



# Massachusetts Cannabis Control Commission

## Marijuana Retailer

### General Information:

License Number: MR285387  
Original Issued Date: 09/12/2025  
Issued Date: 09/12/2025  
Expiration Date: 09/12/2026

## ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Hometown Harvest LLC

Phone Number: 401-232-8888 Email Address: [nho@oblaws.com](mailto:nho@oblaws.com)

Business Address 1: 243 Main Street

Business Address 2:

Business City: Athol

Business State: MA

Business Zip Code: 01331

Mailing Address 1: 128 Dorrance Street

Mailing Address 2: 6th Floor

Mailing City: Providence

Mailing State: RI

Mailing Zip Code: 02903

## 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: 20 Percentage Of Control: 20

Role: Owner / Partner

Other Role:

First Name: Nicholas

Last Name: Obolensky

Suffix:

Gender: Male

User Defined Gender:

Date generated: 01/06/2026

Page: 1 of 6

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 31 Percentage Of Control: 31

Role: Owner / Partner Other Role:

First Name: Annabelle Last Name: Bamforth Suffix:

Gender: Female User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 9 Percentage Of Control: 9

Role: Owner / Partner Other Role:

First Name: Samuel Last Name: Eaton Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 20 Percentage Of Control: 20

Role: Owner / Partner Other Role:

First Name: Loren Last Name: Forbes Suffix:

Gender: Female User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 5

Percentage Of Ownership: 20 Percentage Of Control: 20

Role: Owner / Partner Other Role:

First Name: Michael Last Name: Grasso Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

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: Samuel Last Name: Eaton Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$100000 Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

Date generated: 01/06/2026



**First Name:** Nicholas **Last Name:** Obolensky **Suffix:**  
**RMD Association:** Not associated with an RMD  
**Background Question:** no

**Individual Background Information 2**

**Role:** Owner / Partner **Other Role:** COO  
**First Name:** Michael **Last Name:** Grasso **Suffix:**  
**RMD Association:** Not associated with an RMD  
**Background Question:** no

**Individual Background Information 3**

**Role:** Owner / Partner **Other Role:** CEO  
**First Name:** Samuel **Last Name:** Eaton **Suffix:**  
**RMD Association:** Not associated with an RMD  
**Background Question:** no

**Individual Background Information 4**

**Role:** Owner / Partner **Other Role:** CMO  
**First Name:** Annabelle **Last Name:** Bamforth **Suffix:**  
**RMD Association:** Not associated with an RMD  
**Background Question:** no

**Individual Background Information 5**

**Role:** Owner / Partner **Other Role:** GM  
**First Name:** Loren **Last Name:** Eaton-Forbes **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
Department of Unemployment Assistance - Certificate of Good standing	Certificate of Compliance_MA DUA.pdf	pdf	67b4dc85ac5cea389e83db52	02/18/2025
Articles of Organization	24_11-7 Certificate of Org. for Hometown Harvest, LLC.pdf	pdf	67b4dd052cd2ec2282a4b923	02/18/2025
Secretary of Commonwealth - Certificate of Good Standing	MA SOS Cert. of Good Standing.pdf	pdf	67c1eef5dc92c5a698ef404d	02/28/2025
Department of Revenue - Certificate of Good standing	MA DOR Cert of Good Standing status.pdf	pdf	67c1ef0a541e85345e1d4880	02/28/2025

No documents uploaded

**Massachusetts Business Identification Number:** 001848800  
**Doing-Business-As Name:**  
**DBA Registration City:**  
**Date generated:** 01/06/2026

## BUSINESS PLAN

### Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Business Plan.pdf	pdf	67c1fb5adc92c5a698ef5fb7	02/28/2025
Plan for Liability Insurance	Plan for Obtaining Liability Insurance.pdf	pdf	67c1fb9bdc92c5a698ef5ffc	02/28/2025
Proposed Timeline	Timeline.pdf	pdf	67e1bb133b8f2e45c6dc8201	03/24/2025
Operating Agreement or Articles of Incorporation	First Amended OA HH Rd.1_signed by all.pdf	pdf	68014d85d80aaa0db4512d1b	04/17/2025

## OPERATING POLICIES AND PROCEDURES

### Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan for Obtaining Marijuana:Products.pdf	pdf	67c1fc2c541e85345e1d680c	02/28/2025
Restricting Access to age 21 and older	Restricting Access to Age 21 and Older.pdf	pdf	67c1fc82541e85345e1d6831	02/28/2025
Security plan	Security Plan.pdf	pdf	67c1fcd541e85345e1d684e	02/28/2025
Prevention of diversion	Prevention of Diversion.pdf	pdf	67c1fd31541e85345e1d686b	02/28/2025
Storage of marijuana	Storage of Marijuana.pdf	pdf	67c1fd78dc92c5a698ef616d	02/28/2025
Transportation of marijuana	Transportation of Marijuana.pdf	pdf	67c1fdca541e85345e1d68b5	02/28/2025
Inventory procedures	Inventory Procedures.pdf	pdf	67c1fe2f541e85345e1d692b	02/28/2025
Quality control and testing	Quality Control and Testing.pdf	pdf	67c1fea7541e85345e1d6a0e	02/28/2025
Dispensing procedures	Dispensing Procedures.pdf	pdf	67c1feb2541e85345e1d6a22	02/28/2025
Personnel policies including background checks	Personnel Policies.pdf	pdf	67c1ff23541e85345e1d6a5a	02/28/2025
Record Keeping procedures	Record Keeping Procedures.pdf	pdf	67c1ff36541e85345e1d6ac4	02/28/2025
Maintaining of financial records	Maintaining of Financial Records.pdf	pdf	67c1ff86dc92c5a698ef631b	02/28/2025
Qualifications and training	Qualifications and Training.pdf	pdf	67c1fff5dc92c5a698ef6357	02/28/2025
Energy Compliance Plan	Energy Plan SOP Hometown Harvest.pdf	pdf	67e1bb6f85fc04b7dce0a20b	03/24/2025
Diversity plan	Hometown Harvest Retail SOP 2025.05.23 Diversity Plan.pdf	pdf	683098b22309ac25e3579c83	05/23/2025

## MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

## ATTESTATIONS

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

Commission.: I Agree

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

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

Notification:

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

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

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

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### HOURS OF OPERATION

Monday From: 9:00 AM	Monday To: 10:00 PM
Tuesday From: 9:00 AM	Tuesday To: 10:00 PM
Wednesday From: 9:00 AM	Wednesday To: 10:00 PM
Thursday From: 9:00 AM	Thursday To: 10:00 PM
Friday From: 9:00 AM	Friday To: 11:00 PM
Saturday From: 9:00 AM	Saturday To: 11:00 PM
Sunday From: 10:00 AM	Sunday To: 8:00 PM

date of publication. With legal notices, sooner is always better. 72 hours ahead of publication is ideal.

Please note that with the exception of certain standard notices such as informal probate notices, name changes, conservator/guardian notices and citations on petitions of formal adjudication, all legal notices must be typed and sent to [legalads@recorder.com](mailto:legalads@recorder.com).

We do not have a typesetter and cannot accept hard copies of zoning hearings, ordinance, public meeting notices, requests for bids, etc. These must be sent in a Word doc or in the body of the email.

Please call **Suzanne** at **413-772-0261 x228** with any questions about placing legal notices in the Recorder.

Notice is hereby given under M.G.L. Chapter 40, Section 32, that the Attorney General has approved the following amendments to the by-laws:

Adopted at the Annual Town Meeting held June 3, 2024.

Article 36 (General By-Laws) - The text can be viewed at the Petersham Town Office Building, 3 South Main Street, Petersham, MA 01366. It will be posted in the glass case at the front door.

Diana L. Cooley  
Town Clerk

January 4, 11

4441834

# Please Recycle This Newspaper

## Legals

### LEGAL NOTICE OF COMMUNITY OUTREACH MEETING REGARDING AN ADULT-USE RETAIL MARIJUANA ESTABLISHMENT HOMETOWN HARVEST 243 MAIN ST. ATHOL, MASSACHUSETTS 01331

Notice is hereby given that Hometown Harvest of 243 Main Street, Athol Massachusetts, will conduct an in-person Community Outreach Meeting on the following matter on January 27th 2025 at 5:30 pm at the Athol Public Library Conference Room, 568 Main St, Athol, MA 01331. Hometown Harvest will be applying for an Adult-Use Retail Marijuana Establishment License, citing a location at 243 Main Street, Athol Massachusetts.

