



## Massachusetts Cannabis Control Commission

### Marijuana Retailer

#### General Information:

License Number: MR284009  
Original Issued Date: 10/15/2021  
Issued Date: 10/13/2022  
Expiration Date: 10/15/2023

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Massachusetts Citizens for Social Equity LLC

Phone Number: 734-323-1822

Email Address: ankur@c3industries.com

Business Address 1: 561 Dudley Street

Business Address 2:

Business City: Boston

Business State: MA

Business Zip Code: 02125

Mailing Address 1: 4420 Varsity Drive

Mailing Address 2:

Mailing City: Ann Arbor

Mailing State: MI

Mailing Zip Code: 48108

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

### PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

### RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: Percentage Of Control: 51

Role: Executive / Officer

Other Role:

First Name: Brian

Last Name: Chavez

Suffix:

Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: Decline to Answer	
Specify Race or Ethnicity:	

Person with Direct or Indirect Authority 2

Percentage Of Ownership:	Percentage Of Control: 16.33	
Role: Executive / Officer	Other Role:	
First Name: Ankur	Last Name: Rungta	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: Decline to Answer		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 3

Percentage Of Ownership:	Percentage Of Control: 16.33	
Role: Executive / Officer	Other Role:	
First Name: Vishal	Last Name: Rungta	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: Decline to Answer		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 4

Percentage Of Ownership:	Percentage Of Control: 16.34	
Role: Executive / Officer	Other Role:	
First Name: Joel	Last Name: Ruggerio	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: Decline to Answer		
Specify Race or Ethnicity:		

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 49	Percentage of Ownership: 49	
Entity Legal Name: C3 Industries Inc.	Entity DBA:	DBA City:
Entity Description: Holding Company		
Foreign Subsidiary Narrative:		
Entity Phone:	Entity Email:	Entity Website:
Entity Address 1:	Entity Address 2:	
Entity City:	Entity State:	Entity Zip Code:
Entity Mailing Address 1:	Entity Mailing Address 2:	
Entity Mailing City:	Entity Mailing State:	Entity Mailing Zip Code:
Relationship Description: C3 Industries Inc. is the holding company for Massachusetts Citizens for Social Equity LLC ("MCSE"). C3 Industries Inc. owns 49% of MCSE.		

Entity with Direct or Indirect Authority 2

Percentage of Control: 51	Percentage of Ownership: 51	
Entity Legal Name: Chavez Retail Holdings LLC	Entity DBA:	DBA

**Entity Description:** Holding Company

**Foreign Subsidiary Narrative:**

**Entity Phone:**

**Entity Email:**

**Entity Website:**

**Entity Address 1:**

**Entity Address 2:**

**Entity City:**

**Entity State:**

**Entity Zip Code:**

**Entity Mailing Address 1:**

**Entity Mailing Address 2:**

**Entity Mailing City:**

**Entity Mailing State:**

**Entity Mailing Zip Code:**

**Relationship Description:** Chavez Retail Holdings LLC is the holding company for Massachusetts Citizens for Social Equity LLC ("MCSE"). Chavez Retail Holdings LLC owns 51% of MCSE.

#### CLOSE ASSOCIATES AND MEMBERS

No records found

#### CAPITAL RESOURCES - INDIVIDUALS

No records found

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

##### Business Interest in Other State 1

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

**Owner First Name:** C3

**Owner Last Name:**

**Owner Suffix:**

Industries Inc.

**Entity Legal Name:** QPS Holdings LLC

**Entity DBA:**

**Entity Description:** Oregon Cannabis businesses (cultivation, manufacturing, retail etc.)

**Entity Phone:** 734-323-1822

**Entity Email:**

**Entity Website:**

ankur@c3industries.com

**Entity Address 1:** 10160 North Lombard St

**Entity Address 2:**

**Entity City:** Portland

**Entity State:** OR

**Entity Zip Code:** 97203

**Entity Country:** United States

**Entity Mailing Address 1:** 4420 Varsity Drive

**Entity Mailing Address 2:**

**Entity Mailing City:** Ann Arbor

**Entity Mailing State:** MI

**Entity Mailing Zip Code:**

48108

**Entity Mailing Country:** United States

##### Business Interest in Other State 2

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

**Owner First Name:** C3

**Owner Last Name:**

**Owner Suffix:**

Industries Inc.

**Entity Legal Name:** QPS Michigan Holdings LLC

**Entity DBA:**

**Entity Description:** Michigan Cannabis businesses (cultivation, manufacturing, retail etc.)

**Entity Phone:** 734-323-1822

**Entity Email:**

**Entity Website:**

ankur@c3industries.com

**Entity Address 1:** 4420 Varsity Drive

**Entity Address 2:**

**Entity City:** Ann Arbor

**Entity State:** MI

**Entity Zip Code:** 48108

**Entity Country:** United States

**Entity Mailing Address 1:** 4420 Varsity Drive

**Entity Mailing Address 2:**

**Entity Mailing City:** Ann Arbor

**Entity Mailing State:** MI

**Entity Mailing Zip Code:**

**Entity Mailing Country:** United States

48108	States
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#### Business Interest in Other State 3

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

Owner First Name: C3      Owner Last Name:      Owner Suffix:  
Industries

Entity Legal Name: QPS Missouri Holdings LLC      Entity DBA:

Entity Description: Missouri Cannabis businesses (cultivation, manufacturing, retail etc.)

Entity Phone: 734-323-1822      Entity Email:      Entity Website:  
ankur@c3industries.com

Entity Address 1: 122 East High Street, Floor 3      Entity Address 2:

Entity City: Jefferson City      Entity State: MO      Entity Zip Code: 65101      Entity Country: United States

Entity Mailing Address 1: 4420 Varsity Drive      Entity Mailing Address 2:

Entity Mailing City: Ann Arbor      Entity Mailing State: MI      Entity Mailing Zip Code: 48108      Entity Mailing Country: United States

#### Business Interest in Other State 4

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

Owner First Name: C3      Owner Last Name:      Owner Suffix:  
Industries Inc.

Entity Legal Name: QPS 20327 Groesbeck LLC      Entity DBA:

Entity Description: Michigan medical marijuana provisioning center

Entity Phone: 734-323-1822      Entity Email:      Entity Website:  
Ankur@c3industries.com

Entity Address 1: 20327 Groesbeck Hwy      Entity Address 2:

Entity City: Detroit      Entity State: MI      Entity Zip Code: 48205      Entity Country: United States

Entity Mailing Address 1: 4420 Varsity Drive      Entity Mailing Address 2:

Entity Mailing City: Ann Arbor      Entity Mailing State: MI      Entity Mailing Zip Code: 48108      Entity Mailing Country: United States

#### DISCLOSURE OF INDIVIDUAL INTERESTS

##### Individual 1

First Name: Brian      Last Name: Chavez      Suffix:

Marijuana Establishment Name: Massachusetts Citizens for Social Equity LLC      Business Type: Marijuana Retailer

Marijuana Establishment City: Boston      Marijuana Establishment State: MA

##### Individual 2

First Name: Brian      Last Name: Chavez      Suffix:

Marijuana Establishment Name: Erba C3 Dorchester LLC      Business Type: Marijuana Retailer

Marijuana Establishment City: Boston      Marijuana Establishment State: MA

##### Individual 3

First Name: Ankur      Last Name: Rungta      Suffix:

Marijuana Establishment Name: QPS Massachusetts Holdings, LLC      Business Type: Marijuana Cultivator

Marijuana Establishment City: Franklin      Marijuana Establishment State: MA

##### Individual 4

First Name: Ankur      Last Name: Rungta      Suffix:



