



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR283519
Original Issued Date: 07/27/2021
Issued Date: 07/13/2023
Expiration Date: 07/27/2024

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: JDM Sales, Inc.

Phone Number: 508-259-2140 Email Address: vishnupatel73@gmail.com

Business Address 1: 220 Pulaski Boulevard

Business Address 2:

Business City: Bellingham

Business State: MA

Business Zip Code: 02019

Mailing Address 1: 220 Pulaski Boulevard

Mailing Address 2:

Mailing City: Bellingham

Mailing State: MA

Mailing Zip Code: 02019

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control: 100

Role: Owner / Partner

Other Role:

First Name: Vishnubhai

Last Name: Patel

Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity: Asian Indian

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: Vishnubhai

Last Name: Patel

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$200000 Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Vishnubhai

Last Name: Patel

Suffix:

Marijuana Establishment Name: DDM Sales, Inc.

Business Type: Marijuana Retailer

Marijuana Establishment City: Blackstone

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 103 Uxbridge Road

Establishment Address 2:

Establishment City: Mendon

Establishment Zip Code: 01756

Approximate square footage of the establishment: 3800

How many abutters does this property have?: 12

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host Community Agreement Certification Form SIGNED JDM Sales, Inc. 02252020.pdf	pdf	5eb9a9f75f1314349d5f871c	05/11/2020
Community Outreach Meeting Documentation	Community Outreach Attestation Form Initialed JDM Sales, Inc. 02202020.pdf	pdf	5eb9aa071cd17834bad6247e	05/11/2020
Plan to Remain Compliant with Local Zoning	Plan for Compliance with local codes, ordinances, bylaws JDM Sales, Inc. Final 05012020.pdf	pdf	5eb9aa19ddb8c72d5360a67f	05/11/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact FINAL with attachments JDM 10302020.pdf	pdf	5f9c61fd57d9d707ee4d6d66	10/30/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role:	Other Role:
First Name: Vishnubhai	Last Name: Patel 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
Bylaws	By-Laws Signed JDM Sales, Inc. 03032020.pdf	pdf	5eb9acdd0f96d32d2066f8f5	05/11/2020
Articles of Organization	Articles of Organization JDM Sales, Inc. 02202020.pdf	pdf	5eb9ad001cd17834bad62498	05/11/2020
Department of Revenue - Certificate of Good standing	COGS DOR JDM 10092020.pdf	pdf	5f9c62206e60eb07f57f0b7b	10/30/2020
Secretary of Commonwealth - Certificate of Good Standing	COGS from SOC JDM Sales, Inc. 10072020.pdf	pdf	5f9c6229dfcf9f07cd9435a2	10/30/2020
Bylaws	Unemployment Assistance Affidavit Patel JDM 10072020.pdf	pdf	5f9c65087083620840284ba8	10/30/2020

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	COGS SOC JDM 04212023.pdf	pdf	644a986f0509d600098c434c	04/27/2023
Department of Revenue - Certificate of Good standing	JDM SALES INC - DOR - CERTIFICATE OF GOOD STANDING.pdf	pdf	644a98760509d600098c4367	04/27/2023
Department of Unemployment Assistance - Certificate of Good standing	Affidavit DUA JDM 04272023.pdf	pdf	644a987b0dd43c00070fc786	04/27/2023

Massachusetts Business Identification Number: 001417130

Doing-Business-As Name: JDM Cannabis

DBA Registration City: Mendon

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan for Obtaining Liability Insurance - JDM Sales, Inc. Final 03102020.pdf	pdf	5ebd672c7dc0413492816b37	05/14/2020
Proposed Timeline	Proposed Timeline JDM Sales, Inc. 06292020.pdf	pdf	5efa0bbe5a7aee7aa4898ba5	06/29/2020
Business Plan	Business Plan JDM Sales, Inc. 06292020.pdf	pdf	5efa0c527375807accfc5d81	06/29/2020
Proposed Timeline	Proposed Timeline UPDATED JDM Sales, Inc. 05102022.pdf	pdf	627d61c0eb816b000858fa97	05/12/2022
Proposed Timeline	Proposed Timeline UPDATED 2023 JDM Sales, Inc. 05122023.pdf	pdf	645e90279c23790008bbe067	05/12/2023

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 and marijuana products JDM Sales, Inc. Final 03102020.pdf	pdf	5ebd77c25c6c422d41afbb66	05/14/2020
Restricting Access to age 21 and older	Policy for Restricting Access to Age 21 and Older JDM Sales, Inc. Final 03102020.pdf	pdf	5ebd77da502f482d48990166	05/14/2020
Prevention of diversion	Anti-Diversion Policy JDM Sales, Inc. Final 03102020.pdf	pdf	5ebd78538caba634a8439658	05/14/2020
Transportation of marijuana	Policy and Procedure for the Transportation of Marijuana JDM Sales, Inc. 05012020.pdf	pdf	5ebd786b502f482d4899016c	05/14/2020
Inventory procedures	Inventory JDM Sales, Inc. 03102020.pdf	pdf	5ebd7880ddb8c72d5360aee9	05/14/2020
Quality control and testing	Policy for Quality Control and Testing of Marijuana and Marijuana Products JDM Sales, Inc. 05012020.pdf	pdf	5ebd78a05c6c422d41afbb70	05/14/2020
Dispensing procedures	Policy for Dispensing JDM Sales, Inc. 03072020.pdf	pdf	5ebd78ad502f482d48990170	05/14/2020
Personnel policies including background checks	Personnel Policies JDM Sales, Inc. 04212020.pdf	pdf	5ebd78bcf16b5934c591b0c3	05/14/2020
Record Keeping procedures	Record Keeping Policy and Procedure 03072020.pdf	pdf	5ebd78c9ce51fd2d12e5d9d2	05/14/2020
Qualifications and training	Qualifications and Training JDM Sales, Inc. 03102020.pdf	pdf	5ebd78f0f16b5934c591b0c7	05/14/2020
Security plan	Security Plan JDM Sales, Inc. 06292020.pdf	pdf	5efa12f08a595d6c1025838b	06/29/2020
Storage of marijuana	Policy and Procedure for the Storage of Marijuana JDM Sales, Inc. 10072020.pdf	pdf	5f9c624f8cc05c081b1b5b6a	10/30/2020
Maintaining of financial	Maintaining of Financial Records 10302020.pdf	pdf	5f9c6274df85ec07dfb877b5	10/30/2020

records

Diversity plan	Diversity Plan JDM Sales, Inc. 10072020.pdf	pdf	5f9c628fdcf9f07cd9435a8	10/30/2020
Energy Compliance Plan	Energy Compliance Plan JDM Sales, Inc. 05122022.pdf	pdf	627d6205eb816b000858fd67	05/12/2022

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 Agree

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: GOAL 1: Goal number one in JDM Sales, Inc.'s (hereinafter, "JDM") Plan for Positive Impact is to set up one annual city or waterway cleanup event in communities that were disproportionately affected by marijuana laws. JDM'S goal is to have at least five employees receive five paid volunteer hours, along with other volunteers, participate in a morning or afternoon cleanup event. JDM is to try and coordinate these events with government officials and JDM is to provide logistical assistance, materials, supplies, and equipment for the cleanup events. The date of the cleanup is to be chosen in advance and one notice is to be published in the newspaper of general circulation of the cities.

PROGRESS: JDM is not yet operational. JDM does not have any employees at this time. Therefore, this program has not started. Once JDM hires employees, JDM will commence work on Goal 1.

Progress or Success Goal 2

Description of Progress or Success: GOAL 2: JDM Sales, Inc. (hereinafter, "JDM") planned to partner with an established nonprofit organization. JDM planned to donate an annual \$5,000.00 to the nonprofit, and give each 30+ hour employee with 3+ months company tenure eight hours of paid volunteerism for a total of 50 hours of volunteerism a year. This is to begin no later than 90 days after commence operations. JDM partnered with South Worcester Neighborhood Improvement Corporation (hereinafter, "SWNIC"). JDM also agreed to host an annual food drive

for SWNIC.

PROGRESS: JDM partnered with South Worcester Neighborhood Improvement Corp. (hereinafter, "SWNIC"). Please see the attached copy of the \$5,000.00 donation to SWNIC.

Since JDM is not yet operational and has not hired employees, no volunteer hours have been donated.

Since JDM is not yet operational, has not hired employees, and a building has not been completed yet, JDM has not yet had a food drive.

COMPLIANCE WITH DIVERSITY PLAN Diversity Progress or Success 1

Description of Progress or Success: GOAL 1: The first goal of JDM Sales, Inc.'s (hereinafter, "JDM") Diversity Plan is to hire 50% women; 5% veterans; 15% people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people; 5% persons with disabilities; and 5% LGBTQ+.

PROGRESS: JDM is not yet operational. As of this date, JDM has not hired any employees.

JDM proposes to change Goal 1 to the following:

NEW GOAL NUMBER 1: This is a hiring goal whereby JDM shall assemble and maintain a diverse staff at all levels of the marijuana establishment comprised as follows:

- 50% women; 5% veterans; 15% people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people; 5% persons with disabilities; 5% LGBTQ+ people.

Proposed Program 1 – Advertising: JDM will post advertisements on its website and Indeed.com or a similar job website when an employment position is available. The career description on both, the "Careers" page of JDM's website and the advertisement on Indeed.com or similar job website, shall include a statement that JDM welcomes job applications from everyone including minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation.

Measurement & Accountability – Metrics – Program 1: At least monthly, a JDM manager shall review the "Careers" section of JDM's website in order to make sure that (1) the "Careers" section continues to exist, (2) there is a statement of inclusion as depicted in Program 1 above, and (3) if a job is posted on Indeed.com or similar job website, that such listing conforms to the standard as set forth in Program 1 above. The reviewing manager shall record their monthly findings in a log that shall be maintained within the business records of the dispensary.

proposed Program 2 – Recruitment and Hiring: JDM will continue to improve the recruitment, search, and hiring process to enhance the potential for increasing diversity of its staff. JDM will develop, review and revise a hiring guide and provide training as needed.

In order to enhance the potential for increasing diversity and equality in hiring and recruitment procedures, JDM will:

1. Implement a "blind-hiring" policy that anonymizes the demographic information about a candidate from the recruiter or hiring manager to prevent bias;
2. Provide human resource training for hiring managers and recruiters in order to address unconscious bias and cultural sensitivity;
3. Use job descriptions that appeal to diverse candidates.

Measurement & Accountability – Metrics – Program 2: JDM managers in conjunction with Human Resources shall review the JDM hiring guide and update as needed at least once per year with a specific goal to ensure that the hiring guide addresses equity and diversity. A log stating the review date and review results shall be maintained within the business records of the dispensary.

JDM managers in conjunction with Human Resources shall review the number of training sessions made available to hiring managers and recruiters and record the dates such training was available and the names of those who completed said training sessions in a log that shall be maintained within the business records of the dispensary.

JDM managers in conjunction with Human Resources, will review all job descriptions on a yearly basis in order to make sure that such descriptions appeal to diverse candidates. Evidence of such review along with findings shall be recorded in a log that shall be maintained within the business records of the dispensary.

Measurement & Accountability – Metrics – Both Program 1 and Program 2: On a quarterly basis but whenever JDM has a job opening, a JDM manager or human resources officer will review employee statistics in order to ensure that the employee demographics, after any new employee hire, shall be no less than as follows:

50% Minorities, Women, Veterans, People With Disabilities, And People Of All Gender Identities And Sexual Orientation.

The JDM manager or human resources officer, shall maintain a log with current demographic information within the records of the dispensary.

Diversity Progress or Success 2

Description of Progress or Success: GOAL 2: JDM Sales, Inc.'s (hereinafter, "JDM") second goal of the Diversity Plan is to implement a "blind-hiring" policy that anonymizes the demographic information about a candidate from recruiters/hiring managers to prevent bias. The second goal also included using job descriptions that appeal to diverse candidates and to give each HR Training for hiring managers that address unconscious bias and cultural sensitivity. Lastly, JDM set to engage with industry trade groups, training companies, and recruitment companies to promote diversity and inclusion.

PROGRESS: JDM is not yet operational. JDM has not hired any employees yet.

JDM Proposes to remove the current Goal 2 because it is contained in Program 2 of the above Goal Number 1. The new Goal Number 2 is as follows:

NEW Goal Number 2 (Previously Program 3): This is a paid internship training program made available to the general public over 21 years of age and targeting minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation.

Program 1 – Internship - Post Secondary School or Licensed Educator Partnership

JDM will either partner with a post-secondary education institution in order to participate in a cannabis internship program or maintain its own internship program, including development of a complete curriculum, with the oversight and assistance of a Massachusetts licensed professional educator with at least a Master's degree in education.

The purpose of the program shall be to mentor/train qualified applicants who are minorities, women, veterans, persons with disabilities, and people of all gender identities and sexual orientation. The intern shall become proficient at most if not all job descriptions within the dispensary including but not limited to Receptionist, Fulfillment Team Member, Sales Team Member (a/k/a Budtender), Team Lead, Retail Sales Manager, General Manager.

At a positive conclusion of the intern's training, the dispensary will provide job placement assistance for the applicant or if a position is available at JDM, then JDM shall have the option of hiring said intern.

JDM shall offer this program once per calendar year to qualified applicants. The program duration shall be dictated by either the post-secondary school or by a Massachusetts licensed professional educator as per the curriculum developed and managed by said licensed educator. Internship programs shall last a minimum of eight (8) weeks or if such programs must be of shorter duration as dictated by the post-secondary institution or licensed professional educator, then multiple internship programs may be offered so that the aggregate of all internships equal at least eight (8) weeks in a year. JDM shall advertise and make people aware of the program via any media that JDM managers think will be effective in obtaining qualified candidates. If the program is partnered with a post-secondary institution, then JDM will request that the institution also use its resources in order to find an internship candidate.

This internship program shall be at no cost to the intern and the intern will be paid while participating in the program.

Measurement & Accountability – Metrics: A JDM manager will communicate with both the intern and internship program curriculum manager at least once per week and shall write a report detailing the intern's progress. At the conclusion of each internship, JDM shall present a questionnaire to the intern(s) in order to identify issues that the intern found helpful, difficult, and issues that need improvement. The intern will be interviewed to reveal whether the intern found that the education received was sufficient thus giving confidence to the intern in order to perform duties inside a dispensary. In addition, during the exit interview, a JDM manager and the intern will discuss the internship program and how it can be improved. JDM shall also enter into a discussion with the curriculum manager and, using feedback from the intern, discuss ways to improve the program especially ways to increase an intern's likelihood of success in the industry. JDM will follow the intern's progress post-internship in order to determine whether or not the intern obtained employment in the cannabis industry and if not, the reasons why and whether such reasons were as a result of a program deficiency.

