eastern or North African (Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian), Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY
No records found

CLOSE ASSOCIATES AND MEMBERS
No records found

CAPITAL RESOURCES - INDIVIDUALS
Individual Contributing Capital 1

First Name: Irene	Last Name: Tarshi	Suffix:	
Types of Capital: Monetary/ Equity	Other Type of Capital:	Total Value of the Capital Provided: \$1100000	Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES
No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES
No records found

DISCLOSURE OF INDIVIDUAL INTERESTS
Individual 1

First Name: Irene	Last Name: Tarshi	Suffix:
Marijuana Establishment Name: Grow One Inc.	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Lowell	Marijuana Establishment State: MA	

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 60 Dix Street	
Establishment Address 2:	
Establishment City: Lowell	Establishment Zip Code: 01852
Approximate square footage of the Establishment: 10000	How many abutters does this property have?: 53
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes	
Cultivation Tier: Tier 02: 5,001 to 10,000 sq. ft.	Cultivation Environment: Indoor

FEE QUESTIONS

Cultivation Tier: Tier 03: 10,001 to 20,000 sq. ft Cultivation Environment: Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Grow One Inc-HCA Certification.pdf	pdf	5dea84f540e348579197ff64	12/06/2019

Plan to Remain Compliant with Local Zoning	Grow One-Local Zoning Compliance Plan.pdf	pdf	5dea84ff8bdcfd57ae529290	12/06/2019
Community Outreach Meeting Documentation	Community Outreach docs for Grow One.pdf	pdf	5f1855a9a3272a742d1c2da9	07/22/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Positive Impact Plan - Grow One Inc. - Cultivation (1).pdf	pdf	5efbb8a13bc38b6be8a7ccc6	06/30/2020
Other	NEVA PIP Acceptance Letter for Grow One Inc..pdf	pdf	5efbc1fb7375807accfc6463	06/30/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other Role:
First Name: Irene Last Name: Tarshi 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
Articles of Organization	Grow One Inc-Articles of Organization.PDF	pdf	5dea86318bdcfd57ae5292a0	12/06/2019
Bylaws	Grow One Inc-Corporate Bylaws.pdf	pdf	5dea86337aad8653363c0650	12/06/2019
Secretary of Commonwealth - Certificate of Good Standing	Grow One Inc-Sec of Comm-Certificate of Good Standing.pdf	pdf	5dea864ca9ef3857c445cecd	12/06/2019
Department of Revenue - Certificate of Good standing	Grow One-DOR-CertificateofGoodStanding.pdf	pdf	5dea8656d5b0805341c656d7	12/06/2019
Department of Revenue - Certificate of Good standing	Grow One-UA form (1).pdf	pdf	5ea30b05f0445c357cb0ab53	04/24/2020

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	2023-02-03 Grow One Inc. - Certificate of Good Standing	pdf	63dd6142a8e275000719da1f	02/03/2023

	(DOR).pdf			
Secretary of Commonwealth - Certificate of Good Standing	2023-02-03 Grow One Inc. - Certificate of Good Standing (SOC).pdf	pdf	63dd6144a8e275000719da4f	02/03/2023
Department of Unemployment Assistance - Certificate of Good standing	2023-02-22 Grow One Inc. - DUA Attestation.pdf	pdf	6421034f50e43b00083d534d	03/26/2023

Massachusetts Business Identification Number: 001367248

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Grow One Business Plan (1).pdf	pdf	5dea8686fd468857b99bf929	12/06/2019
Plan for Liability Insurance	Grow One - Plan to Obtain Liability Insurance.pdf	pdf	5ebef0d35fa02a2d3651daf2	05/15/2020
Proposed Timeline	2023-03-30 Grow One Inc. - Proposed Timeline (2023 Update).pdf	pdf	6425e3e950e43b0008426f52	03/30/2023

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Record Keeping procedures	Grow One-Record Keeping SOPs.pdf	pdf	5dea86c00f35e05798b3a85c	12/06/2019
Storage of marijuana	Grow One-Storage SOPs.pdf	pdf	5dea86c4160e3b57a3dd5b22	12/06/2019
Transportation of marijuana	Grow One-Transportation SOPs.pdf	pdf	5dea86c5fd468857b99bf92d	12/06/2019
Personnel policies including background checks	Grow One-Personnel SOPs.pdf	pdf	5dea86e7170b4c5353e3d990	12/06/2019
Prevention of diversion	Grow One-Prevention of Diversion.pdf	pdf	5dea86e8160e3b57a3dd5b26	12/06/2019
Quality control and testing	Grow One-Quality Control SOPs.pdf	pdf	5dea86ecbcb01253152f964b	12/06/2019
Inventory procedures	Grow One-Inventory SOPs.pdf	pdf	5dea870574bb15534cd4fd72	12/06/2019
Maintaining of financial records	Grow One-Maintaining Financial Records SOPs.pdf	pdf	5dea871b7aad8653363c0656	12/06/2019
Restricting Access to age 21 and older	Grow One - Restricting Access to age 21 or older.pdf	pdf	5ebef27b8caba634a84399e0	05/15/2020
Qualifications and training	updated for 7-2020 RFI Grow One- Qualifications and Training SOPs.docx.pdf	pdf	5f15eb7344827474644e9953	07/20/2020
Policies and Procedures for cultivating.	7-2020 Grow One Cultivation Procedures.pdf	pdf	5f15f3dba3272a742d1c2849	07/20/2020
Security plan	Security Plan for Grow One.pdf	pdf	5f16fa15cfe2dd743cd67594	07/21/2020
Diversity plan	2023-03-30 Grow One Inc. - Diversity Plan.pdf	pdf	6425e80250f99b0008bae56f	03/30/2023

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: See attached.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: See attached.

HOURS OF OPERATION

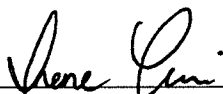
Monday From: Open 24 Hours	Monday To: Open 24 Hours
Tuesday From: Open 24 Hours	Tuesday To: Open 24 Hours
Wednesday From: Open 24 Hours	Wednesday To: Open 24 Hours
Thursday From: Open 24 Hours	Thursday To: Open 24 Hours
Friday From: Open 24 Hours	Friday To: Open 24 Hours
Saturday From: Open 24 Hours	Saturday To: Open 24 Hours
Sunday From: Open 24 Hours	Sunday To: Open 24 Hours

Host Community Agreement Certification Form

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

Applicant

I, Irene Tarshi, Owner, (*insert name*) certify as an authorized representative of Grow One Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with the City of Lowell (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on December 3rd 2019 (*insert date*).



Signature of Authorized Representative of Applicant

Host Community

I, Eileen Donaghue, City Manager, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for the City of Lowell (*insert name of host community*) to certify that the applicant and the City of Lowell (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 12/3/2019 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

Grow One Inc.
Local Zoning Compliance Plan

The City of Lowell's Zoning Ordinance, Article VII, Special Regulations, at Section 7.10, requires marijuana cultivation facilities¹ to go through its site plan review process, which is outlined below.

General Narrative to be Submitted Pursuant to Lowell Zoning Ordinance §7.10.5

Property Location: 60 Dix Street, Lowell, MA 01852

Introduction: As outlined more fully below, Grow One Inc. hereby respectfully requests that the City of Lowell Planning Board grant approval of its site plan to open and operate a marijuana establishment known as a "Tier 2 Cultivator" and a "Marijuana Product Manufacturer" which would sell, at wholesale, marijuana ("cannabis") flower and cannabis derived products only to licensed marijuana establishments throughout the Commonwealth of Massachusetts.

By way of background, on November 8, 2016, Massachusetts voters approved ballot question 4 and thereby legalized the use and sale of marijuana to adults at least twenty-one years old. The Massachusetts legislature subsequently amended the law in Chapter 55 of the Acts of 2017, "An Act to Ensure Safe Access to Marijuana" (the "Act") and which required the creation of a new regulatory agency, the Cannabis Control Commission ("CCC"). On March 23, 2018, the CCC finalized its regulations, 935 CMR 500.00, that created different categories of licenses for the sale of marijuana, including Marijuana Cultivator Tier 2 and Marijuana Product Manufacturing licenses. Grow One Inc. has submitted a Marijuana Cultivator Tier 2 and Marijuana Product Manufacturing license applications and shall abide by all local ordinances. Grow One Inc. entered into a Host Community Agreement with the City of Lowell that defines the rights, duties, and responsibilities of Grow One Inc. and which provides 3% of the gross revenues to the City to offset community impacts from the siting of the facility in Lowell.

Purpose: Grow One Inc. is looking to open and operate a cannabis establishment in Lowell by following all applicable local ordinances and processes and applying for Marijuana Cultivator Tier 2 and Marijuana Product Manufacturing licenses from the Massachusetts Cannabis Control Commission. After obtaining all local approvals and state licensure, the business will consist of the cultivation and manufacturing of top quality cannabis products under one state license and one roof. The Lowell Zoning Ordinance defines "cultivation" to include a marijuana product manufacturer. The proposed Marijuana Cultivator Tier 2 and Marijuana Product Manufacturing businesses would occupy the premises at 60 Dix Street, and other than some supplemental security measures, the exterior of the building shall remain unchanged and therefore the neighborhood character will be preserved.

¹ Article II of the Lowell Zoning Ordinance defines a "Marijuana Cultivation Facility" to include a "Marijuana Product Manufacturer."

Property: The Property (60 Dix Street, Light Industrial Zoning District) is a free-standing steel building that Grow One will be renting approximately 10,000 square feet out of the building's total 18,000 square feet. Minimal exterior alterations may be undertaken in order to comply with the applicable security regulations and pursuant to a review and approval of the security plan by Police Chief Webb. Interior alterations to make the space suitable for cannabis cultivation and manufacturing are planned, but there will be nothing to indicate that this type of business is located within the warehouse visible from the outside. Grow One believes that safety and security are paramount to an adult use marijuana facility. Pursuant to the Lowell Zoning Ordinance, a comprehensive written security plan will be submitted separately to Chief Webb of the Lowell Police Department for approval at a meeting to be held at Police Department Headquarters. As shown in the 1,000 foot context map which is incorporated hereto by reference, there are no Registered Marijuana Dispensaries (medical) or Recreational Retail (adult use) Facilities within 1,000 feet, and there are no schools (K-12 public nor private) within 500 feet of the proposed site.

§7.10.5 Criteria

Pursuant to Section 7.10.5 of the Ordinance, Grow One is required to submit a description of the scale and type of activities proposed to be conducted at the proposed site. The Property will be used for the wholesale of marijuana and marijuana infused products in compliance with applicable state regulations, and which marijuana and marijuana infused products will be cultivated and manufactured on the proposed site. Pursuant to the CCC's adult use marijuana program, if Grow One is granted final Marijuana Cultivator Tier 2 and Marijuana Product Manufacturing licenses, it will be permitted to sell, at wholesale, all cannabis flower that it cultivates on site and any marijuana infused products it manufactures on site to any other licensed marijuana establishment throughout the Commonwealth of Massachusetts. In order to be eligible for sale at wholesale, all marijuana products whether flower or marijuana derived products shall be tested by an approved testing lab and which must receive a passing grade in order to be sold at wholesale. The Marijuana Cultivator Tier 2 and Marijuana Product Manufacturing licenses would also permit Grow One to deliver, in an approved secure vehicle with two registered marijuana agents assigned to the delivery, its products to any other licensed marijuana establishment, but not directly to adult consumers.

Grow One will meet or exceed all conditions found in Section 7.10.4 of the Ordinance. The Property is located, will be constructed, and will be operated in a manner sufficient to minimize, to the maximum extent practicable, any odor, safety concerns, noise, and environmental impacts from the proposed facility. All marijuana and marijuana derived products that Grow One will sell at wholesale shall be packaged in accordance with the CCC's regulations and shall be air-tight and odor proof as well as child resistant.

The Property conforms to all applicable dimensional requirements of properties located in the Light Industrial District, all as shown on the included site plan. In addition to all authorized City of Lowell inspectors, police, fire, or other authorized personnel and any inspectors from CCC or

other regulatory agency with the requisite regulatory authority, only Registered Marijuana Agents, 21 years or older, of Grow One or a Registered Marijuana Agent of a wholesale customer, shall be permitted to be present in the Property or any portion thereof. This facility will not have retail sales direct to adult consumers and therefor Grow One will not utilize a drive-up nor a walk-up window for sales to its wholesale clients.

Finally, Grow One hereby incorporates by reference the documents which shall be submitted with its application materials pursuant to Section 7.10.5. A copy of Grow One's security plan will be submitted for review and approval by Chief Webb of the Lowell Police Department as described herein. A copy of the required solid waste disposal and recycling plan will be submitted to Solid Waste & Recycling, the Lowell Fire Department, and the Lowell Police Department for review and approval. A copy of the Transportation Demand Management Plan has also been included with these materials.

§11.4.7-Site Plan Approval Criteria

1. Buildings

As indicated on the Site Plan, the building is a single story warehouse constructed of steel, concrete, and other materials and the building's footprint is approximately 18,000 square feet. Grow One will not be making any changes to the exterior building(s) which comprise the subject Property and there will be no earthmoving activities.