Marijuana Establishment Name: QPS Massachusetts Holdings, LLC

Marijuana Establishment City: Franklin

Business Type: Marijuana Product Manufacture

Marijuana Establishment State: MA

Individual 5

First Name: Ankur

Last Name: Rungta

Suffix:

Marijuana Establishment Name: Erba C3 Dorchester LLC

Marijuana Establishment City: Dorchester

Business Type: Marijuana Retailer

Marijuana Establishment State: MA

Individual 6

First Name: Vishal

Last Name: Rungta

Suffix:

Marijuana Establishment Name: QPS Massachusetts Holdings, LLC

Marijuana Establishment City: Franklin

Business Type: Marijuana Cultivator

Marijuana Establishment State: MA

Individual 7

First Name: Vishal

Last Name: Rungta

Suffix:

Marijuana Establishment Name: QPS Massachusetts Holdings, LLC

Marijuana Establishment City: Franklin

Business Type: Marijuana Product Manufacture

Marijuana Establishment State: MA

Individual 8

First Name: Vishal

Last Name: Rungta

Suffix:

Marijuana Establishment Name: Erba C3 Dorchester LLC

Marijuana Establishment City: Dorchester

Business Type: Marijuana Retailer

Marijuana Establishment State: MA

Individual 9

First Name: Joel

Last Name: Ruggiero

Suffix:

Marijuana Establishment Name: QPS Massachusetts Holdings, LLC

Marijuana Establishment City: Franklin

Business Type: Marijuana Cultivator

Marijuana Establishment State: MA

Individual 10

First Name: Joel

Last Name: Ruggiero

Suffix:

Marijuana Establishment Name: QPS Massachusetts Holdings, LLC

Marijuana Establishment City: Franklin

Business Type: Marijuana Product Manufacture

Marijuana Establishment State: MA

Individual 11

First Name: Joel

Last Name: Ruggiero

Suffix:

Marijuana Establishment Name: Erba C3 Dorchester LLC

Marijuana Establishment City: Dorchester

Business Type: Marijuana Retailer

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 561 Dudley Street

Establishment Address 2:

Establishment City: Boston

Establishment Zip Code: 02125

Approximate square footage of the establishment: 5710

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

How many abutters does this property have?: 7

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload
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				Date
Certification of Host Community Agreement	MCSE_Dudley St_CCC Cert.pdf	pdf	602b15db4cfbf7366ef3f244	02/15/2021
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning.pdf	pdf	602b24a584d16335f02255a9	02/15/2021
Community Outreach Meeting Documentation	MCSE Roxbury- Community Outreach Meeting Attestation (Final).pdf	pdf	60662764d90419077cc35525	04/01/2021

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 (Updated).pdf	pdf	603d9c98b64912358e312615	03/01/2021

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### INDIVIDUAL BACKGROUND INFORMATION

##### Individual Background Information 1

Role: Other Role:  
 First Name: Brian Last Name: Chavez Suffix:  
 RMD Association: Not associated with an RMD  
 Background Question: yes

##### Individual Background Information 2

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

##### Individual Background Information 3

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

##### Individual Background Information 4

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

#### ENTITY BACKGROUND CHECK INFORMATION

##### Entity Background Check Information 1

<b>Role:</b> Parent Company	<b>Other Role:</b>
<b>Entity Legal Name:</b> C3 Industries Inc.	<b>Entity DBA:</b>
<b>Entity Description:</b> Holding Company	
<b>Phone:</b> 734-323-1822	<b>Email:</b> ankur@c3industries.com
<b>Primary Business Address 1:</b> 4420 Varsity Drive	<b>Primary Business Address 2:</b>
<b>Primary Business City:</b> Ann Arbor	<b>Primary Business State:</b> MI <b>Principal Business Zip Code:</b> 48108
<b>Additional Information:</b>	

#### Entity Background Check Information 2

<b>Role:</b> Parent Company	<b>Other Role:</b>
<b>Entity Legal Name:</b> Chavez Retail Holdings LLC	<b>Entity DBA:</b>
<b>Entity Description:</b> Holding Company	
<b>Phone:</b> 617-817-5615	<b>Email:</b> donchavez@gmail.com
<b>Primary Business Address 1:</b> 561 Dudley Street	<b>Primary Business Address 2:</b>
<b>Primary Business City:</b> Roxbury	<b>Primary Business State:</b> MA <b>Principal Business Zip Code:</b> 02119
<b>Additional Information:</b>	

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	MCSE - Cert. of Organization.pdf	pdf	602b29a665c0d035fcc4e240	02/15/2021
Secretary of Commonwealth - Certificate of Good Standing	Good Standing Cert MCSE Sec of State.pdf	pdf	602b29c34e95aa35cfc241e6	02/15/2021
Secretary of Commonwealth - Certificate of Good Standing	Cert of Good Standing Unemployment Office MCSE.pdf	pdf	602b29d46d809f35defbc809	02/15/2021
Department of Revenue - Certificate of Good standing	DOR Cert. Good Standing.pdf	pdf	602b35381681d1368fdb59c3	02/15/2021
Bylaws	Massachusetts Citizens for Social Equity LLC - Operating Agreement (Final Fully Executed).pdf	pdf	60662a94a9f50407ba30e9c2	04/01/2021

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	MCSE Cert of Good Standing_DOR_July 13, 2022.pdf	pdf	62f9a1d07deb3b000904a37a	08/14/2022
Secretary of Commonwealth - Certificate of Good Standing	MCSE Cert_good_standing_SecofState_2022.pdf	pdf	62f9a1d17deb3b000904a38e	08/14/2022
Department of Unemployment Assistance - Certificate of Good standing	Dept of unemployment Assistance_MCSE_Cert of Compliance_July 6, 2022.pdf	pdf	62f9a1d41e960b0009ff3b32	08/14/2022

**Massachusetts Business Identification Number:** 001362087

**Doing-Business-As Name:** High Profile X Budega

**DBA Registration City:** Boston

## BUSINESS PLAN

### Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Business Plan.pdf	pdf	602b2a641681d1368fdb59a4	02/15/2021
Plan for Liability Insurance	Plan to Obtain Liability Insurance.pdf	pdf	602b2a67238c3036b0f86a25	02/15/2021
Proposed Timeline	12_MCSE Renewal_Timeline Update_561 Dudley_FINAL.pdf	pdf	62fae4be6b64fa00075b07ac	08/15/2022