Diversity Progress or Success 3

Description of Progress or Success: GOAL 3: JDM Sales, Inc.'s (hereinafter "JDM") third goal is to offer a paid internship program to a woman or veteran every six months and teach the intern the duties and responsibilities to operate a dispensary.

PROGRESS: JDM is not yet operational. JDM has not hired any employees yet.

JDM has updated this goal in its 2023 Proposed Diversity Plan.

JDM proposes to remove the current Goal 3 (Also Known as Program 3 in the existing Diversity Plan) because it is now Goal Number 2 in the 2023 Proposed Diversity Plan. The new Proposed Goal Number 3 is as follows:

NEW GOAL NUMBER 3: This is an internal goal to promote diversity and inclusion within the dispensary and to keep employees updated on training opportunities and events available to employees.

Program 1 – Internal Newsletter Program: JDM shall distribute a monthly internal workplace newsletter. The newsletter shall inform all dispensary employees about training opportunities and events available to employees. Issues such as mental health, diversity, and inclusion will be discussed in newsletters throughout the year. The newsletter shall also notify and remind employees that it promotes equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation. At its discretion, JDM may offer incentives to motivate employees to recommend candidates for hire, such candidates to be one or more of minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation.

Measurement & Accountability – Metrics: Within one month after the end of each calendar year, JDM shall count monthly newsletters in order to determine whether or not a newsletter was distributed to employees on a monthly basis. JDM shall also review all monthly newsletters in order to determine whether the newsletters continuously state that JDM promotes equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation. JDM shall also review newsletters to determine whether or not they properly inform dispensary employees about training opportunities and events available to employees and to identify newsletters areas of needed improvement.

REMINDER: JDM is not yet operational. JDM has not hired any employees yet. Therefore, JDM has not yet produced an internal newsletter.

Diversity Progress or Success 4

Description of Progress or Success: GOAL 4: JDM Sales, Inc. (hereinafter, "JDM") is to distribute a monthly internal workplace newsletter encouraging employees to recommend women, veterans, minorities, persons with disabilities, and LGBTQ+ for employment opportunities. JDM will offer incentive to motivate employees to recommend candidates to hire.

PROGRESS: JDM is not yet operational.

JDM proposed to remove Goal 4 because it is now Goal Number 3.

HOURS OF OPERATION

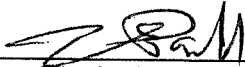
Monday From: 9:00 AM	Monday To: 10:00 PM
Tuesday From: 9:00 AM	Tuesday To: 10:00 PM
Wednesday From: 9:00 AM	Wednesday To: 10:00 PM
Thursday From: 9:00 AM	Thursday To: 10:00 PM
Friday From: 9:00 AM	Friday To: 11:00 PM
Saturday From: 9:00 AM	Saturday To: 11:00 PM
Sunday From: 9:00 AM	Sunday To: 6:00 PM

Host Community Agreement Certification Form

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

Applicant

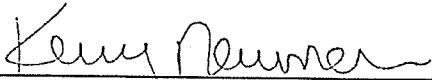
I, Vishnubhai B. Patel, (*insert name*) certify as an authorized representative of JDM Sales, Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with Town of Mendon (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on January 9, 2020 (*insert date*).



Signature of Authorized Representative of Applicant

Host Community

I, Kimberly Newman, Town Administrator, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Mendon (*insert name of host community*) to certify that the applicant and Town of Mendon (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on January 9, 2020 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

Community Outreach Meeting Attestation Form

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

I, Vishnubhai B. Patel, *(insert name)* attest as an authorized representative of JDM Sales, Inc. *(insert name of applicant)* that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on February 11, 2020 *(insert date)*.
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on January 20, 2020 *(insert date)*, which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A *(please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document)*.
3. A copy of the meeting notice was also filed on January 23, 2020 *(insert date)* with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B *(please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document)*.
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on January 18, 2020 *(insert date)*, which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C *(please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee)*.

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

MARIJUANA

**LEGAL NOTICE
Notice of Community
Outreach Meeting**

Notice is hereby given that a Community Outreach Meeting for a proposed marijuana establishment is scheduled for February 11, 2020 at 7:00 PM at Willow Brook Restaurant, 16 Hastings Street, Mendon, MA 01756. The proposed marijuana retailer is anticipated to be operated by JDM Sales, Inc. and located at 103 Uxbridge Road, Mendon, MA 01756. There will be an opportunity for the public to ask questions.

AD#13864588

MDN 1/20/20

NOTICE OF COMMUNITY OUTREACH MEETING

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[REDACTED]
[REDACTED]
[REDACTED]

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er terms, in any, to be
eutsche Bank National Trust Company as Trustee for MASTR
pecialized Loan Trust 2007-02 Mortgage Pass-Through
ertificates

resent Holder of said Mortgage,
y Its Attorneys,
IRLANS PC
O Box 540540
Valtham, MA 02454
Phone: (781) 790-7800
9-008265

AD# 13863536
MDN 1/20, 1/27, 2/3/20

FRANKLIN/PL/PUBLIC
HEARING 1/27/20

**LEGAL NOTICE
FRANKLIN PLANNING
BOARD
PUBLIC HEARING NOTICE**

In accordance with the Town
of Franklin Zoning By-Laws,
the Franklin Planning Board
will hold a public hearing on
Monday, January 27, 2020
at 7:10 PM in the Town
Council Chambers of the
Franklin Municipal Building,
355 East Central Street, for a
Site Plan application at 122
Chestnut Street in Franklin,
MA prepared by Spruhan
Engineering, Newton, MA,
Inc. and submitted to the
Department of Planning &
Community Development on
December 13, 2019, by
Michael O'Brien, Norfolk, MA.

The property is located in the
Commercial II Zoning District
(Assessors Map 280 Lot 077)
on Chestnut Street. The
applicant is proposing to con-
struct a 10 unit apartment
building with parking,
drainage and landscaping.
Please contact the
Department of Planning &
Community Development at
(508) 520-4907 if you require
further information or if you
need to make arrangements
to provide translation services
for the hearing impaired, or
for persons with language
barriers.

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MA 01756. The proposed
marijuana retailer is anticipat-
ed to be operated by JDM
Sales, Inc. and located at 103
Uxbridge Road, Mendon, MA
01756. There will be an
opportunity for the public to
ask questions.

AD#13864588
MDN 1/20/20



**Don't
Trade in
your Chance
to Give.**

Donate your

ATTACHMENT D

This notice shall be posted on
the seven affected trees and
at the fieldstone wall locations
at least seven (7) days before
the public hearing.

For additional information,
please contact the Medway
Planning and Economic
Development office at 508-
533-3291.

Andy Rodenhiser
Planning and Economic
Development Board Chairman

AD#13862794
MDN 1/14, 1/20/20

Your News
In Print
and
Online



All about you.

Plan for Compliance With Local Codes, Ordinances, and Bylaws

JDM Sales, Inc. (hereinafter “JDM”) developed the following plan to ensure that the proposed adult-use Marijuana Establishment (hereinafter the “proposed dispensary”) is or will be compliant with local codes, ordinances, and bylaws for its proposed adult-use marijuana dispensary at 103 Uxbridge Road (Route 16), Mendon, Massachusetts:

Background:

At a Mendon Special Town Meeting held on November 20, 2019, it was voted to allow adult-use marijuana dispensaries in the General Business (GB) zoning district by Special Permit. The Planning Board has authority over granting/denying such Special Permits.

The proposed dispensary is located in the General Business (GB) zoning district. Therefore, a Special Permit granted by the Planning Board will be required in order for the proposed dispensary to operate.

Initial Compliance:

JDM and its consultants comprehensively reviewed the new zoning bylaws and all other Town bylaws and are developing plans and strategies in order to meet and/or exceed all criteria including but not limited to the new Special Permit criteria. JDM engaged the services of an engineering firm that regularly practices in the Town of Mendon. In addition, JDM retained a local attorney who regularly practices zoning, planning, and local licensing. Both the engineering firm and local attorney will work in tandem in order to obtain the required Special Permit. At this time, no other permits are required from other Town boards but if the Town institutes additional permitting requirements, the engineering firm and/or local attorney will work in tandem in order to obtain any additional required permits. Lastly, JDM has already secured a Host Community Agreement with the Town.

Ongoing Compliance:

JDM is committed to being in compliance with all local codes, ordinances, and bylaws. JDM has engaged the services of an attorney who regularly practices zoning, planning, and local licensing. This attorney shall be tasked with the ongoing job of identifying local licensing requirements for the proposed dispensary and to ensure that the proposed dispensary shall, at all times, remain in compliance with all local codes, ordinances, and bylaws.

JDM and the local attorney will continuously monitor local licensing issues and will cooperate with the host community in order to remain in compliance with all local codes, ordinances, and bylaws.

The proposed dispensary is located more than 500 feet from the nearest school. There are no buffer zone issues at this location.

JDM Sales, Inc.
103 Uxbridge Road, Mendon, MA 01756
508.259.2140

April 4, 2023

Kimberly Newman, Town Administrator
Town of Mendon
20 Main Street
Mendon, MA01756

Re: JDM Sales, Inc.
103 Uxbridge Road, Mendon, MA 01756

Dear Ms. Newman,

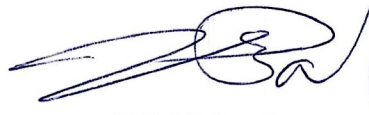
Please provide me with any and all records regarding costs to the Town for the above-captioned marijuana establishment.

We ask that you not only include any costs to the Town, but any and all anticipated costs to the Town as well.

Please mail your response to Ryan Law Office using the enclosed self-addressed stamped envelope.

Thank you.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Vishnubhai B. Patel', with a stylized flourish at the end.

JDM Sales, Inc.
By: Vishnubhai B. Patel
Its: President

JDM Sales, Inc.
103 Uxbridge Road, Mendon, MA 01756
508.259.2140

May 5, 2023

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

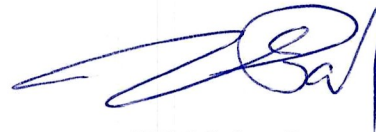
Re: JDM Sales, Inc. – Costs to Municipality

To whom it may concern:

JDM Sales, Inc. sent a letter to the Mendon Town Administrator, Kimberly Newman, on April 4, 2023 requesting records regarding costs to the Town as well as any anticipated costs to the Town associated with the operation of the establishment.

JDM Sales, Inc. did not receive a response from the Town Administrator.

Very truly yours,



JDM Sales, Inc.
By: Vishnubhai B. Patel
Its: President

JDM Sales, Inc. - Plan for Positive Impact

Program 1:

Measurable Goal: JDM Sales, Inc. (hereinafter “JDM”) will complete at least one (1) annual waterway or city clean-up event in communities that were disproportionately affected by marijuana laws. Waterways shall be defined as oceanside beach areas, lakeside beach areas, and riverfront areas.

Metric: At the end of the year, JDM will count the number of waterway or city clean-ups performed in communities that were disproportionately affected by marijuana laws to make sure that at least one (1) clean-up was performed.

Program: JDM employees will travel to these municipalities in order to help in the revitalization of these disproportionately impacted areas. To do this, JDM plans to organize an annual waterway or city clean-up whereby at least five (5) JDM employees, along with volunteers, will spend a morning or afternoon cleaning trash from public spaces. JDM shall coordinate the event with government officials, provide logistical assistance and provide materials, supplies, and equipment.

The President of JDM will choose clean-up dates in advance. The President or an appointed employee shall publish at least one clean-up Notices in a newspaper of general circulation in the city or town in which the clean-up is scheduled. The newspaper Notice shall contain information relating to the waterway or city clean-up but will not contain anything related to marijuana or the nature of the business of JDM. The President of JDM or an appointed employee will document the event so that JDM has a record to present to the Cannabis Control Commission upon license review.

Which Municipalities Were Chosen and Why: The municipalities chosen were selected from a Cannabis Control Commission guidance document titled Guidance for Identifying Areas of Disproportionate Impact. We reached out to all identified communities within Worcester and Norfolk Counties. Some did not respond. We have been in communication with the communities that expressed interest in working with us. They indicated that we will be able to either host clean-up events or attend specific town-wide opportunities. We will include these locations on a rotating basis and will continue to repeat the rotation once we have visited all cooperating municipalities. The following is a list of communities and their contact persons we are working with:

Town of Randolph: Elizabeth LaRosee - Director of Library, Recreation and Community Programs

City of Quincy: Declan Devine “Neponset River Watershed Association”

City of Braintree: Madeline E. Gorchels, MESM – Stormwater Outreach Coordinator, Braintree Department of Public Works

City of Fitchburg: Nate LaRose – Recreation Director

***See attached correspondence with community leaders.**

The other communities that we contacted are Worcester, Spencer, Walpole and Southbridge. Although these communities did not respond, we will periodically reach out to them in hope that we will be able to include them in our clean-up efforts. If they need help, we will add them to our rotation.

In addition, JDM will routinely review guidance documents from the Cannabis Control Commission in order to determine whether or not the above-stated Areas of Disproportionate Impact have been increased or decreased in Worcester and Norfolk Counties whereupon the clean-up schedule will be revised to either add a new Area of Disproportionate Impact or subtract an area that has been removed from the most recent Cannabis Control Commission guidance document. Even if an Area of Disproportionate Impact has been removed, JDM will continue to operate at least (one) 1 clean-up per year.

Program 2:

Measurable Goal: Partner with an established not-for-profit community organization that provides direct social services to populations in Worcester. Our goal is to provide a minimum donation of \$5,000 and 50 hours of service annually.

Program: JDM has chosen the South Worcester Neighborhood Improvement Corp. (SWNIC) <http://www.swnic.net/> as our community service partner. SWNIC is a 501(c)(3) charity that serves areas of disproportionate impact, including city of Worcester census tracts 731002, 731203, 731204, 731300, 732400, 732700 and 733000.

SWNIC is located in census tract 733000. SWNIC services include facilitating access to housing, unemployment opportunities, health services, education, and other social services to the residents of South Worcester.

A. JDM will make a minimum \$5,000 donation annually to the above-named organization.

I. The first donation will occur once JDM has received provisional licensure from the commission.

B. Each 30+ hour employee with 6+ months company tenure shall be eligible for 8 hours of paid volunteerism to this organization. JDM shall deliver at least 50 paid volunteer hours to the organization each year.

I. The donation of volunteer hours will begin after JDM has commenced operations.

C. Support for SWNIC's food pantry will be encouraged through ongoing staff participation and JDM will host an annual food drive for the SWNIC food pantry.

Metric: JDM shall record the \$5,000 donation to be made to SWNIC upon issuance of a provisional license in its positive impact folder which shall become part of JDM's internal processes.

JDM shall create a spreadsheet. This spreadsheet shall also be in JDM's positive impact folder. The spreadsheet shall list paid volunteer hours worked with SWNIC per year. Such hours worked shall be verified with SWNIC prior to entering hours worked on the spreadsheet. Total donation volunteer hours worked shall be at least 50 per year for the dispensary.