2. Parking & Loading

There is a large parking area with exclusive use of ten (10) parking spaces located behind the building for convenient employee (10-20 total at full capacity) access to the business. The lot's location and layout are suitable for security monitoring of all parking, loading, and pedestrian activities adjacent to the facility. The exclusive use spaces represent more than the eight (8) required by the Zoning Ordinance (8.33 spaces required pursuant to 1:1,200 square foot requirement for marijuana establishment), and Grow One may also have access to additional parking spaces on the Property if the Planning Board so desires. The Property includes a loading area to the rear of the building which will be the sole approved area for truck deliveries to or from the business. Construction vehicle traffic is anticipated during the buildout phase to properly prepare the interior of the building for cultivation and manufacturing, but should consist primarily of relatively light duty vehicles used by various contractors. No large construction equipment or earth moving equipment shall be required for the proposed use as the use is proposed for an existing warehouse space.

3. Traffic Flow & Circulation

As required by Section 7.10.5 of the Ordinance, Grow One has provided a Transportation Demand Management Plan with its application materials incorporated herein by reference. The relatively low number of employees and deliveries to the proposed site lead to the conclusion that "the additional traffic generated by the proposed co-location of adult use can be safely and

efficiently accommodated along the adjacent roadway network.” As indicated above, there is a parking lot with exclusive use of eleven (11) parking spaces located in rear of the building with adequate space for ingress and egress. The entrance to the site is located next to the intersection of Ellsworth Street and Dix Street and the additional traffic from employees, deliveries, and periodic visits by state and local personnel is not anticipated to create any substantial impact to traffic flows in or near the site.

The following outline describes the modes of transportation to the facility and discusses traffic flows and impacts from employees, construction, maintenance and regular scheduled deliveries. Due to the nature of the intended non-retail business, the majority of the traffic to and from the facility would be the six to ten employees working approved operating hours and would therefore be unlikely to result in a peak or off peak travel nuisance. Deliveries by approved vehicles would occur during designated time periods and loading zones.

- General traffic flows will be conducted off the main public way of Ellsworth Street and Dix Street. Traffic entering our facility will be traveling either east or west along Ellsworth Street or east or west coming from Olney Street.
- Parking lot traffic flows will be through common use drive way, into the designated Grow One parking areas, and turn around will be conducted in the marked locations.
- Employee Parking will be designated as such and parking lot will be painted to reserve specific parking locations for Grow One employees.
- Delivery vehicles will be designed to load and unload in the "Loading Zone"
- Visitor parking will be marked as shown in the site plan

4. External Lighting

The Property utilizes external lighting in the following manner: areaway light on the front, side, and rear of the building, spot lighting at the rear loading area, and lights attached to poles at the driveway entrance closest to Ellsworth Street and on poles sited throughout the parking lot.

5. Landscaping & Screening

As indicated in the Site Plan, the Property features minimal landscaping and is primarily of an industrial character. Grow One does not propose making any additional changes to landscaping or screening of the Property unless so requested by the Planning Board, the CCC, or the Chief of Police.

6. Utilities

The Property is already connected to the municipal water and sewer system and has solar panels on the roof to offset some, or all, of the power required for cultivation and manufacturing of marijuana and marijuana derived products. The Property may require additional amps of electrical service to be installed, which if required, will be installed pursuant to all local regulatory requirements and in close consultation with the applicable utility. Grow One shall, if necessary, request that the landowner become a participant in the Lowell power aggregation program to comply with the applicable rules, regulations, and City of Lowell ordinances.

7. Snow Removal

During and after snowfalls which require removal and clearing of snow, Grow One shall rely on the services of a landscaping and snow plow company to clear and remove snow from its parking lot and areas of ingress and egress provided for by the landowner.

8. Description of Natural Area Protection & Enhancement

The proposed facility is located within an existing commercial warehouse building with a preexisting parking lot that satisfies all of the requirements of the zoning ordinance. No earthmoving operations, major exterior alterations, or grading activities are proposed. There will therefore be no change to the surrounding natural area.

Scale: The Grow One business will occupy a 10,000 square foot facility within the 18,000 square foot free-standing steel building at 60 Dix Street, Lowell, MA 01852, which is in the Light Industrial (LI) zoning district. The Marijuana Cultivator Tier 2 license restricts cultivation to a maximum canopy area of 10,000 square feet of mature plants.

- **Cultivation Plans:** Multiple different strains of cannabis in separate cultivation units will be grown within this business/property. These strains are hand selected by our master grower and selected to provide craft quality products for wholesale to licensed retail establishments. Flowering Canopy is limited to 10,000 sq. ft. of space, while the vegetation growth will be conducted in 1000 sqft, proration in 600 sqft, and mother plants will be cultivated in an additional 900 sqft space. Drying and curing will be designated in a locked humidor style space designed to store products in rotation from 3 units at a time.
- **Manufacturing Plans:** Vaporizer cartridges will be filled using 100% cannabis oil. These cartridges will come in a variety of flavors and potency ranges to provide a wide spectrum of price points to meet the market demands.
- **Product Storage:** Products designated and tagged for sale will be stored in a secured and double locked limited access zone. Executive level employees and owners are the only designated points of contact to this product. Manifests will be kept to secure safe keeping and product diversion. (See general society plans for more details).
- **On Site Sales:** No "on-site" sales will occur at this location.
- **Off Site Deliveries:** Deliveries to other licensed shops will be conducted from this facility. Delivery vehicles will comply with the CCC regulations to ensure safe and secure delivery from location to location. Delivery manifests logging location, drive time, pick up, drop off and return information will be strictly maintained for proper inventory control, regulatory compliance, and reporting purposes.
- **Educational Materials:** Product informational materials will be provided to our sales team for delivery to our retail partners. This educational material will be provided to describe the care and quality with which our products are produced.
- **Programs and Activities:** Providing public education to the local community will be an integral component of our business model. Hosting local forums and gatherings to explain and educate the community about the cannabis industry is a critical part of our

success and our industry's success. Examples include but are not limited to: Cannabis 101, Children's Safety and Limited Access, Treatments and Support panels, etc

Context Map: (See attached) Identification of the community surrounding the property including all types of businesses, land use, residences, child care, and educational.

Security Plan: See attached Documentation to be Submitted to, and reviewed and approved by, Chief of Police Webb

- General Security Plan: This document outlines the entire scope of security and the measures that will be taken to secure the facility in accordance with the applicable Cannabis Control Commission Regulations and with the express written approval of the Lowell Chief of Police.
- Security camera site plan: These architectural site plans will describe in detail where the camera placement will be located. The material will be backed up to a secure data base and stored for 90 days.
- Entry and Exit Plan: This document will describe all locations of the facility designating the Limited Access Zones, Secured product storage, and all secured access entry and exit ways.

Designated Community Liaison: Irene Tarshi

Solid Waste and Recycling Plan: see attached documents for site location of waste stations. The facility will be utilizing 3 stages of waste management to ensure a safe and secure system of disposal. Waste will be maintained in 3 separate locations.

- Solid Waste or Regular Trash: typical dumpster use maintained by Waste Management Solutions or Casellas Waste Management.
- Recycle: Cardboard, glass, and metals will be stored in a separate container and recycled to the appropriate locations for disposal.
- Organic Waste: Our goal is to not waste a speck of dirt. All organic wastes will be appropriately disposed of if they cannot be reused and or donated locally.
 - Off Beet Compost: Lowell based group (Haverhill site) will compost the bulk of our material from soils to peat pods and other type organics.
 - Mill City Grows: Partial amounts of organic matter will be donated to the local organization to help in aerating soil and other compost to local gardens and flower beds
 - Onsite Compost: Our onsite compost area will house the remaining organic material. If acceptable to the City, this material will be donated to the Parks and Recreation Department to help with flower pots, community beds, and other areas with soil.
- Liquid Wastes: Liquid wastes, if any, will be filtered, stored, and disposed of in accordance with all state and local laws.
 - Public Use: Nutrient rich water will be donated to the local community for watering of public gardens, flower beds or other community uses.
 - Any unused water will be set for pick up and disposal to the appropriate water treatment facility.

Pursuant to Lowell Zoning Ordinance, §11.4.7, the following is a zoning evaluation table depicting a cultivation facility as a permitted use in the Light Industrial Zoning District with site plan review approval from the Planning Board.

	LI Zoning District
12.9.s Cultivation	Y (with Site Plan Review)

Grow One will be submitting its Site Plan Review Application to the Lowell Planning Board in January, 2020, subject to the final written City of Lowell approvals of our security plan and waste disposal plan, and anticipates getting on the hearing agenda for a February 2020 hearing with an anticipated grant of site plan approval forthcoming in March 2020. We intend to obtain all requisite building permits for construction of the facility to our specification after we obtain a provisional license from the Massachusetts Cannabis Control Commission. Zoning compliance is of paramount importance to Grow One and we are committed to adhering to the letter and spirit of all applicable zoning ordinances and any other local regulations that may be applicable to the facility.

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, Irene Tarshi, President, (*insert name*) attest as an authorized representative of Grow One, Inc. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on June 6, 2019 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on May 24, 2019 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on May 24, 2019 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on May 24, 2019 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

J. T.

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.

J.T.

FRIDAY, MAY 24, 2019

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CLASSIFIEDS

THE SUN

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Public Notice

CARE AND PROTECTION, TERMINATION OF PARENTAL RIGHTS, SUMMONS BY PUBLICATION, DOCKET NUMBER: 18CP017910,
Tital Court of Massachusetts, Juvenile Court Department, COMMONWEALTH OF MASSACHUSETTS, Middlesex County Juvenile Court, 89 Appleton Street, Lowell, MA 01852 TO: Unknown/unnamed father of Natalia Barnard.

A petition has been presented to this court by DCF - Lowell, seeking, as to the following child, Natalia Barnard, that said child be found in need of care and protection and committed to the Department of Children and Families. The court may dispense the rights of the person(s) named herein to receive notice of or to consent to any legal proceedings affecting the

Public Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 5, 2019 at 6 pm at VFW Post 602, 190 Plain St, Lowell, MA 01852. The proposed Marijuana Cultivation and Manufacturing Establishment is anticipated to be located at 60 Dix Street, Lowell, MA 01852. There will be an opportunity for the public to ask questions May 24, 2019

Public Notice

CITATION GIVING NOTICE OF PETITION FOR APPOINTMENT OF GUARDIAN FOR INCAPACITATED PERSON PURSUANT TO G.L.c. 190B, Section 5-304
Docket No. M19P247360 Commonwealth of Massachusetts The Trial Court Probate and Family Court Middlesex Probate and Family Court

Public Notice

Commonwealth of Massachusetts The Trial Court Probate and Family Court Middlesex Division Docket No. PROBATE NOTICE OF INFORMAL PROBATE Estate of Catherine A O'Donnell, Date of Death 02/10/2019 To all persons who have or may have some interest in the above-captioned estate and, if interested, to the Office of the Attorney General and the Department of Veterans Affairs, notice is hereby given on March 7, 2019 that the Petitioner, John O'Donnell of Andover, MA and William J O'Donnell, Jr. of Weymouth, MA intend to file with the above-named Probate and Family Court, not sooner than seven (7) days after this notice, a Petition for Informal Probate of a will that Shelly Oaks of

214 Attic, Cellar & Odd Jobs

CLEAN UP/CLEAN OUT ESTATES
Attics, cellars, garages, FREE Est. Call Myra Joe 7 DAYS A WEEK 978-995-6257 978-256-5016 Senior Discount

238 Cement & Masonry

ALL TYPES OF MASONRY
Repairs are our specialty! Brick, Block, Stone, Concrete Slabs, Walks, Chimneys, Walls & Ceramic Tile, Lowell & surrounding areas. Free estimates. Call Ted 978-387-8778 or 603-893-1321

341 Painting & Paper Hanging

★ **CHOOSE THE PROS** ★
QUALITY PAINTING, PAPER HANGING, WALL PAPER REMOVAL, NIVEN & SON 978-441-1419 FREE ESTIMATES! Veterans & Senior Disc. 15+ YEARS IN THE SUN

510 Help Wanted General

PAINTERS EXPERIENCED
Own transportation, Reliable and Dependable. Please call 978-256-5761

758 Wanted to Buy

MR. BASEBALL
Buying sports cards are memorabilia 208-767-2407

761 Yard Sales

Multi Family Yard Sale Sat May 25 8-2 (Rain Da Sunday May 26) 225 Pond St, Billerica

762 Under \$100

24"mopoose girl MT bike 21SPD & helmet + chain lock \$45 978 452 903

756 Swimming Pools & Supplies

3 fresh water fishing pool & pool & line tackle box 1 hrs \$30 978 452 9034

268 Drywall & Plastering

AFFORDABLE DRYWALL
Water Damage Repair. Free estimates. Specializing in Textured

507 Help Wanted Business

Manager I, Software Applications for ASH NEXX, Inc. (Billerica, MA) resp for heading a SW dev grn who create, config, test & support sensor/door manufacturing equip. Rags Master's in Comp Sci Comp Sys Eng or rel fld & 2 yrs exp in job offer or

762 Under \$100

For posting go to: www.ubknet.ma.us

756 Swimming Pools & Supplies

36 TASC0 telescope p accessories \$35.00 978 452 9030

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866.896.4979

Public Notice

Commonwealth of Massachusetts The Trial Court Probate and Family Court Middlesex Division

Attachment **B**

May 24, 2019

To whom it may concern:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 6, 2019 at 6 pm at VFW Post 662, 190 Plain St, Lowell, MA 01852. The proposed Marijuana Cultivation and Manufacturing Establishment is anticipated to be located at 60 Dix Street, Lowell, MA 01852. There will be an opportunity for the public to ask questions

The Mensing Group LLC

NDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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

Article Addressed to:

Office of Economic Development
50 Arcand Drive
2nd Floor
Lowell, MA 01852



9590 9402 4444 8248 2568 10

Article Number (Transfer from service label)

7018 3090 0000 6175 6955

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

(over \$500)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☒ Agent ☐ Addressee

B. Received by (Printed Name)

James Ostis 6/5/19

C. Date of Delivery

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

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

NDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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

Planning & Development Office
50 Arcand Drive
2nd Floor
Lowell, MA 01852



9590 9402 4444 8248 2573 98

Article Number (Transfer from service label)

7018 3090 0000 6175 6986

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

Restricted Delivery

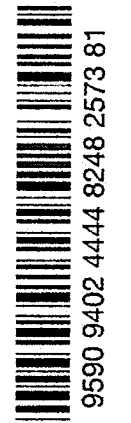
SENDER: COMPLETE THIS SECTION

■ Complete items 1, 2, and 3.