Information presented at the community outreach meeting will include, but not be limited to:

1. The type of adult-use Marijuana Establishment to be located at the proposed address;
2. Information adequate to demonstrate that the proposed Adult-use Marijuana Establishment location will be maintained securely;
3. Steps to be taken by the Adult-use Marijuana Establishment to prevent diversion to minors;
4. A plan by the Marijuana Establishment to positively impact the community;
5. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
6. A transcript of questions and answers posed by community members during the meeting.

Community members will be permitted, and are encouraged, to ask questions and receive answers from representatives of Hometown Harvest.

A copy of this notice is on file with the Town Clerk, the Board of Selectmen's office, and the Planning Department, all located at the Athol Town Hall, 584 Main St, Athol, MA 01331, and copy of this Notice was mailed 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.

January 11

4442073

### **Plan to Remain Compliant with Local Zoning**

Hometown Harvest. (the “**Company**”) is seeking licensure to operate as a Marijuana Retailer at 243 Main St, Athol, MA, MA 01331. Hometown Harvest is in compliance with section 3.26 of the Town of Athol’s zoning bylaws: “Registered Marijuana Dispensaries.” Although Hometown Harvest is not a “registered marijuana dispensary” it has nevertheless complied with the Town’s zoning requirements by applying for and receiving a special permit from the Town, approved by the Planning Board on December 5, 2024, and by executing a Host Community Agreement with the Town of Athol, approved and signed by the Town Administrator on behalf of the Select Board on December 17, 2024.

There are no public or private schools providing education in kindergarten or any of grades 1 through 12 within five hundred (500) feet of the proposed facility (measured property line to property line).

The Company expects to commence operations of its facility in April of 2025 and will continue to work with officials from the Town of Athol to ensure the operations have a positive impact on the community.

The Company hereby submits that it will continue to comply with all local and state requirements and the Partners will be responsible for ongoing compliance with local and state rules and regulations.

# Community Outreach Meeting Attestation Form

## Instructions

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

## Attestation

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

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



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

- a. Date of publication:
- b. Name of publication:

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

- a. Date notice filed:

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

- a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:

- a. The type(s) of ME or MTC to be located at the proposed address;
- b. Information adequate to demonstrate that the location will be maintained securely;
- c. Steps to be taken by the ME or MTC to prevent diversion to minors;
- d. A plan by the ME or MTC to positively impact the community; and
- e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



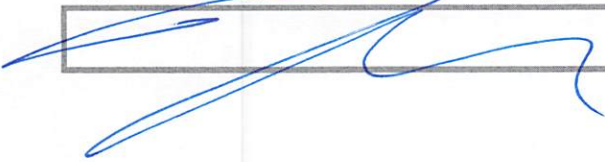
Name of applicant:

Hometown Harvest, LLC

Name of applicant's authorized representative:

Nicholas H. Obolensky

Signature of applicant's authorized representative:

A handwritten signature in blue ink is written over a rectangular box. The signature is stylized and appears to be 'N. Obolensky'.

# **ATTACHMENT A**

date of publication. With legal notices, sooner is always better. 72 hours ahead of publication is ideal.

Please note that with the exception of certain standard notices such as informal probate notices, name changes, conservator/guardian notices and citations on petitions of formal adjudication, all legal notices must be typed and sent to [legalads@recorder.com](mailto:legalads@recorder.com).

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January 11

4442073

# **ATTACHMENT B**

LEGAL NOTICE OF COMMUNITY OUTREACH MEETING REGARDING AN ADULT-USE  
RETAIL MARIJUANA ESTABLISHMENT  
HOMETOWN HARVEST 243 MAIN ST. ATHOL, MASSACHUSETTS 01331

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# **ATTACHMENT C**

LEGAL NOTICE OF COMMUNITY OUTREACH MEETING REGARDING AN ADULT-USE  
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## Plan for Positive Impact

**I. GOALS** – Hometown Harvest. (the “**Company**”) shall adopt a plan for Positive Impact (the “**Plan**”), the goals of which shall be to (a) recruit and hire employees from the following Areas of Disproportionate Impact (an “**ADI**”) **Amherst, Greenfield and Fitchburg**, and employees with past drug convictions (or whose parents or spouses have drug convictions), (b) assisting individuals within an **ADI** who have been negatively harmed by cannabis prohibition to have their criminal record expunged of such offenses, and (c) training existing employees to advance within the company or have the skills to open their own facility.

**II. PROGRAMS** - With respect to employee recruitment, the Company shall;

1. Implement Positive Impact Hiring Plan:

Endeavor to hire employees from **ADIs**, Massachusetts residents who have past drug convictions and Massachusetts residents with parents or spouses who have drug convictions (such employee being a “Preferred Status Employee”). The Company will post job advertisements on job boards in **ADI’s Amherst, Greenfield and Fitchburg**, which are **ADIs** that are near to the location of the proposed Marijuana Establishment in an effort to attract individuals from such areas. Such advertisements shall expressly state that Massachusetts residents with past drug convictions (or whose parents or spouses have past drug convictions), Commission designated Social Equity Program Participants, Commission-designated Economic Empowerment Priority applicants and residents of **Amherst, Greenfield and Fitchburg** are expressly encouraged to apply and shall receive preferential hiring status. The Company 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. The Company will host job fairs or post advertisements for new positions on an as needed basis.

2. Implement Positive Impact Training Plan:

Employees that have been employed by the Company for at least one year may apply to participate in a management training curriculum. An employee in the management training curriculum shall spend at least one month working with each manager and executive within the Company. At minimum, the management training curriculum shall include instruction on compliance with CCC regulations including security requirements, social equity goals, logistics of raising capital, identification of real property suitable for cannabis use, review of local zoning regulations, and use of payroll and accounting procedures.

With respect to any notices published, the Company 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 the applicant will not violate the Commission’s regulations with respect to the limitations on ownership or control or other applicable laws.

**III. MEASUREMENTS** – The Company shall collect data from all employees as to their status as ADI citizens, social equity status or history of being negatively harmed by cannabis prohibition. The Company shall also collect data from all prospective employees as to the way in which the employee learned of the job opportunity that they are applying for (i.e. via a job fair, newspaper or website). The Company shall keep a record of all job postings that it publishes in print or online. Such data shall include a copy of the advertisement, the date that it was published and the newspaper/website that it was published on.

Within two years of opening, the Company will seek to have at least 50% of employees be from ADI areas, or people who have been negatively harmed by cannabis prohibition. If that goal is not met, the Company shall revise its plan to increase the number of job fairs per year and/or change its method of advertising available positions (i.e. more frequent postings or posting in different publications).

The Company shall collect data as to the number of employees engaged with its management training curriculum. Within two years of becoming operational, the Company shall endeavor to have at least one current employee complete the management training program and receive a promotion at the Company. Within five years of becoming operational, the Company shall endeavor to have at least three current employees complete the management training program and receive a promotion at the Company. In addition to the above, the Company shall collect data relating to the number of jobs created in ADIs by former employees that have participated in the Company's management training curriculum.

All data described in this section shall be collected in the form of employee surveys, and readily available to be reviewed at any time. The Company shall record and retain such data in accordance with 830 CMR 62C.25.1: Record Retention. The Company shall provide the CCC with a copy of such data in support of any application to renew any Marijuana Establishment license.

The Company shall review all data collected pursuant to this Plan for Positive Impact every six months, and create a report thereof. These biannual reports will be reviewed and utilized by the company prior to making a decision to (a) post an advertisement for a job opening, (b) hire an employee, (c) host a job fair, (d) accept an eligible employee's application into the company's management training curriculum. Such reports will also be used to demonstrate proof of success or progress upon the yearly renewal of the Company's Marijuana Establishment License.

The Company affirmatively states that it: (1) 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; (2) any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws; and (3) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of this license.