***See attached letter from SWNIC evidencing our agreement with them.**

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

Wed Oct 21 2020 08:58:25 GMT-0400 (Eastern Daylight Time)

Subject: Re: Volunteer Opportunity DDM Cannabis

From: elarosee@ocln.org

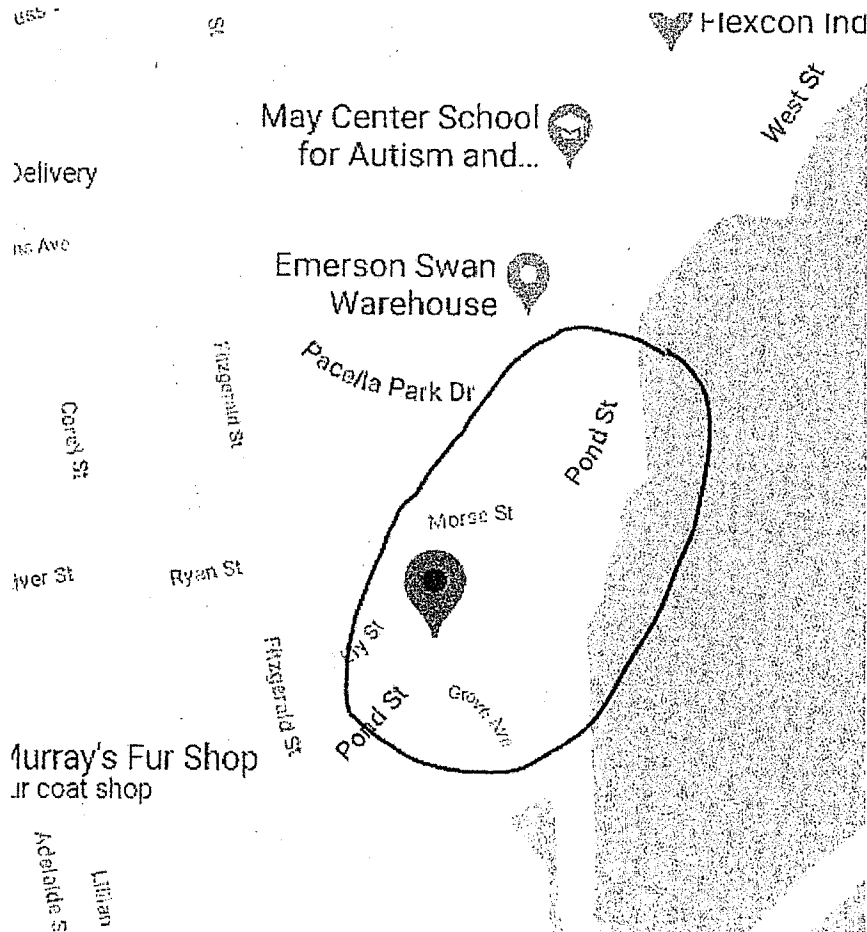
Date: 10/20/2020 6:11 PM

To: paralegal1@ryanlawoffice.com

Matter:

-Type or Select Matter-

Hello! I received word back that we would be happy to have JDM Sales take over cleaning the Pond St area near the reservoir. If you want to just make us aware the days the team will be out there that would be great. They will need to follow proper CDC, State, and Town guidance on masks, distancing, etc. as well as practice a safe clean-up (wearing bright colors, gloves, grabbers, not walking in the street, etc.). Also if there is any advertising or marketing regarding this we would want to see that first. Here is a waiver for the volunteers to sign. Will you need supplies (ie buckets, gloves, etc.)? Thanks! - Liz



Sincerely,
Elizabeth LaRosee
Director of Library, Recreation, and Community Programs
Town of Randolph
Office Location:
Turner Free Library
2 North Main Street

10/13/2020

Re: Volunteers

Tue Oct 13 2020 14:13

Subject: Re: Volunteers

Sent: October 8, 2020 1:35 PM

From: devine@neponset.org

To: Hayley Gervais [paralegal1@ryanlawoffice.com]

Hi Hayley,

Thank you for reaching out! Yes, every year we have a Spring and a Fall cleanup. The Spring cleanup will be in the end of April but the exact date is not yet determined. I have made a note of your group's interest so that we can reconnect as we get closer to Spring.

Let me know if you would like to be added to our mailing list. We post about different volunteer opportunities such as water testing, invasive plant removal and tree plantings.(though we have fewer events during the Winter.)

Thanks again and we will be in touch in the Spring!

-Declan

On Wed, Oct 7, 2020 at 10:46 AM Hayley Gervais <paralegal1@ryanlawoffice.com> wrote:

Good Morning,

I am wondering if you have any clean-up events that we could volunteer for in 2021. We are working with the Cannabis Control Commission to identify events for a staff volunteer event that would service communities in the local area. Please let me know if you are able to use some free help.

Thank you,

Paula M. Ryan
Legal Assistant
Ryan Law Office
181 Main Street
Blackstone, MA 01504
Phone: 508.883.6000
Fax: 508.876.9387

--
Declan Devine
Environmental Science and Engineering Fellow
Neponset River Watershed Association
2173 Washington Street
Canton, MA 02021
Cell: 240-404-8631
devine@neponset.org

10/21/2020

RE: Volunteer Opportunities for Waterway/City Clean-Ups

Phone: 508.883.6000

Fax: 508.876.9387

-----Original message-----

From: "Gorchels, Madeline" [mgorchels@braintree.ma.gov]

Sent: Friday, Oct 9 2020 8:45 AM

To: paralegal1@ryanlawoffice.com

Subject: Re: Volunteer Opportunities for Waterway/City Clean-Ups

Hello Paula,

Ben Hulke passed along your information in regards to organizing events for waterway and city cleaning in Braintree. I am the Town's Stormwater Outreach Coordinator and will be managing similar events for Public Works in the future. Currently, we are unable to do in person events due to the pandemic. However, I would be happy to assist you set up your own clean up event in whatever way I can. Additionally, we will soon be launching "Clean Water Braintree" Facebook, Twitter, and Instagram accounts where we will make announcements about future volunteer opportunities. I can let you know when those pages are up and running, this is probably the best way to stay informed on our upcoming water/city cleaning events.

Let me know if there is anything else you need from me,

Madeline

*Madeline E. Gorchels, MESM
Stormwater Outreach Coordinator
Braintree Department of Public Works
85 Quincy Ave.
Braintree, MA 02148
t. 781-794-8947
She/her*

10/28/2020

RE: Attn Nate

Wed Oct 28 2020 11:40:06 GMT-0400 (Eastern Daylight Time)

Subject: RE: Attn Nate
From: NLaRose@fitchburgma.gov
Date: 10/28/2020 11:33 AM
To: paralegal1@ryanlawoffice.com
Matter: 2020-02105- Patel, Victor Mendon Dispensary JDM Sales

Good Morning Paula,

Thank you for reaching out to us. We look forward to working with JDM Sales to support our community parks. Please feel free to reach out to me at any time.

Best,

Nate

--

Nathan LaRose

Recreation Director

City of Fitchburg

166 Boulder Drive, STE 108

Fitchburg, MA 01420

978-829-1815

nlarose@fitchburgma.gov

From: Hayley Gervais [paralegal1@ryanlawoffice.com]
Sent: Wednesday, October 28, 2020 11:22 AM
To: recreation <recreation@fitchburgma.gov>
Subject: Attn Nate

South Worcester Neighborhood Improvement Corporation

47 Camp Street -- Worcester, MA 01603 508-757-8344

April 22, 2020

Vishnubhai B. Patel -- President
JDM Sales, Inc.
220 Pulaski Boulevard
Bellingham, MA 02019

Dear Mr. Patel,

This letter serves to memorialize our conversation regarding donations of time and money from JDM Sales, Inc. to the South Worcester Neighborhood Improvement Corporation.

The South Worcester Neighborhood Improvement Corporation is a 501(c)(3) nonprofit in Worcester, Massachusetts. Our mission is to provide encouragement, momentum, and tools people need including education, employment, housing, health, food security, and assistance with family issues.

The South Worcester Neighborhood Improvement Corporation can and will accept monetary donations from JDM Sales, Inc. along with donations of time from employees of JDM Sales, Inc. as part of your plan to positively impact communities that have been disproportionately harmed by cannabis prohibition.

If there are any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom L'Ecuyer", with a long, sweeping horizontal stroke extending to the right.

Tom L'Ecuyer
Director

BY-LAWS
OF
JDM SALES, INC.

ARTICLE I – OFFICES

The principal office of the corporation in the State of Massachusetts shall be located in the Town of Bellingham County of Norfolk. The corporation may have such other offices, either within or without the State of incorporation as the board of directors may designate or as the business of the corporation may from time to time require.

ARTICLE II – STOCKHOLDERS

1. ANNUAL MEETING.

The annual meeting of the stockholders shall be held on the First day of July in each year, beginning with the year 2020 at the hour 1:00 o'clock PM, for the purpose of electing directors and for the transaction of such other business as may come before the meeting. If the day fixed for the annual meeting shall be a legal holiday such meeting shall be held on the next succeeding business day.

2. SPECIAL MEETINGS.

Special meetings of the stockholders, for any purpose or purposes, unless otherwise prescribed by statute, may be called by the president or by the directors, and shall be called by the president at the request of the holders of not less than per cent of all the outstanding shares of the corporation entitled to vote at the meeting.

3. PLACE OF MEETING.

The directors may designate any place, either within or without the State unless otherwise prescribed by statute, as the place of meeting for any annual meeting or for any special meeting called by the directors. A waiver of notice signed by all stockholders entitled to vote at a meeting may designate any place, either within or without the state unless otherwise prescribed by statute, as the place for holding such meeting. If no designation is made, or if a special meeting be otherwise called, the place of meeting shall be the principal office of the corporation.

4. NOTICE OF MEETING.

Written or printed notice stating the place, day and hour of the meeting and, in case of a special meeting, the purpose or purposes for which the meeting is called, shall be delivered not less than Ten (10) days nor more than thirty (30) days before the date of the meeting, either personally or by mail, by or at the direction of the president, or the secretary, or the officer or persons calling the meeting, to each stockholder of record entitled to vote at such meeting. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail, addressed to the stockholder at his address as it appears on the stock transfer books of the corporation, with postage thereon prepaid.

5. CLOSING OF TRANSFER BOOKS OR FIXING OF RECORD DATE.

For the purpose of determining stockholders entitled to notice of or to vote at any meeting of stockholders or any adjournment thereof, or stockholders entitled to receive payment of any dividend, or in order to make a determination of stockholders for any other proper purpose, the directors of the corporation may provide that the stock transfer books shall be closed for a stated period but not to exceed, in any case, sixty days. If the stock transfer books shall be closed for the purpose of determining stockholders entitled to notice of or to vote at a meeting of stockholders, such books shall be closed for at least thirty days immediately preceding such meeting. In lieu of closing the stock transfer books, the directors may fix in advance a date as the record date for any such determination of stockholders, such date in any case to be not more than sixty days and, in case of a meeting of stockholders, not less than thirty days prior to the date on which the particular action requiring such determination of stockholders is to be taken. If the stock transfer books are not closed and no record date is fixed for the determination of stockholders entitled to notice of or to vote at a meeting of stockholders, or stockholders entitled to receive payment of a dividend, the date on which notice of the meeting is mailed or the date on which the resolution of the directors declaring such dividend is adopted, as the case may be, shall be the record date for such determination of stockholders. When a determination of stockholders entitled to vote at any meeting of stockholders has been made as provided in this section, such determination shall apply to any adjournment thereof.

6. VOTING LISTS.

The officer or agent having charge of the stock transfer books for shares of the corporation shall make, at least sixty days before each meeting of stockholders, a complete list of the stockholders entitled to vote at such meeting, or any adjournment thereof, arranged in alphabetical order, with the address of and the number of shares held by each, which list, for a period of sixty days prior to such meeting, shall be kept on file at the principal office of the corporation and shall be subject to inspection by any stockholder at any time during usual business hours. Such list shall also be produced and kept open at the time and place of the meeting and shall be subject to the inspection of any stockholder during the whole time of the meeting. The original stock transfer book shall be prima facie evidence as to who are the stockholders entitled to examine such list or transfer books or to vote at the meeting of stockholders.

7. QUORUM.

At any meeting of stockholders 51% of the outstanding shares of the corporation entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of stockholders. If less than said number of the outstanding shares are represented at a meeting, a majority of the shares so represented may adjourn the meeting from time to time without further notice. At such adjourned meeting at which a quorum shall be present or represented, any business may be transacted which might have been transacted at the meeting as originally notified. The stockholders present at a duly organized meeting may continue to transact business until adjournment, notwithstanding the withdrawal of enough stockholders to leave less than a quorum.

8. PROXIES.

At all meetings of stockholders, a stockholder may vote by proxy executed in writing by the stockholder or by his duly authorized attorney in fact. Such proxy shall be filed with the secretary of the corporation before or at the time of the meeting.

9. VOTING.

Each stockholder entitled to vote in accordance with the terms and provisions of the certificate of incorporation and these by-laws shall be entitled to one vote, in person or by proxy, for each share of stock entitled to vote held by such stockholders. Upon the demand of any stockholder, the vote for directors and upon any question before the meeting shall be by ballot. All elections for directors shall be decided by plurality vote; all other questions shall be decided by majority vote except as otherwise provided by the Certificate of Incorporation or the laws of this State.

10. ORDER OF BUSINESS.

The order of business at all meetings of the stockholders, shall be as follows:

1. Roll call.
2. Proof of notice of meeting or waiver of notice .
3. Reading of minutes of preceding meeting.
4. Reports of Officers.
5. Reports of Committees.
6. Election of Directors.
7. Unfinished business.
8. New business.

11. INFORMAL ACTION BY STOCKHOLDERS.

Unless otherwise provided by law, any action required to be taken at a meeting of the shareholders, or any other action which may be taken at a meeting of the shareholders, may be taken without a meeting if a consent in writing, setting forth the action so taken, shall be signed by all of the shareholders entitled to vote with respect to the subject matter thereof.

ARTICLE III – BOARD OF DIRECTORS

1. GENERAL POWERS.

The business and affairs of the corporation shall be managed by its board of directors. The directors shall in all cases act as a board, and they may adopt such rules and regulations for the conduct of their meetings and the management of the corporation, as they may deem proper, not inconsistent with these by-laws and the laws of this State.

2. NUMBER, TENURE AND QUALIFICATIONS.

The number of directors of the corporation shall be at least one. Each director shall hold office until the next annual meeting of stockholders and until his/her successor shall have been elected and qualified.