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

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

Mayor's Office
375 Merrimack Street
2nd Floor, Room 50
Lowell, MA 01852



9590 9402 4444 8248 2573 81

NDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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

Article Addressed to:

City Clerk's Office
375 Merrimack Street
1st Floor, Room 31
Lowell, MA 01852



9590 9402 4444 8248 2876 54

Article Number (Transfer from service label)

7018 3090 0000 6175 6962

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

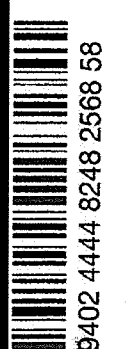
(over \$500)

COMPLETE THIS SECTION

le items 1, 2, and 3.

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

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



9402 4444 8248 2568 58

Attachment I C

May 24, 2019

To whom it may concern:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 6, 2019 at 6 pm at VFW Post 662, 190 Plain St, Lowell, MA 01852. The proposed Marijuana Cultivation and Manufacturing Establishment is anticipated to be located at 60 Dix Street, Lowell, MA 01852. There will be an opportunity for the public to ask questions

The Mensing Group LLC

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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



9590 9402 4444 8248 2568 10

Article Number (Transfer from service label)

7018 3090 0000 6175 6955

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of

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

3. Service Type

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

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

(over \$500)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☒ Agent ☐ Addressee

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

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

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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



9590 9402 4444 8248 2573 98

Article Number (Transfer from service label)

7018 3090 0000 6175 6986

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of

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

3. Service Type

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

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

Restricted Delivery

SENDER: COMPLETE THIS SECTION

■ Complete items 1, 2, and 3.

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

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

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

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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

Article Addressed to:



9590 9402 4444 8248 2876 54

Article Number (Transfer from service label)

7018 3090 0000 6175 6962

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of

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

3. Service Type

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

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

(over \$500)

COMPLETE THIS SECTION

le items 1, 2, and 3.

we can return the card to you.

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



9402 4444 8248 2568 58

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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



9590 9402 4444 8248 2572 68

Article Number (Transfer from service label)

7018 3090 0000 6175 7358

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Estelle P. Kelly*

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below:

3. Service Type

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

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

(over \$500)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent
☐ Addressee

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

- Service Type**
☐ Priority Mail Express
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Return Receipt for Merchandise

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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



9590 9402 4444 8248 2573 12

Article Number (Transfer from service label)

7018 3090 0000 6175 7419

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below:

3. Service Type

- ☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Registered Mail
☐ Registered Mail Restricted Delivery
(over \$500)

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent
☐ Addressee

C. Date of Delivery

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

- Service Type**
☐ Priority Mail Express®
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Return Receipt for Merchandise

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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



9590 9402 4444 8248 2574 59

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below:

3. Service Type

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

- ☐ Priority Mail Express
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt Merchandise

COMPLETE THIS SECTION

Items 1, 2, and 3.

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

RECEIVER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Mary Clark* ☐ Agent ☐ Addressee

C. Date of Delivery
8.29.11

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

3. Service Type

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *J. Parygin* ☐ Agent ☐ Addressee

C. Date of Delivery
8.29.11

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

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

Article Number (Transfer from service label)

7018 3090 0000 6175 7150

Restricted Delivery

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

Domestic Return Form

RECEIVER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

C. Date of Delivery
8.29.11

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

3. Service Type

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

SENDER: COMPLETE THIS SECTION

1. Complete items 1, 2, and 3.

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

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

1. Article Addressed to:

9590 9402 4444 8248 2569 02

Article Addressed to:

7018 3090 0000 6175 6993

Restricted Delivery

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

Domestic Return Form

RECEIVER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Addressee

C. Date of Delivery
8.29.11

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

3. Service Type

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

COMPLETE THIS SECTION

1. Complete items 1, 2, and 3.

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

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

1. Article Addressed to:

9402 4444 8248 2569 26

SENDER: COMPLETE THIS SECTION

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

Article Addressed to:



9590 9402 4444 8248 2574 42

Article Number (Transfer from service label)

7018 3090 0000 6175 7037

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Sharon R. Kelly*

☐ Agent ☒ Addressee

C. Date of Delivery
5-29-19

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

3. Service Type

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

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Sharon R. Kelly*

C. Date of Delivery
5-29-19

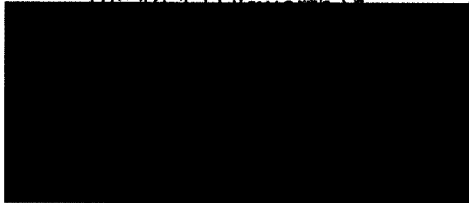
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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

SENDER: COMPLETE THIS SECTION

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

Article Addressed to:



9590 9402 4444 8248 2574 66

Article Number (Transfer from service label)

7018 3090 0000 6175 7051

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent ☒ Addressee

B. Received by (Printed Name)

C. Date of Delivery
5-29-19

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

3. Service Type

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

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

SENDER: COMPLETE THIS SECTION

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



9590 9402 4444 8248 2569 40

SENDER: COMPLETE THIS SECTION

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

Article Addressed to:



9590 9402 4444 8248 2875 93

Article Number (Transfer from service label)

7018 3090 0000 6175 7174

Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent ☒ Addressee

C. Date of Delivery
5-29-19

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

3. Service Type

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

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

COMPLETE THIS SECTION

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

Addressed to:



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



9402 4444 8248 2569 33

SENDER: COMPLETE THIS SECTION

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



9590 9402 4444 8248 2572 37

2. Article Number (Transfer from service label)

7018 3090 0000 6175 6016

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☐ Agent ☐ Addressee
- X [Redacted Signature] ☐ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery ☒ 5/28/19
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type ☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☐ Certified Mail® ☐ Return Receipt Merchandise ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation Restricted Delivery ☐ Signature Confirmation Restricted Delivery (over \$500)

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☐ Agent ☐ Addressee
- X [Redacted Signature] ☐ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery ☒ 5/28/19
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

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

SENDER: COMPLETE THIS SECTION

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



9590 9402 4444 8248 2875 48

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7129

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

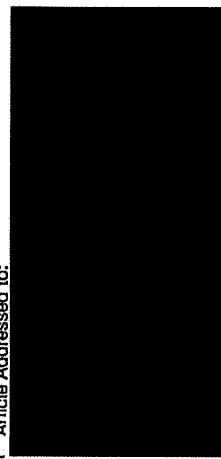
- A. Signature ☐ Agent ☐ Addressee
- X [Redacted Signature] ☐ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery ☒ 5/28/19
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type ☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☐ Certified Mail® ☐ Return Receipt Merchandise ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation Restricted Delivery (over \$500)

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:



9590 9402 4444 8248 2572 51

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7341

SENDER: COMPLETE THIS SECTION

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



9590 9402 4444 8248 2574 28

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7013

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☐ Agent ☐ Addressee
- X [Redacted Signature] ☐ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery ☒ 5/28/19
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type ☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☐ Certified Mail® ☐ Return Receipt Merchandise ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery ☐ Signature Confirmation Restricted Delivery (over \$500)

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☐ Agent ☐ Addressee
- X [Redacted Signature] ☐ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery ☒ 5/28/19
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

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

SENDER: COMPLETE THIS SECTION

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



9590 9402 4444 8248 2571 90

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7464

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:



9590 9402 4444 8248 2574 80

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7082

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☒ Addressee

C. Date of Delivery
5-29

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

3. Service Type

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☒ Addressee

B. Received by (Printed Name)

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

3. Service Type

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

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:



9590 9402 4444 8248 2574 73

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7068

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☒ Addressee

C. Date of Delivery
5-29

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

3. Service Type

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

SENDER: COMPLETE THIS SECTION

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



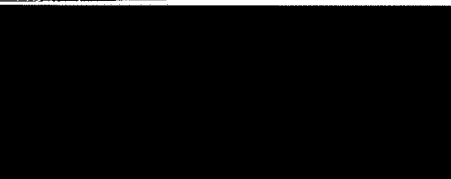
9590 9402 4444 8248 2568 27

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7433

SENDER: COMPLETE THIS SECTION

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



9590 9402 4444 8248 2569 57

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7334

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

Domestic Return

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☒ Addressee

C. Date of Delivery
5-3

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

3. Service Type

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☒ Addressee

B. Received by (Printed Name)

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

3. Service Type

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

SENDER: COMPLETE THIS SECTION

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



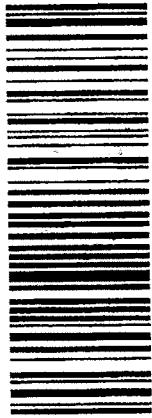
9590 9402 4444 8248 2571 83

2. Article Number (Transfer from service label)

7018 3090 0000 6175 7457

CERTIFIED MAIL

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

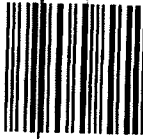


7018 3090 0000 6175 7136

ANIX



1000



01854

U.S. POST
HOLLISTON
01746
MAY 24, 1
AMOUNT
\$6.
R2304M11

NIXIE 015 5E 1 0005/30/19

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD

-- 9308120087150389

ANK

BC: 01746145935

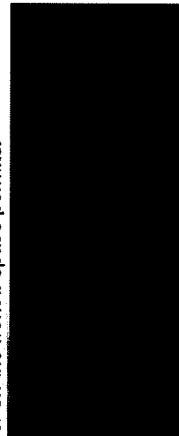
*0321-00055-25-00

0185457226002

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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



9590 9402 4444 8248 2876 16

Article Number (Transfer from service label)

7018 3090 0000 6175 7198

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Adrienne Porter

☒ Agent ☐ Addressee

C. Date of Delivery

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

3. Service Type

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

Article Number

7018 3090 0000 6175 7198

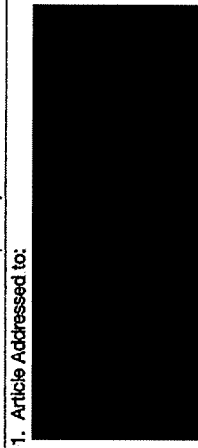
Article Number (Transfer from service label)

7018 3090 0000 6175 7136

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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



9590 9402 4444 8248 2568 41

Article Number (Transfer from service label)

7018 3090 0000 6175 7228

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Adrienne Porter

☒ Agent ☐ Addressee

B. Received by (Printed Name)

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

3. Service Type

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

Article Number

7018 3090 0000 6175 7228

Article Number (Transfer from service label)

7018 3090 0000 6175 7136

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

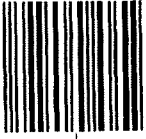
CERTIFIED MAIL



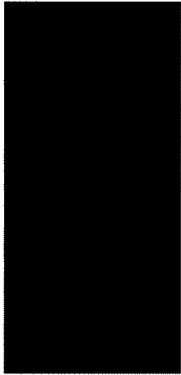
7018 3090 0000 6175 7242



1000



01852



U.S. POSTAL
FCM LETTER
HOLLISTON
01746
MAY 24, 19
AMOUNT
\$6.8
R2304M115

NIXIE

015 DE 1 0006/16/19

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

UNC BC: 01746146935 *0021-00032-25-00
018524693546907E
9400921669167280

50
S. 29
6-14-19
6-26-19
7-3-19
018524693546907E

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

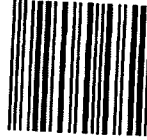
CERTIFIED MAIL



7018 3090 0000 6175 7259



1000



01852



U.S. POSTAL
FCM LETTER
HOLLISTON
01746
MAY 24, 19
AMOUNT
\$6.8
R2304M11

NIXIE

015 DE 1 0006/04/19

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

UTC BC: 01746146935 *0021-00032-25-00
018524693546907E
917461469

6/1/19
6/16/19
6/26/19
6/29/19

Adrienne Porter

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



7018 3090 0000 6175 7006

1000



01852



U.S. POSTS
FOM. ET
MAY 24
R2304M1
\$6
AMOUNT

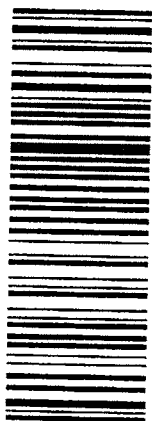
6.4.19



REGISTERED MAIL

Adrienne Porter

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



7018 3090 0000 6175 7501

1000



01852



U.S. POSTS
FOM. ET
MAY 24
R2304M1
\$6
AMOUNT

6.4.19



01852E052 007

7018 3090 0000 6175 7273

7018 3090 0000 6175 7099

01742550000
O'DONNELL CO. CO. CO.

[illegible][illegible]

010001 74452374 B2042

[illegible]