### **Proposed Timeline**

Hometown Harvest's partners propose a plan to commence retail operations by mid April, 2025 or within 60 days after licensing.

The Commonwealth of Massachusetts, William Francis Galvin  
**Corporations Division**

One Ashburton Place - Floor 17, Boston MA 02108-1512 | Phone: 617-727-9640

**Certificate of Organization**

(General Laws, Chapter 156C, Section 12)

Filing Fee: \$500.00

Identification Number:	001848800	(number will be assigned)
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1. The exact name of the limited liability company is:  HOMETOWN HARVEST, LLC
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2. The address in the Commonwealth where the records will be maintained:					
Number and street:	32 TERRACE STREET				
Address 2:					
City or town:	ORANGE	State:	MA	Zip code:	01364
Country:	UNITED STATES				

3. The general character of business (if the limited liability company is organized to render professional service, this form must be filed by fax, mail or in person):  THIS LIMITED LIABILITY COMPANY IS FORMED WITH THE INTENTION OF APPLYING TO THE MASSACHUSETTS CANNABIS CONTROL COMMISSION FOR AN ADULT-USE RECREATIONAL MARIJUANA RETAIL SALES LICENSE AS WELL AS ANY OTHER LAWFUL ACTIVITY IN WHICH A COMPANY ORGANIZED UNDER THE MASSACHUSETTS LIMITED LIABILITY ACT MAY LAWFULLY ENGAGE.
---

4. The latest date of dissolution, if specified: (mm/dd/yyyy)
---

5. The name and address of the Resident Agent:					
Agent name:	NICHOLAS H. OBOLENSKY, ESQ.				
Number and street:	2 SPINNAKER LANE				
Address 2:					
City or town:	SOUTH DARTMOUTH	State:	MA	Zip code:	02748

I NICHOLAS H. OBOLENSKY, resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.
--

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

Title	Name	Address
MANAGER	LOREN E. EATON-FORBES	32 TERRACE STREET ORANGE, MA 01364 USA
MANAGER	SAMUEL F. EATON	627 SHAKER HILL ROAD ENFIELD, NH 03748 USA
MANAGER	ANNABELLE L. BAMFORTH	627 SHAKER HILL ROAD ENFIELD, NH 03748 USA
MANAGER	NICHOLAS H. OBOLENSKY	128 DORRANCE STREET, 6TH FLOOR PROVIDENCE, RI 02903 USA
MANAGER	MICHAEL R. GRASSO	7 RACEWAY DRIVE NANTUCKET, MA 02554 USA

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

Title	Name	Address
SOC SIGNATORY	NICHOLAS H. OBOLENSKY OBOLENSKY	128 DORRANCE STREET, 6TH FLOOR PROVIDENCE, RI 02903 USA

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

Title	Name	Address
REAL PROPERTY	LOREN E. EATON-FORBES	32 TERRACE STREET ORANGE, MA 01364 USA
REAL PROPERTY	SAMUEL F. EATON	627 SHAKER HILL ROAD ENFIELD, NH 03748 USA

9. Additional matters:

10. This certificate is effective at the time and on the date approved by the Division, unless a later effective date not more than ninety (90) days from the date of filing is specified:

Later Effective Date (mm/dd/yyyy):

Time (HH:MM)

SIGNED UNDER THE PENALTIES OF PERJURY, this 7 Day of November, 2024,

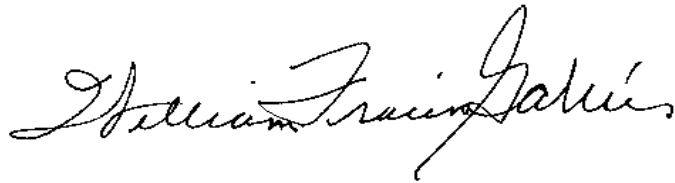
NICHOLAS H. OBOLENSKY

, Signature of Authorized Signatory.

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:

November 07, 2024 11:31 AM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, prominent initial "W".

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*



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

William Francis Galvin  
Secretary of the  
Commonwealth

February 21, 2025

TO WHOM IT MAY CONCERN:

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

**HOMETOWN HARVEST, LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **November 7, 2024.**

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

I also certify that the names of all managers listed in the most recent filing are: **LOREN E. EATON-FORBES, SAMUEL F. EATON, ANNABELLE L. BAMFORTH, NICHOLAS H. OBOLENSKY, MICHAEL R. GRASSO**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **LOREN E. EATON-FORBES, SAMUEL F. EATON, ANNABELLE L. BAMFORTH, NICHOLAS H. OBOLENSKY, MICHAEL R. GRASSO, NICHOLAS H. OBOLENSKY OBOLENSKY**

I also certify that the names of all persons authorized to act with respect to real property listed in the most recent filing are: **LOREN E. EATON-FORBES, SAMUEL F. EATON**

In testimony of which,

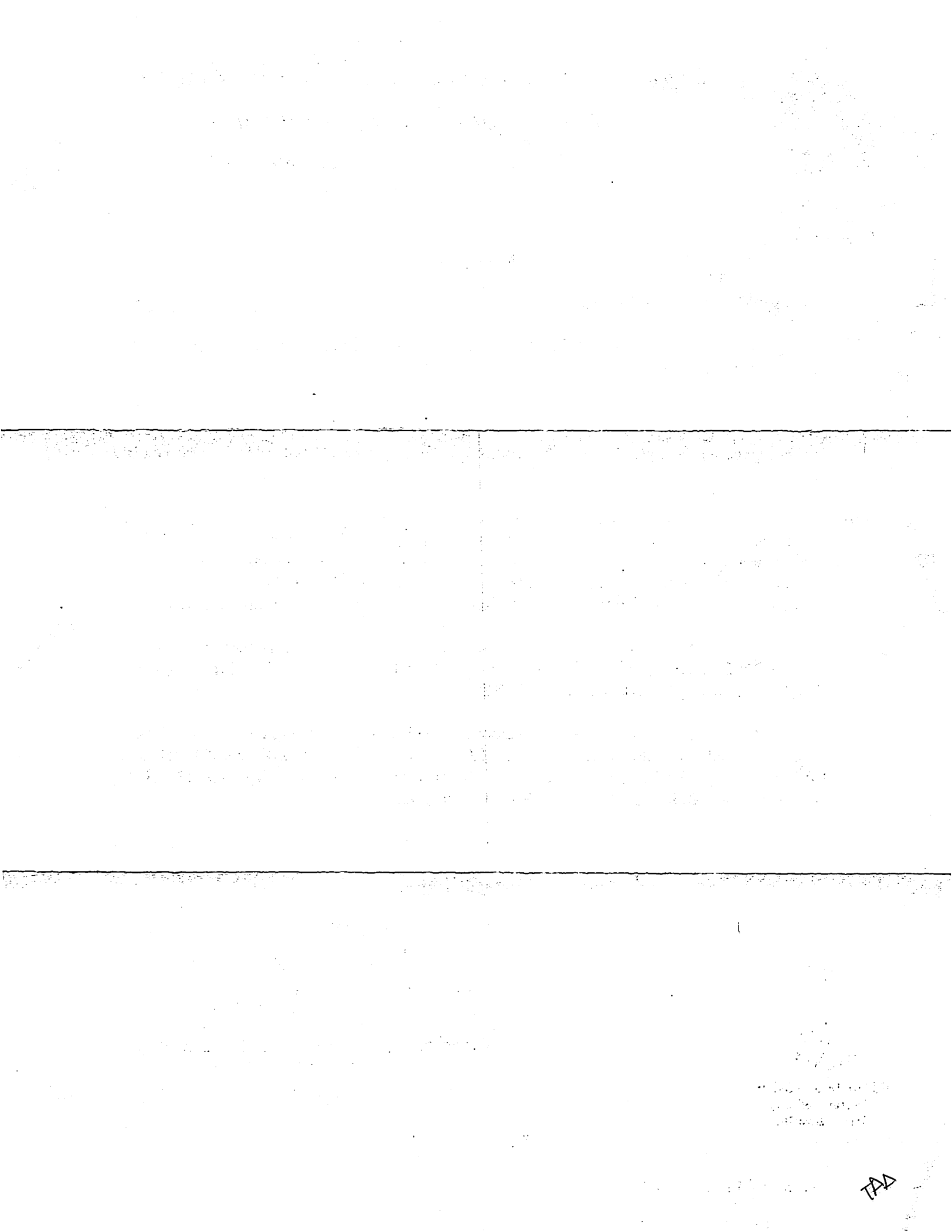
I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

Secretary of the Commonwealth





TAD



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

mass.gov/dor

Letter ID: L1124748192  
Notice Date: February 18, 2025  
Case ID: 0-002-769-585



## CERTIFICATE OF GOOD STANDING/TAX COMPLIANCE REQUEST STATUS



HOMETOWN HARVEST LLC  
2 SPINNAKER LN  
SOUTH DARTMOUTH MA 02748-3086



### ***Why did I receive this notice?***

We received your request for a Certificate of Good Standing and/or Tax Compliance for HOMETOWN HARVEST LLC. As of the date of this notice, the Commissioner of Revenue is unable to certify whether you are in compliance with your tax obligations under Chapter 62C of the Massachusetts General Laws.