## OPERATING POLICIES AND PROCEDURES

### Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan to Obtain Products.pdf	pdf	602b2a8e6d809f35defbc80d	02/15/2021
Separating recreational from medical operations, if applicable	Separating Rec. from Med..pdf	pdf	602b2a8e4cfbf7366ef3f26a	02/15/2021
Restricting Access to age 21 and older	Restricting Access to Age 21+.pdf	pdf	602b2a8f604cbb361671034e	02/15/2021
Transportation of marijuana	Transportation Policy.pdf	pdf	602b2abe238c3036b0f86a29	02/15/2021
Maintaining of financial records	Financial Record Maintenance.pdf	pdf	602b2ada4e95aa35cfc241ef	02/15/2021
Diversity plan	Diversity Plan (2).pdf	pdf	60662d2b3e0ae507c9313213	04/01/2021
Personnel policies including background checks	C_I_MCSE_SOP_Staffing Plan_COMPLETE.pdf	pdf	62f9a46f1e960b0009ff3be6	08/14/2022
Storage of marijuana	D_MCSE_SOP_Storage of Marijuana_COMPLETE.pdf	pdf	62f9a4707deb3b000904a468	08/14/2022
Inventory procedures	G_2_MCSE_SOP_Inventory Protocols_COMPLETE.pdf	pdf	62f9a4717deb3b000904a47c	08/14/2022
Dispensing procedures	1_MCSE_SOP_Retail Sales Policy_COMPLETE.pdf	pdf	62f9a4727deb3b000904a490	08/14/2022
Security plan	A_MCSE_SOP_Security Plan_002_COMPLETE.pdf	pdf	62f9a4741e960b0009ff3bfa	08/14/2022
Qualifications and training	MCSE_Qualifications & Training with Manual_561 Dudley.pdf	pdf	62f9a5141e960b0009ff3c5c	08/14/2022
Prevention of diversion	P_MCSE_SOP_Diversion Prevention_COMPLETE.pdf	pdf	62f9a5157deb3b000904a4de	08/14/2022
Energy Compliance Plan	Q_12_MCSE PPLI_Energy Efficiency SOP_COMPLETE.pdf	pdf	62f9a5161e960b0009ff3c70	08/14/2022
Record Keeping procedures	G_MCSE_SOP_Recordkeeping_COMPLETE.pdf	pdf	62f9a5177deb3b000904a4f2	08/14/2022
Quality control and testing	H_MCSE_SOP_Quality Control_COMPLETE.pdf	pdf	62f9a5191e960b0009ff3c84	08/14/2022

## MARIJUANA RETAILER SPECIFIC REQUIREMENTS

### Adequate Patient Supply Documentation:

Document Category	Document Name	Type	ID	Upload Date
	14a_MCSE Renewal_Retail Specific Requirements Letter_561 Dudley.pdf	pdf	62fae5231e960b000901166b	08/15/2022

Reasonable Substitutions of Marijuana Types and Strains Documentation:

Document Category	Document Name	Type	ID	Upload Date
	14b_MR284097 MCSE Renewal_Retail Specific Requirements Letter_561 Dudley.pdf	pdf	62f9a7951e960b0009ff3d1b	08/14/2022

### 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:** The Company has not commenced the operation of its Marijuana Retailer at 561 Dudley in the City of Boston, Massachusetts. As such, the Company has not commenced its hiring efforts to staff the facility. As a result, it has not been required to commence its hiring efforts aimed at improving the employment within the areas of disproportionate impact that were identified by the Company.

Notwithstanding the foregoing, the Company has satisfied its obligation to provide its annual financial contribution, in the amount of \$5,000.00, to its community partner, Orchard Gardens Residents Association. A copy of the cheque to evidence the donation is included with this renewal application.

In addition, despite the Company not yet commencing the operation of its facility, it has developed policies and procedures that it will immediately implement to ensure it satisfies its obligations. A copy of the Company's positive impact policy is also included with this renewal application.

The Company plans to move closer towards its operational status by the end of the year. As such, it will begin hiring in compliance with its

obligations set out in its positive impact plan. The Company will ensure it satisfies its obligations and will provide any information requested by the Commission in a timely manner upon request.

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

**Description of Progress or Success:** The Company has not commenced the operation of its Marijuana Retailer at 561 Dudley Street, Boston, MA 02125. As such, the Company has not commenced its hiring efforts to staff the facility. As a result, many of the Company's diversity commitments remain inapplicable until it moves closer to operational status.

Notwithstanding the foregoing, the Company has developed operational policies and procedures that will be immediately implemented to ensure it satisfies its diversity obligation. A copy of the Company's diversity policy is included with this renewal application.

The Company intends to host a virtual job fair within the coming months. It will ensure it satisfies its obligations and will provide any information requested by the Commission in a timely manner upon request.

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

## Host Community Agreement Certification Form

### Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. Please note that submission of information that is "misleading, incorrect, false, or fraudulent" is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

### Certification

The parties listed below do certify that the applicant and municipality have executed a host community agreement on the specified date below pursuant to G.L. c. 94G § 3(d):

1. Name of applicant:

Massachusetts Citizens for Social Equity LLC

2. Name of applicant's authorized representative:

Brian Chavez

3. Signature of applicant's authorized representative:

*Brian Chavez*

4. Name of municipality:


Boston

5. Name of municipality's contracting authority or authorized representative:

Robert Arcangeli



6. Signature of municipality's contracting authority or authorized representative:



7. Email address of contracting authority or authorized representative of the municipality (*this email address may be used to send municipal notices pursuant to 935 CMR 500.102(1) and 501.102(1).*):

robert.arcangeli@boston.gov

8. Host community agreement execution date:

9/11/20





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

The City of Boston (the “**City**”) amended its zoning code at a on April 13, 2018, to allow the dispensing of marijuana for adult-use in the various neighborhoods and subdistricts throughout the City of Boston.

Massachusetts Citizens for Social Equity LLC (the “**Company**”), is proposing to develop and operate a Marijuana Establishment at 561 Dudley Street, Roxbury, MA 02125 (the “**Property**”). This site is located in the Roxbury Neighborhood Zoning District and the Multi-Family Residential / Local Shopping (MFR/LS) Zoning Subdistrict. Pursuant to Article 50, Section 28 of the Zoning code for the City of Boston (the “**Ordinance**”), the use of the Property for a Marijuana Establishment is permitted, subject to the receipt of a license from the Boston Cannabis Board (the “**Board**”), the granting of a Use Variance and any other relief deemed necessary by the City of Boston Zoning Board of Appeals (the “**Zoning Board**”), and the execution of a Host Community Agreement with the City. Please see the attached zoning bylaws and zoning map for reference.

The Company has discussed its marijuana retail facility with City officials including, but not limited to the, Mayor’s Office, City Council, Inspectional Services Department and Police Department. The Company has also executed a Host Community Agreement with the City, and received a license from the Board and approvals from the Zoning Board. Please see a copy of the zoning decision and licensing board approval attached hereto and incorporated herewith.

The Company plans to continue to work with officials from the City to ensure the operations will have a positive impact on the community and will work diligently to obtain all necessary approvals and permitting.

The Company hereby submits that it will continue to comply with all local and state requirements and Brian Chavez, Owner and CEO, will be responsible for ongoing compliance with local and state rules and regulations.



City of Boston  
Mayor Martin J. Walsh  
Board of Appeal

**NOTICE OF DECISION  
CASE NO. BOA953865  
PERMIT #ALT923098  
APPEAL SUSTAINED  
WITH PROVISOS**

In reference to appeal of

Massachusetts for Citizens for Social Equity, LLC

Concerning premises

561 Dudley Street, Ward 13

to vary the application of the Zoning Act, Ch. 665, Acts of 1956, as amended, in this specific case, I beg to advise that the petition has been granted.

Decision has been filed in the office of the Commissioner of the Inspectional Services Department, 1010 Massachusetts Avenue, fifth floor, Boston, MA 02118, and is open for public inspection. Date of entry of this decision in the Inspectional Services Department was January 13, 2021.

Please be advised, due to the ongoing COVID-19 public health emergency, this decision of the Board has been reviewed and signed electronically by the signing Board Members. The addition of the certification of the Executive Secretary to the signature page attests that each Board Member who has signed this decision electronically has had an opportunity to review the written decision and has given his or her express written permission to the Executive Secretary to sign this decision electronically.

**FOR THE BOARD OF APPEAL**

**/s/Kevin P. O'Connor, Jr.**

**Kevin P. O'Connor, Jr.  
Principal Administrative Assistant**



## DECISION OF THE BOARD ON THE APPEAL OF

November 10 2020

Date

Massachusetts for Citizens for Social Equity, LLC  
to vary the terms of the Boston Zoning Code, under Statute 1956, Chapter 665, as amended, Section 8, at premises:

561 Dudley Street, Ward - 13

For the terms of the Boston Zoning Code (see Acts of 1956, c. 665) in the following respect: - Variance

Article(s): Article 50 Section 28 Use Regulations. Cannabis Establishment is a Forbidden use in a  
MFR/LS Sub-district

Article 50 Section 29 Side Yard Insufficient. Proposed addition has insufficient side yard.