3. REGULAR MEETINGS.

A regular meeting of the directors, shall be held with- out other notice than this by-law immediately after, and at the same place as, the annual meeting of stockholders. The directors may provide, by resolution, the time and place for the holding of additional regular meetings without other notice than such resolution.

4. SPECIAL MEETINGS.

Special meetings of the directors may be called by or at the request of the president or any two directors. The person or persons authorized to call special meetings of the directors may fix the place for holding any special meeting of the directors called by them.

5. NOTICE.

Notice of any special meeting shall be given at least ten days previously thereto by written notice delivered personally or by mail addressed to each director at her/his business address. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail so addressed, with postage thereon prepaid. A notice may also be given by Certified Mail or a nationally recognized overnight courier with proof of delivery or receipt. The attendance of a director at a meeting shall constitute a waiver of notice of such meeting, except where a director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.

6. QUORUM.

At any meeting of the directors 51% shall constitute a quorum for the transaction of business, but if less than said number is present at a meeting, a majority of the directors present may adjourn the meeting from time to time without further notice.

7. MANNER OF ACTING.

The act of the majority of the directors present at a meeting at which a quorum is present shall be the act of the directors.

8. NEWLY CREATED DIRECTORSHIPS AND VACANCIES.

Newly created directorships resulting from an increase in the number of directors and vacancies occurring in the board for any reason except the removal of directors without cause may be filled by a vote of a majority of the directors then in office, although less than a quorum exists. Vacancies occurring by reason of the removal of directors without cause shall be filled by vote of the stockholders. A director elected to fill a vacancy caused by resignation, death or removal shall be elected to hold office for the unexpired term of his/her predecessor.

9. REMOVAL OF DIRECTORS.

Any or all of the directors may be removed for cause by vote of the stockholders or by action of the board. Directors may be removed without cause only by vote of the stockholders.

10. RESIGNATION.

A director may resign at any time by giving written notice to the board, the president or the secretary of the corporation. Unless otherwise specified in the notice, the resignation shall take effect upon receipt thereof by the board or such officer, and the acceptance of the resignation shall not be necessary to make it effective.

11. COMPENSATION.

No compensation shall be paid to directors, as such, for their services, but by resolution of the board a fixed sum and expenses for actual attendance at each regular or special meeting of the board may be authorized. Nothing herein contained shall be construed to preclude any director from serving the corporation in any other capacity and receiving compensation therefor.

12. PRESUMPTION OF ASSENT.

A director of the corporation who is present at a meeting of the directors at which action on any corporate matter is taken shall be presumed to have assented to the action taken unless his dissent shall be entered in the minutes of the meeting or unless he shall file his written dissent to such action with the person acting as the secretary of the meeting before the adjournment thereof or shall forward such dissent by registered mail to the secretary of the corporation immediately after the adjournment of the meeting . Such right to dissent shall not apply to a director who voted in favor of such action.

13. EXECUTIVE AND OTHER COMMITTEES.

The board, by resolution, may designate from among its members an executive committee and other committees, each consisting of three or more directors. Each such committee shall serve at the pleasure of the board.

ARTICLE IV – OFFICERS

1. NUMBER.

The officers of the corporation shall be a president, a vice -president, a secretary and a treasurer, each of whom shall be elected by the directors. Such other officers and assistant officers as may be deemed necessary may be elected or appointed by the directors.

2. ELECTION AND TERM OF OFFICE.

The officers of the corporation to be elected by the directors shall be elected annually at the first meeting of the directors held after each annual meeting of the stockholders. Each officer shall hold office until his successor shall have been duly elected and shall have qualified or until his death or until he shall resign or shall have been removed in the manner hereinafter provided.

3. REMOVAL.

Any officer or agent elected or appointed by the directors may be removed by the directors whenever in their judgment the best interests of the corporation would be served thereby, but such removal shall be without prejudice to the contract rights, if any, of the person so removed.

4. VACANCIES.

A vacancy in any office because of death, resignation, removal, disqualification or otherwise, may be filled by the directors for the unexpired portion of the term.

5. PRESIDENT.

The president shall be the principal executive officer of the corporation and, subject to the control of the directors, shall in general supervise and control all of the business and affairs of the corporation. The president shall, when present, preside at all meetings of the stockholders and of the directors, and may sign, with the secretary or, any other proper officer of the corporation thereunto authorized by the directors, certificates for shares of the corporation, any deeds, mortgages, bonds, contracts, or other instruments which the directors have authorized to be executed, except in cases where the signing and execution thereof shall be expressly delegated by the directors or by these by-laws to some other officer or agent of the corporation, or shall be required by law to be otherwise signed or executed and in general shall perform all duties incident to the office of president and such other duties as may be prescribed by the directors from time to time.

6. VICE-PRESIDENT.

In the absence of the president or in event of her/his death, inability or refusal to act, the vice-president shall perform the duties of the president, and when so acting, shall have all the powers of and be subject to all the restrictions upon the president. The vice-president shall perform such other duties as from time to time may be assigned to her/him by the president or by the directors.

7. SECRETARY.

The secretary shall keep the minutes of the stockholders and of the directors meetings in one or more books provided for that purpose, see that all notices are duly given in accordance with the provisions of these by-laws or as required, be custodian of the corporate records and of the seal of the corporation and keep a register of the post office address of each stockholder which shall be furnished to the secretary by such stockholder, have general charge of the stock transfer books of the corporation and in general perform all duties incident to the office of secretary and such other duties as from time to time may be assigned by the president or by the directors.

8. TREASURER.

If required by the directors, the treasurer shall give a bond for the faithful discharge of his/her duties in such sum and with such surety or sureties as the directors shall determine. The treasurer shall have charge and custody of and be responsible for all funds and securities of the corporation, receive and give receipts for moneys due and payable to the corporation from any source whatsoever, and deposit all such moneys in the name of the corporation in such banks, trust companies or other depositories as shall be selected in accordance with these by-laws and in general perform all of the duties incident to the office of treasurer and such other duties as from time to time may be assigned by the president or by the directors.

9. SALARIES.

The salaries of the officers shall be fixed from time to time by the directors and no officer shall be prevented from receiving such salary by reason of the fact that he/she is also a director of the corporation.

ARTICLE V – CONTRACTS, LOANS, CHECKS AND DEPOSITS

1. CONTRACTS.

The directors may authorize any officer or officers, agent or agents, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the corporation, and such authority may be general or confined to specific instances.

2. LOANS.

No loans shall be contracted on behalf of the corporation and no evidences of indebtedness shall be issued in its name unless authorized by a resolution of the directors. Such authority may be general or confined to specific instances.

3. CHECKS, DRAFTS, ETC.

All checks, drafts or other orders for the payment of money, notes or other evidences of indebtedness issued in the name of the corporation, shall be signed by such officer or officers, agent or agents of the corporation and in such manner as shall from time to time be determined by resolution of the directors.

4. DEPOSITS.

All funds of the corporation not otherwise employed shall be deposited from time to time to the credit of the corporation in such banks, trust companies or other depositaries as the directors may select.

ARTICLE VI – CERTIFICATES FOR SHARES AND THEIR TRANSFER

1. CERTIFICATES FOR SHARES.

Certificates representing shares of the corporation shall be in such form as shall be determined by the directors. Such certificates shall be signed by the president and by the secretary or by such other officers authorized by law and by the directors. All certificates for shares shall be consecutively numbered or otherwise identified. The name and address of the stockholders, the number of shares and date of issue, shall be entered on the stock transfer books of the corporation. All certificates surrendered to the corporation for transfer shall be canceled and no new certificate shall be issued until the former certificate for a like number of shares shall have been surrendered and canceled, except that in case of a lost, destroyed or mutilated certificate a new one may be issued therefor upon such terms and indemnity to the corporation as the directors may prescribe.

2. TRANSFERS OF SHARES.

- (a) Upon surrender to the corporation or the transfer agent of the corporation of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment or authority to transfer, it shall be the duty of the corporation to issue a new certificate to the person entitled thereto, and cancel the old certificate; every such transfer shall be entered on the transfer book of the corporation which shall be kept at its principal office.
- (b) The corporation shall be entitled to treat the holder of record of any share as the holder in fact thereof, and, accordingly, shall not be bound to recognize any equitable or other claim to or interest in such share on the part of any other person whether or not it shall have express or other notice thereof, except as expressly provided by the laws of this state.

ARTICLE VII – FISCAL YEAR

The fiscal year of the corporation shall begin on the 1st day of January in each year.

ARTICLE VIII – DIVIDENDS

The directors may from time to time declare, and the corporation may pay, dividends on its outstanding shares in the manner and upon the terms and conditions provided by law.

ARTICLE IX – SEAL

The directors shall provide a corporate seal which shall be circular in form and shall have inscribed thereon the name of the corporation, the state of incorporation, year of incorporation and the words, "Corporate Seal."

ARTICLE X – WAIVER OF NOTICE

Unless otherwise provided by law, whenever any notice is required to be given to any stockholder or director of the corporation under the provisions of these by-laws or under the provisions of the articles of incorporation, a waiver thereof in writing, signed by the person or persons entitled to such notice, whether before or after the time stated therein, shall be deemed equivalent to the giving of such notice.

ARTICLE XI – AMENDMENTS

These by-laws may be altered, amended or repealed and new by-laws may be adopted by a vote of the stockholders representing a majority of all the shares issued and outstanding, at any annual stockholders' meeting or at any special stockholders' meeting when the proposed amendment has been set out in the notice of such meeting.

Regarding Article IV OFFICERS:

Paragraph 1. NUMBER. The word "vice-president" shall be stricken from this paragraph.

Paragraph 6. VICE-PRESIDENT. This paragraph is hereby stricken. There shall be no vice-president.

Secretary Certificate

I, Vishnubhai B. Patel, Secretary of JDM Sales, Inc., hereby certify that the attached copy of the By-Laws of JDM Sales, Inc. is a true and correct copy of same.

Signed and sealed this 26th day of February, 2020.



JDM Sales, Inc.

By: Vishnubhai B. Patel

Its: Secretary



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

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

Identification Number: 001417130

ARTICLE I

The exact name of the corporation is:

JDM SALES, INC.

ARTICLE II

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

THE CORPORATION IS ORGANIZED TO SELL, DISTRIBUTE, PROMOTE, MARKET, AND OTHERWISE PROVIDE RETAIL SALES OF PRODUCTS IN ACCORDANCE WITH THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS. TO ENGAGE IN ALL ACTIVITIES INCIDENTAL THERETO, AND TO ENGAGE IN ALL OTHER ACTIVITIES IN WHICH A CORPORATION FORMED UNDER THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS MAY LAWFULLY ENGAGE.

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding
		Num of Shares	Total Par Value	
CNP	\$0.00000	10,000	\$0.00	0

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

ARTICLE IV

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

NOT APPLICABLE

ARTICLE V

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

NOT APPLICABLE

ARTICLE VI

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

1. MINIMUM NUMBER OF DIRECTORS. THE BOARD OF DIRECTORS MAY CONSIST OF ONE OR MORE INDIVIDUALS, NOTWITHSTANDING THE NUMBER OF SHAREHOLDERS. 2. PERSONAL LIABILITY OF DIRECTORS TO CORPORATION. NO DIRECTOR SHALL HAVE PERSONAL LIABILITY TO THE CORPORATION FOR MONETARY DAMAGES FOR BREACH OF HIS OR HER FIDUCIARY DUTY AS A DIRECTOR NOTWITHSTANDING ANY PROVISION OF LAW IMPOSING SUCH LIABILITY, PROVIDED THAT THIS PROVISION SHALL NOT ELIMINATE OR LIMIT THE LIABILITY OF A DIRECTOR (A) FOR ANY BREACH OF THE DIRECTOR'S DUTY OF LOYALTY TO THE CORPORATION OR ITS SHAREHOLDERS, (B) FOR ACTS OR OMISSIONS NOT IN GOOD FAITH OR WHICH INVOLVE INTENTIONAL MISCONDUCT OR A KNOWING VIOLATION OF LAW, (C) FOR IMPROPER DISTRIBUTIONS UNDER CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS, OR (D) FOR ANY TRANSACTION FROM WHICH THE DIRECTOR DERIVED AN IMPROPER PERSONAL BENEFIT. 3. SHAREHOLDER VOTE IS REQUIRED TO APPROVE MATTERS ACTED ON BY SHAREHOLDERS. WITH RESPECT TO ANY MATTER AS TO WHICH THE AFFIRMATIVE VOTE OF MORE THAN A MAJORITY OF THE SHARES IN ANY VOTING GROUP SHALL BE REQUIRED BY ANY PROVISION OF CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS FOR THE APPROVAL OF THE MATTER, THE AFFIRMATIVE VOTE OF A MAJORITY OF ALL THE SHARES IN ANY SUCH VOTING GROUP ELIGIBLE TO VOTE ON THE MATTER SHALL BE SUFFICIENT FOR THE APPROVAL OF THE MATTER NOTWITHSTANDING THAT SUCH GREATER VOTE ON THE MATTER WOULD BE OTHERWISE REQUIRED. 4. SHAREHOLDER ACTION WITHOUT A MEETING BY LESS THAN UNANIMOUS CONSENT. ACTION REQUIRED OR PERMITTED BY CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS TO BE TAKEN AT A SHAREHOLDERS MEETING MAY BE TAKEN WITHOUT A MEETING BY SHAREHOLDERS HAVING NOT LESS THAN THE MINIMUM NUMBER OF VOTES NECESSARY TO TAKE THE ACTION AT A MEETING AT WHICH ALL SHAREHOLDERS ENTITLED TO VOTE ON THE ACTION ARE PRESENT AND VOTING. 5. AUTHORIZATION OF DIRECTORS TO MAKE, AMEND OR REPEAL BYLAWS. THE BOARD OF DIRECTORS MAY MAKE, AMEND OR REPEAL THE BYLAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH, BY VIRTUE OF AN EXPRESS PROVISION IN CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS, THE ARTICLES OF ORGANIZATION OR THE BYLAWS REQUIRES ACTION BY THE SHAREHOLDERS. 6. AUTHORITY OF DIRECTORS TO CREATE NEW CLASSES AND SERIES OF SHARES. THE BOARD OF DIRECTORS, ACTING WITHOUT THE SHAREHOLDERS, MAY (A) RECLASSIFY ANY UNISSUED SHARES OF ANY AUTHORIZED CLASS OR SERIES INTO ONE OR MORE EXISTING OR NEW CLASSES OR SERIES, AND (B) CREATE ONE OR MORE NEW CLASSES OR SERIES OF SHARES, SPECIFYING THE NUMBER OF SHARES TO BE INCLUDED THEREIN, THE DISTINGUISHING DESIGNATION THEREOF AND THE PREFERENCES, LIMITATIONS AND RELATIVE RIGHTS APPLICABLE THERETO, PROVIDED THAT THE BOARD OF DIRECTORS MAY NOT APPROVE AN AGGREGATE NUMBER OF AUTHORIZED SHARES OF ALL CLASSES AND SERIES WHICH EXCEEDS THE TOTAL NUMBER OF AUTHORIZED SHARES SPECIFIED IN THE ARTICLES OF ORGANIZATION APPROVED BY THE SHAREHOLDERS. 7. MEETINGS OF THE SHAREHOLDERS OF THE CORPORATION MAY BE HELD ANYWHERE IN THE UNITED STATES. 8. THE CORPORATION SHALL HAVE THE POWER TO BE A PARTNER IN ANY BUSINESS ENTERPRISE WHICH THIS CORPORATION WOULD HAVE THE POWER TO CONDUCT BY ITSELF.