According to our records, you're not registered with the Department of Revenue. As a result, we don't know if you have any outstanding liabilities. We're also unable to determine if you're legally required to file and pay taxes in Massachusetts.

### ***What if I have questions?***

If you have questions, call us at (617) 887-6400, Monday through Friday, 9:00 a.m. to 4:00 p.m.

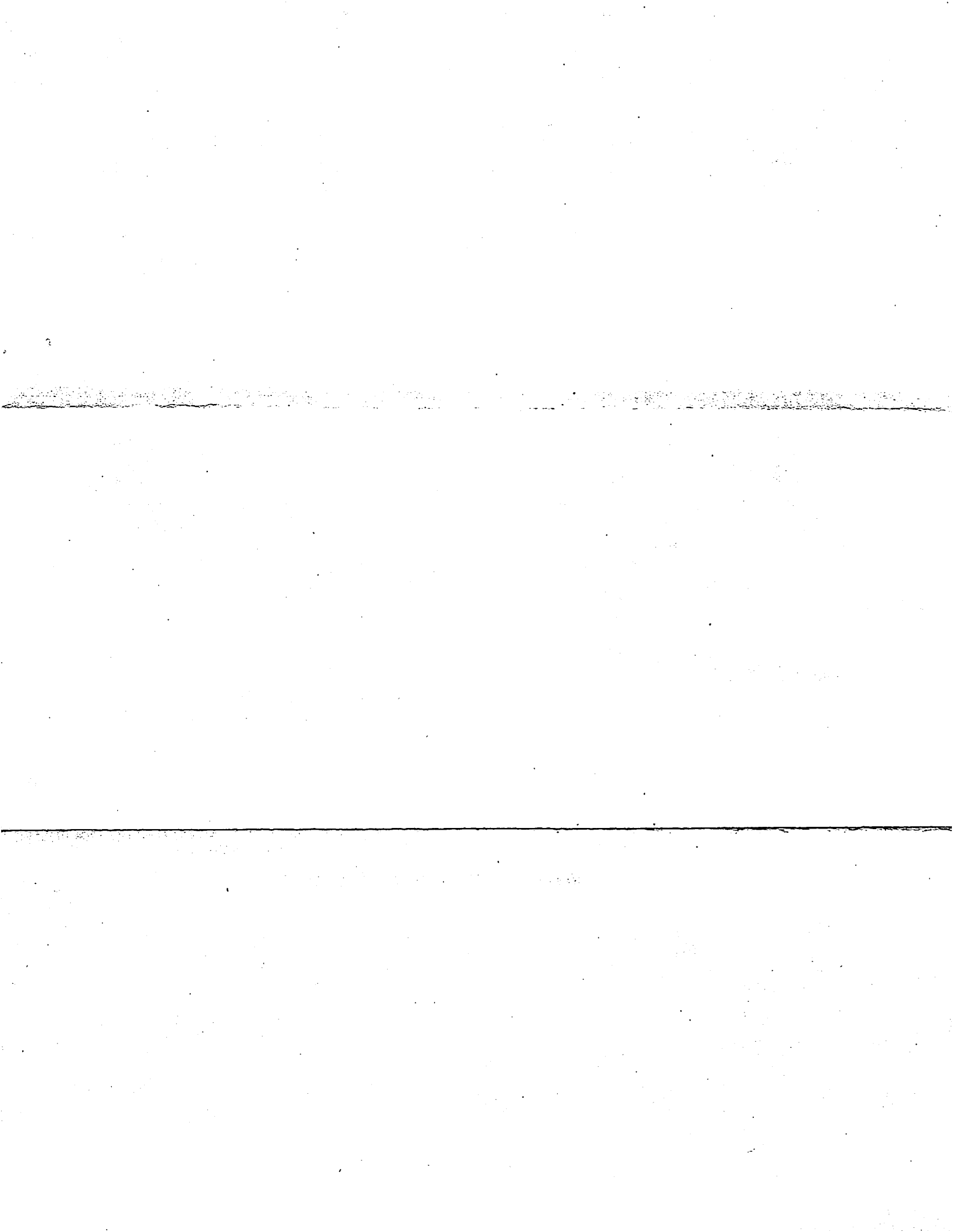
### ***Visit us online!***

Visit [mass.gov/dor](http://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

Use the confirmation code below to print another copy of this letter or to review your submission.  
Confirmation Code: fk69px

Edward W. Coyle, Jr., Chief  
Collections Bureau



**Business Plan**

# Hometown Harvest LLC

Business Plan

234 Athol Massachusetts

**Business Name:** Hometown Harvest LLC

**Owner:** Loren Eaton-Forbes

**Location:** 243 Main St Athol, Massachusetts

**Business Type:** Cannabis Dispensary

**Target Market:** Adult cannabis consumers in Athol and the surrounding North-Central Massachusetts area.

**Mission Statement:** To provide safe, high-quality cannabis products in a welcoming, inclusive environment that promotes wellness, education, and community engagement.\*

## Executive Summary

### **Business Overview:**

Hometown Harvest Dispensary is a cannabis retail business located in Athol, Massachusetts. The dispensary aims to create a community-focused shopping experience by offering high-quality cannabis products, personalized customer service, and education on safe and responsible cannabis use. Hometown Harvest will stand out by promoting local brands, supporting local businesses, offering high quality cannabis products at an affordable price, and engaging in community events.

With the use of strategic partnerships, dispensary location, low renovation costs, and projected immediate cash flow, Hometown Harvest will need little outside investment.

The Athol Mass location will hopefully be the first of three locations.

### **Vision Statement:**

To be the premier choice for cannabis, for the hard working adults, in the North-Central Massachusetts region by setting high standards for product quality, customer service, and community engagement.

### **Objectives:**

1. Achieve monthly sales of \$250,000 by end of year one.
2. Develop a strong, positive reputation within the community through consistent engagement and high customer satisfaction.
3. Build a loyal customer base through educational initiatives and personalized service.

## Market Analysis

### **Industry Overview:**

The cannabis industry in Massachusetts has shown rapid growth since legalization, with a strong demand for recreational use. The state's regulated cannabis market continues to attract adult users seeking recreational and therapeutic benefits. With the projected growth of cannabis sales in Massachusetts, there is substantial market potential for local dispensaries in towns like Athol, which is underserved compared to larger cities.

### **Local Demographics:**

- Population: Athol and surrounding areas approximately 25,000
- Median household income: \$59,000
- Female persons: 49.5%
- Avg Age: 41.9

### **Target Market:**

- **Primary Market:** Adults 21+, lower to upper middle class, including Athol residents and visitors from neighboring areas, who seek recreational cannabis products.
- **Secondary Market:** Vacationing adults 21+.

### **Market Needs:**

1. A dispensary that prioritizes safety, transparency, and education around cannabis use.
2. Diverse, quality cannabis products that cater to adults 21+.
3. Community involvement that resonates with the local population in Athol and surrounding towns.
4. Focuses on the working class.