Article 53 Section 29 Lot Area Insufficient

Article 53 Section 29 Lot Frontage Insufficient

Article 53 Section 29 Front Yard Insufficient

Article 53 Section 29 Floor Area Ratio Excessive

Article 53 Section 29 Off-Street Parking & Loading Req Parking on adjacent lot

Purpose: Change occupancy to include cannabis dispensary

In his formal appeal, the Appellant states briefly in writing the grounds of and the reasons for his appeal from the refusal of the Building Commissioner, as set forth in papers on file numbered BOA953865 and made a part of this record.

In conformity with the law, the Board mailed reasonable notice of the public hearing to the petitioner and to the owners of all property deemed by the Board to be affected thereby, as they appeared on the then most recent local tax lists, which notice of public hearing was duly advertised in a daily newspaper published in the City of Boston, namely:

THE BOSTON HERALD on Tuesday, October 20, 2020

The Board took a view of the petitioner's land, examined its location, layout and other characteristics.

The Boston Planning & Development Agency was sent notice of the appeal by the Building Department and the legal required period of time was allotted to enable the BPDA to render a recommendation to the Board, as prescribed in the Code.

After hearing all the facts and evidence presented at the public hearing held on Tuesday, November 10, 2020 in accordance with notice and advertisement aforementioned, the Board finds as follows:

The Appellant appeals to be relieved of complying with the aforementioned section of the Boston Zoning Code, all as per Application for Permit# ALT923098 and filed February 13, 2019 plans submitted to the Board at its hearing and now on file in the Building Department



## DECISION OF THE BOARD ON THE APPEAL OF

561 Dudley Street, Ward 13  
BOA-953865  
Date of Hearing: November 10, 2020  
Permit # ALT923098  
Page # 2

In this appeal, the Petitioner seeks a variance pursuant to Article 7, § 7-3 of the Boston Zoning Code relating to Article 50, § 50-28 and various dimensional variances inclusive of §§ 50-29, regarding Lot Area Insufficient, Lot Frontage Insufficient, Floor Area Ratio Excessive, Front Yard Insufficient, and Side Yard Insufficient. In addition, the Petitioner seeks a conditional use permit pursuant to Article 6, § 6-3 relating to Article 50, § 50-43 regarding Off-Street Parking & Loading, to operate a Cannabis Establishment at the building located at 561 Dudley Street, Ward 13, within the Roxbury Neighborhood Zoning District ("the Premises").

### **BACKGROUND**

The Petitioner received a zoning code refusal from Plans Examiner James M. Kennedy, on behalf of the Commissioner, on March 29, 2019. It appealed said refusal on or about May 16, 2019 and was given a public hearing date of November 10, 2020.

At the public hearing the Petitioner presented facts and materials, as to how it satisfied the criteria for a variance and conditional use permit, as set forth in the Boston Zoning Code and public testimony was taken. A representative of the Mayor's Office of Neighborhood Services, a representative of District City Councilor President Kim Janey's Office, City Councilor Essaibi-George's Office, City Councilor Frank Baker's Office, and an abutter, all spoke in support of the Cannabis Establishment. One person spoke in opposition. Many community meetings were held, including the state required and properly noticed Community Meeting on August 13, 2019. In addition, 565 letters of support (and only 1 letter of opposition) were submitted to the Board including a letter of support from City Council President Kim Janey, City Councilor Frank Baker, State Representative Liz Miranda, and Congresswoman Ayanna Pressley.

### **DOCUMENTS FILED WITH THE CITY AND/OR THE BOARD**

The Petitioner filed the following documents:

- Appeal and Filing Fee;
- Plans prepared by Alfaro Mendoza & Company Architects and Builders;
- A Host Community Agreement executed by the Petitioner and the City of Boston on September 11, 2020; and
- Letters of support as referenced above.



DECISION OF THE BOARD ON THE APPEAL OF

561 Dudley Street, Ward 13  
BOA-953865  
Date of Hearing: November 10, 2020  
Permit # ALT923098  
Page # 3

**FINDINGS**

Based on the evidence before it, and pursuant to Article 7, § 7-3, the Board makes the following findings:

- (a) That there are special circumstances or conditions, fully described in the findings, applying to the land or structure for which the variance is sought (such as, but not limited to, the exceptional narrowness, shallowness or shape of the lot, or exceptional topographical conditions thereof), which circumstances or conditions are peculiar to such land or structure but not the neighborhood, and that said circumstances or conditions are such that the application of the provisions of this Code would deprive the appellant of the reasonable use of such land or structure;
- (b) That for reasons of practical difficulty and demonstrable and substantial hardship fully described in the findings, the granting of the variance is necessary for the reasonable use of the land or structure and that the variance as granted by the Board is the minimum variance that will accomplish this purpose; and
- (c) That the granting of the variance will be in harmony with the general purposes and intent of this Code and will not be injurious to the neighborhood or otherwise detrimental to the public welfare.

In determining its findings, the Board of Appeal has taken into account: (1) the number of persons residing or working upon such land or in such structure; (2) the character and use of adjoining lots and those in the neighborhood; and (3) traffic conditions in the neighborhood.



**DECISION OF THE BOARD ON THE APPEAL OF**

561 Dudley Street, Ward 13  
BOA-953865  
Date of Hearing: November 10, 2020  
Permit # ALT923098  
Page # 4

Based on the evidence before it, and pursuant to Article 6, § 6-3, the Board makes the further following findings:

- a) The specific site is an appropriate location for such use;
- b) The use will not adversely affect the neighborhood;
- c) There will be no serious hazard to vehicles or pedestrians from the use;
- d) No nuisance will be created by the use; and
- e) Adequate and appropriate facilities will be provided for the proper operation of the use.

**CONCLUSION**

Based on the evidence, the Board finds that all conditions required for the granting of the variances as described under Article 7, § 7-3, and for the granting of a conditional use permit as described under Article 6 § 6-3 of the Zoning Code have been met.



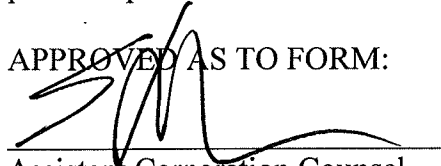
City of Boston  
Mayor Martin J. Walsh  
Board of Appeal

DECISION OF THE BOARD ON THE APPEAL OF

561 Dudley Street, Ward 13  
BOA-953865  
Date of Hearing: November 10, 2020  
Permit # ALT923098  
Page # 5

Therefore, acting under its discretionary power, the Board (the members and/or substitute members sitting on this appeal) voted unanimously to grant the requested Variances and Conditional Use Permit as described above, which annuls the refusal of the Building Commissioner and orders him to grant Variances and a Conditional Use Permit with the provisos provided below.

APPROVED AS TO FORM:

  
Assistant Corporation Counsel

PROVISO:

1. Relief applicable this Applicant only;
2. BPDA Design review for screening and buffering; and
3. Parking on Lot B shall be exclusive to this use.