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

ARTICLE VII

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

Later Effective Date: 1/1/2020 Time: 00:01 AM

ARTICLE VIII

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

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

Name: VISHNUBHAI B. PATEL
No. and Street: 220 PULASKI BOULEVARD
City or Town: BELLINGHAM State: MA Zip: 02019 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	VISHNUBHAI B PATEL	8 FIELD CIRCLE WRENTHAM, MA 02093 USA
TREASURER	VISHNUBHAI B PATEL	8 FIELD CIRCLE WRENTHAM, MA 02093 USA
SECRETARY	VISHNUBHAI B PATEL	8 FIELD CIRCLE WRENTHAM, MA 02093 USA
DIRECTOR	VISHNUBHAI B PATEL	8 FIELD CIRCLE WRENTHAM, MA 02093 USA

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

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

RETAIL SALES OF VARIOUS PRODUCTS

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

No. and Street: 220 PULASKI BOULEVARD
City or Town: BELLINGHAM State: MA Zip: 02019 Country: USA

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

No. and Street: 220 PULASKI BOULEVARD
City or Town: BELLINGHAM State: MA Zip: 02019 Country: USA
which is

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

Signed this 26 Day of December, 2019 at 12:01:38 PM by the incorporator(s). (If an existing

corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)

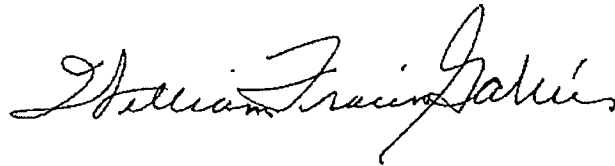
VISHNUBHAI B. PATEL, INCORPORATOR

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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:

December 26, 2019 11:59 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



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

mass.gov/dor

Letter ID: L1389157952
Notice Date: October 8, 2020
Case ID: 0-000-883-754



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



JDM SALES INC
220 PULASKI BLVD
BELLINGHAM MA 02019-2409

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



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

William Francis Galvin
Secretary of the
Commonwealth

Date: October 06, 2020

To Whom It May Concern :

I hereby certify that according to the records of this office,
JDM SALES, INC.

is a domestic corporation organized on **January 01, 2020** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 20100139190

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

Processed by: NMa

Unemployment Assistance Affidavit

In accordance with 935 CMR 500.101(1) and in support of the application of JDM Sales, Inc. (the “**Applicant**”) with a principle address of 220 Pulaski Blvd., Bellingham, MA 02019, hereby confirms and certifies to the Cannabis Control Commission (the “**CCC**”) that:

1. JDM Sales, Inc. cannot register with the Department of Unemployment Assistance until employees are hired.

Under penalties of perjury I declare that I have examined this certification and to the best of my knowledge and belief it is true, correct and complete, and I further declare that I have authority to sign this document.

Dated as of September 29, 2020

By: _____

Name: Vishnubhai B. Patel
Company: JDM Sales, Inc.
Title: President

Plan for Obtaining Liability Insurance

Purpose:

The purpose of this plan is to outline how JDM Sales, Inc. will obtain and maintain the required General Liability and Product Liability insurance coverages as required pursuant to 935 CMR 500.105(10).

Plan:

JDM Sales, Inc. (hereinafter “JDM”) has already engaged with multiple insurance providers offering General Liability and Product Liability insurance coverage with minimum coverage amounts in conformance with 935 CMR 500.105(10). These insurance providers are well established in the legal marijuana industry and currently insure many marijuana establishments. In addition, these insurance providers are all licensed in the Commonwealth of Massachusetts.

Once a Provisional Marijuana Establishment License is issued to JDM, it will obtain and maintain:

General Liability Insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and

Product Liability Insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually,

except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission.

The deductible for each policy shall be no higher than \$5,000.00 per occurrence.

If JDM is unable to obtain the required insurance coverage, then JDM will place in escrow a sum of no less than Two Hundred Fifty Thousand and 00/100 (\$250,000.00) Dollars or such other amount approved by the Commission, to be expended for coverage of liabilities.

JDM shall replenish such escrow account within ten days of any expenditure.

JDM 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.

BUSINESS PLAN

JDM SALES, INC.

JDM Sales, Inc. (hereinafter “JDM” or the “Company”) is applying for a license with the Cannabis Control Commission to operate an adult-use cannabis retail facility at 103 Uxbridge Road, Mendon, Massachusetts.

Ownership and Management:

JDM is a single owner corporation owned and operated by Vishnubhai B. Patel (hereinafter “Mr. Patel”) who is a minority applicant. Mr. Patel’s Company is well capitalized and has sufficient financial resources to successfully develop an adult-use dispensary in Mendon. Mr. Patel has many years of retail experience in Massachusetts selling government regulated products such as tobacco, alcohol, and lottery tickets. As a result, Mr. Patel has the knowledge and experience necessary to open and operate a successful adult-use cannabis dispensary. He also has the knowledge and experience necessary to keep JDM in compliance with Cannabis Control Commission (hereinafter “CCC”) regulations. Mr. Patel developed a set of Policies and Procedures for the proposed Mendon dispensary. These documents create a set of standards for proper operation of the Company. Mr. Patel is self-funding this business venture.

The Site:

JDM has entered into a lease whereby the property owner will lease a 4,000 square foot building on 1.1 acres of land to JDM. JDM was granted a Host Community Agreement by the Mendon Board of Selectmen and is working with an engineering firm and attorney in order to obtain a Special Permit and an approved site plan from the Mendon Planning Board.

Uxbridge Road is also known as Route 16. Route 16 is a very heavily traveled road spanning approximately 59 miles extending from the Connecticut state line near Webster to Revere. The Mendon portion of Route 16 is extremely busy with approximately 17,000 automobile trips per day. With a very high automobile count, this location is ideal for an adult-use cannabis dispensary.

Retail Operations:

The proposed dispensary will contain a comprehensive menu including flower strains, concentrates, edibles, topicals, pre-rolls, vaporizer cartridges, and any marijuana product that is allowed for the Adult-Use market under Cannabis Control Commission regulations. The Company has already contacted various Massachusetts wholesale vendors. The Company already has signed a letter of intent with one wholesaler and is about to sign a second letter of

intent with another wholesaler. In addition, the Company is already in talks with other Massachusetts wholesalers in order to be ready to purchase wholesale products once properly licensed. All products sold will be properly packaged and labeled according to Cannabis Control Commission regulations. All cannabis purchases shall be made from Massachusetts licensed facilities.

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

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

POLICY AND PROCEDURE

RESTRICTING ACCESS TO AGE 21 AND OLDER

1. Intent and Purpose

JDM Sales, Inc. (hereinafter, “JDM”) will be compliant with all regulations in 935 CMR 500.000 et. seq. (hereinafter, the “Regulations”) and any other requirements or guidance issued by the Massachusetts Cannabis Control Commission (hereinafter, “CCC”) or any other regulatory agency.

The purpose of this policy and procedure is for agents and employees of JDM to ensure that Regulations are followed for proper access to the dispensary and keeping the access restricted to only persons who are 21 years of age or older.

The location of the proposed dispensary is 103 Uxbridge Road, Mendon, MA 01756

2. Definitions

- Agent is board member, director, employee, executive, manager, or volunteer of a Marijuana Establishment, who is 21 years of age or older (see 935 CMR 500.002).
- Employee includes a consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana (see 935 CMR 500.002).
- Consumer is a person who is 21 years of age or older (see 935 CMR 500.002).
- Visitor is an individual, other than a Marijuana Establishment Agent, authorized by the Marijuana Establishment, on the premises of an establishment for a purpose related to its operations and consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000 et. sec., provided however, that no such individual shall be younger than 21 years of age (see 935 CMR 500.002).
- “Proof of Identification” is a government issued document containing a photograph of the individual and has the name, date of birth, physical description and signature of the individual and is currently valid and not expired. Such document shall hereinafter be referred to as an “ID”.

JDM will only accept the following forms of ID as proof of identification:

- A state-issued Driver’s License
- Government-Issued ID Card
- Military Identification Card
- Passport

3. Responsibilities

JDM agents and employees are responsible for ensuring that all visitors, consumers, agents, and employees who enter the dispensary or are associated with the operations of the dispensary are 21 years of age or older.

4. Access to the Dispensary

JDM shall allow only the following individuals to access the dispensary:

1. JDM agents and employees. All such persons shall be screened in order to determine verification that they are 21 years of age or older and are currently authorized to be on the premises.
2. Consumers who are 21 years of age or older. All JDM agents and employees shall be trained in the verification and identification of individuals. To verify age, JDM agents and employees will examine the form of identification, such as a driver's license, government-issued ID card, passport, or military ID. The JDM agents and employees will use the Intellicheck or similar service to scan the identification document of each individual who wishes to enter the dispensary. Consumers shall be restricted from access to all areas within the dispensary except the retail dispensary area.

In the event that an ID is not scannable or the scanner is not operational, individuals will not be allowed into the dispensary. If for any reason the identity of the customer or the validity of the ID is in question, the customer will not be allowed to enter the dispensary.
3. Visitors such as vendors and contractors who must produce a Government Issued Identification Card. Dispensary agents and employees shall verify the person is 21 years of age or older. Once verified, the person will be given a Visitor Identification Badge. Visitors will be escorted by a dispensary agent or employee at all times. Visitors will be logged in and out of the facility. This log will be available to the CCC upon request. The visitor will return their Visitor Identification Badge once logged out and exiting the dispensary.
4. Representatives of the CCC who are authorized by the CCC to enter the dispensary.
5. Emergency Responders who are responding to an emergency shall have immediate access to the dispensary.
6. Law Enforcement personnel responding to an emergency shall have immediate access to the dispensary. Law enforcement personnel acting within lawful jurisdiction but not responding to an emergency shall have access to the dispensary as a Visitor and under such criteria.
7. Public health and inspectional services acting within lawful jurisdiction shall have access to the dispensary as a Visitor and under such criteria.

5. Training

JDM will train all agents and employees regarding the proper verification and identification of individuals. Training will be done prior to agents and employees performing verification and identification duties. JDM will supply the Intellicheck or a similar service scanner to help agents and employees verify age.

All JDM agents and employees shall enroll and complete the Responsible Vendor Training Program in accordance with 935 CMR 500.105 (2)(b) and any other CCC regulations. The curriculum shall include but not be limited to:

Discussion concerning marijuana's effect on the human body. Training shall include:

- i. Marijuana's physical effects based on type of marijuana product;
- ii. The amount of time to feel impairment;
- iii. Visible signs of impairment; and
- iv. Recognizing the signs of impairment.

Diversion prevention and prevention of sales to minors, including best practices;

Compliance with all tracking requirements; and

Acceptable forms of identification. Training shall include:

- i. How to check identification;
- ii. Spotting false identification;
- iii. Medical registration cards issued by the DPH;
- iv. Provisions for confiscating fraudulent identifications; and
- v. Common mistakes made in verification.

Other key state laws and rules affecting owners, managers, agents, and employees, which shall include:

- i. Local and state licensing and enforcement;
- ii. Incident and notification requirements;
- iii. Administrative and criminal liability;
- iv. License sanctions and court sanctions;
- v. Waste disposal;
- vi. Health and safety standards;
- vii. Patrons prohibited from bringing marijuana onto licensed premises;
- viii. Permitted hours of sale;
- ix. Conduct of establishment;
- x. Permitting inspections by state and local licensing and enforcement authorities;
- xi. Licensee responsibilities for activities occurring within licensed premises;
- xii. Maintenance of records;
- xiii. Privacy issues; and

xix. Prohibited purchases and practices.

Such other areas of training determined by the Cannabis Control Commission to be included in a responsible vendor training program.

POLICY AND PROCEDURE

QUALITY CONTROL AND TESTING OF MARIJUANA AND MARIJUANA PRODUCTS

I. Intent

JDM Sales, Inc. (hereinafter, “JDM”) is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB” or “the Commission”) or any other regulatory agency.

To provide clear and concise instructions for JDM employees on Quality Control and Testing that are in compliance with the Regulations.

Superb quality control and the testing of marijuana products are essential for the operation of JDM Retail Marijuana Facility. JDM uses best industry practices when it comes to quality control and product testing, furthermore JDM will not sell any marijuana product that is a potentially hazardous food (PHF) or time/temperature control for safety food (TCS food).

II. General Requirements

Quality Control will be maintained through the strict adherence to Good Manufacturing Practices and compliance with 935 CMR 500.000 et. seq, 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*, the sanitation requirement in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine*.

JDM will only source marijuana products from Marijuana Establishments where the product has been tested in accordance with the Regulations. Prior to accepting any marijuana or marijuana product from a source Marijuana Establishment JDM will view and confirm that the source products have been tested in accordance with the Regulations and will store and maintain the testing records.

No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Any testing results indicating noncompliance with M.G.L. c.132B and the regulations at 333 CMR 2.00 through 333 CMR 14.00 will be immediately reported to the Commission, who may refer any such result to the Massachusetts Department of Agricultural Resources.

JDM will not prepare, sell or otherwise transfer an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15:

1. For a single serving of an edible marijuana product, five milligrams of active tetrahydrocannabinol (THC); and

2. In a single package of multiple edible marijuana product to be eaten, swallowed, or otherwise ingested, not more than 20 servings or 100 milligrams of active THC.
3. The THC content must be homogenous, or evenly distributed throughout the edible marijuana product.

JDM will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid waste disposal, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. If minimum standards or best management practices are not established by the time of an application for initial licensure, JDM will satisfy such standards or best management practices as a condition of license renewal, in addition to any the terms and conditions of any environmental permit regulating the licensed activity.

III. Sanitation

JDM Retail Marijuana facility (“the facility”) will be designed and constructed with sanitation in mind.

All product contact surfaces will be smooth, durable and easily cleanable.