**Community Considerations:** Athol has many manufacturing jobs. The town is expanding with recently approving multiple apartment and hotel projects. The town is investing in beautification and expanding of their main street area. Athol will be investing roughly \$3,000,000 in beautification and infrastructure improvements directly surrounding the dispensary.

### **Competitive Analysis:**

Hometown Harvest will compete with dispensaries in surrounding towns. However, being composed of local industry leaders, a community and working class focused dispensary will provide a unique edge. Many competitors lack an emphasis on local community engagement and education, both of which are core values for Hometown Harvest.

## **Product Line**

### **Product Categories:**

1. **Flower:** Strains from trusted, local growers with an emphasis on quality and consistency.
2. **Concentrates:** High-quality extracts including shatter, wax, and live resin.
3. **Edibles:** A range of THC and CBD-infused edibles, including gummies, chocolates, and beverages.
4. **Topicals:** Salves, balms, and lotions for localized relief.
5. **Accessories and other:** Pipes, vaporizers, grinders, art, clothing, storage solutions, and more.

### **State Sales by Product:**

- Flower sales represent roughly 42%
- Vapes 19%
- Prerolls 16%
- Edibles 12%

- Concentrates 5%

**Sourcing and Suppliers:**

Hometown Harvest will prioritize sourcing products from western Massachusetts businesses, to support local growers and contribute to economic growth within the region.

Hometown Harvest has and will continue to create strategic partnerships with suppliers, wholesalers, and other local vendors to reduce capital needed for start up.

## Marketing Strategy

**Brand Positioning:**

Hometown Harvest will position itself as a trusted, community-oriented dispensary with a focus on quality and price. By creating a friendly, welcoming environment, Hometown Harvest will attract a loyal customer base that values friendly and personalized service.

**Unique Selling Proposition (USP):**

A community and working class focused dispensary that offers high-quality cannabis products and prioritizes customer education and local collaboration.

**Marketing Channels:**

1. **Social Media Marketing:** posts targeting audiences over 21 years of age only, on platforms like Instagram, Facebook, X, and TikTok to engage with cannabis consumers and promote new product launches and events.
2. **Community Events:** Host educational seminars, "meet-the-grower" events, popup brand events, and participate in local festivals and fairs.
3. **Email Marketing:** Newsletters with product updates, educational articles, and promotions.
4. **SMS Marketing:** Periodic text messages offering bundles and early access to our loyalty card members.
5. **Collaborations:** Partner with local businesses for co-marketing opportunities and cross-promotions.

**Customer Loyalty Program:**

Introduce a rewards program to retain customers and encourage repeat visits. Offer bundles, early access to new products, and points for every dollar spent.

**Other:** Hometown Harvest has twice made the front page, above fold, of the largest newspaper in Athol. With little marketing efforts Hometown Harvest's brand has already become talk of the town.

# Operations Plan

## **Location and Facility Requirements:**

A 1200 sq ft retail building that is well-visible, centrally located, at 243 Main St. Athol MA. The dispensary layout will include a welcoming reception area, retail showroom, product storage, and secure point-of-sale systems. The location was previously a profitable dispensary.

Little construction and remodel will be needed.

Host Community Agreement has been secured from the town of Athol.

## **General Staffing Needs:**

1. **General Manager:** Responsible for overseeing day-to-day operations, compliance, and team management.
2. **Shift Leaders:** Customer service leadership skills with extensive knowledge of cannabis products and consumption methods.
3. **Budtenders:** Customer service specialists with extensive knowledge of cannabis products and consumption methods.
4. **Marketing:** Marketing specialist that creates and implements a marketing plan. Handling the day to day marketing activities, with an eye on brand and sales growth.
5. **Inventory Specialist:** Manages stock levels, product ordering, and inventory control.

## **Compliance and Licensing:**

Hometown Harvest will follow all regulations set by the Massachusetts Cannabis Control Commission (CCC). The business will secure the necessary retail licenses, adhere to packaging and labeling requirements, and implement secure storage protocols for cannabis products.

# Financial Plan

## **Market Overview:**

Massachusetts adult-use has seen growth year over year since the inception in 2018

Year	Adult-Use
2023	\$1,556,826,393.87
2022	\$1,488,674,521.04
2021	\$1,332,327,979.67
2020	\$702,609,593.36
2019	\$433,096,256.80
2018	\$5,633,545.49
Total	\$5,519,168,290.23

Given Massachusetts' established market and its trajectory, it's reasonable to expect continued growth in the state's cannabis sales over the next five years. However, the exact figures will depend on various factors, including regulatory changes, market dynamics, and consumer preferences.

**Startup Costs:**

1. **Licensing and Permits:** \$5,000
2. **Lease and utilities (3 months):** \$15,000
3. **Employees and HR (1 month):** \$32,500 (needs adjustment)
4. **Build-Out and Design:** \$2,000
5. **Product Inventory:** Strategic partnerships acquired. See Appendix A
6. **Marketing & Branding:** \$10,000
7. **Insurances:** \$5,000
8. **Office Equipment and POS:** \$10,000
9. **Misc:** \$5,000

**Cash Flow:** \$175,000 per month

**Investment:** \$55,000

**Revenue Projections (Year 1):**

- **Monthly Sales (Average):** \$165,000/m, scaling to \$250,000/m as the customer base grows.
- **Total Annual Revenue:** Approximately \$2,000,000.

**Return on Investment:**

Short term goal is to grow from \$2,000,000 in the first year to \$3,000,000 by year five. Company will provide a net 70% dividend starting after year one.

## **Investor Advantage**

Investing in Hometown Harvest Dispensary presents a unique opportunity to invest in a company with immediate cash flow, community-focused cannabis business in an underserved region of Massachusetts. With a strong commitment to the local communities, diversity, equity, and inclusion, Hometown Harvest is poised to build a loyal, diverse customer base and foster strong community connections, providing a sustainable competitive edge.

The store front is located in the heart of downtown Athol and was previously a profitable dispensary until the previous owner was institutionalized. This gives us an advantage of a location that could show immediate cash flow.

The dispensary's strategic focus on local partnerships and supplier diversity further positions it as a socially responsible brand with a solid foundation for growth. Investors can expect a return on investment not only through financial gains but by supporting a pioneering business that aligns with evolving consumer values around equity, quality, and community impact in the fast-growing cannabis industry.

## **Sustainability and Community Engagement**

Hometown Harvest is committed to environmental sustainability by offering eco-friendly packaging and supporting local, organic growers. Additionally, the business will participate in regular community service, donate a portion of profits to local nonprofits, and collaborate with local businesses for events that foster a sense of community pride and awareness around responsible cannabis use.

### **Conclusion:**

Hometown Harvest Dispensary aims to establish itself as Athol's leading choice for cannabis products through a focus on high-quality products, community engagement, and personalized customer service. By positioning itself as a trusted resource in cannabis education and a champion for local businesses, Hometown Harvest is poised to make a meaningful impact in Athol and the surrounding communities.

### **Plan for Obtaining Liability Insurance**

Hometown Harvest. (the “**Company**”) will obtain and maintain, general liability insurance coverage that meets or exceeds the requirements set forth in 935 CMR 500.105 (10).

This policy may also be referred to by the Company as the “**Liability Insurance Policy**”.

The company is in discussions with insurance providers and will engage with the provider who best suits the needs of the company once we receive a Provisional License.

1. Once the company receives its Provisional Marijuana Establishment License, the company will engage with an insurance provider who is experienced in the legal marijuana industry.

a. Company will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually.

b. The deductible for each policy will be no higher than \$5,000 per occurrence.

2. The company will maintain reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission and make these reports available to the Commission upon request.

### **Restricting Access to Age 21 and Older**

Hometown Harvest. (the “**Company**”) shall require that all Marijuana Establishment Agents, Visitors and Consumers of marijuana for adult use (each as defined in 935 CMR 500.002) are 21 years of age or older. The Company will positively identify individuals seeking access to the premises of the Marijuana Establishment, or to whom marijuana or marijuana products are being transported pursuant to 935 CMR 500.105(14) (if applicable) to limit access solely to individuals 21 years of age or older.