U.S. POST OFFICE
HOLLIS, N.J.
MAY 24 1966
AMOUNT \$6.00
MAY 24 1966

THE
NATIONAL
ARCHIVES
COLLECTION
OF
THE
UNITED STATES
OF AMERICA



U.S. POST
F.C.M. LETTI
HOLLISTO
01746
MAY 24 1966
AMOUNT
\$6.
R2304M15

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

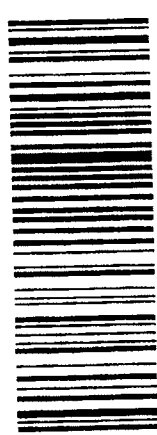
15+
5-30-19

Refused
No contact
Name
10/

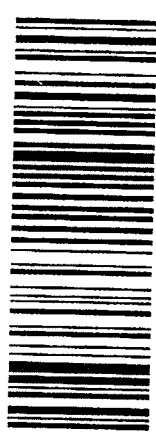
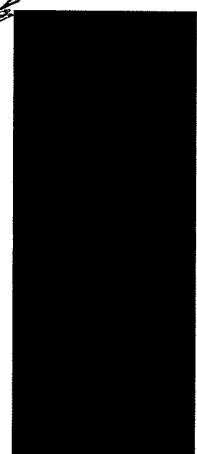
Adrienne Porter
ATTN: The Mensing Group LLC
135 Adams Street
Holliston, MA 01746-2221

50
5-29

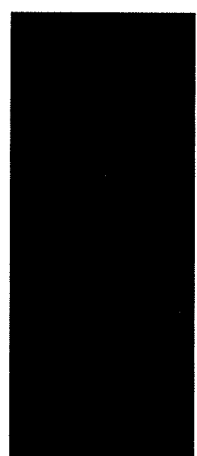
.. 94089212669167126



7018 3090 0000 6175 7365



7018 3090 0000 6175 7211



POSTAGE

U.S. POSTAGE
FCM LETTER
HOLLISTON, MA
01746
MAY 24, 19
AMOUNT
\$6.8



01883346141627E

UNC

SCI

01746195917

01746195917



U.S. POSTAGE PAID
FCM LETTER
HOLLISTON, MA
01746
MAY 24, 19
AMOUNT
\$6.85

R2304M115408-19

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☒ Agent ☐ Addressee

C. Date of Delivery
5-30-19

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



9590 9402 4444 8248 2875 24

Article Number (Transfer from service label)

7018 3090 0000 6175 7105

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

Domestic Return Receipt

3. Service Type

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

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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



9590 9402 4444 8248 2875 86

Article Number (Transfer from service label)

7018 3090 0000 6175 7105

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

3. Service Type

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

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☒ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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



9590 9402 4444 8248 2573 05

Article Number (Transfer from service label)

7018 3090 0000 6175 7402

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

Domestic Return Receipt

3. Service Type

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

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3.

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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



9590 9402 4444 8248 2573 29

Article Number (Transfer from service label)

7018 3090 0000 6175 7426

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

3. Service Type

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

2. Article Number (Transfer from service label)

9590 9402 4444 8248 2574 35



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

SENDER: COMPLETE THIS SECTION

2. Article Number (Transfer from service label)

9590 9402 4444 8248 2574 97



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

SENDER: COMPLETE THIS SECTION

2. Article Number (Transfer from service label)

9590 9402 4444 8248 2572 44



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

SENDER: COMPLETE THIS SECTION

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Certified Mail
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery
☐ Return Receipt
☐ Return Receipt Restricted Delivery
☐ Merchandise
☐ Merchandise Restricted Delivery
☐ Restricted Delivery
☐ Restricted Delivery Restricted Delivery

A. Signature

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Certified Mail
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery
☐ Return Receipt
☐ Return Receipt Restricted Delivery
☐ Merchandise
☐ Merchandise Restricted Delivery
☐ Restricted Delivery
☐ Restricted Delivery Restricted Delivery

A. Signature

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Registered Mail
☐ Registered Mail Restricted Delivery
☐ Certified Mail
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Signature Confirmation
☐ Signature Confirmation Restricted Delivery
☐ Return Receipt
☐ Return Receipt Restricted Delivery
☐ Merchandise
☐ Merchandise Restricted Delivery
☐ Restricted Delivery
☐ Restricted Delivery Restricted Delivery

A. Signature

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

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

A. Signature

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

3. Service Type

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

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

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

A. Signature

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☐ No

If YES, enter delivery address below:

3. Service Type

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

9590 9402 4444 8248 2568 89



2. Article Number (Transfer from service label)

7018 3090 0000 6175 7256

☐ Restricted Delivery

9590 9402 4444 8248 2875 62



2. Article Number (Transfer from service label)

7018 3090 0000 6175 7143

☐ Restricted Delivery

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

Municipal Cost Non-Response Attestation

I, Irene Tarshi, authorized representative for Grow One Inc., sent the attached notice to the City Clerk of Lowell on November 17, 2022. As of the date of this application submission, Grow One Inc. has not received a response from Lowell. Upon receipt of a response, if any, Grow One Inc. will promptly forward the response to the MA Cannabis Control Commission licensing division as a supplement to this application.

By:  _____

Name: Irene Tarshi

Title: President

Date: 02 / 11 / 2023

Entity: Grow One Inc.

November 17, 2022

City Clerk Michael Geary
375 Merrimack Street
1st Floor, Room 31
Lowell, MA 01852

Sent by Email.

Re: Notice of Annual State Cannabis License Renewal - Grow One Inc.

Dear Clerk Geary:

Please be advised that as a condition of Grow One Inc.'s state cannabis license renewal application, the Cannabis Control Commission requires Grow One submit documentation that it requested from its Host Community the records of any cost to the Host Community, whether anticipated or actual, resulting from the licensee's operation within its borders, and any response received from the Host Community in connection with such request.

Accordingly, please accept this correspondence as our formal request to Lowell to produce the records of any cost to Lowell, whether anticipated or actual, resulting from Grow One's operation within the borders of Lowell. 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 Cannabis Control Commission.

Note that M.G.L. c. 94G, § 3(d) requires that any cost to the town imposed by the operation of a Marijuana Establishment be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Sincerely,

Irene Tarshi, President
Grow One Inc.

Grow One Inc. - Cultivation

POSITIVE IMPACT PLAN

Goals: Provide financial support to New England Veterans Alliance (“NEVA”) because it is an entity that offers support, education and/or job training to Massachusetts residents disproportionately impacted by the War on Drugs. The amounts of these donations will depend on the financial growth and profitability of the company. As sales and profits increase, Grow One Inc. will revisit its program donation goals to consider more generous donations as business allows.

Goal 1: Donate a total of **\$2,500.00 annually** to the organizations as more particularly described below.

Program: The donation to be made to New England Veterans Alliance is intended to enhance its ability to cultivate veterans through alternative therapeutic programs. **\$2,500.00 annual donation**

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

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

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

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



The Commonwealth of Massachusetts
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: 001367248

ARTICLE I

The exact name of the corporation is:

GROW ONE, 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:

APPLY FOR LICENSURE/LICENSE WITH THE CANNABIS CONTROL COMMISSION.

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>	
CWP	\$0.01000	1,000	\$10.00	10

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:

NONE

ARTICLE VI

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

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

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

Name: IRENE TARSHI
No. and Street: 362 NORTHEND BLVD.
City or Town: SALISBURY State: MA Zip: 01952 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	IRENE TARSHI	362 NORTH END BLVD. SALISBURY, MA 01952 USA
TREASURER	IRENE TARSHI	362 NORTH END BLVD. SALISBURY, MA 01952 USA
SECRETARY	EDWARD COOREY	98 DUNVEGAN WOOD DRIVE HAMPTON, NH 03842 USA
DIRECTOR	IRENE TARSHI	362 NORTH END BLVD. SALISBURY, MA 01952 USA

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

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

A LICENSURE WITH CANNABIS CONTROL COMMISSION

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

No. and Street: 362 NORTH END BLVD.
City or Town: SALISBURY State: MA Zip: 01952 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: 362 NORTH END BLVD.
City or Town: SALISBURY State: MA Zip: 01952 Country: USA
which is

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

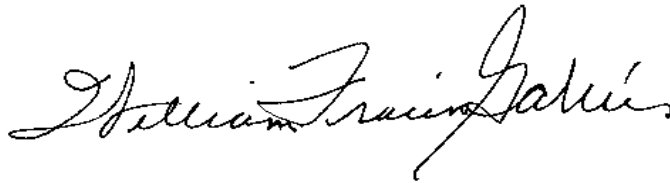
Signed this 6 Day of February, 2019 at 8:07:00 AM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

IRENE TARSHI

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:

February 06, 2019 08:06 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

BYLAWS
Grow One Inc.

SECTION 1 Articles of Organization

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

SECTION 2 Shareholders

2.1 Annual Meeting

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

2.2 Special Meetings

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

2.3 Place of Meetings; Remote Participation

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

2.4 Notice of Shareholder Meetings

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

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

2.5 Action at Meeting

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

2.6 Voting and Proxies

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

2.7 Action by Consent; Electronic Transmission

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

b. Any vote, consent, waiver, proxy appointment, or other action by a shareholder or by the proxy or other agent of any shareholder shall be considered given in writing, dated, and signed if it consists of an electronic transmission that sets forth or is delivered with information from which the corporation can determine (1) that the electronic transmission was transmitted by the shareholder, proxy, or agent or by a

person authorized to act for the shareholder, proxy, or agent; and (2) the date on which such shareholder, proxy, agent, or authorized person transmitted the electronic transmission. The date on which the electronic transmission is transmitted shall be considered the date on which it was signed. The electronic transmission shall be considered received by the corporation if it has been sent to any address specified by the corporation for that purpose or, if no address has been specified, to the principal office of the corporation, addressed to the Secretary or other officer or agent having custody of the records of proceedings of shareholders.

SECTION 3 Directors

3.1 Number and Election

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

3.2 Resignation, Removal, and Vacancy

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

3.3 Powers of Directors

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

3.4 Regular Meetings

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

3.5 Special Meetings

Special meetings of the board of directors may be held at any time and at any place when called by the President, Treasurer, or two or more directors, or the sole director if there is only one director. Notice of such meeting shall be given to each director by the Secretary or, if there is no Secretary, or in case of the

death, absence, incapacity, or refusal of the Secretary, by the officer or directors calling the meeting. Such notice (1) must be given at least two days prior to the date of the special meeting, and (2) need not describe the purpose of the meeting unless otherwise required by the articles of organization or these bylaws.

3.6 Waiver of Notice

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

3.7 Quorum and Voting

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

3.8 Action by Consent

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

3.9 Remote Participation

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

3.10 Committees

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

SECTION 4 Officers

4.1 Identity, Election, and Appointment of Officers

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

4.2 Duties and Powers; Qualification and Tenure

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

4.3 President

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

4.4 Treasurer

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

4.5 Secretary

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

4.6 Removal and Vacancies

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

SECTION 5 Capital Shares

5.1 Share Certificates

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

5.2 Transfer of Shares

Subject to restrictions, if any, imposed by the articles of organization, title to a share certificate and to the shares represented thereby shall be transferred only by delivery of the certificate properly endorsed, or by

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

5.3 Transfer Records

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

5.4 Lost or Destroyed Certificates

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

SECTION 6 Fiscal Year

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

SECTION 7 Indemnification

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

SECTION 8 Other Provisions

8.1 Notices

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

8.2 Voting of Securities

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

SECTION 9 Amendments

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

[END]



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

William Francis Galvin
Secretary of the
Commonwealth

Date: December 03, 2019

To Whom It May Concern :

I hereby certify that according to the records of this office,
GROW ONE, INC.

is a domestic corporation organized on **February 06, 2019** , 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.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 19120096240

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

Processed by:



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

mass.gov/dor

Letter ID: L1092495424
Notice Date: December 4, 2019
Case ID: 0-000-680-288



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



IRENE TARSHI
GROW ONE INC.
362 NORTH END BLVD
SALISBURY MA 01952-2108

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

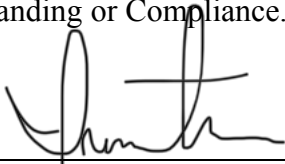
Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

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

Edward W. Coyle, Jr., Chief
Collections Bureau

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

Signed under the pains and penalties of perjury, I, Irene Tarshi, as President of Grow One Inc. certify that Grow One Inc. does not currently have employees and is therefore unable to register with the Massachusetts Department of Unemployment Assistance to obtain a Certificate of Good Standing or Compliance.



Irene Tarshi, President
Grow One Inc.

4/22/20

Date

Grow One, Inc.

60 Dix Street, Lowell, MA 01852
Business Plan

Prepared for: The City of Lowell

Executive Summary

Company Name

Grow One, Inc.

Facility Location

60 Dix Street
Lowell, Massachusetts 01852

Mission

The mission of Grow One, Inc. (“Grow One”) is to operate a cultivation facility that supplies high-quality cannabis products to dispensaries and manufacturers throughout Massachusetts.