1. The walls, ceiling and floors of all storage and packaging areas will be constructed of materials that are smooth, durable and can be adequately kept clean and in good repair.
 - a. There will be coving at base junctures that is compatible with both wall and floor coverings. The coving should provide at least 1/4-inch radius and 4" in height.
 - b. The CEO will prepare a cleaning and sanitation checklist for oversee that the cleaning and sanitation is performed to a satisfactory manner.
2. The facility will provide sufficient space for the placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations and the sale of safe marijuana products.
3. Lighting and Light Fittings - Shatter-proof or safety-type light bulbs, fixtures, or other glass is used where lighting is suspended over retail or storage areas or otherwise protect against marijuana product contamination in case of glass breakage.
 - a. Suspended lighting is constructed from non- corrodible and cleanable assemblies.
 - b. All light bulbs used in the production, processing and storage areas are shatterproof and/or protected with plastic covers.
 - c. Adequate safety lighting in all areas.
4. Buildings, fixtures, and other physical facilities will be constructed in such a manner that allow them to be maintained in a sanitary condition
5. Product Preparation Surfaces (stainless steel tables, scale surfaces and utensils) will 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.

- a. Pre-scrape surface to remove gross soils.
- b. Wash surface with recommended strength solution of pot & pan detergent.
- c. Rinse with water and wipe dry.
- d. Using trigger sprayer bottle and a different wiping cloth, apply sanitizing solution of sanitizer.
- e. Per label directions, use appropriate test papers to determine correct concentration of the sanitizer solution. Surfaces must remain wet for 60 seconds
- f. Allow to air dry.

6. Hand-washing facilities will be adequate and convenient and shall be furnished with running water at a suitable temperature.

- a. Located in the packaging area and where good sanitary practices require employees to wash and sanitize their hands
- b. Provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices

7. The facility water supply comes from the Town of “Mendon” municipal water supply and is sufficient for necessary operations.

8. The facilities plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility.

- a. Plumbing shall properly convey sewage and liquid disposable waste from the facility.

- b. There will be no cross-connections between the potable and wastewater lines;

9. The facility will provide its employees with adequate, readily accessible toilet facilities that will be maintained in a sanitary condition and in good repair.

10. All storage areas will be constructed in a manner that will protect its contents against physical, chemical, and microbial contamination as well as against deterioration of marijuana products or their containers.

Contamination Control

1. Training

- a. All employees will be trained on pest prevention, pest management, pest detection, and pest treatments.

2. Traps for monitoring

- a. Small sticky traps for monitoring of flying or airborne pest shall be posted, mapped and levels of any pest monitored/documented.

3. Handling and storage of marijuana product or marijuana plant waste

- a. All marijuana plant waste will be placed in the hermetically sealed “Marijuana Waste” container.

- i. This container must impervious and covered

- b. All marijuana waste will be stored in the waste room in sealed containers until disposal

4. Handling and storage of non-marijuana waste.
 - a. All non-marijuana waste will be placed into the appropriate impervious covered waste receptacles
 - i. Recyclable
 - ii. Organic
 - iii. Solid waste
 - b. At the end of every day these containers will be emptied, and the contents removed from the building and placed in the appropriate containers to await pickup
5. All toxic materials including cleaning compounds, sanitizers, etc. will be stored in an area away from marijuana storage areas.

Personnel

1. Any employee or contractor who, by medical examination or supervisory observation, is shown to have, or appears to have, any disease transmissible through food, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination shall be excluded from any operations which may be expected to result in contamination of the facility or others until the condition is corrected. Personnel shall be instructed to report such health conditions to their supervisors.
 - a. Any manager, when he or she knows or has reason to believe that an employee has contracted any disease transmissible through food or has become a carrier of such disease, or any disease listed in 105 CMR 300.200(A) will report the same immediately by email to the Mendon Board of Health.
 - b. JDM will voluntarily comply with any and all isolation and/or quarantine orders issued by the Mendon Board of Health or the Department of Public Health.
 - c. JDM Agents must report any flu-like symptoms, diarrhea, and/or vomiting to their supervisor. Employees with these symptoms will be sent home with the exception of symptoms from a noninfectious condition
2. All JDM Agents shall conform to sanitary practices while on duty, including
 - a. Maintain adequate personal cleanliness:
Grooming:
 - i. Arrive at work clean – clean hair, teeth brushed, bathed and used deodorant daily.
 - ii. Maintain short, clean, and polish-free fingernails. No artificial nails are permitted in the food/product production or processing area.
 - a. Fingernails should be trimmed, filed, and maintained so edges and surfaces are cleanable and not rough.
 - iii. Wash hands (including under fingernails vigorously and thoroughly with soap and warm water for a period of 20 seconds:
 - When entering the facility before work begins.
 - In the restroom after toilet use and when you return to your work station.

- After touching face, nose, hair, or any other body part, and after sneezing or coughing.
- After cleaning duties.
- After eating or drinking.
- Any other time an unsanitary task has been performed – i.e. taking out garbage, handling cleaning chemicals, wiping tables, picking up a dropped item, etc.
 - a. Wash hands only in hand sinks designated for that purpose.
 - b. Dry hands with single use towels. Turn off faucets using a paper towel, in order to prevent recontamination of clean hands.

Proper Attire:

- i. Wear appropriate clothing – clean uniform with sleeves and clean non-skid close-toed work shoes (or leather tennis shoes) that are comfortable for standing and working on floors that can be slippery.
- ii. Wear disposable gloves with any cuts, sores, rashes, or lesions.

Cuts, Abrasions, and Burns:

- i. Bandage any cut, abrasion, or burn that has broken the skin.
- ii. Cover bandages on hands with gloves and finger cots and change as appropriate.
- iii. Inform supervisor of all wounds.

Smoking, eating, and gum chewing:

- i. JDM facility is a smoke free facility. No smoking or chewing tobacco shall occur on the premises.
- ii. Eat and drink in designated areas only.
- iii. Refrain from chewing gum or eating candy during work.

HACCP- Hazard Analysis and Critical Control Point

JDM will implement a HACCP plan in accordance with the HACCP Principles & Application Guidelines issued by the FDA. This HACCP plan will address packaging of all marijuana products that will take place in the facility. Once operational JDM will:

1. Assemble the HACCP team (CEO, Dispensary Manger, and outside consultants)
2. Describe the product and its distribution
3. Describe the intended use and consumers of the product
4. Develop a flow diagram which describes each process
5. Verify the flow diagram
6. Conduct a hazard analysis for each product (Principle 1)
7. Determine critical control points (CCPs) for each product (Principle 2)
8. Establish critical limits (Principle 3)
9. Establish monitoring procedures (Principle 4)
10. Establish corrective actions (Principle 5)

11. Establish verification procedures (Principle 6)
12. Establish record-keeping and documentation procedures (Principle 7)

Training

JDM will provide training and training opportunities to all of its employees. In addition to required training, JDM will encourage advanced training to packaging agents in the areas of Good Manufacturing Practices and HACCP.

1. All employees will be trained on Good Manufacturing Practices (“GMP”) and Sanitation prior to or during the first day of employment.
 - a. Include basic product safety training as part of new employee orientation.
 - b. The sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food;
 - c. The sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments; and
 - d. The requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements
2. Employees engaging in the packaging will be trained and certified in; a. A nationally accredited Food Handler Program (i.e. ServSafe)
3. Provide staff with at least bi-annual training on Good Manufacturing Practices and HACCP.
4. Monthly in-service training.
5. At least 1 Manager must be a Certified Food Protection Managers (CFPM) by completing a ServSafe or similar nationally accredited food safety certification course.
6. Use outside resources, such as Extension specialists, vendors, health department inspectors, or qualified trainers to provide GMP, Sanitation and HACCP training.
7. Observe staff to ensure they demonstrate plant safety knowledge each day in the workplace.
8. Document the content of all training sessions and attendance. File documentation in HACCP records.

IV. Testing of Marijuana and Marijuana Products

JDM will only source marijuana products from Marijuana Establishments where the product has been tested in accordance with the Regulations. Prior to accepting any marijuana or marijuana product from a source Marijuana Establishment JDM will view and confirm that the source products have been tested in accordance with the testing requirements outlined in 935 CMR 725.160 and the “Protocol for sampling and analysis of finished medical marijuana products and marijuana infused products for Massachusetts Registered Medical Marijuana Dispensaries” published by DPH. These testing records will be stored and maintained pursuant to our Records Retention Policy and Procedure.

We will contract with a Licensed Independent Testing Laboratory for the purposes of “Quality Control Testing.” Our quality control testing will be used to ensure that the products we are

receiving from our wholesale partners are consistent with the testing records that have been reported to us. These quality control tests will help us to ensure that our products are contaminant-free and the correct dosage and potency. We plan to use CDX Analytics which is Accredited to International Organization for Standardization (ISO) 17025 by Perry Johnson Laboratory Accreditation, Inc. (PJLA), 755 W. Big Beaver, Suite 1325 Troy, Michigan 48084, a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. CDX Analytics will be Licensed by the Commission prior to JDM contracting them for testing services.

1. This testing lab will pick up and transport our testing samples to and from their lab.
2. JDM will ensure that the storage of all marijuana products at the laboratory complies with 935 CMR 500.105(11).
3. Any and all excess JDM marijuana product samples used in testing will be disposed of in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to JDM Facility for disposal or by the Independent Testing Laboratory disposing of it directly.

JDM will not sell or otherwise market for adult use any Marijuana Product that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160

Required testing includes:

1. Cannabinoid Profile
2. Contaminants as specified by the Department including, but not limited to:
 - a. Mold
 - b. Mildew
 - c. Heavy metals
 - d. Plant-Growth Regulators and Pesticides that are compliant with M.G.L. c. 132B and the regulations promulgated at 333 CMR 2.00 through 333 CMR 14.00.
 - e. Bacteria
 - f. Fungi
 - g. Mycotoxins.

JDM will maintain the results of all testing for no less than one year.

If a marijuana product fails the laboratory testing, it will be quarantined and stored away from other product and the Department and the Source Marijuana establishment will be notified immediately. JDM will submit to the Department upon their request, any information regarding contamination. The entire batch of the product will be quarantined and not sold to customers. If through a re-test of the product, it is determined that there is no contamination, the product may be removed from quarantine status and sold. Product that is confirmed to be contaminated, or if the testing results are inconsistent with the labels on the product, will be returned to the Source Marijuana Establishment.

POLICY AND PROCEDURE

PERSONNEL

(This document is a summary of the Personnel Policies for JDM Sales, Inc. including our draft policy for background checks. This plan may be amended once we are licensed and hiring employees or if other guidance issued by the Commission is issued.)

I. Intent

JDM Sales, Inc. (hereinafter “JDM”) is committed to being compliant with all regulations outlined in 935 CMR 500.000 et. seq. (“the Regulations”) and any other requirements or sub-regulatory guidance issued by the Massachusetts Cannabis Control Commission (“CNB” or “the Commission”) or any other regulatory agency.

To provide clear and concise instructions for JDM employees regarding Personnel Policies that are in compliance with the Regulations

II. Purpose

The purpose of this policy is to outline the responsibilities of the Company, the Company’s management team and Agents to ensure specific, methodical, and consistent compliance of the Regulations and to ensure that our personnel policies are compliant with all regulations and laws.

III. Personnel Records

JDM will 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 JDM agent. Such records shall be maintained for at least 12 months after termination of the individual’s affiliation with JDM 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-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe manufacturing & processing conditions;
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with 935 CMR 500.030.

These Personnel Records will be held electronically and in hard copy. The electronic records will be stored in a secure server with encryption software that protects against unauthorized access to the files.

Access to the electronic records will only be allowed to JDM Management agents who require access. as part of their job duties. Hard Copy (written records) will be stored in a secure, locked cabinet in a locked room accessible to only JDM Management agents who require access. These records will be made available for inspection by the Commission upon request.

IV. The JDM Agents

All JDM board members, directors, employees, executives, managers and volunteers will register with the Commission as a JDM Marijuana Establishment Agent (“JDM Agent”). For clarity an employee means, any consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

All JDM Agents shall;

1. Be 21 years of age or older;
2. Not 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
3. Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

JDM will submit to the Commission an application for every JDM Agent, this application will include;

1. The full name, date of birth, and address of the individual;
2. All aliases used previously or currently in use by the individual, including maiden name, if any;
3. 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;
4. An attestation that the individual will not engage in the diversion of marijuana products;
5. 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;
6. Background information, including, as applicable:
 - a. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or

- misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
 - b. A description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority relating to any professional or occupational or fraudulent practices;
 - c. 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;
 - d. A description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority with regard to any professional license or registration held by the applicant; and
7. A nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
 8. Any other information required by the Commission.

The JDM CEO will register with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and will 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 JDM seeks a marijuana establishment agent registration which was obtained within 30 days prior to submission.

JDM will notify the Commission no more than one business day after a JDM agent ceases to be associated with the establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.

The Agent registration card is valid for one year from the date of issue, JDM will renew each JDM Agent Registration Card on an annual basis upon a determination by the Commission that the applicant for renewal continues to be suitable for registration.

After obtaining a registration card for a JDM Agent registration card, JDM will notify the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five business days of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

All Agents will carry the registration card at all times while in possession of marijuana products, including at all times while at the establishment or while transporting marijuana products.

V. Background Checks

JDM will comply with all Background Check requirements in the Regulations and any other sub-regulatory guidance issued by the Commission.

Application Process- During the application process JDM will complete the Background Check Packet as outlined in 935 CMR 500.101(1)(b) which includes;

1. The list of individuals and entities in 935 CMR 500.101(1)(a)1. (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);
2. Information for each individual identified in 935 CMR 500.101(1)(a)1., which shall include:
 - a. The individual's full legal name and any aliases;
 - b. The individual's address;
 - c. The individual's date of birth
 - d. A photocopy of the individual's driver's license or other government-issued identification card;
 - e. A CORI Acknowledgment Form, pursuant to 803 CMR 2.09: Requirements for Requestors to Request CORI, provided by the Commission, signed by the individual and notarized;
 - f. Authorization to obtain a full set of fingerprints, in accordance with M.G.L. c. 94G, § 21, submitted in a form and manner as determined by the Commission;
3. Relevant Background Check Information. Applicants for licensure will also be required to provide information detailing involvement in any criminal or civil or administrative matters:
 - a. A description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor including, but not limited to, action against any health care facility or facility for providing marijuana for medical or recreational purposes, in which those individuals either owned shares of stock or served as board member, executive, officer, director or member, and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
 - b. A description and the relevant dates of any civil action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, including, but not limited to a complaint relating to any professional or occupational or fraudulent practices;
 - c. A description and relevant dates of any past or pending legal or enforcement actions in any other state against any board member, executive, officer, director or member, or against any entity owned or controlled in whole or in part by them, related to the cultivation, processing, distribution, or sale of marijuana for medical or recreational purposes;
 - d. A description and the relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or like action by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, including, but not limited to any complaint or issuance of an

order relating to the denial, suspension, or revocation of a license, registration, or certification;

e. A description and relevant dates of any administrative action, including any complaint, order or disciplinary action, by the Commonwealth, or a like action by another state, the United States or foreign jurisdiction, or a military, territorial, Native American tribal authority or foreign jurisdiction, with regard to any professional license, registration, or certification, held by any board member, executive, officer, director, or member that is part of the applicant's application, if any;

f. A description and relevant dates of actions against a license to prescribe or distribute controlled substances or legend drugs held by any board member, executive, officer, director or member that is part of the applicant's application, if any; and

g. Any other information required by the Commission.