Pursuant to 935 CMR 500.140, the Company shall immediately inspect an individual’s proof of identification and determine that the individual is 21 years of age or older upon entry to the Marijuana Establishment. The Company shall also inspect an individual’s proof of identification at the point-of-sale and determine that the individual is 21 years of age or older.

The identification shall contain a name, photograph, and date of birth, and shall be limited to one of the following:

1. A driver’s license;
2. A government issued identification card;
3. A military identification card; or
4. A passport.

This policy may also be referred to by the Company as the “**Policy to Restrict Access to Persons Age 21 and Older**”.

## **Quality Control and Testing for Contaminants**

### **Testing of Marijuana**

Hometown Harvest (the “**Company**”) shall not sell or otherwise market for adult use any marijuana product, including marijuana, that has not first been tested by an Independent Testing Laboratory, except as allowed under 935 CMR 500.000: Adult Use of Marijuana.

The Company is not proposing to cultivate or produce its own products at this time. The Company intends to obtain all of its products from other duly licensed Marijuana Establishments.

The Company shall ensure that all marijuana and marijuana products sold at its Marijuana Establishment have been tested by an Independent Testing Laboratory that tests the marijuana products in compliance with the protocol(s) established in accordance with M.G.L. 94G § 15 and in a form and manner determined by the Commission including, but not limited to, *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*. Testing of the Company’s environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Marijuana Dispensaries* published by the Commission, as applicable.

The Company shall ensure that all marijuana and marijuana products have been tested for the cannabinoid profile and for contaminants as specified and required by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

The Company shall notify the Commission within seventy-two (72) hours of receipt in writing, of any laboratory testing results indicating that the marijuana or marijuana products contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) that contamination cannot be remediated, and must be disposed of. The notification from the Company shall describe a proposed plan of action for both the destruction of the contaminated production batch within seventy-two (72) hours, and the assessment of the source of contamination and shall contain any information regarding contamination as specified by the Commission, or immediately upon request by the Commission. The Company shall ensure that notification comes from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly.

The Company shall maintain the results of all testing for no less than one year. Any marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with the Company’s Transportation Policy and 935 CMR 500.105(13).

All excess marijuana shall be disposed of in compliance with the Company's Waste Disposal Policy and 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly.

Single-servings of Marijuana Products tested for potency in accordance with 935 CMR500.150(4)(a) shall be subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Marijuana and Marijuana Products submitted for retesting prior to remediation must be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation

### Handling of Marijuana

The Company shall handle and process marijuana and marijuana products in a safe and sanitary manner. The Company shall implement the following policies (as applicable to its Marijuana Retail License):

- (a) To the extent applicable the Company shall process the leaves and flowers of the female marijuana plant only, which shall be:
  1. Well cured and generally free of seeds and stems;
  2. Free of dirt, sand, debris, and other foreign matter;
  3. Free of contamination by mold, rot, other fungus, pests and bacterial diseases and satisfying the sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food, and if applicable, 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments;
  4. Prepared and handled on food-grade stainless steel tables with no contact with the Company's marijuana establishment agents' bare hands; and
  5. Packaged in a secure area.
  
- (b) The Company shall comply with the following sanitary requirements:
  1. Any marijuana establishment agent whose job includes contact with marijuana or non-edible marijuana products, including cultivation, production, or packaging shall comply with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
  2. Any marijuana establishment agent working in direct contact with preparation of marijuana or non-edible marijuana products shall conform to sanitary practices while on duty, including:
    - i. Maintaining adequate personal cleanliness; and

- ii. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. The Company shall supply adequate and convenient hand-washing facilities furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. The Company shall supply sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
7. The Company shall ensure that there will be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
9. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items shall not be stored in an area containing products used in the cultivation of marijuana. The Commission may require a Marijuana Establishment to demonstrate the intended and actual use of any toxic items found on the premises;
11. The Company's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;

12. Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There shall be no cross-connections between the potable and waste water lines;
  13. The Company shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
  14. Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
  15. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
  16. All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).
- (c) The Company shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*.

This policy may also be referred to by the Company as the “**Quality Control and Testing Policy**”.

## Personnel Policies Including Background Checks

Hometown Harvest. (the “**Company**”) shall implement the following Personnel Policies and Background Check policies:

- (1) The Company shall require that all personnel strictly adhere to, and comply with, all aspects of the Security Policy, which policy shall be incorporated herein by reference, specifically employee security policies, including personal safety and crime prevention techniques;
- (2) The Company shall develop a staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- (3) The Company shall develop emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- (4) It shall be a policy of the Company that the workplace shall be alcohol, smoke and drug-free;
- (5) The Company shall require that all personnel strictly adhere to, and comply with, all aspects of the *Record Retention* and *Financial Record Maintenance and Retention* policies, which policies shall be incorporated herein by reference, specifically regarding the maintenance of confidential information and other records required to be maintained confidentially;
- (6) The Company shall immediately dismiss any Marijuana Establishment agent who has:
  - a. Diverted marijuana, which shall be reported to law enforcement authorities and to the Commission;
  - b. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  - c. 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 Other Jurisdictions (as that term is defined in 935 CMR 500.002).
- (7) The Company shall make a list of all board members and Executives (as that term is defined in 935 CMR 500.002) of the Marijuana Establishment, and members of the licensee (if any), available upon request by any individual. The Company may make this list available on its website.
- (8) The Company shall develop policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s), as set forth in its Security Policy.

(9) The Company shall apply for registration for all of its board members, directors, employees, Executives (as that term is defined in 935 CMR 500.002), managers, and volunteers. All such individuals shall:

- (a) be 21 years of age or older;
- (b) not have been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions (as that term is defined in 935 CMR 500.002); and
- (c) be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 935 CMR 500.801 or 935 CMR 500.802.

(10) An application for registration of a marijuana establishment agent shall include:

- (a) the full name, date of birth, and address of the individual;
- (b) all aliases used previously or currently in use by the individual, including maiden name, if any;
- (c) a copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
- (d) an attestation that the individual will not engage in the diversion of marijuana products;
- (e) written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
- (f) background information, including, as applicable:
  - 1. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002), whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
  - 2. a description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002), relating to any professional or HHupational or fraudulent practices;
  - 3. a description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or

registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;

4. a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or Other Jurisdiction (as that term is defined in 935 CMR 500.002) with regard to any professional license or registration held by the applicant;

(g) a nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and

(h) any other information required by the Commission.

- (11) An Executive (as that term is defined in 935 CMR 500.002) of the Company registered with the Department of Criminal Justice Information Systems (“**DCJIS**”) pursuant to 803 CMR 2.04: iCORI Registration, shall submit to the Commission a Criminal Offender Record Information (“**CORI**”) report and any other background check information required by the Commission for each individual for whom the Company seeks a marijuana establishment agent registration, obtained within 30 calendar days prior to submission.
  - a. The CORI report obtained by the Company shall provide information authorized under Required Access Level 2 pursuant to 803 CMR 2.05(3)(a)2.
  - b. The Company’s collection, storage, dissemination and usage of any CORI report or background check information obtained for marijuana establishment agent registrations shall comply with 803 CMR 2.00: Criminal Offender Record Information (CORI).
- (12) The Company shall notify the Commission no more than one (1) business day after a marijuana establishment agent ceases to be associated with the Company. The subject agent’s registration shall be immediately void when the agent is no longer associated with the Company.
- (13) The Company shall require that all agents renew their registration cards annually from the date of issue, subject to a determination by the Commission that the agent continues to be suitable for registration.
- (14) After obtaining a registration card for a marijuana establishment agent, the Company shall notify the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five (5) business days of any changes to the information that the Marijuana Establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.
- (15) The Company’s agents shall carry their registration card at all times while in possession of marijuana products, including at all times while at the Marijuana Establishment or while transporting marijuana products.