Signed, January 06, 2021

/s/ Christine Araujo

Christine Araujo – Chair (Voted In Favor)

/s/ Mark Fortune

Mark Fortune – Secretary (Voted In Favor)

/s/ Mark Erlich

Mark Erlich (Voted In Favor)

/s/ Joseph Ruggiero

Joseph Ruggiero (Voted In Favor)

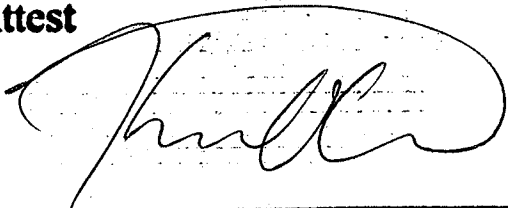
/s/ Edward Deveau

Edward Deveau (Alternate) (Voted In Favor)

/s/ Tyrone Kindell Jr.

Tyrone Kindell, Jr. (Alternate) (Voted In Favor)

**A True Copy,  
Attest**



**KEVIN O'CONNOR**  
Esq. Assistant Corporation Counsel



City of Boston  
Mayor Martin J. Walsh  
Boston Cannabis Board

Commissioners:  
Kathleen M. Joyce, Chairman  
Lisa Holmes  
Darlene Lombos  
John Smith  
Alejandra St. Guillen  
Executive Secretary:  
Lesley Delaney Hawkins

**VOTING AGENDA  
BOSTON CANNABIS BOARD  
August 19, 2020**

**Transactional Items heard August 12, 2020:**

1. Verdant Medical Inc. has applied for a Recreational Cannabis Retail License to be exercised at 1589 Blue Hill Avenue in Mattapan. The applicant is an equity applicant.  
Applicant contact: Tito Jackson

**GRANTED**

2. Patriot Care Corp., the holder of an operational Medical Cannabis Dispensary License, has applied for a Recreational Cannabis Retail License to be co-located at 21 Milk Street in Downtown Boston. The applicant is a non-equity applicant.  
Applicant contact: Larry DiCara

**DEFERRED: BCB REQUESTS ADDITIONAL INFORMATION AND  
DOCUMENTATION FROM THE APPLICANT REGARDING THE DIVERSITY AND  
INCLUSION PLAN AND EMPLOYMENT PLAN**

3. Massachusetts Citizens for Social Equity LLC has applied for a Recreational Cannabis Retail License to be exercised at 561 Dudley Street in Roxbury. The applicant is an equity applicant.  
Applicant contact: Michael Ross

**GRANTED**

**Old & New Business:**

1. Appointment of Lesley Delaney Hawkins as Executive Secretary pursuant to the BCB's Rules and Regulations. This position is not compensated.

**APPROVED**



TEXT AMENDMENT NO. 432

THE COMMONWEALTH OF MASSACHUSETTS

CITY OF BOSTON

IN ZONING COMMISSION

The Zoning Commission of the City of Boston, acting under Chapter 665 of the Acts of 1956, as amended, after due report, notice and hearing does hereby amend the text of the Boston Zoning Code, as established under Chapter 665 of the Acts of 1956, as amended, as follows:

1. By striking the definition "Medical Marijuana Treatment Center" from **Articles 2 and 2A** of the Code, and inserting in place thereof the following:

"Cannabis Establishment," an entity, licensed and registered with the Commonwealth of Massachusetts that acquires, cultivates, possesses (including development of related products as edible marijuana infused products (MIP), tinctures, aerosols, oils, or ointments), transfers, transports, sells, distributes, dispenses, or administers cannabis, products containing cannabis, including, but not limited to an adult use cannabis establishment, a medical use cannabis establishment, a marijuana retailer, a marijuana product manufacturer or a marijuana cultivator. Cannabis Establishments shall include any Marijuana Establishment or Medical Marijuana Treatment Center licensed pursuant to 935 CMR 500, 105 CMR 725.100, or any successor regulation.

2. By amending **Article 8 (Regulation of Uses)** as follows:

- a. In **Section 8-7, Table A, Use Regulations**, delete existing Use Item #39B "Medical Marijuana Treatment Center" and insert the following use item:

	<u>S</u>	<u>R</u>	<u>H</u>	<u>L</u>	<u>B</u>	<u>M</u>	<u>I</u>	<u>W</u>	<u>MER</u>
39B Cannabis Establishment	F*	F*	F*	C*	C*	C*	C*	C*	C*

\* Cannabis Establishment-provided that any cannabis establishment shall be sited at least one half mile or 2,640 feet from another existing cannabis establishment and at least 500 feet from a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12. Distances shall be determined from the nearest lot line of the proposed establishment to the nearest lot line of an existing establishment or school. Use approval shall be applicable to the applicant only..

3. In the following articles:

- Article 38** (Midtown Cultural District)
- Article 39** (North Station Economic Development Area)
- Article 40** (South Station Economic Development Area)
- Article 41** (Huntington Avenue/Prudential Center District)
- Article 43** (Chinatown District)
- Article 44** (Leather District)
- Article 45** (Government Center/Markets District)
- Article 46** (Bulfinch Triangle District)
- Article 47** (Cambridge Street-North District)
- Article 50** (Roxbury Neighborhood District)
- Article 51** (Allston-Brighton Neighborhood District)
- Article 52** (Dorchester Avenue Neighborhood District)
- Article 53** (East Boston Neighborhood District)
- Article 54** (North End Neighborhood District)
- Article 55** (Jamaica Plain Neighborhood District)
- Article 56** (West Roxbury Neighborhood District)
- Article 57** (Saint Vincent Neighborhood District)
- Article 58** (City Square Neighborhood District)
- Article 59** (Mission Hill Neighborhood District)
- Article 60** (Greater Mattapan Neighborhood District)
- Article 61** (Audubon Circle Neighborhood District)
- Article 62** (Charlestown Neighborhood District)
- Article 63** (Bay Village Neighborhood District)
- Article 64** (South End Neighborhood District)
- Article 65** (Dorchester Neighborhood District)
- Article 66** (Fenway Neighborhood District)
- Article 67** (Roslindale Neighborhood District)
- Article 68** (South Boston Neighborhood District)
- Article 69** (Hyde Park Neighborhood District)
- Article 70** (Beth Israel Hospital Institutional District)
- Article 71** (Massachusetts College of Pharmacy Institutional District)

**Article 72** (New England Deaconess Hospital Institutional District)

**Article 73** (Dana-Farber Cancer Institute Institutional District)

**Article 90** (New Market Industrial-Commercial Neighborhood District)

- a. In Articles 38-41 and 44-47, in the sections on Use Regulations, delete the Conditional Use item, "Medical Marijuana Treatment Center".
- b. In Articles 38-41 and 44-47, in the sections on Use Regulations, subsection on Conditional Uses, insert the following:

"Cannabis Establishment-provided that any cannabis establishment shall be sited at least one half mile or 2,640 feet from another existing cannabis establishment and at least 500 feet from a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12. Distances shall be determined from the nearest lot line of the proposed establishment to the nearest lot line of an existing establishment or school. Use approval shall be applicable to the applicant only."

- c. For Articles 43, 50-73 and 90, in each table of uses, delete the use "Medical Marijuana Treatment Center" and its associated footnote from the subcategory heading "Health Care Uses" or in the case of Article 43, the relevant Appendices.
- d. In each table of uses, under the subcategory heading "Retail Uses," or in the case of Article 43, the relevant Appendices, insert the following:

"Cannabis Establishment"

as a Forbidden Use in all Residential Districts and as a Conditional Use in all other Districts.

- e. In each table of uses, under the subcategory heading "Retail Uses," or in the case of Article 43, the relevant Appendices, next to the use "Cannabis Establishment:"

Insert the next, appropriate numerical footnote notation.