JDM will not present any individual in our application whose background check will result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in Table A of 935 CMR 500.801.

Background Checks not included in the Application Process- For all Marijuana Establishment Agent Registrations not included in the application process JDM will submit Marijuana Establishment Agent applications for all required individuals. JDM will perform its own due diligence in the hiring of employees and contractors and will not knowingly submit an employee or contractors' application if the background check would result in a Mandatory Disqualification or Presumptive Negative Suitability Determination as outlined in Table B: Retail and Transporter Marijuana Establishment Agents, under 935 CMR 500.802.

VI. Equal Employment Policy

It is the policy of JDM to provide equal employment opportunities to all employees and employment applicants without regard to unlawful considerations of race, religion, creed, color, national origin, sex, pregnancy, sexual orientation, gender identity, age, ancestry, physical or mental disability, genetic information, marital status or any other classification protected by applicable local, state or federal laws. This policy prohibits unlawful discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. This policy applies to all aspects of employment, including, but not limited to, hiring, job assignment, working conditions, compensation, promotion, benefits, scheduling, training, discipline and termination.

JDM expects all employees to support our equal employment opportunity policy, and to take all steps necessary to maintain a workplace free from unlawful discrimination and harassment and to accommodate others in line with this policy to the fullest extent required by law. For example, JDM will make reasonable accommodations for employees' observance of religious holidays and practices unless the accommodation would cause an undue hardship on JDM operations. If an employee desires a religious accommodation, they are required to make the request in writing to their manager as far in advance as possible. Employees requesting accommodations are expected

to attempt to find co-workers who can assist in the accommodation (e.g. trade shifts) and cooperate with JDM in seeking and evaluating alternatives.

Moreover, in compliance with the Americans with Disabilities Act (ADA), The JDM provides reasonable accommodations to qualified individuals with disabilities to the fullest extent required by law. JDM may require medical certification of both the disability and the need for accommodation. Keep in mind that JDM can only seek to accommodate the known physical or mental limitations of an otherwise qualified individual. Therefore, it is the employees' responsibility to come forward if they are in need of an accommodation. JDM will engage in an interactive process with the employee to identify possible accommodations, if any will help the applicant or employee perform the job.

VII. Anti-Harassment and Sexual Harassment Policy

JDM seeks to promote a workplace that is free from discrimination and harassment, whether based on race, color, gender, age, religion, creed, national origin, ancestry, sexual orientation, marital status or disability. Inappropriate interference with the ability of JDM's employees to perform their expected job duties is not tolerated.

It is illegal and against JDM policy for any employee, male or female, to harass another employee. Examples of such harassment include making sexual advances or favors or other verbal or physical conduct of a sexual nature a condition of any employee's employment; using an employee's submission to or rejection of such conduct as the basis for, or as a factor in, any employment decision affecting the individual; or otherwise creating an intimidating, hostile, or offensive working environment by such conduct.

The creation of an intimidating, hostile, or offensive working environment may include but is not limited to such actions as persistent comments on an employee's sexual preferences, the display of obscene or sexually oriented photographs or drawings, or the telling of sexual jokes. Conduct or actions that arise out of a personal or social relationship and that are not intended to have a discriminatory employment effect may not be viewed as harassment. JDM will determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation.

JDM will not condone any sexual harassment of its employees. All employees, including supervisors and managers, will be subject to severe discipline, up to and including discharge, for any act of sexual harassment they commit.

JDM will not condone sexual harassment of its employees by non-employees, and instances of such harassment should be reported as indicated below for harassment by employees.

If you feel victimized by sexual harassment you should report the harassment to your manager immediately. If your immediate manager is the source of the alleged harassment, you should report the problem to the Human Resources Department.

Managers who receive a sexual harassment complaint should carefully investigate the matter, questioning all employees who may have knowledge of either the incident in question or similar

problems. The complaint, the investigative steps and findings, and disciplinary actions (if any) should be documented as thoroughly as possible.

Any employee who makes a complaint, or who cooperates in any way in the investigation of same, will not be subjected to any retaliation or discipline of any kind.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC - 300 days; MCAD - 300 days).

The United States Equal Employment Opportunity Commission ("EEOC") One Congress Street, 10th Floor Boston, MA 02114, (617) 565-3200.

The Massachusetts Commission Against Discrimination ("MCAD") One Ashburton Place, Rm. 601, Boston, MA 02108, (617) 994-6000.

VIII. Americans with Disability Act

JDM strongly supports the policies of the Americans with Disabilities Act and is completely committed to treating all applicants and employees with disabilities in accordance with the requirements of that act. JDM judge's individuals by their abilities, not their disabilities, and seeks to give full and equal employment opportunities to all persons capable of performing successfully in the company's positions. JDM will provide reasonable accommodations to any persons with disabilities who require them, who advise JDM of their particular needs. Information concerning individuals' disabilities and their need for accommodation will of course be handled with the utmost discretion.

IX. Drug Free Workplace

JDM is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, it maintains a strict policy against the use of alcohol and the unlawful use of drugs in the workplace. Consequently, no employee may consume or possess alcohol, or use, possess, sell, purchase or transfer illegal drugs at any time while on The JDM premises or while using JDM's vehicles or equipment, or at any location during work time.

No employee may report to work with illegal drugs (or their metabolites) or alcohol in his or her bodily system. The only exception to this rule is that employees may engage in moderate consumption of alcohol that may be served and/or consumed as part of an authorized Company social or business event. "Illegal drug" means any drug that is not legally obtainable or that is legally obtainable but has not been legally obtained. It includes prescription drugs not being used for prescribed purposes or by the person to whom it is prescribed or in prescribed amounts. It also includes any substance a person holds out to another as an illegal drug.

Any violation of this policy will result in disciplinary action, up to and including termination.

Any employee who feels he or she has developed an addiction to, dependence upon, or problem with alcohol or drugs, legal or illegal, is strongly encouraged to seek assistance before a violation of this policy occurs. Any employee who requests time off to participate in a rehabilitation program will be reasonably accommodated. However, employees may not avoid disciplinary action, up to and including termination, by entering a rehabilitation program after a violation of this policy is suspected or discovered.

X. Smoke Free Workplace

Smoking is prohibited throughout the workplace. This policy applies equally to all employees, clients, partners, and visitors.

XI. Employee Assistance Policy

To help employees in circumstances where counseling services would be helpful, JDM will make an Employee Assistance Program (EAP) counseling service available to employees, when needed, at no personal cost.

XII. Employee Diversion of Marijuana

If a JDM Agent is found to have diverted marijuana, that agent will immediately be dismissed and have their Marijuana Establishment Registration Card confiscated. The CEO will immediately be notified. The CEO will make a detailed report of the event and report it to local law enforcement and the Commission within 24 hours.

XIII. Employee Handbook

The JDM will provide a comprehensive employee handbook to all employees that will outline all the information pertinent to their employment with JDM. These subjects will include, but not be limited to;

1. JDM Mission and Vision
2. Organizational Structure
3. General Employment Policies
4. Employee Categories
5. Conflicts of Interest
6. Access to Personnel Files
7. Performance Evaluations
8. Hours of Work
9. Compensation
10. Benefits
11. Code of Conduct
12. Discipline
13. Training

JDM SALES, INC.

STAFFING PLAN:

EXECUTIVE LEVEL:

- CEO
- CFO
- COO

MANAGEMENT LEVEL:

- GENERAL MANAGER
- SECURITY MANAGER
- UP TO 3 ASSISTANT MANAGERS

STAFF LEVEL:

- UP TO TWENTY (20) STAFF LEVEL SALES REPRESENTATIVES

CONSULTANT LEVEL:

- ATTORNEY / COMPLIANCE OFFICER
- HUMAN RESOURCE PROVIDER
- BRAND CONSULTANT
- UP TO FIVE (5) SECURITY OFFICERS

POLICY AND PROCEDURE

RECORD KEEPING PROCEDURE

1. Intent

JDM Sales, Inc. (hereinafter “JDM”) is committed to being compliant with all regulations outlined in 935 CMR 500.00 et. seq. (hereinafter the “regulations”) and any other requirements or guidance issued by the Cannabis Control Commission (hereinafter the “CCC”) or any other regulatory agency.

JDM intends on providing clear and concise instructions for JDM employees regarding record-keeping and methods used to remain in compliance with the regulations.

2. Purpose

The purpose of this policy is to outline the responsibilities of JDM, including JDM employees and agents in order to ensure specific, methodical, and consistent compliance with the regulations and to ensure that our record-keeping procedures are compliant with all regulations and laws.

3. Access to the Commission

JDM electronic and hard copy (written) records will be available to the CCC upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection.

4. Access by the Massachusetts Department of Revenue (“DOR”)

JDM books, records, papers and other data will be made available upon request by the DOR. Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the CCC or DOR. Any additional reports and schedules relating to the preparation of tax returns will be maintained and made available upon request. Inventory system data as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the DOR Commissioner consents in writing to an earlier destruction, the records will be preserved until the statute of limitations for

making additional assessments for the period for which the return was due has expired. The DOR may require a longer retention period, such as when the records are the subject of an audit, court case, or other proceeding.

Additionally, JDM will comply with all records retention requirements outlined in the DOR Regulations including but limited to 830 CMR 62C.25.1: Record Retention.

5. Point of Sale (POS) Systems

JDM will utilize a POS system that complies with the requirements in G.L. c. 62C, § 25; 830 CMR 62C.25.1 (the Records Retention Regulation); and the Massachusetts Department of Revenue (“DOR”) Directive 16-1 “Recordkeeping Requirements for Sales and Use Tax Vendors Utilizing Point of Sale (POS) Systems”

1. Our POS system will record all transactions in a manner that will allow the DOR to verify what was sold and whether the appropriate amount of tax was collected. Along with the data in the POS system, JDM will maintain the following records:

- a. A journal or its equivalent, which records daily all non-cash transactions affecting accounts payable;
- b. A cash journal or its equivalent, which records daily all cash receipts and cash disbursements, including any check transactions;
- c. A sales slip, invoice, cash register tape, or other document evidencing the original transaction, which substantiates each entry in the journal or cash journal;
- d. Memorandum accounts, records or lists concerning inventories, fixed assets or prepaid items, except in cases where the accounting system clearly records such information; and
- e. A ledger to which totals from the journal, cash journal and other records have been periodically posted. The ledger must clearly classify the individual accounts receivable and payable and the capital account.

2. Each POS transaction record will provide enough detail to independently determine the taxability of each sale and the amount of tax due and collected. Information on each sales transaction will include, but is not limited to the:

- a. individual item(s) sold,
- b. selling price,
- c. tax due,
- d. invoice number,
- e. date of sale,
- f. method of payment, and
- g. POS terminal number and POS transaction number.

3. JDM will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:

- a. Internal sequential transaction numbers;
- b. Records of all POS terminal activity; and
- c. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.
- d. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:
- e. Any and all activity related to other operating modes available in the system, such as a training mode; and
- f. Any and all changes in the setup of the system.

6. Types of Records

The following records shall be maintained and stored by JDM and available to the Commission upon request:

1. Operating procedures as required by 935 CMR 500.105(1)
 - a. Security measures in compliance with 935 CMR 500.110;
 - b. Employee security policies, including personal safety and crime prevention techniques;
 - c. A description of the Marijuana Establishment's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - d. Storage of marijuana in compliance with 935 CMR 500.105(11);
 - e. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - f. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
 - g. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
 - h. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
 - i. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
 - j. Alcohol, smoke, and drug-free workplace policies;
 - k. A plan describing how confidential information will be maintained;
 - l. A policy for the immediate dismissal of any marijuana establishment agent who has:
 - i. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
 - ii. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
 - iii. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the

United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

m. A list of all board members and executives of a Marijuana Establishment, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR This requirement may be fulfilled by placing this information on the Marijuana Establishment's website.

n. 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).

o. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.

p. Policies and procedures for energy efficiency and conservation that shall include:

i. Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;

ii. Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;

iii. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and

iv. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

2. Operating procedures as required by 935 CMR 500.130(5)

a. Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);

b. Policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by a Marijuana Establishment to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety;

c. Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana products is segregated from other product and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12);

d. Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);

e. Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15); and

f. Policies and procedures for the transfer, acquisition, or sale of marijuana products

g. between Marijuana Establishments.

3. Inventory records as required by 935 CMR 500.105(8); and

4. Seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).

5. Personnel records required by 935 CMR 500.105(9)(d), including but not limited to;

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-hour related duty training.

c. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;

d. Personnel policies and procedures; and

e. All background check reports obtained in accordance with 935 CMR 500.030

6. Business records, which shall include manual or computerized records of:

a. Assets and liabilities;

b. Monetary transactions;

c. Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

d. Sales records including the quantity, form, and cost of marijuana products; and

e. Salary and wages paid to each employee, stipend paid to each board member, and an executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

7. Waste disposal records as required under 935 CMR 500.105(12); and

8. Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.

9. Responsible vendor training program compliance records.

10. Vehicle registration, inspection and insurance records. (If Applicable)

All records kept and maintained by JDM Sales, Inc. shall be securely held. Access to these records will only be accessible to those employees whose job duties require them to access such records.

POLICY AND PROCEDURE

QUALIFICATIONS AND TRAINING

1. Intent

JDM Sales, Inc. (hereinafter “JDM”) is committed to being compliant with all regulations outlined in 935 CMR 500.00 et. seq. (hereinafter the “regulations”) and any other requirements or guidance issued by the Cannabis Control Commission (hereinafter the “CCC”) or any other regulatory agency.

JDM intends on providing clear and concise instructions to JDM agents and employees regarding the positions and qualifications with the goal of remaining in compliance with all regulations at all times.

The terms “agents” and “employees” are defined in 935 CMR 500.002.

2. Purpose

The purpose of this policy is to outline the responsibilities of JDM, including JDM’s management, employees, and agents, in order to ensure specific, methodical, and consistent compliance with the regulations and to ensure that JDM only hires qualified Marijuana Establishment agents and that JDM’s training process and curriculum are in compliance with all regulations and laws.

3. Qualifications for JDM Marijuana Establishment Agents

The minimum requirements to become a JDM Marijuana Establishment Agent (hereinafter “Agent”) are as follows. All JDM board members, directors, employees, executives, managers, or volunteers will register with the CCC as an Agent. Employee includes a consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of marijuana.

All JDM Agents must:

1. Be 21 years of age or older
2. Not 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
3. Be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

JDM will develop a job description for all positions with the company. While all agents must meet the qualifications listed above, several of JDM's positions will require additional qualifications depending on the required duties.