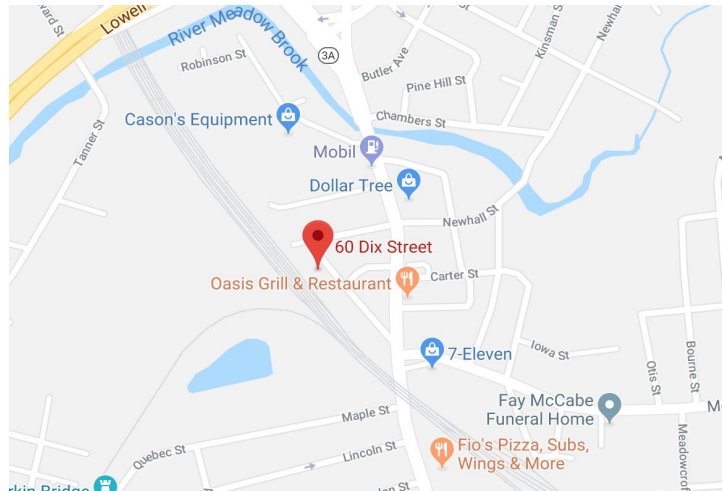
Goals

- ✓ Develop a recognizable and trusted brand.
- ✓ Set industry standards for product quality.
- ✓ Serve as a model to regulatory authorities.
- ✓ Stimulate local economy by employing resident staff and vendors.

The Company

Grow One is a privately funded Massachusetts corporation (ID Number: 001367248) seeking to obtain a Tier 2 marijuana cultivators license from the Cannabis Control Commission (“CCC”) to operate a 10,000 sq.ft. cultivation facility located at 60 Dix Street in Lowell, Massachusetts. Grow One will utilize the facility space to cultivate cannabis through every stage of the grow process, from seed to harvest, before selling the product to authorized manufacturers and retail shops.

Our Grow One team consists of a Board of Directors and trusted advisors with diverse professional backgrounds in the fields of real estate, accounting, finance, management and cannabis cultivation. Our team was intentionally designed to promote a diversified workforce as to increase creativity, productivity and competitive advantages.



Grow One believes that a diverse workforce is a more productive workforce which is why we will recruit and hire qualified persons from the community into all job classifications without regard to race, color, religion, national origin, sex, gender identity or expression, pregnancy, sexual orientation, age, disability, or military status.

The Management

□ Irene Tarshi
(Principal Owner)

Grow One is owned and managed by Irene Tarshi, an emerging female entrepreneur who currently owns and manages several properties, residential and commercial, throughout Massachusetts. She is a business-minded woman with an eye for market trends, a knack for investing and a reputation as a fierce negotiator. Irene grew up in Lawrence, Massachusetts, a low income and underserved community. Her ambition behind constructing a cultivation facility in Lowell is driven by her desire to give back, provide jobs and promote the economy in a city that could greatly benefit from the boost.

□ Edward Coorey
(Secretary)

Edward Coorey serves as the Secretary at Grow One. With nearly four decades of business and accounting experience Edward manages our financial affairs. He is a seasoned businessman who has advised and lead numerous corporations through their infancy stages and on to their feet.

□ Issac M. Williams
(Cannabis Cultivator)

Isaac M. Williams is a cannabis connoisseur. He has spent years dedicated to studying the art of cannabis cultivation through his own research, in the classroom and under the guidance of skilled growers. He has completed classes in the study of hydroponics at GYOstuff hydroponics, in Cambridge, Massachusetts, and was taught about organic hemp farming by Henry Ruess, a renowned cultivator of Healthy Hemp Research, LLC based out of Colorado. Isaac spent four year serving on the MassCann Board of Directors working as an advocate for a regulated industry and educating people about the benefits of cannabis and cultivation.

□ Henry A. Ruess
(Hemp Cultivator)

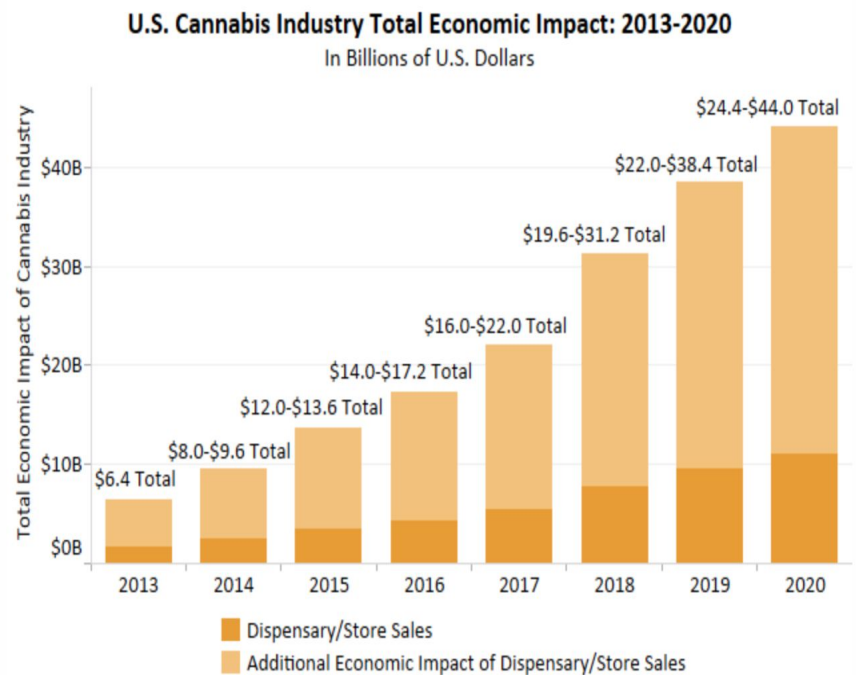
Henry A. Ruess is an experienced, passionate and respected hemp cultivator. He studied cultivation under renowned master grower, Mike Walsh, a CSU horticulture graduate, owner of Mountain Lion Garden Supply and co-developer at Mammoth P. Henry spent several years cultivating for Healthy Help Research, LLC, where he gained experience in a variety of fields, including, industrial farming, cloning, genetic selection, breeding, seed production, CBD production, maintenance, scheduling and harvesting.

Market Analysis

National Market

Public support for adult-use recreational cannabis is on the rise with 63.4% of Americans in favor of its legalization. In 2018, twenty-one states considered legalization bills, and, as of today, ten states and the District of Columbia have successfully passed legislation legalizing adult-use cannabis, illustrating the nation's increasing acceptance and potential for growth within the industry.

By 2020, it is expected that cannabis will be legally available to approximately 50% of the United States population and at the current rate, the cannabis market is on track to become a massive economic force, generating upwards of \$44 billion in revenue, annually.



Source: Marijuana Business Factbook 2016

Massachusetts Market

In 2017, nearly 1.7 million Massachusetts residents voted to approve Question 4 legalizing adult-use recreational cannabis, with almost twenty thousand (20,000) of those voters being from Lowell. In Colorado, the most established and regulated adult-use market in the United States, cannabis sales per resident averaged \$272/year, in 2018. Projecting that figure onto Massachusetts' 6.9 million person population, and considering the fact that Massachusetts has nearly a million more residents with an increased earning value 8.45%, indicates that the Massachusetts market has the potential to generate between \$1.8 to \$2.0 billion in revenue from cannabis sales.

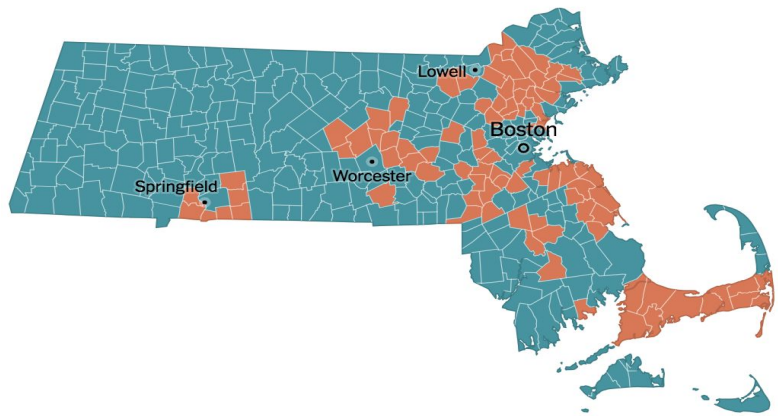
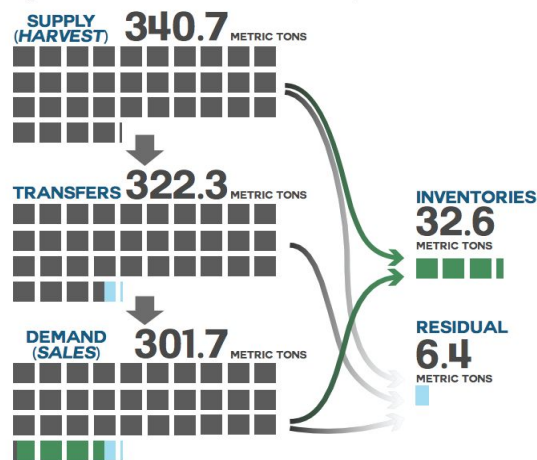


Figure 2. Statewide Product Flows, 2017



Source: MPG, LLC, State of Colorado.

In 2017, cultivators in Colorado harvested 340.7 metric tons of cannabis flower, with demand totaling 301.7 metric tons. Comparing the 1.3 million Coloradoians who voted in favor of cannabis legalization and the 1.7 million Massachusetts residents supporting the the initiative, it can be estimated that supply figures will need to reflect those represented in Colorado in order to furnish the demand.

As of today, the CCC has issued 17 retail, 11 product manufacturing licenses and 11 cultivation licenses. The numbers show that there is currently only 355,000 sq.ft of licenced grow space within the state and

estimates indicate that Massachusetts cultivators will need to produce almost 300,000 lbs/year, or 4.8 million ounces, of cannabis to adequately serve the billion dollar market which demonstrates a greater need for in-state cultivators in order to supply the enormously growing demand.

Massachusetts Cannabis Cultivation Licenses Issued

Name	Location	Tier Level
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Berkshire Roots	Pittsfield, MA	Tier 2
Cultivate Holdings	Leicester, MA	Tier 2
Garden Remedies	Fitchburg, MA	Tier 3
Good Chemistry	Bellingham, MA	Tier 4
I.N.S.A	Easthampton	Tier 7
New England Treatment Access	Franklin, MA	Tier 6
Northeast Alternatives, Inc	Fall River, MA	Tier 1
Patriot Care	Lowell, MA	Tier 6
Revolutionary Clinics	Fitchburg, MA	Tier 8
Sanctuary medicinals	Littleton, MA	Tier 5
Temescal Wellness	Worcester, MA	Tier 2

Lowell Market

The CCC has named Lowell as one of the communities disproportionately impacted by high rates of arrest and incarceration for cannabis and other drug crimes as a result of state and federal drug policy. Criminalization has had long-term negative effects on these communities and the CCC is using the new legalization of cannabis to redress the harm the people of Lowell have endured. Grow One plans to create relationships with local retail shops and manufacturers to foster, promote growth, generate revenue and rehabilitate the City of Lowell. Grow One will prioritize serving these establishments to enhance the industry and better the community.

Financial Summary

Start-Up Summary

Grow One is a privately funded venture with an initial start-up operating budget of \$1.1 million. We plan to fully build-out and renovate the property located at 60 Dix Street in Lowell, Massachusetts to create an advanced cultivation facility with sophisticated gear and equipment in order to thrive in this emerging and competitive cannabis market. Initial investments will cover start-up costs and fixed expenses until profit stability is achieved. The chart below displays an estimate of the initial start-up cost expenses based on Grow One's plan to utilize 9,000 sq.ft as grow space.

Start-Up Expenses	Amount	
Rent (1st Quarter)	\$21,668.00	
Build-out/ Improvements	\$80,000.00	
Growing Equipment	\$175,000.00	
Lighting system	\$140,000.00	
Alarm & Security System	\$53,000.00	
Licensing & Legal Fees	\$64,000.00	
Admin. Expenses	\$58,000.00	
Other Misc. Expenses	\$117,000.00	
	Total	\$708,668.00

Operational Finance Summary

The chart below displays estimates for direct and operating cost.

Direct & Operating Costs	Amount	
Electricity (lights)	\$36,000.00	
Electricity (fans, pumps etc.)	\$27,000.00	
Water	\$1,000.00	
Grow Solutions/Nutrients	\$8,000.00	
Lab Testing	\$6,000.00	
Packaging/Storage	\$3,500.00	
Other Supplies	\$2,000.00	
Taxes	\$19,000.00	
Salaries	\$280,000.00	
	Total	\$382,500.00

Profit & Loss Summary

The yearly projections are estimated in the table below:

Profit & Loss Forecast	
Revenue (Est.)	\$5,000,000.00
Initial Costs	\$708,668.00
Operating Costs	\$382,500.00
Excise Tax (3%)	\$150,000.00
Gross Profit	\$3,758,832.00
Net Profit	\$2,667,664.00

Marketing Strategy

Grow One is dedicated to respecting and adhering to the rules and regulations that govern the marketing techniques of cannabis products. Our plan is to promote our product through authorized digital, media and print platforms.

Grow One will not market, advertise or brand:

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

Our marketing and advertising campaign include:

- ☐ Developing close personal relationships with wholesale buyers, manufacturers and retail shop owners through direct communication
- ☐ Creating an email list and developing a web presence (website, social media etc.)
- ☐ Attending cannabis/hemp related conventions/events
- ☐ Advertising via print publications, including:
 - ☐ 420 Magazine

- ☐ Dope
- ☐ Advertising via digital/mobile platforms, including:
 - ☐ Weedmaps.com
 - ☐ Leafly.com
 - ☐ Stickyguide.com

Operating Plan

General

Grow One will blend the art and science involved in growing high-quality cannabis to create a product with exceptional flavor, aroma and effects, to be distributed to licenced manufacturers and retail shops throughout Massachusetts. Grow One will utilize 9,000 sq.ft of the 10,000 st.ft. facility to produce several strains of cannabis flower.