- f. At the end of the "Footnotes" section of each use table, insert, in appropriate numerical order with the appropriate footnote number, the following text:

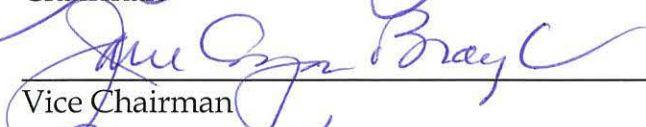
\* Cannabis Establishment-provided that any cannabis establishment shall be sited at least one half mile or 2,640 feet from another existing cannabis establishment and at least 500 feet from a pre-existing public or private



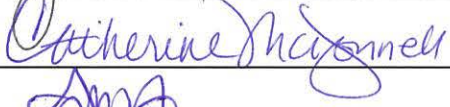
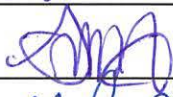

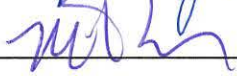
school providing education in kindergarten or any of grades 1 through 12. Distances shall be determined from the nearest lot line of the proposed establishment to the nearest lot line of an existing establishment or school. Use approval shall be applicable to the applicant only.

Text Amendment Application No. 479

Text Amendment No. **432**

  
Chairman

  
Vice Chairman

In Zoning Commission

Adopted: April 11, 2018

Attest:   
Executive Secretary

Text Amendment Application No. 479

Text Amendment No. 432

  
\_\_\_\_\_  
Mayor, City of Boston

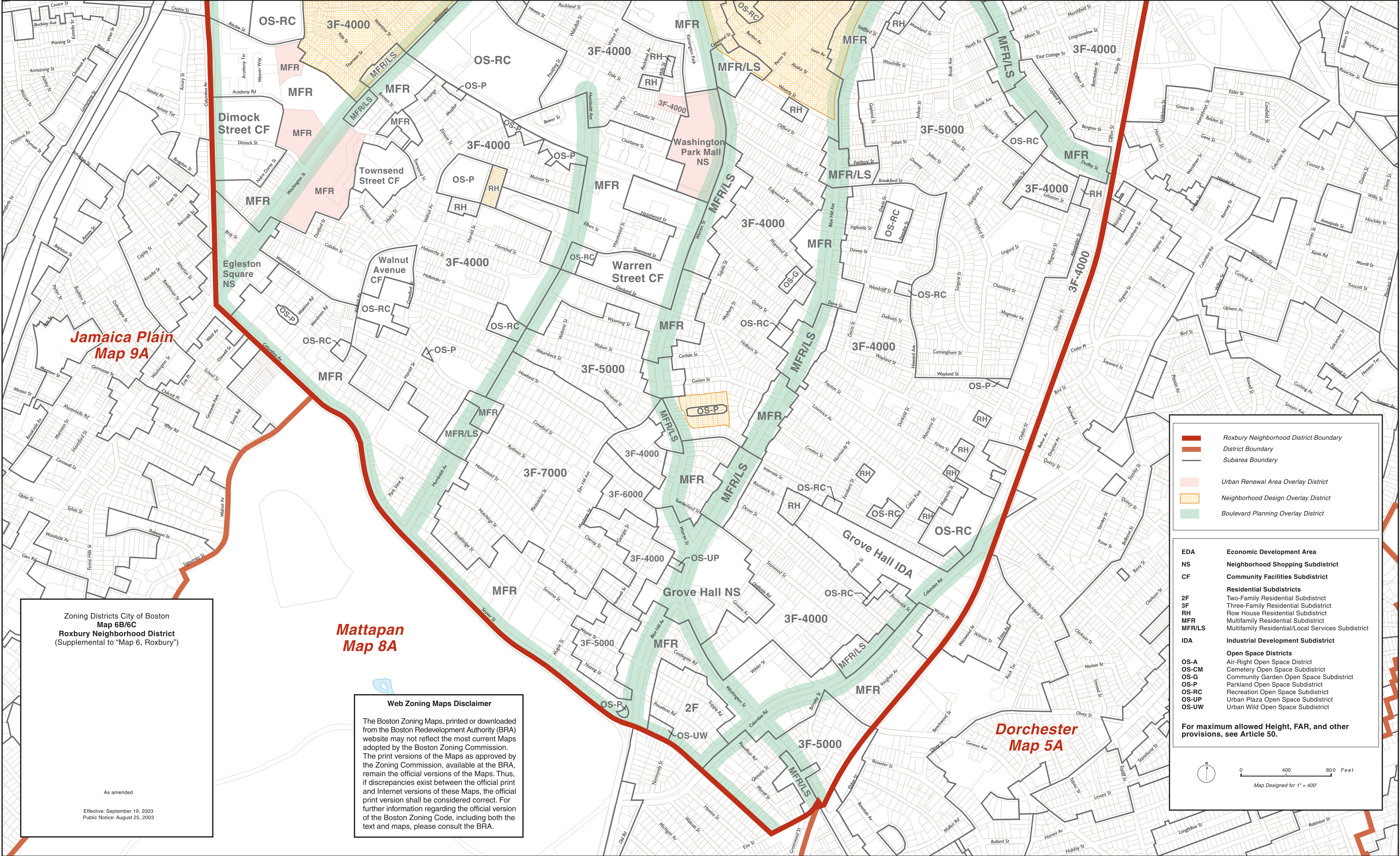
Date: 4-13-18

\_\_\_\_\_  
The foregoing amendment was presented to the Mayor on April 12, 2018, and was signed by him on April 13, 2018, whereupon it became effective on April 13, 2018, in accordance with Section 3 of Chapter 665 of the Acts of 1956, as amended.

Attest:

  
\_\_\_\_\_  
Executive Secretary  
Boston Zoning Commission







# Community Outreach Meeting Attestation Form

## Instructions

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

## Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 12/29/2020
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).





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

a. Date of publication: 12/11/20

b. Name of publication: Boston Herald

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

a. Date notice filed: 12/11/20, 12/14/20, 12/15/20

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

a. Date notice(s) mailed: 12/12/20

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
- a. The type(s) of ME or MTC to be located at the proposed address;
  - b. Information adequate to demonstrate that the location will be maintained securely;
  - c. Steps to be taken by the ME or MTC to prevent diversion to minors;
  - d. A plan by the ME or MTC to positively impact the community; and
  - e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

Massachusetts Citizens for Social Equity LLC

Name of applicant's authorized representative:

Brian Chavez

Signature of applicant's authorized representative:



## Attachment A

### Newspaper Publication

## LEGAL NOTICES

LEGAL NOTICE OF COMMUNITY OUTREACH MEETING  
REGARDING A MARIJUANA ESTABLISHMENT PROPOSED BY  
MASSACHUSETTS  
CITIZENS FOR SOCIAL EQUITY LLC

Notice is hereby given that a virtual community outreach meeting for Massachusetts Citizens for Social Equity LLC ("MCSE")'s proposed Marijuana Establishment is scheduled for December 29, 2020, at 6:00 p.m. online at <https://princelobel.zoom.us/j/92013846777> or by telephone by calling +13017158592, Webinar ID: 920 1384 6777. The proposed Marijuana Retailer (the "Facility") is anticipated to be located at 561 Dudley Street, Roxbury, MA 02125 (the "Property"). Closed captioning will be provided. Community members and members of the public are encouraged to ask questions and receive answers from representatives of MCSE.

Questions may be submitted in advance to [donchavez@gmail.com](mailto:donchavez@gmail.com). All materials for the meeting will be available more than 24 hours before the virtual community outreach meeting on [www.princelobel.com](http://www.princelobel.com).

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch.94G and 935 CMR 500.000 et seq.