4. Required Training for JDM Agents

Pursuant to 935 CMR 500.105(2)(a) JDM will ensure all JDM Agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function.

1. JDM's initial training begins during employee orientation where all new agents/employees will be issued their employee handbook. Classroom or online training on this day will include but not be limited to:
 - a. Code of Conduct
 - b. Verifying Identifications
 - c. Marijuana Regulations
 - d. Security and Safety
 - e. Emergency Procedures/Disaster Plan
 - f. Diversion of Marijuana
 - g. Terminable Offenses
 - h. Confidential Information
 - i. Employee Policies (all employee policies from the handbook will be covered) including but not limited to:
 - i. Alcohol, smoke, and drug-free workplace
 - ii. Equal Employment Policy
 - iii. Anti-Harassment and Sexual Harassment Policy
 - iv. Americans with Disability Act
 - v. Employee Assistance Policy
 - vi. Diversity Plan
2. After the initial training is complete, agents will be trained on job specific areas depending on their duties. This training can be done in a classroom setting, online, or computerized, on the job training ("OJT") or through external training platforms.
3. All JDM agents will receive a minimum of 8 hours training annually.
4. JDM will record, maintain and store documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of the presenters. These records will be stored in the Agents Personnel File. Training records will be retained by JDM for at least one year after agents' termination.
5. When implemented by the CCC and available, JDM will required all of its Agents to attend and complete a Responsible Vendor Training Program to become designated as a "responsible vendor"
 - a. After the responsible vendor designation is applied each JDM owner, manager, and employee involved in the handling and sale of marijuana for adult use will

successfully complete the program once every year thereafter to maintain designation as a “responsible vendor”

b. Although administrative agents/employees who do not handle or sell marijuana are not required to take the responsible vendor program, JDM will allow and encourage them to attend on a voluntary basis

c. JDM will maintain records of responsible vendor training program compliance for four years and make them available to inspection by the CCC and any other applicable licensing authority upon request during normal business hours.

5. Additional Training

JDM will provide training and training opportunities to its agents/employees. In addition to required training, JDM will encourage advanced training to JDM agents/employees in the following areas through the Milford Regional Medical Center or otherwise:

1. CPR for Family and Friends

i. This class is designed primarily for those who want to learn CPR and foreign-body airway obstruction relief skills for the rescue of family and friends. This is not a certification class

2. Heartsaver CPR AED

i. This course teaches adult, infant and child CPR and AED use, as well as how to relieve choking on adults, infants and children

3. Basic Life Support (BLS) CPR

i. The course is intended for participants who provide health care, or anyone who is required to take a healthcare provider course for employment.

In addition to the above, JDM will also offer training in:

1. Workplace Basic Safety

2. Basic Fire Safety

3. Product Diversion

4. Other relevant training programs

POLICY AND PROCEDURE

MAINTAINING FINANCIAL RECORDS

1. Intent

JDM Sales, Inc. (hereinafter “JDM”) is committed to being compliant with all regulations outlined in 935 CMR 500.00 et. seq. (hereinafter the “regulations”) and any other requirements or guidance issued by the Cannabis Control Commission (hereinafter the “CCC”) or any other regulatory agency.

JDM intends on providing clear and concise instructions to JDM employees regarding the maintenance of financial records with the goal of remaining in compliance with all regulations at all times.

2. Purpose

The purpose of this policy is to outline the responsibilities of JDM, including JDM’s management, employees, and agents, in order to ensure specific, methodical, and consistent compliance with the regulations and to ensure that JDM’s financial records are maintained in compliance with all regulations.

3. Policy

JDM’s financial records will be kept and maintained according to generally accepted accounting principles. The JDM President is responsible for all accounting responsibilities and will engage the services of external Accountants and Tax Professionals to ensure proper accounting compliance. Once operational, JDM will hire or engage as a contractor a bookkeeper with experience in business accounting to assist in the maintaining of these records.

All JDM financial/business records will be available for inspection to the Commission upon request.

JDM will maintain all business records in Manual and electronic (computerized) form. These records shall include but are not limited to;

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, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a

Marijuana Establishment, including members of the nonprofit corporation, if any. In relation to the maintenance of financial records, JDM will incorporate the following into our business operations;

1. JDM will engage the services of a professional payroll and human resources company to assist in Human resources management and payroll services for our employees
2. JDM will engage a banking relationship in Massachusetts to provide banking services for JDM.
3. JDM will use up to date financial software programs for all financial transactions.
4. JDM does not plan to make cash transactions with other Marijuana Establishments. All transactions shall be made using traditional banking transactions including checks, wire transfers, debit cards or credit cards.
5. On an annual basis, JDM will engage the services of an independent certified public accountant who is preferably experienced in the legal marijuana industry, to conduct a financial audit of the JDM financial records (books).
6. JDM will engage the services of an industry experienced tax professional for the filing of all required state and federal tax documents.

4. Access by the Commission

JDM electronic and hard copy (written) records will be available to the Commission upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection.

5. Access by the Massachusetts Department of Revenue (“DOR”)

JDM electronic and hard copy (written) records will be made available upon request by the DOR. Accounting records and information in electronic format will be provided in a searchable electronic format if requested by the DOR. Any additional reports and schedules relating to the preparation of tax returns will be maintained and made available upon request. Inventory system data as well as any additional purchase reports, schedules or documentation that reconcile to other books and records, such as purchase journals or a general ledger, will also be maintained and made available upon request.

These records will be kept so long as their contents are material in the administration of Massachusetts tax laws. At a minimum, unless the DOR consents in writing to an earlier destruction, the records will be preserved until the statute of limitations for making additional assessments for the period for which the return was due has expired. The DOR may require a longer retention period, such as when the records are the subject of an audit, court case, or other proceeding.

Additionally, JDM will comply with all records retention requirements outlined in the DOR Regulations including but limited to 830 CMR 62C.25.1: Record Retention.

6. Point of Sale (POS) Systems

JDM will utilize a POS system that complies with the requirements in G.L. c. 62C, § 25; 830 CMR 62C.25.1 (the Records Retention Regulation); and the Massachusetts Department of Revenue (“DOR”) Directive 16-1 “Recordkeeping Requirements for Sales and Use Tax Vendors Utilizing Point of Sale (POS) Systems”

1. Our POS system will record all transactions in a manner that will allow the DOR to verify what was sold and whether the appropriate amount of tax was collected. Along with the data in the POS system, JDM will maintain the following records:

- a. A journal or its equivalent, which records daily all non-cash transactions affecting accounts payable;
- b. A cash journal or its equivalent, which records daily all cash receipts and cash disbursements, including any check transactions;
- c. A sales slip, invoice, cash register tape, or other document evidencing the original transaction, which substantiates each entry in the journal or cash journal;
- d. Memorandum accounts, records or lists concerning inventories, fixed assets or prepaid items, except in cases where the accounting system clearly records such information; and
- e. A ledger to which totals from the journal, cash journal and other records have been periodically posted. The ledger must clearly classify the individual accounts receivable and payable and the capital account.

2. Each POS transaction record will provide enough detail to independently determine the taxability of each sale and the amount of tax due and collected. Information on each sales transaction will include, but is not limited to the:

- a. individual item(s) sold,
- b. selling price,
- c. tax due,
- d. invoice number,
- e. date of sale,
- f. method of payment, and
- g. POS terminal number and POS transaction number.

3. JDM will maintain auditable internal controls to ensure the accuracy and completeness of the transactions recorded in the POS system. The audit trail details include, but are not limited to:

- a. Internal sequential transaction numbers;
- b. Records of all POS terminal activity; and
- c. Procedures to account for voids, cancellations, or other discrepancies in sequential numbering.

d. The POS audit trail or logging functionality must be activated and operational at all times, and it must record:

e. Any and all activity related to other operating modes available in the system, such as a training mode; and

f. Any and all changes in the setup of the system.

7. Off-Site Storage of Duplicate Records

JDM shall maintain complete duplicate sets of all financial records. Such duplicate sets of financial records shall be stored at a secure location within Massachusetts but other than the dispensary location. Access to the secure location shall be limited. Access shall be granted to only such persons who, in the sole discretion of the JDM president, need access in order to properly perform their duties.

JDM shall not utilize software or other methods to manipulate or alter sales data in compliance with 935 CMR 500.140(6).

JDM shall conduct a monthly analysis of equipment to determine that no software has been installed that could be utilized to manipulate or alter sales data in compliance with 935 CMR 500.140(6).

JDM shall maintain records that it has preformed the monthly analysis in compliance with 935 CMR 500.140(6).

JDM shall immediately disclose information to the CCC if it is determined that software or other methods have been installed/utilized to manipulate or alter sales data in compliance with 935 CMR 500.140.

A retailer that is co-located shall maintain and provide to the Commission on a biannual basis accurate sales data during the six months immediately preceding this application for the purpose of ensuring adequate supply of marijuana and marijuana products under 935 CMR 500.140(10) and 935 CMR 500.140(6) (*required for retail only*).

JDM Sales, Inc. Diversity Plan

Vishnubhai B. Patel (hereinafter “Mr. Patel”) is a minority applicant. Therefore, his company, JDM Sales, Inc. is firmly committed to creating a culture of inclusion and creativity. These principles shall guide how Mr. Patel intends on building his workforce, cultivate future minority leaders and create a company of true inclusion instead of the status quo.

Diversity is extremely important to Mr. Patel. As a minority, Mr. Patel has witnessed disparate and unfair treatment of minorities and women. As the father of minority children, Mr. Patel has witnessed firsthand, disparate treatment of his own children. As a result, he recognizes how difficult it can be for minorities and women to realize their dreams in society.

This Diversity Plan is designed to correct such disparate treatment. As a business owner, Mr. Patel is in the unique position to do so. Mr. Patel has vast experience in retail sales. He already owns several variety stores and gas stations. He has always made it a goal to hire minority and women applicants in order to give them a chance to succeed. In addition, he continues to work closely with those minorities who want to achieve a better life by offering training and assistance thus helping them achieve career goals. As a result of his efforts, some of Mr. Patel’s former employees own their own stores. Mr. Patel intends on continuing his mentorship work with JDM Sales, Inc.

Diversity goals will be reviewed and documented on an annual basis starting one year from receiving a provisional license. Documentation of the results of these reviews will be stored for a minimum of three (3) years and will be available for the Cannabis Control Commission’s review upon request.

Measurable Goal: Assemble a diverse staff, including minorities, women, veterans, people with disabilities, and LGBTQ+. Mr. Patel wants to see a staff comprised of at least fifty percent (50%) women and ten percent (10%) veterans by the end of year 1. However, JDM Sales, Inc. shall not discriminate against any applicant. JDM Sales, Inc. will concentrate on hiring the following:

- **50% WOMEN**
- **10% VETERANS**

Metrics: JDM Sales, Inc. will establish the number of individuals hired who are women and veterans. This number will be assessed from the total number of employees to ensure that 50% of all individuals hired are women and 10% of all individuals hired are veterans, thus achieving our goal.

Program 1 – Advertising: JDM Sales, Inc. will post at least quarterly advertisements in newspapers of the dispensary’s choosing that are in general circulation in communities that are

within a ten mile radius of the proposed dispensary stating that the dispensary is specifically targeting women and veterans to hire.

Also, JDM Sales, Inc. intends on adding a “Careers” section to its website once the website is active. Within the “Careers” section, JDM Sales, Inc. will prominently display information stating that the dispensary is recruiting women and veterans to hire.

Program 2 – Recruitment and Hiring: Continue to improve the recruitment, search, and hiring process to enhance the potential for increasing diversity of the staff.

JDM Sales, Inc. will develop, review and revise a hiring guide and provide training as needed.

Also, the dispensary will establish and implement a plan for outreach to local communities, organizations, and affinity groups to develop connections for hiring diverse groups locally.

In order to promote diversity and equality in hiring and recruitment procedures, JDM Sales, Inc. will:

1. Implement a “blind-hiring” policy that anonymizes the demographic information about a candidate from the recruiter or hiring manager to prevent bias
2. Human Resource training for hiring managers and recruiters that addresses unconscious bias and cultural sensitivity.
3. Use job descriptions that cater to and appeal to diverse candidates
4. Engage with industry trade groups, training companies, and recruitment companies that promote diversity and inclusion.

Program 3 – Internship Program: Create an internship program whereby JDM Sales, Inc. offers a paid intern position to veteran and woman applicants looking to learn management and operations of a marijuana dispensary.

JDM Sales, Inc. will mentor/train a qualified applicant, teaching and helping the applicant learn all of the complex duties and responsibilities relative to operating a cannabis dispensary.

JDM Sales, Inc. will mentor a minimum of two interns per year. Each internship shall last up to six months. One internship will be awarded approximately every six months. JDM Sales, Inc. will choose from a pool of applicants and choose either one woman applicant or one veteran applicant.

The intern will be trained and become proficient at all job descriptions within the dispensary including but not limited to Dispensary Associate, Order Fulfillment Associate, Security Associate, Facilities Associate, Operations Associate, and most or all other positions within the dispensary.

At the conclusion of the intern's training, the dispensary will provide job placement assistance for the applicant.

Program 5 – Internal Newsletter Program: JDM Sales, Inc. will distribute a monthly internal workplace newsletter encouraging current employees to recommend women and veterans for employment opportunities. It must be noted that JDM shall not discriminate against other individuals who are minorities, persons with disabilities, and LGBTQ+.

This recruitment method will help motivate current employees to recommend such individuals by offering incentives to employees who recommend applicants who are ultimately hired by JDM Sales, Inc.

Attestation:

1. JDM Sales, Inc. 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 Marijuana Establishments, and
2. Any action taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

JDM Sales, Inc. – Energy Compliance Plan

Plan:

In effort to mitigate its environmental impact, JDM Sales, Inc. (hereinafter, “JDM”) will utilize best management practices to reduce energy consumption at its dispensary located at 103 Uxbridge Road, Mendon, Massachusetts. While JDM does not own the premises, JDM has been involved in the design of the building. JDM is working with the general contractor to make sure that energy efficiency is a priority. All construction shall meet or exceed the Massachusetts State Energy Code.

In addition, once operating, JDM shall ensure that operation of the dispensary will be executed with an eye on energy efficiency. Therefore, some methods of achieving same are as follows:

1. JDM will utilize as much natural lighting as possible to reduce electricity usage.
2. JDM will have motion detector light switches in all low traffic areas such as offices, conference room, etc.
3. All appliances shall be Energy Star rated.
4. Although all construction shall be in compliance with Massachusetts state energy code, when feasible, JDM will attempt to exceed state energy code.

JDM will ensure the facility remains in compliance with the energy efficiency and conservation regulations codified in 935 CMR 500.105(1)(q) and 500.105(15).