- (16) Should any of the Company's agents be affiliated with multiple Marijuana Establishments the Company shall ensure that such agents are registered as a marijuana establishment agent by each Marijuana Establishment and shall be issued a registration card for each establishment.
- (17) The Company shall maintain, and keep up to date, an employee handbook that employees will be given copies of at the start of their employment and will be required to attest that they have read and received the same, covering a wide range of topics, including but not limited to: (1) Employee benefits; (2) Vacation and sick time; (3) Work schedules; (4) Confidentiality standards; (5) Criminal background check standards (6) Security and limited access areas; (7) Employee identification and facility access; (8) Personal safety and crime prevention techniques; (9) Alcohol, drug, and smoke-free workplace; and (10) Grounds for discipline and termination. Each Employee shall be required to review the handbook and attest to their understanding and receipt of the same. The Company will review its employee handbook periodically and communicate any changes to its employees.

### **Personnel Record Keeping**

The Company shall maintain the following Personnel Records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
  - a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
  - b. Documentation of verification of references;
  - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
  - d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
  - e. Documentation of periodic performance evaluations;
  - f. A record of any disciplinary action taken; and
  - g. Notice of completed responsible vendor and eight (8) hour related duty training.

3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions (as applicable);
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with M.G.L. c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).

The Company's aforementioned Personnel Records shall be available for inspection by the Commission, upon request. All records shall be maintained in accordance with generally accepted accounting principles.

Following closure of the Company's Marijuana Establishment, all records shall be kept for at least two (2) years at the Company's expense, in a form and location acceptable to the Commission.

### **Staffing Plan:**

#### Executive Level:

- Ownership Partners
- Managing Partner

#### Management Level:

- Assistant Manager; and
- Shift Leads

#### Staff Level

- Up to fifteen (10) Staff Level Sales Representatives;

#### Consultant Level

- Attorney / Compliance Officer;
- Human Resources Provider; and
- Up to five (5) Security Officers.

This policy may also be referred to by the Company as the “**Personnel and Background Check Policy**”.

## Record Keeping Procedures

Hometown Harvest. (the “**Company**”) shall keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records shall be available for inspection by the Commission, upon request and shall include, but not be limited to, all records required in any section of 935 CMR 500.000: Adult Use of Marijuana, in addition to the following:

- (a) Written operating procedures as required by 935 CMR 500.105(1);
- (b) Inventory records as required by 935 CMR 500.105(8);
- (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
- (d) Personnel records as described in the Company’s Personnel and Background Check Policy, which policy shall be incorporated herein by reference, and as follows:
  - a. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
  - b. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual’s affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
    - i. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
    - ii. Documentation of verification of references;
    - iii. The 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 individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
    - v. Documentation of periodic performance evaluations;
    - vi. A record of any disciplinary action taken; and
    - vii. Notice of completed responsible vendor and eight (8) hour related duty training.

- c. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions (as applicable);
  - d. Personnel policies and procedures; and
  - e. All background check reports obtained in accordance with M.G.L. c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI);
- (e) Business records as described in the Company’s Financial Record Maintenance and Retention Policy, which shall include manual or computerized records of the following: (1) assets and liabilities; (2) monetary transactions; (3) books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; (4) sales records including the quantity, form, and cost of marijuana products; and (5) salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment, if any; and
- (f) Waste disposal records as required under 935 CMR 500.105(12), including but not limited to, a written or electronic record of the date, the type and quantity of marijuana, marijuana products or waste disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two (2) Marijuana Establishment Agents present during the disposal or other handling, with their signatures. The Company shall keep these records for at least three (3) years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

All Confidential Information (as that term is defined in 935 CMR 500.002) shall be maintained confidentially including secured or protected storage (whether electronically or in hard copy), and accessible only to the minimum number of specifically authorized employees essential for efficient operation and retention of such records. In any event, the Company shall be authorized to disclose such confidential information as may be required by law.

Following closure of a Marijuana Establishment, the Company shall keep all records for at least two (2) years at the Company’s expense and in a form and location acceptable to the Commission. It shall be a policy of the company that any and all records subject to any enforcement action shall be retained for the duration of such action, or as otherwise extended by order of the Commission.

This policy may also be referred to by the Company as the “**Record Retention Policy**”.

## Maintaining of Financial Records

Hometown Harvest. (the “**Company**”) shall keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records shall be available for inspection by the Commission, upon request and shall include, but not be limited to, all financial records required in any section of 935 CMR 500.000: Adult Use of Marijuana, and business records, in accordance with 935 CMR 500.105(e), which shall include manual or computerized records of:

1. Assets and liabilities;
2. Monetary transactions;
3. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
4. Sales records including the quantity, form, and cost of marijuana products; and
5. Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment, if any.

Furthermore, consistent with the Company’s *Dispensing Policy*, the Company shall implement the following policies for Recording Sales

- (a) The Company shall utilize a point-of-sale (“**POS**”) system approved by the Commission, in consultation with the Massachusetts Department of Revenue (“**DOR**”).
- (b) The Company may also utilize a sales recording module approved by the DOR.
- (c) The Company shall not utilize any software or other methods to manipulate or alter sales data at any time or under any circumstances.
- (d) The Company shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. The Company shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If the Company determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
  - i. it shall immediately disclose the information to the Commission;
  - ii. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and

- iii. take such other action directed by the Commission to comply with 935 CMR 500.105.
- (e) The Company shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
- (f) The Company shall adopt separate accounting practices at the POS for marijuana and marijuana product sales, and non-marijuana sales.
- (g) The Company shall allow the Commission and the DOR audit and examine the POS system used by a retailer in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000: Adult Use of Marijuana;

Following closure of a Marijuana Establishment, the Company shall keep all records for at least two (2) years at the Company's expense and in a form and location acceptable to the Commission.

This policy may also be referred to by the Company as the “**Financial Record Maintenance and Retention Policy**”.

## Employee Qualifications and Training

Hometown Harvest. (the “**Company**”) shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum shall include a three (3) hour Responsible Vendor Program under 935 CMR 500.105(2)(b). Agents responsible for tracking and entering product into the Seed-to-sale SOR must receive training in a form and manner determined by the Commission. The Company shall appoint an inventory manager who shall be responsible for compliance with seed-to-sale SOR tracking and shall complete, among other things, advanced training offered by METRC. It shall be a policy of the Company that all marijuana agents and staff shall receive and participate in, a minimum of, eight (8) hours of on-going training annually.

Company Training Policies shall be as follows:

1. All 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 attend and successfully complete a responsible vendor training program.
2. Once the Company is designated as a “responsible vendor” all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor training program within ninety (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 training 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 on request during normal business hours.
6. Management-level employees shall be trained with respect to proper disposal methods including composting procedures (as such procedures are set forth in the Company’s Storage Policy, which policy shall be incorporated herein by reference) and shall be instructed to complete inventory audits pursuant to the Company’s Inventory Policy, which policy shall be incorporated herein by reference.

The Company shall 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. Scientifically based evidence on the physical and mental health effects based on the 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. Patient registration cards formerly and validly issued by the DPH or currently and validly issued by the Commission;
  - 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;
  - 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 the Marijuana 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.

The Company shall also ensure that all of its board members, directors, employees, Executives (as that term is defined in 935 CMR 500.002), managers, and volunteers shall:

- (a) be 21 years of age or older;
- (b) not have been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
- (c) be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

This policy may also be referred to by the Company as the “**Employee Qualification and Training Policy**”.

# Energy Efficiency and Conservation Plan

## *Standard Operating Procedure*

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In compliance with 935 CMR 500.105(15) Hometown Harvest has identified potential energy use reduction opportunities (such as natural lighting and energy efficiency measures) and implemented these opportunities to the extent possible. Hometown Harvest reduced electric demand (such as lighting schedules, active load management, and energy storage); and will be engaging with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. Hometown Harvest will work closely with our local utility companies to create and execute interactive Energy Savings Plans, by means of:

- Understanding how we use energy through analysis generation;
- Compare our operation with similar businesses and act accordingly;
- Intake customized energy improvement recommendations from professionals; and
- Utilize cost incentives through utility energy performance.

Our construction team, project managers, architects, and engineers have executed the retail buildout processes through pre-construction, construction, and review construction phases within preliminary planning guidelines that ensure the highest capacity of energy efficiency throughout the reasonable lifespan of the operation, including but not limited to:

- The purchase and installation of to-code R-Value insulation materials, that actively resist the conductive flow of heat, wherever applicable on site;
- The purchase and installation of LED lighting systems;
- The removal and disposal of outdated HVAC systems, with the purchase and installation of advanced HVAC systems.