A copy of this notice is on file with the City Clerk's office, the Boston Planning and Development Agency, the Mayor's office, and the Boston Cannabis Board, at Boston City Hall, 1 City Hall Square, Boston, Massachusetts 02201. A copy of this notice was published in a newspaper of general circulation at least fourteen (14) calendar days prior to the virtual community outreach meeting and mailed at least seven (7) calendar days prior to the virtual community outreach meeting to abutters of the Property, owners of land directly opposite the Property on any public or private street or way, and abutters to the abutters within three hundred (300) feet of the property line of the Property 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.

Dec 11

## LEGAL NOTICES

LEGAL NOTICE OF COMMUNITY OUTREACH MEETING  
REGARDING A MARIJUANA ESTABLISHMENT PROPOSED BY MAS-  
SACHUSETTS  
CITIZENS FOR SOCIAL EQUITY LLC

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Questions may be submitted in advance to [donchavez@gmail.com](mailto:donchavez@gmail.com). All materials for the meeting will be available more than 24 hours before the virtual community outreach meeting on [www.princelobel.com](http://www.princelobel.com).

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq.

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Dec 11

## LEGAL NOTICES

## LEGAL NOTICES

## LEGAL NOTICES

## NOTICE OF PUBLIC HEARING

Notice is hereby given pursuant to M.G.L. c. 30A, §2, that the Department of Public Health will hold a public hearing on emergency amendments to the following regulation: 105 CMR 700.000 – Implementation of M.G.L. c. 94C.

The emergency amendments update the regulation which implements M.G.L. c. 94C, the Controlled Substances Act. The emergency amendments expand access to vaccines for vaccine-preventable diseases, including COVID-19. They were duly filed with the Secretary of the Commonwealth on November 19, 2020 and are currently in effect.

The public hearing will be held on **Monday, January 4, 2021, at 3:00 p.m.** Due to the State of Emergency declared by Governor Charles D. Baker on March 10, 2020, and subsequent emergency orders limiting public gatherings, the hearing will be conducted on a moderated conference call. The information for the **moderated conference** call is: Dial-in Telephone Number: 877-917-4913

Participant Passcode: 9919056

A copy of the proposed amendments to 105 CMR 700.000 may be viewed on the Department's website at <https://www.mass.gov/service-details/proposed-regulations-and-amendments-department-of-public-health> or requested from the Office of the General Counsel by calling 617-624-5220.

Speakers who testify at the public hearing are requested to provide a copy of their oral comments. The Department encourages all interested parties to submit comments electronically to [RegTestimony@mass.gov](mailto:RegTestimony@mass.gov) or by mail to William Anderson, Office of the General Counsel, Department of Public Health, 250 Washington Street, Boston, MA 02108. All submissions must include the sender's full name and address.

When electronically submitting comments, type "DCP Regulations" in the subject line and attach a Word document with your comments or type your comments in the body of your email.

The Department will post all testimony that complies with these instructions on its website. **All comments must be submitted by 5:00 p.m. on Wednesday, January 6, 2021.** All comments received by the Department may be released in response to a request for public records.

If you are deaf or hard of hearing, or are a person with a disability who requires accommodation, please contact Alex Gomez at least 5 days before the hearing at Tel # 617-624-5928, Fax # 617-624-5075, email [Alex.Gomez@mass.gov](mailto:Alex.Gomez@mass.gov), or TTY # 617-624-6001.

www.bostonherald.com

## PUBLIC NOTICE

The Boston Redevelopment Authority ("BRA") d/b/a the Boston Planning & Development Agency ("BPDA") hereby gives notice pursuant to Article 80 of the Boston Zoning Code ("Code") that a Project Notification Form ("PNF") for Large Project review was filed by 440 Atlantic Avenue, LLC (the "Proponent") on December 11, 2020 for the redevelopment of the Hook Wharf site (the "Proposed Project") located at 15-17 Northern Avenue in the Downtown Waterfront District of Boston. The 0.46-acre site is bounded by Northern Avenue to the north, Atlantic Avenue to the west, and Seaport Boulevard to the south.

The Proposed Project will include approximately 275,00 square feet of hotel and ground-floor retail/restaurant uses, in a single building with no on-site parking, as well as a new Harborwalk segment, public realm improvements, and in-water docking facilities. The site is currently improved by temporary trailers hosting the James Hook Lobster Company as well as associated in-water facilities.

The Proponent is seeking the issuance of a Scoping Determination by the BPDA pursuant to Section 80B-5. The BPDA in the Scoping Determination for such PNF may waive further review pursuant to Section 80B-5.3(d), if, after reviewing public comments, the BPDA finds that such PNF adequately describes the Proposed Project's impacts.

The PNF may be obtained from the BPDA website- [www.bostonplans.org](http://www.bostonplans.org) or may be reviewed in the Office of the Secretary of the BPDA, Room 910, Boston City Hall, 9th Floor, Boston MA 02201 between 9:00 AM and 5:00 PM, Monday through Friday, except legal holidays. Public comments on the PNF, including the comments of public agencies, should be submitted in writing to Ebony DaRosa at the address stated above or via email at [Ebony.DaRosa@Boston.gov](mailto:Ebony.DaRosa@Boston.gov) on or before January 11, 2021.

BOSTON REDEVELOPMENT AUTHORITY  
d/b/a BOSTON PLANNING & DEVELOPMENT AGENCY  
Teresa Polhemus  
Executive Director/Secretary  
December 11, 2020

Dec 11

## Notice of Regulatory Action and Public Comment Period

Notice is hereby given pursuant to M.G.L. c. 30A, § 3 that the Massachusetts Department of Transportation (MassDOT) will accept public comment concerning the following regulatory actions:

1. Repeal of 701 CMR 3.00 Privacy and Confidentiality.

The proposed regulatory action will repeal an older, now duplicative regulation promulgated by the former Executive Office of Transportation and Construction. The proposed regulatory action will not substantially alter those matters subject to regulation, but will serve to remove obsolete and redundant regulations.

Written comments presenting data, views, or arguments concerning the proposed regulatory action will be accepted until 5:00 p.m. on January 1, 2021. Written comments must be submitted by email or postal mail to the following address:

Email: [rferch@mbta.com](mailto:rferch@mbta.com)

Postal Mail: Massachusetts Department of Transportation

Office of the General Counsel  
10 Park Plaza, Room 3510  
Boston, MA 02116

A copy of proposed 701 CMR 3.00 may be obtained by contacting Ryan Ferch at MassDOT/MBTA Office of the General Counsel, 10 Park Plaza, Room 3510, Boston, MA 02116, or by email at [rferch@mbta.com](mailto:rferch@mbta.com).

Dec 11

FRIDAY, DECEMBER 11, 2020 BOSTON HERALD



# HOME DELIVERY

Call 1-800-882-1211 to sign up today!

**BOSTON  
Herald**  
[www.bostonherald.com](http://www.bostonherald.com)

Attachment B

Notice Filed with Municipality

**LEGAL NOTICE OF COMMUNITY OUTREACH MEETING  
REGARDING A MARIJUANA ESTABLISHMENT PROPOSED BY MASSACHUSETTS  
CITIZENS FOR SOCIAL EQUITY LLC**

Notice is hereby given that a virtual community outreach meeting for **Massachusetts Citizens for Social Equity LLC ("MCSE")'s proposed Marijuana Establishment** is scheduled for **December 29, 2020, at 6:00 p.m.**, online at <https://princelobel.zoom.us/j/92013846777> or by telephone by calling +13017158592, Webinar ID: 920 1384 6777. The proposed Marijuana Retailer (the "**Facility**") is anticipated to be located at **561 Dudley Street, Roxbury, MA 02125** (the "**Property**"). Closed captioning will be provided. Community members and members of the public are encouraged to ask questions and receive answers from representatives of MCSE.