Grow One will operate a year-round, indoor cultivation facility anticipated to generate between 4 and 6 harvests per year. We anticipate housing between 6,5000-8,000 plants which will produce approximately 1,000 lbs. of cannabis every 72 days, or 5,000 lbs. per year. We will use movable shelving to store plants as these means allow maximize space efficiency which allows for greater product yields and greater profits.

Each plant will receive a tag and will be tracked through Massachusetts seed-to-sale software system provided by METRC®.

Security Plan

Grow One will install a security system including alarms and surveillance that fully comply with the guidelines stated in 935 CMR 500.110 and all other rules and regulations governing security measures of cultivation facilities. It is of the utmost importance to Grow One that the premises, our employees, consumers and the general public are protected and safe while in and around our facility.

Surveillance/ Alarm shall include:

- ☐ The outside perimeter shall be sufficiently lit to facility surveillance
- ☐ Commercial grade security equipment will be installed to alarm the perimeter, including all entry and exit points and windows.
- ☐ Video Cameras shall be installed in all points of entry and exit and in parking lot
- ☐ A silent duress alarm shall be installed to notify local law enforcement in an emergency

- ☐ Video cameras to run for 24 hours and shall provide date and time stamps
- ☐ Video camera shall be installed in all areas that may contain cannabis product

Access:

- ☐ The perimeter of the facility shall be surrounded by a fence
- ☐ Grow One will adopt procedures to prevent loitering to ensure that no unauthorized individuals access the facility
- ☐ All entrances will be secured to ensure no unauthorized personnel access the facility
- ☐ Limited access areas will be designated and labeled as such
- ☐ All cannabis products will be secured and locked away to prevent diversion, theft or loss
- ☐ Keys and access codes will be accessible to specifically authorized personnel only
- ☐ All cannabis products will be kept out of plain sight from the general public
- ☐ All employees will wear visible ID badges
- ☐ All guest will wear visibly Guest ID Badges

Staff:

- ☐ Safety protocol and drills will be implented and practices in the event of emergecny, diversion or theft.
- ☐ Staff will undergo regular and updated training and safety awareness

Staff Training and Recruitment

Grow One will be staffed with qualified and trusted local residents. We anticipate assembling a staff of approximately 7 people. We plan to comply with all rules and regulations which is why we will only hire qualified and experienced employees. Our staff will be recruited directly, via local advertisement and the CCC's social equity connector program. Our team will consist of a managing director, growers, trimmers, packaging assistant and sales representative.

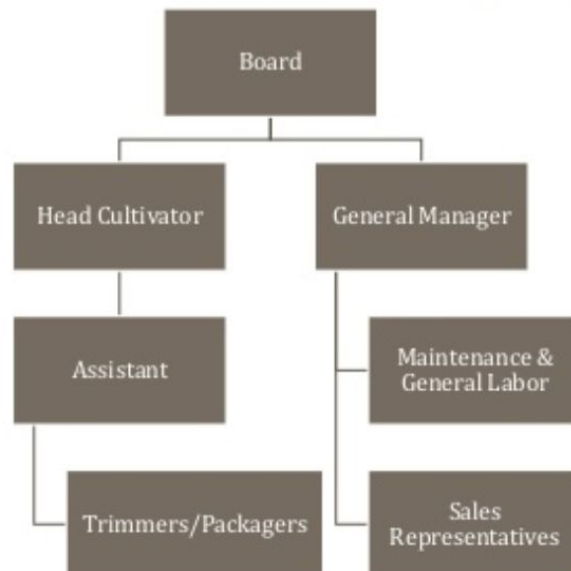


Figure 6. Organizational structure

All staff will be required to undergo training prior to starting employment. Additionally, we will require a minimum of 20 hours of ongoing job training per year to ensure that our staff is

up-to-speed with the most current and innovative trends in the industry, in order to provide the best quality product. We plan to host onsite workshops and offer our staff written educational material to promote continued education.

Disposal

All products shall be disposed of in accordance with 935 CMR 500.105 (12) and all other governing rules and regulations:

- ☐ No products will be stored in a manner that produces odor
- ☐ All cannabis products shall be stored, secured and managed in accordance with local and state statutes, ordinances and regulations
- ☐ All cannabis waste will be ground up and mixed with solid wastes as to render the cannabis unusable for its original purpose. It will then be taken to a solid waste facility for final disposal.
- ☐ Two staff members will witness and document the disposal of the cannabis waste
 - ☐ Electronic records of disposal will be maintained

Community Impact

Opioid Crisis Prevention

Grow One is dedicated to helping fight our communities opioid crisis. We plan to work closely with law enforcement agency to educate and assist our community in any way that we can.

Research indicates that cannabis (particularly, CBD) has benefits in assisting addiction and we plan to utilize its benefits to create a safer, opioid-free community.

Youth-Use Prevention

Grow One will adhere strictly to the rules restricting use to only those over the age of 21. We plan to assist the community in educating Lowell's youth in regards to public health and drug abuse prevention.

Community Service

Grow One plans to host free local seminars to adults in the community interested in horticulture and cannabis cultivation. Grow One is dedicated to community involvement and wants to know the people we are serving.

Grow One Inc.

PLAN TO OBTAIN LIABILITY INSURANCE

Grow One Inc. ("Grow One") will work with an insurance broker licensed in the Commonwealth of Massachusetts to obtain insurance that meets or exceeds the requirements set forth in 935 CMR 500.105 (10).

Pursuant to 935 CMR 500.105(10) Grow One shall 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, or such amount as otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

Pursuant to 935 CMR 500.105(10)(b) if Grow One is unable to obtain minimum liability insurance coverage as required by 935 CMR 500.105(10)(a), Grow One will place in escrow a sum of no less than Two Hundred and Fifty Thousand and 00/100 (\$250,000.00) or such other amount approved by the Commission, to be expended for coverage of liabilities. If Grow One is unable to obtain minimum liability insurance coverage as required by 935 CMR 500.105(10)(a) Grow One will properly document such inability through written records that will be retained in accordance with the Company's Record Retention Policy. If the Liability Insurance Escrow Account is used to cover such liabilities, it will be replenished within ten (10) business days of such expenditure.

Grow One will submit reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

GROW ONE INC.

RECORD-KEEPING AND DOCUMENT RETENTION POLICIES AND PROCEDURES

Grow One Inc. (the “Company”) is a *marijuana establishment* as defined by 935 CMR 500.002 seeking licensure as a Tier 2 cultivator and a marijuana product manufacturer. The Company sets forth the following policies and procedures pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1)(c)(7) (i). This regulation requires the Company to provide a detailed summary of operating procedures and policies including record-keeping procedures. All of the Company’s records shall be kept pursuant to 935 CMR 500.105(9). All records will be made readily available to the Commission upon request.

A. COMPLIANCE WITH 935 CMR 500.105(9)

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

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

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

B. ACCESS TO RECORDS

1. Agents and Employees with Access to Records

Only designated management-level agents and employees will have authorization to access the Company’s records. The Company may choose to designate a Chief Compliance Officer (“CCO”) to manage access to any Company records. The CCO or other reliable agent designated by the Company shall be responsible for compiling any and all information and documentation requested by the Commission, law enforcement, or judicial bodies; for taking charge of any offsite storage of hardcopy documents at a certified commercial storage facility; for allowing regulators access to any and all documents and data stored remotely; for allocating space on-site at the Company’s facilities for the storage of documents; and for external auditing of compliance with all provisions of record-keeping set forth by the Commission.

2. Provisions of Hardcopy and Electronic Record Keeping

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

3. Security in Hardcopy and Electronic Record Keeping

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

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

4. Record Storage and Disposal

The Company shall audit its electronic and hardcopy records at its facility in limited access areas, which shall include a secure server room equipped with fire detection and suppression systems. Any

hardcopy records held offsite shall be stored at certified commercial storage facilities. Before any vital records are destroyed, a list of records due for destruction or transfer shall be reviewed by one of the Company's C-level managers, (CFO, CEO, CCO, or COO). Records will not be destroyed or transferred without the approval of an authorized C- level manager.

C. RECORD RETENTION

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

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

1. Written Operating Procedures

a. In accordance with 935 CMR 500.105(9)(a), an authorized agent or employee shall be responsible for maintaining all written operating procedures that address the following as required by 935 CMR 500.105(1):

- i. Security measures in compliance with 935 CMR 500.110;
- ii. Employee security policies, including personal safety protocols and crime prevention techniques;
- iii. Hours of operation and after-hours contact information;
- iv. Storage of marijuana in compliance with 935 CMR 500.105(11) (for more information regarding the storage of marijuana, see the Company's *Standard Operating Procedures for the Storage of Marijuana*);
- v. Description of strains of marijuana to be cultivated, processed, or sold, as applicable, and the forms of marijuana infused products to be cultivated, processed, or sold, as applicable;
- vi. Procedures to ensure accurate record-keeping including inventory protocols in compliance with 935 CMR 500.105(8) and 935 CMR 500.105(9) (for more information regarding inventory, see the Company's *Inventory Policies and Procedures*);

- vii. Plans for quality control including product testing for contaminants in compliance with 935 CMR 500.160;
- viii. A staffing plan and staffing records in compliance with 500.105(9);
- ix. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- x. Alcohol, smoke, and drug-free workplace policies;
- xi. A plan for the maintenance of confidential information;
- xii. A policy for immediate dismissal of any agent who has engaged in any of the following activities: diverted marijuana; engaged in unsafe practices; 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.
- xiii. Policies and procedures for making a list of all board members and executive members pursuant to 935 CMR 500.105(1)(m);
- xiv. Policies and procedures for the handling of cash;
- xv. Policies and procedures to prevent the diversion of marijuana to individuals younger than twenty-one (21) years of age (also see the Company's *Plan for Restricting Access to Age 21 and Older*); and
- xvi. Policies and procedures for energy efficiency and conservation pursuant to 935 CMR 500.105(1)(p).

b. In addition to the above general operating procedures set forth under 935 CMR 500.105(1), the Company shall also maintain additional policies and procedures addressing the following:

- i. Methods for identifying, recording, and reporting diversion, theft, or loss and methods for correcting all errors and inaccuracies in inventories which shall, at a minimum, be compliant with 935 CMR 500.105(8);
- ii. Policies and procedures for handling voluntary and mandatory recalls of marijuana;
- iii. Policies and procedures in compliance with 935 CMR 500.105(12) for ensuring outdated, damaged, deteriorated, mislabeled, or contaminated marijuana is segregated from other marijuana and destroyed;
- iv. Transportation policies and procedures which shall be in compliance with 935 CMR 500.105(13) (also see the Company's *Standard Operating Procedures for the Transportation of Marijuana*);

- v. Policies and procedures in compliance with 935 CMR 500.105(15) and 935 CMR 500.120(11) to reduce energy and water usage, engage in energy conservation, and mitigate other environmental impacts; and
- vi. Policies and procedures for the transfer, acquisition, or sale of marijuana between the Company and other licensed marijuana establishments.

2. Cultivation and Manufacturing Records

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

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

3. Records of Responsible Vendor Training Program Compliance

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

4. Inventory Records

In accordance with 935 CMR 500.105(9)(b), the Company shall maintain inventory records in compliance with 935 CMR 500.105(8). (For more information regarding inventory, see the Company's *Inventory Policies and Procedures*.) An authorized agent or employee designated by the Company shall be responsible for maintaining accurate inventory records. Records of marijuana in the process of cultivation and records of finished and stored marijuana and marijuana infused products shall be generated monthly or more frequently. Records of comprehensive annual inventory shall be generated at least once a year if not more often. Inventory records shall include at a minimum:

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

5. Seed-To-Sale Tracking Records

In accordance with 935 CMR 500.105(9)(c), the Company shall maintain real-time seed-to-sale tracking records at each stage of cultivation, production, transport, and sale in compliance with 935 100.105(8)(e). The Company shall utilize Commission-approved software that is capable of integration with the State's METRC software platform for the purpose of seed-to-sale tracking. Seed-to-sale tracking records shall be recorded in accordance with the Company's standard operating procedures.

6. Personnel Records

In compliance with 935 CMR 500.105(9)(d), a designated agent or employee authorized by the Company shall be responsible for maintaining personnel records, including but not limited to the information and records listed below. (For more information regarding personnel, see the Company's

Personnel Policies Including Background Checks and Standard Operating Procedures Regarding Qualifications, Training, and Requirements of Personnel.)

- a. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with job descriptions;
- b. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- c. Personnel policies and procedures;
- d. All background checks in accordance with 935 CMR 500.030; and
- e. A personnel record for each agent or employee which shall be maintained for at least twelve (12) months after termination of an agent's affiliation with the Company. All personnel records shall include the following information:
 - i. All materials submitted to the Commission pursuant to 935 CMR 500.030(2), including a copy of the agent's registration card;
 - ii. Documentation of verification of references;
 - iii. A detailed job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - iv. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the trainee indicating the date, time, and place they received said training and the topics discussed, including the name and title of presenters;
 - v. Documentation of periodic performance evaluations;
 - vi. Records of any disciplinary action taken; and
 - vii. Notice of completed responsible vendor and eight-hour related duty training.

7. Financial and Business Records

All financial and business records will be kept in accordance with 935 CMR 500.105(9)(e). See the Company's *Policies and Procedures for Maintaining Financial Records* for a detailed description of the Company's compliance with 935 CMR 500.105(9)(e). An authorized agent designated by the Company shall be responsible for maintaining Company business and financial records. Hardcopies of business and financial records shall be maintained in secured areas accessible only to designated employees and agents. All financial records will be maintained in accordance with Generally Accepted Accounting Principles (GAAP).