Further practices to maintain energy efficiency throughout daily operations include:

- Using power strips to power all devices, and turning off all power strips at the conclusion of the closing process (excludes security systems);
- Using communal printers, coffee makers, microwave ovens, and refrigerators;
- Turning off monitors when leaving for more than one hour;
- Save paper by only photocopying what is absolutely needed, and always using the second side of sheets by either printing on both sides or using the blank side as scratch paper;
- Report any obvious energy waste or material deficiencies such as broken heaters or air leaks up the chain of command;
- Close or tilt window blinds to block direct sunlight to reduce cooling needs during warmer months;
- Prohibiting the use of individual space heaters; and
- Using Energy Star labeled appliances.

Hometown Harvest will take consideration of opportunities for renewable energy generation if at any point local zoning and planning authorities make renewable energy generation possible for lots of our physical size, in our applicable zone.

## Diversity Plan

### I. GOALS

It shall be the policy of Hometown Harvest. (the “Company”) to promote equity among minorities, women; veterans; people with disabilities; and L.G.B.T.Q. + in the operations of the Marijuana Establishment by (a) increasing the number of such individuals who achieve their goal of entering the adult-use marijuana industry and (b) insuring that such employees are retained by providing the tools and corporate infrastructure to ensure their success.

### II. PROGRAMS

1. The Company will recruit a diverse workforce by strengthening and developing relationships with minorities, women; veterans; people with disabilities; and L.G.B.T.Q.+ by holding job fairs and advertising job openings in Orange and Gardner, which are cities near to the location of the Marijuana Establishment that have the largest and most diverse populations. The Company will post job advertisements in Orange and Gardner, and in the Western Massachusetts Craigslist Board. The advertisements shall state that minorities, women; veterans; people with disabilities; and L.G.B.T.Q.+ shall be encouraged to apply. The Company shall aim to hire at least **50% women; 20% people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people; 10% veterans; 10% people with disabilities; and 10 % L.G.B.T.Q.+ employees.**

**Metrics and Evaluation:** Hometown Harvest will assess the demographics of its employees to see if it is meeting its goal of increasing diversity in these positions. Hometown Harvest will annually analyze the staffing makeup and based upon the outcome of those analytics, determine what steps are necessary to further increase the diversity of Hometown Harvest. Hometown Harvest will assess and review its progress within a year of receiving its Final License from the Cannabis Control Commission for an adult-use marijuana establishment and then annually, thereafter. Based upon this annual review and in conjunction with the renewal of its license, Hometown Harvest will be able to demonstrate to the Commission the success of this initiative.

2. The Company will review and modify recruitment strategies for identifying and attending minority and women job fairs on an on-going basis. Job vacancies will only be filled after being publicly posted. The Company will avoid relying upon existing employee referrals, which often result in "like me" referrals, where employees refer candidates of the same race, religion, national origin or other class. **Hometown Harvest plans to host or attend a minimum of two job fairs annually.**

**Metrics and Evaluation:** Hometown Harvest will record and file records for job fairs attended or hosted, as well as documents overviewing successful employment of applicants from aforementioned job fairs, on an as needed basis for employee vacancies. Hometown Harvest will assess and review its progress within a year of receiving its Final

License from the Cannabis Control Commission for an adult-use marijuana establishment and then annually, thereafter. Based upon this annual review and in conjunction with the renewal of its license, Hometown Harvest will be able to demonstrate to the Commission the success of this initiative.

3. When the company is considering hiring outside companies, the Company shall have a preference to hire companies that are listed on State's Directory found at <https://www.sdo.osd.state.ma.us/BusinessDirectory/BusinessDirectory.aspx> as a Minority Business Enterprise (MBE), Women Business Enterprise (WBE), Lesbian Gay Bisexual Transgender Enterprise (LGBTBE), Service-Disabled Veteran-Owned Business Enterprise (SDVOBE) or a Disability-Owned Business Enterprises (DOBE) (collectively a Disadvantaged Business Enterprise). **The Company has a goal of hiring a minimum of 20% Minority Business Enterprises (MBE) that are majority-owned or managed by people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, 50% Women Business Enterprises (WBE) that are majority-owned or managed by women, 20% Lesbian Gay Bisexual Transgender Enterprises (LGBTBE) that are majority-owned or managed by individuals who identify as LGBTQ+, 10% Service-Disabled Veteran-Owned Business Enterprises (SDVOBE) that are majority-owned or managed by veterans, and 10% Disability-Owned Business Enterprises (DOBE) (collectively a Disadvantaged Business Enterprise) that are majority-owned or managed by persons with disabilities.**

**Metrics and Evaluation:** Hometown Harvest will assess the status of the businesses it hires to see if it is meeting its goal of increasing diversity in these partnerships. Hometown Harvest will annually analyze the outside partnerships and based upon the outcome of those analytics, determine what steps are necessary to further increase the diversity of Hometown Harvest. Hometown Harvest will assess and review its progress within a year of receiving its Final License from the Cannabis Control Commission for an adult-use marijuana establishment and then annually, thereafter. Based upon this annual review and in conjunction with the renewal of its license, Hometown Harvest will be able to demonstrate to the Commission the success of this initiative.

4. The Company will adopt a formalized and written anti-discrimination and harassment policy which clearly advises all employees and managers that any illegal discrimination or harassment will not be tolerated. Examples of such behavior include derogatory comments based on racial or ethnic characteristics and sexual advances. Executive and Management staff will be trained on how to recognize racial and gender bias at the workplace. The Company has identified Compliance Training Group, a division of Employers Choice Online Inc., that specializes in Human Resources and workplace compliance training services and products for executives, supervisors, and employees as its vendor of diversity training programming. The Company will require all executives and managers to complete the management diversity training course **once every two years**. The Company will require all staff to complete Compliance Training Groups employee diversity training course **once every two years**. The training courses shall identify and provide understanding of the benefits and challenges of workplace diversity,

the importance of sensitivity and inclusion, and the legal basis for providing an equal-opportunity workplace. With respect to any notices published, the Company 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 the applicant will not violate the Commission's regulations with respect to the limitations on ownership or control or other applicable laws.

**Metrics and Evaluation:** Hometown Harvest will keep records of its diversity training courses and will review these records and reassess the need for further training or action in the case of diversity related workplace incidents. Hometown Harvest will assess and review its progress within a year of receiving its Final License from the Cannabis Control Commission for an adult-use marijuana establishment and then annually, thereafter. Based upon this annual review and in conjunction with the renewal of its license, Hometown Harvest will be able to demonstrate to the Commission the success of this initiative.

### III. MEASUREMENTS

The Company shall immediately begin to collect all data described in this Plan. In particular, the Company shall create a record containing the following information:

1. Number of individuals from the above-referenced demographic groups who were hired and retained after the issuance of a license;
2. Number of promotions for people falling into the above-listed demographics since initial licensure;  
Number of positions created since initial licensure;
3. Number of and type of information sessions held or participated in with supporting documentation;  
Number of postings in diverse publications or general publications with supporting documentation;
4. Number and subject matter of trainings held and the number of individuals falling into the above-listed demographics in attendance; and
5. Number of Disadvantage Business Enterprises that the Company has hired.

On the date that is six (6) months from the date that operations have commenced, and again on each and every six (6) month period thereafter, the Company shall review all data collected pursuant to this **Diversity Plan** and create a report thereof. These biannual reports will be reviewed and utilized by the Company prior to making decision to (a) post an advertisement for a job opening, (b) hire an employee and (c) host a job fair. If after two years, the data collected reveals that the goals stated in this plan are not being met, the Company shall adopt new policies that are tailored to meet such goals. Such reports will also be used to demonstrate proof of success or progress upon the yearly renewal of the Company's Marijuana Establishment License.

The Company affirmatively states that: (1) it 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;

(2) any actions taken, or programs instituted, will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws and (3) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of this license.

This policy may also be referred to by the Company as the “**Diversity Plan**”.