8. Waste Disposal Records

Pursuant to 935 CMR 500.105(9)(f), waste disposal records shall be maintained as required under 935 CMR 500.105(12). An authorized agent or employee designated by the Company shall be designated to maintain all waste disposal records. (For more information regarding the Company's procedures for the disposal of plant, solid and liquid waste, see Section D of the Company's *Operational Plan: Policies*

and Procedures for Cultivation.) Waste disposal records shall be kept for a minimum of three (3) years or throughout the duration of any enforcement action or as long as required by the Commission, whichever period is longest. Waste disposal records shall include the following information:

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

9. Transportation Manifests

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

10. Security Recordings

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

11. Records of Testing of Marijuana and Marijuana Infused Products

An authorized agent or employee designated by the Company shall ensure that test results for all marijuana and marijuana infused products are generated in accordance with 935 CMR 500.160 and are maintained by the Company for no less than one year. The Company has written policies for responding to laboratory results that indicate contaminant levels are above the acceptable limits identified in DPH protocols pursuant to 935 CMR 500.160(1). For more information regarding the

testing of marijuana and marijuana infused products, see the Company's *Procedures for Quality Control and Testing for Potential Contaminants*.

GROW ONE INC.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Grow One Inc. (the “Company”) is a *marijuana establishment* as defined by 935 CMR 500.002. The Company sets forth the following personnel policies pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1)(c)(7) (g). The regulations require that the marijuana establishment provide a detailed summary of operating policies and procedures regarding personnel and background checks. This document and the personnel policies and procedures described herein shall be kept in accordance with the record keeping provisions at 935 CMR 500.105(9) and shall be made available to the Commission upon request.

A. STATEMENT OF INTENT AND SCOPE

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

B. REGISTRATION OF AUTHORIZED AGENTS

1. The Company must submit an application for registration for any individual which it wishes to employ as an authorized agent. All authorized agents shall be registered pursuant to requirements set forth under 935 CMR 500.030, and the Company shall strictly adhere to all provisions set forth under 935 CMR 500.030. Pursuant to 935 CMR 500.030(1), the Company must ensure that all applicants:

- a. Are at least twenty-one (21) years old;
- b. Have not been convicted of an offense involving the distribution of controlled substances to minors; and
- c. Are suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802. 935 CMR 500.800 addresses the background check suitability standard for licensure and registration (discussed in further detail below), while 935 CMR 500.802 lists additional suitability standards for licensure as an authorized agent. The Company will always ensure that any applicants for licensure as authorized agent are in compliance with 935 CMR 500.802.

2. The Company shall submit a complete application for registration of all applicants to the Commission containing all of the information set forth under 935 CMR 500.030(2). This regulation requires that the submitted application includes the following information:

- a. The full name, date of birth, and address of the applicant;

- b. Any aliases used previously or currently by the applicant, including maiden names;
- c. A copy of the applicant's driver's license, liquor purchase identification card pursuant to *M.G.L. c. 138 § 34B*, or other verifiable identity document acceptable to the Commission;
- d. An attestation that the applicant will not engage in the diversion of marijuana products;
- e. Written acknowledgment by the applicant of any limitations on his or her authorization to carry out any duties in relation to marijuana within the Commonwealth of Massachusetts;
- f. Relevant background information as listed under 935 CMR 500.030(2)(f);
- g. A nonrefundable fee paid by the Company; and
- h. Any other information requested by the Commission.

3. As are adhered to. This means that the following shall apply. indicated above, the Company shall ensure that all provisions of 935 CMR 500.030

- a. The Company will submit to the Commission, a Criminal Offender Record Information (CORI) report and background check information for each applicant, obtained within 30 days prior to submission.
- b. The Company will notify the Commission within twenty-four (24) hours in the event that an authorized agent ceases to be associated with the Company.
- c. The Company will follow all procedures to assist in the renewal of an authorized agent's registration on an annual basis or as determined by the Commission.
- d. The Company will notify the Commission within five (5) days if an authorized agent loses their registration card or if any of the authorized agent's personal information required for registration has changed.

4. Pursuant to 935 CMR 500.030, the Commission will give a registration card to each authorized agent deemed suitable for licensure. The Company will require that all authorized agents keep their registration card on their person at all times that they are either physically on Company property or carrying out a work function related to their employment or work for the Company. Likewise, pursuant to 935 CMR 500.030(7), authorized agents shall carry their registration cards at all times while in the possession of marijuana and marijuana infused products.

C. BACKGROUND CHECKS

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

Criminal Offender Record Information (CORI) report and other background check information to the Commission as a part of the individual's application to become and authorized agent. 935 CMR 500.101(1)(b) sets forth that each applicant for licensure is subject to a background check and must submit specific information to the Commission. Information to be submitted includes all of the information listed under Section (B) above as well as an authorization for the Commission to obtain a full set of fingerprints from the applicant or authorized agent in accordance with M.G.L. c. 94G, § 21. In addition, pursuant to 935 CMR 500.101(1)(b)(3), applicants and authorized agents must provide to the Commission as a part of their application for licensure the following information: information related to relevant criminal action; relevant civil action; relevant dates of past or pending legal enforcement actions; relevant dates of any administrative action; relevant dates of actions; and any other information requested by the Commission.

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

D. RECORD KEEPING

The Company shall keep a personnel record for each authorized agent pursuant to 935 CMR 500.105(9)(d). Personnel records will be kept for a minimum of one year after termination of an authorized agent's relationship with the Company. Personnel records will include all of the information detailed under 935 CMR 500.105(9)(d)(2). In addition, the Company shall also require that personnel records include the following:

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

9. A copy of any materials related to the authorized agent's background check;
10. Documentation of periodic performance evaluations; and
11. Documentation relating to any disciplinary action taken against the authorized agent.

As indicated above, all personnel records and the personnel policies and procedures described herein shall be kept in accordance with the record keeping provisions at 935 CMR 500.105(9) and shall be made available to the Commission upon request.

E. TRAINING

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

F. PERFORMANCE EVALUATION AND DISCIPLINARY ACTION

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

G. DIVERSION PREVENTION

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

GROW ONE INC.

PROCEDURES FOR QUALITY CONTROL AND TESTING FOR POTENTIAL CONTAMINANTS

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

A. STATEMENT OF INTENT

Quality control and contaminant testing will be conducted for each batch of marijuana and marijuana infused products. The Company shall utilize the procedures set forth herein for the quality control and testing for potential contaminants for its Tier 3 cultivation and manufacturing operations. The Company understands that testing ensures that all marijuana and marijuana infused products are safe and appropriately potent. The Company shall not sell, market, or promote any marijuana or marijuana infused products that are incapable of being tested by a testing laboratory licensed by the Commission pursuant to 935 CMR 500.160(9).

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

B. INDEPENDENT LICENSED TESTING LABORATORY

The Company intends to contract with MCR Labs of Framingham, an independent testing laboratory licensed by the Commission, to perform all required testing pursuant to 935 CMR 500.160. The Company shall also contract with another independent testing laboratory licensed by the Commission to serve as a backup to MCR. Any independent testing laboratory (hereinafter “testing laboratory”) that the Company contracts with shall be licensed by the Commission, shall meet the definition under 935 CMR 500.002, and shall comply with all requirements set forth under 935 CMR 500.050(7).

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

C. PROCEDURES FOR QUALITY CONTROL DURING TESTING

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

1. The Company shall verify that the independent testing laboratory it uses complies with 935 CMR 500.160(7), which requires that all storage of marijuana at a testing laboratory shall comply with 935 CMR 500.105(11).
2. The Company shall ensure that transportation of marijuana and marijuana infused products to an independent testing laboratory shall comply with 935 CMR 500.105(13). The Company shall communicate with both the testing laboratory and any licensed third party marijuana transporters to ensure that this regulation is adhered to.
3. The Company will request that the testing laboratory provide a variety of testing including but not limited to: cannabinoid potency profiling, pesticide residue analysis, plant growth regulator screening, microbial contamination assays, and heavy metal concentrations.
4. Pursuant to 935 CMR 500.160(2), the Company shall provide written notice to the Commission within seventy-two (72) hours of receiving laboratory test results that show contaminant levels above the acceptable limits established in the DPH Protocol. Likewise, the Company shall ensure that the selected testing laboratory also has a policy for, and a contractual obligation to, notify the Commission within 72 hours of the transmission of laboratory test results indicating that a contaminant has exceeded any applicable level found in the DPH Protocol. The Company's notification to the Commission in such an instance of contamination shall include a written description of a plan to destroy the contaminated batch in accordance with the requirements for waste disposal found in 935 CMR 500.105(12). The Company's notification shall also include a proposed plan of action to identify the source of the contamination and to promptly fix, remediate, or mitigate the source of the contamination once identified. If any of the Company's inventory is spoiled, deteriorated, mislabeled, contaminated, or expired, it shall be disposed of pursuant to 935 CMR 500.105(12).
5. The Company shall maintain all test results for its marijuana and marijuana infused products for no less than one year from the date of receipt of the results, pursuant to 935 CMR 500.160(3).
6. Following testing, all marijuana and marijuana infused product that meets all standards shall be labeled with a statement and a seal pursuant to 935 CMR 500.105(5)(a)(6), 935 CMR 500.105(5)(b)(14), 935 CMR 500.105(5)(c)(11), or 935 CMR 500.105(5)(d)(9).

D. PROCEDURES FOR QUALITY CONTROL THROUGHOUT CULTIVATION AND MANUFACTURING

The Company shall follow the following procedures during the cultivation and manufacturing of all marijuana and marijuana infused product to ensure that marijuana and marijuana infused product is not

contaminated and is of the highest quality. The Company shall also follow these procedures to protect the surrounding community and the environment.

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

12. The Company's marijuana establishment agents shall abide by strict sanitary practices when working directly in the preparation of any marijuana infused products. Requisite sanitary practices include strict hand washing procedures and maintenance of personal cleanliness.

a. All marijuana establishment agents shall adhere to frequent and thorough hand washing practices in designated hand-washing stations. Hand washing shall occur frequently and always immediately prior to handling or working with marijuana and marijuana infused products. Hand washing stations will be located in close proximity to the production areas for cultivation and manufacturing. Hand washing stations will be equipped with: running water maintained at a suitable temperature; adequate antiseptic and antimicrobial soaps; surfaces that are impervious and easily cleaned; and an adequate drying apparatus. Hand washing will be performed with soap, under hot water, with vigorous agitation of the upper extremities and digits, and for a minimum of thirty (30) seconds. Hand washing shall be repeated whenever hands have, or may have, become contaminated, dirty, or soiled.

b. All marijuana establishment agents shall maintain the highest standards of personal cleanliness.

13. Waste and litter shall be disposed of and periodically removed to minimize odors and to reduce the potential for waste attracting or housing pests and other contaminants. All waste disposal shall be conducted in compliance with 935 CMR 500.105(12).

14. All cultivated and manufactured marijuana and marijuana infused product shall be stored in a manner that prevents the growth of any undesirable organisms.

E. CONDITIONS OF THE COMPANY'S FACILITIES

All facilities maintained and operated by the Company shall be kept in the appropriate condition to prevent contamination and to ensure production of the highest quality marijuana and marijuana infused products. The Company shall adhere to the following requirements in regards to its facilities.

1. The Company's cultivation and manufacturing operation shall be conducted within designated areas of the Company's facilities. The surfaces and equipment within these facilities, including all cooking utensils and vessels, shall be sanitized and cleaned as often as is required to maintain sanitary conditions. The surfaces and all equipment shall be subjected to sanitizing and anti-microbial cleaning by the Company's employees, who shall only utilize cleaning products that appear on the Commission's, or the United States Environmental Protection Agency's, list of approved/registered cleaning products. Administration and application of these cleaning products shall strictly adhere to the manufacturer's label and instructions.
2. The facility's physical plant, including, but not limited to floors, ceilings, walls, shall be constructed and retrofitted, as appropriate, to be both structurally sound and to allow for surfaces to be cleaned and sanitized. All fixtures shall be maintained in a sanitary condition.
3. All of the Company's facilities shall be laid out so as to allow for the storage of materials and equipment for sanitary maintenance of operations.

4. All restrooms within the Company's facilities shall be frequently stocked, cleaned and inspected to ensure that the Company's employees and visitors have adequate access to sanitary restrooms.
5. The Company's facilities will contain plumbing that is of adequate size and design and is adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross- connections between the potable and waste water lines.
6. Any cleaners containing toxic ingredients within the Company's facilities shall be held and stored away from marijuana and marijuana infused products to avoid contamination of those products. All cleaning products containing toxics shall be properly labeled to identify the presence of those toxics. Likewise, any other items containing toxics shall be similarly sequestered away from marijuana and marijuana infused products to ensure that the maximum protection against contamination of these products is achieved. All toxic- containing items shall be properly labeled.

F. STORAGE AND TRANSPORTATION

The Company shall ensure that all marijuana and marijuana infused product is transported and stored in a manner to promote and maintain the highest level of quality and to prevent any damage or contamination. The following provisions shall be followed.

1. The Company shall ensure that all products ready for wholesale are transported and stored under ambient environmental conditions that will provide protection against chemical, microbial, and other physical contamination.
2. Containers holding finished marijuana and marijuana infused products shall be designed to guard against deterioration of the finished tested product. Performance of the packaging with respect to contaminant protection shall be periodically evaluated and changed if appropriate.
3. Pursuant to 935 CMR 500.105(3)(b)(16), the Company shall require that all vehicles and transportation equipment used in the transportation of marijuana and marijuana infused products are designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana infused products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).
4. The Company shall provide documentation to any marijuana establishment to which the Company transfers marijuana or marijuana infused products. This documentation will verify the Company's compliance with the testing requirements under 935 CMR 500.160.

GROW ONE INC.

POLICIES AND PROCEDURES FOR MAINTAINING FINANCIAL RECORDS

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

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

A. CONTROLLING ACCESS TO FINANCIAL RECORDS

1. Individuals With Access To Financial Records

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

2. Storage of Financial Records

Any hard copies of financial records shall be maintained on Company premises in locked, fireproof file cabinets accessible only to the President (“President”) and other authorized management-level personnel. Financial records kept electronically will be saved and backed up on a daily basis. All financial records shall be saved, stored, and kept for a minimum of seven (7) years.

B. TRANSPARENCY AND ACCURACY

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

Also in the interest of transparency, information regarding all funding sources and persons and entities with financial interest in the Company shall be documented. These documents shall contain the following information: the name of the interested entity; the address of the interested entity; the date of birth of the interested entity (if applicable); the social security number of the interested entity (if applicable); and an explanation of the financial interest. In addition, the Company shall maintain an

accounting of the financial benefits accruing to the municipality as a result of the host agreement with the Company.

C. MANAGEMENT OF FINANCIAL RECORDS

The Company plans to utilize Quickbooks or another equally comprehensive and secure accounting program to manage its financial records.

D. CONTENT OF FINANCIAL AND BUSINESS RECORDS

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

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

RESTRICTING ACCESS TO AGE 21 OR OLDER

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

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

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

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

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

1. The Grow One will only employ marijuana establishment agents, as defined by the Commission's definitions at 935 CMR 500.002, who are at least twenty-one (21) years old.
2. The Grow One will only allow visitors, age twenty-one (21) or older, at the Grow One's facilities located in CITY/TOWN, Massachusetts. The Grow One defines visitors in accordance with the Commission's definitions at 935 CMR 500.002. The Grow One will designate an authorized agent to check the identification of all visitors entering the Grow One's facilities. Acceptable forms of identification include:
 - a. A motor vehicle license;
 - b. A liquor purchase identification card;
 - c. A government-issued identification card;
 - d. A valid government-issued passport; and
 - e. A valid United States-issued military identification card.
3. The Grow One will only market marijuana and marijuana infused products to individuals aged twenty-one (21) or older. Any marijuana product labeling will make it clear that marijuana and marijuana infused products are not to be accessed or consumed by individuals under the age of twenty-one (21). Specifically, the Grow One will follow 935 CMR 500.105(4)(a)(5) to ensure that the Grow One's branding, marketing, and advertising is done in a manner that does not encourage or promote the diversion of marijuana. Furthermore, the Grow One understands that in accordance with 935 CMR 500.105(4)(a)(2), advertising of marijuana and marijuana infused products may only be done at charitable or public events where at least 85% of the audience is reasonably expected to be age twenty- one (21) or older.

GROW ONE INC.

STANDARD OPERATION PROCEDURES REGARDING QUALIFICATIONS, TRAINING, AND REQUIREMENTS OF PERSONNEL

Grow One Inc. (the “Company”) is a marijuana establishment as defined by 935 CMR 500.002 seeking licensure as a Tier 2 cultivator and a marijuana product manufacturer. The Company sets forth the following personnel policies pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1)(c)(8)(g) and a detailed description of qualifications and intended training(s) for Marijuana Establishment Agents who will be employees at 935 CMR 500.101(1)(c)(9). The regulations require that the marijuana establishment provide a detailed summary of operating policies and procedures regarding personnel and background checks. This document and the personnel policies and procedures described herein shall be kept in accordance with the record keeping provisions at 935 CMR 500.105(9) and shall be made available to the Commission upon request.

A. STATEMENT OF INTENT AND SCOPE

The Company understands the importance of ensuring that all personnel are properly licensed and registered. An important part of this process is the background check. All marijuana establishment agents are subject to the provisions described herein and within the Commission’s regulations.

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

Each authorized agent will receive a Copy of the Company’s handbook and all standard operating policies and procedures that are applicable to their function in relation to the Company. Authorized agents will only have access to the areas of the Company’s facilities which relate to their particular job function. For instance, an authorized agent working in the back office will not have access to the cultivation area of the Company’s facilities.

B. TRAINING

All authorized agents will participate in a comprehensive training program to ensure that they perform their job functions safely and at the highest level. The training program will consist of written and online materials. All authorized agents shall have access to the training materials relevant to their particular job functions with the Company. The Company will also provide on- the-job training to authorized agents. On-the-job training will be tailored to the roles and responsibilities of the job function of each authorized agent and will consist of “shadowing,” where a new authorized agent observes or works closely with a more veteran authorized agent. Additional training will include, at a

minimum, laws regarding marijuana, privacy, confidentiality, prohibitions on harassment, safety and security, and effective interaction with law enforcement personnel. Authorized agents shall complete requisite initial training prior to performing job functions without supervision. Authorized agents shall receive a minimum of twenty-four hours of ongoing training annually.

The Company will document all required training as described above. The Company will require a signature and a statement from each authorized agent indicating the date, time, and place that they received any training as well as the topics discussed during training and the names and titles of any training presenters. This information will all be kept within each authorized agents personnel file.

C. REQUIREMENTS FOR AUTHORIZED AGENTS

1. **Punctuality and Attendance:** Authorized agents are required to be punctual and in regular attendance when scheduled to carry out work for the Company. Authorized agents are expected to report to work as scheduled, on time, and prepared to work. Authorized agents must remain at work for the entire time scheduled, except for meal times, break times, or when authorized. If an authorized agent must be absent or tardy from work, the authorized agent shall notify the Company as soon as the authorized agent is aware of the need to be absent or tardy.
2. **Nondisclosure or Use of Trade Secrets:** During employment with the Company, authorized agents may have access to and become familiar with confidential or proprietary information. Authorized agents will be required to sign a confidentiality agreement at the beginning of their employment.
3. **Drug and Alcohol Policy:** All authorized agents are strictly prohibited from working under the influence of drugs or alcohol. The use of prescription medication is not prohibited. However, authorized agents shall notify the Company if they will be taking prescription medication on the Company's facilities or while carrying out any work functions for the Company. Otherwise, the use of drugs and alcohol is strictly prohibited on the Company's facilities and while carrying out any work functions on behalf of the Company. Any violation of this provision will result in discipline which could include immediate discharge.

D. PERFORMANCE EVALUATION

The Company will require periodic performance evaluations to confirm that authorized agents can demonstrate requisite skills and knowledge.

A violation of any other safety standard, rule, policy, or procedure of the Company may lead to disciplinary action, up to and including termination of the violating authorized agent. The Company shall document all disciplinary actions taken.

E. DISCIPLINARY ACTION

The Company shall immediately dismiss any authorized agent who has diverted marijuana or marijuana infused products. Any such diversion will be reported to the Commission and local law

enforcement. The Company shall also immediately dismiss any authorized agent who has engaged in unsafe practices with regard to the operation of the Company.

F. DIVERSION PREVENTION

The Company sets forth the following provisions to prevent the diversion of marijuana and marijuana infused products. These provisions are applicable to all authorized agents.

1. Authorized agents will be issued clear cases in which they can store personal belongings. Authorized agents may not bring bags, backpacks, purses, or any other unauthorized container into the Company's work facilities. The Company will have lockers or a designated secure area where authorized agents may secure personal belongings.
2. The Company reserves the right to inspect each authorized agent's clear case upon request. This measure will help to prevent any theft or diversion. In addition, the Company can maintain security and ensure that authorized agents are not bringing unauthorized items such as firearms or weapons into the Company's facilities.
3. All authorized agents will wear Company-issued uniforms without pockets. Uniforms create a professional environment and the absence of pockets prevents employee theft of marijuana and other Company property.

The Company shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training will be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum will include a Responsible Vendor Program under 935 CMR 500.105(2)(b). It shall be a policy of the Company that all marijuana agents and staff will receive and participate in a minimum of eight (8) hours of on-going training annually.

Company Training Policies will be as follows:

1. On or after July 1, 2019, all current owners, managers and employees of the Company that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a "responsible vendor."
2. Once the Company is designated a "responsible vendor," all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within 90 days of hire.
3. It shall be a policy of the Company that after initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall successfully complete the program once every year thereafter to maintain designation as a "responsible vendor."
4. Administrative employees who do not handle or sell marijuana may take the "responsible vendor" program on a voluntary basis.
5. The Company shall maintain records of responsible vendor training program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Certification Training Class Core Curriculum

The Company will ensure that such responsible vendor training programs core curriculum include the following:

- (a) Discussion concerning marijuana's effect on the human body. Training shall include:
 - a. Marijuana's physical effects based on type of marijuana product;
 - b. The amount of time to feel impairment;
 - c. Visible signs of impairment; and
 - d. Recognizing the signs of impairment.
- (b) Diversion prevention and prevention of sales to minors, including best practices;
- (c) Compliance with all tracking requirements; and
- (d) Acceptable forms of identification. Training shall include:
 - a. How to check identification;
 - b. Spotting false identification;
 - c. Medical registration cards issued by the DPH;
 - d. Provisions for confiscating fraudulent identifications; and
 - e. Common mistakes made in verification.
- (e) Other key state laws and rules affecting owners, managers, and employees, which shall include:
 - a. Local and state licensing and enforcement;
 - b. Incident and notification requirements;
 - c. Administrative and criminal liability;
 - d. License sanctions and court sanctions;
 - e. Waste disposal;
 - f. Health and safety standards;
 - g. Patrons prohibited from bringing marijuana onto licensed premises;
 - h. Permitted hours of sale;
 - i. Conduct of establishment;
 - j. Permitting inspections by state and local licensing and enforcement authorities;
 - k. Licensee responsibilities for activities occurring within licensed premises;
 - l. Maintenance of records;
 - m. Privacy issues; and
 - n. Prohibited purchases and practices.
- (f) Any other areas of training determined by the Commission to be included in a responsible vendor training program.

DIVERSITY PLAN

Grow One Inc. (“Grow One” or “Company”) is committed to actively promoting diversity, inclusion, and cultural competency, by implementing programmatic and operational procedures and policies that will help to make Grow One a leader in diversity in the Massachusetts cannabis industry.

Town Specific Data - According to datausa.com, as of 2017 the Town of Lowell had a population of 111,000 people. The 5 largest ethnic groups in Lowell are White (Non-Hispanic) (49.1%), Asian (Non-Hispanic) (20.9%), White (Hispanic) (11.7%), Some Other Race (Hispanic) (7.09%) and Black or African American (non-Hispanic) (6.69%).

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

Goal One:

Achieve at least the goals below for our hiring and staffing:

Veterans	10%
People with Disabilities	10%
LGBTQ+ individuals	10%
Women	10%
People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people	10%

Programs to Achieve Diversity Goal One:

- Provide on-site interactive workshops, annually (at minimum), covering such topics as the prevention of sexual harassment, racial and cultural diversity, and methods of fostering an inclusive work atmosphere.
- Increase diversity of the make-up of our staff by actively seeking out minorities, women, veterans, people with disabilities, and/or members of the LGBTQ+community, both through in-house hiring initiatives and participation in online diversity job boards.
- Establish clearly written policies regarding diversity and a zero-tolerance policy for discrimination and/or sexual harassment, which shall be incorporated into our employee handbook.

Measurements:

- *Qualitative Metrics:* Perform annual evaluation of inclusion/diversity initiatives to ensure diversity is one of Grow One’s strengths and remains a primary focus. This may include

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anonymous employee surveys or other private submission opportunities so that we can attempt to avoid any sort of reluctance for our employees to inform management how we are truly doing in pursuit of our diversity plan goals. The results of the surveys shall be compared to prior years' results to allow Grow One to adjust our programs in the event that our goals are not being achieved.

- *Quantitative Metrics:* We will strive to achieve at least 20% of our staffing needs from women and minorities. The personnel files shall be evaluated on a semi-annual basis to determine how many employees are women and minorities that occupy positions within the company and that number shall be divided by Grow One's total staffing at its Lowell facility to determine the percentage achieved.

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

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

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

Diversity Goal Two:

Enhance workforce diversity by contracting with diverse businesses. Grow One shall strive to employ at least the following percentages of its contractors, subcontractors, and suppliers from the following groups specified in the paragraph below:

- Minority Business Enterprise - 5%
- Women Business Enterprise - 5%
- Veteran Business Enterprise - 5%
- LGBT Business Enterprise - 5%
- Disability-Owned Business Enterprise - 5%

Programs for Diversity Goal Two:

Grow One will make good faith efforts to employ contractors, subcontractors, and suppliers who are listed in the Commonwealth of Massachusetts Directory of Certified Businesses as being a business from the categories above, with particular consideration given to businesses classified as Disadvantaged Business Enterprises.

Grow One seeks to have diversity across the listed demographic groups and measure those against the primary ownership of all of our contracted partners. We will strive to not limit our contractual relationships to a single disadvantaged business entity ("DBE") category and will

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instead seek a variety of qualifying businesses to contract with and will judge the mix of those relationships.

Measurements for Diversity Goal Two:

Grow One shall maintain a list of active contractors, subcontractors, and suppliers and compare that list annually to the Massachusetts Directory of Certified Businesses to determine progress towards the goals listed above.