Questions may be submitted in advance to [donchavez@gmail.com](mailto:donchavez@gmail.com). All materials for the meeting will be available more than 24 hours before the virtual community outreach meeting on [www.princelobel.com](http://www.princelobel.com).

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq.

A copy of this notice is on file with the City Clerk's office, the Boston Planning and Development Agency, the Mayor's office, and the Boston Cannabis Board, at Boston City Hall, 1 City Hall Square, Boston, Massachusetts 02201. A copy of this notice was published in a newspaper of general circulation at least fourteen (14) calendar days prior to the virtual community outreach meeting and mailed at least seven (7) calendar days prior to the virtual community outreach meeting to abutters of the Property, owners of land directly opposite the Property on any public or private street or way, and abutters to the abutters within three hundred (300) feet of the property line of the Property 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.

RECEIVED  
CITY CLERK'S OFFICE  
2020 DEC 11 P 12:26  
BOSTON, MA

## Tan, Ashley

---

**From:** Jeffrey Hampton <jeffrey.hampton@boston.gov>  
**Sent:** Tuesday, December 15, 2020 3:10 PM  
**To:** Tan, Ashley  
**Subject:** Re: FW: 2 notices to file with BPDA

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Received

On Tue, Dec 15, 2020 at 2:53 PM Tan, Ashley <[atan@princelobel.com](mailto:atan@princelobel.com)> wrote:

Hi Jeffrey:

I received your email address from Kate at reception. I have two notices to give to the BPDA, both attached in this email. One for a proposed marijuana establishment at 3995-3997 Washington Street and one for a proposed marijuana establishment at 561 Dudley Street.

Can you email me back confirming receipt?

Thank you so much,

Ashley

---

**From:** Tan, Ashley  
**Sent:** Tuesday, December 15, 2020 11:31 AM  
**To:** 'katelyn.sullivan@boston.gov' <[katelyn.sullivan@boston.gov](mailto:katelyn.sullivan@boston.gov)>  
**Subject:** FW: 2 notices to file with BPDA

Hi Kate:

I have two notices to file with the BPDA. One for a proposed marijuana establishment at 3995-3997 Washington Street and one for a proposed marijuana establishment at 561 Dudley Street.

**Tan, Ashley**

---

**From:** Lesley Hawkins <lesley.hawkins@boston.gov>  
**Sent:** Monday, December 14, 2020 12:37 PM  
**To:** Ross, Michael P.; Patrick Fandel; Faiza Sharif; Edward McGuire  
**Cc:** Cannabis Board; Jessica Thomas; Joseph Coppinger; Tan, Ashley; Glissman, Daniel  
**Subject:** Re: Notice of Community Meeting

Mike,

This correspondence serves as confirmation that you may host this meeting virtually. The BCB and ONS do not handle the posting of the independently hosted meeting. However, ONS can provide the contact in the City Clerk's office to ensure the meeting is posted.

Thank you,

Lesley

\*\*\*NEW: SIGN UP FOR PERIODIC UPDATES FROM THE BOSTON CANNABIS BOARD [HERE](#)\*\*\*

Lesley Delaney Hawkins, Esq.

Executive Secretary, Licensing Board for the City of Boston

Executive Secretary, Boston Cannabis Board

(o) 617.635.4170 | (f) 617.635.4742

SIGN UP FOR PERIODIC UPDATES FROM THE LICENSING BOARD. [Licensees](#). [Attorneys and Practitioners](#).

**CITY of BOSTON**

On Mon, Dec 14, 2020 at 12:24 PM Ross, Michael P. <[mross@princelobel.com](mailto:mross@princelobel.com)> wrote:

Dear Boston Cannabis Board (BCB) and Office of Neighborhood Services (ONS):

Attached please find our notice of a second Community Outreach Meeting for both Roxbury and Roslindale locations for our client Massachusetts Citizens for Social Equity. Pursuant to CCC requirements I hereby request that BCB and ONS post notice of this meeting. Lesley, if you are able, if you could please respond to confirm that said meeting can be conducted virtually. Please feel free to reach out with any questions. Thank you for your attention to this matter.

Best,

Mike Ross

617-699-2839



Michael P. Ross



Prince Lobel Tye LLP

One International Place, Suite 3700  
Boston, Massachusetts 02110

617 456 8149 Direct

mross@princelobel.com



---

This email is intended for the confidential use of the addressees only. Because the information is subject to the attorney-client privilege and may be attorney work product, you should not file copies of this email with publicly accessible records. If you are not an addressee on this email or an addressee's authorized agent, you have received this email in error; please notify us immediately at 617 456 8000 and do not further review, disseminate or copy this email. Thank you.

-----

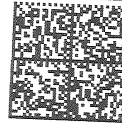
IRS Circular 230 Disclosure: Any federal tax advice or information included in this message or any attachment is not intended to be, and may not be, used to avoid tax penalties or to promote, market, or recommend any transaction, matter, entity, or investment plan discussed herein. Prince Lobel Tye LLP does not otherwise by this disclaimer limit you from disclosing the tax structure of any transaction addressed herein.

## Attachment C

### Examples of Abutter Notices



Prince Lobel Tye LLP  
One International Place, Suite 3700, Boston, MA 02110



**FP** **US POSTAGE**  
**\$000.50<sup>®</sup>**

First-Class  
ZIP 02110

12/16/2020  
034A 0081800655



513 DUDLEY STREET  
ROXBURY, MA 02119



Prince Lobel Tye LLP  
One International Place, Suite 3700, Boston, MA 02110



**FP** **US POSTAGE**  
**\$000.50<sup>®</sup>**

First-Class  
ZIP 02110

12/16/2020  
034A 0081800655



44 BROOK AVENUE  
ROXBURY, MA 02119



Prince Lobel Tye LLP  
One International Place, Suite 3700, Boston, MA 02110



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ZIP 02110

12/16/2020  
034A 0081800655



46 BROOK AVENUE  
ROXBURY, MA 02119

**LEGAL NOTICE OF COMMUNITY OUTREACH MEETING  
REGARDING A MARIJUANA ESTABLISHMENT PROPOSED BY MASSACHUSETTS  
CITIZENS FOR SOCIAL EQUITY LLC**

Notice is hereby given that a virtual community outreach meeting for **Massachusetts Citizens for Social Equity LLC (“MCSE”)**’s **proposed Marijuana Establishment** is scheduled for **December 29, 2020, at 6:00 p.m.**, online at <https://princelobel.zoom.us/j/92013846777> or by telephone by calling +13017158592, Webinar ID: 920 1384 6777. The proposed Marijuana Retailer (the “**Facility**”) is anticipated to be located at **561 Dudley Street, Roxbury, MA 02125** (the “**Property**”). Closed captioning will be provided. Community members and members of the public are encouraged to ask questions and receive answers from representatives of MCSE.

Questions may be submitted in advance to [donchavez@gmail.com](mailto:donchavez@gmail.com). All materials for the meeting will be available more than 24 hours before the virtual community outreach meeting on [www.princelobel.com](http://www.princelobel.com).

This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission’s Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq.

A copy of this notice is on file with the City Clerk’s office, the Boston Planning and Development Agency, the Mayor’s office, and the Boston Cannabis Board at Boston City Hall, 1 City Hall Square, Boston, Massachusetts 02201. A copy of this notice was published in a newspaper of general circulation at least fourteen (14) calendar days prior to the virtual community outreach meeting and mailed at least seven (7) calendar days prior to the virtual community outreach meeting to abutters of the Property, owners of land directly opposite the Property on any public or private street or way, and abutters to the abutters within three hundred (300) feet of the property line of the Property 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.

## Attachment D

Link to Recorded Virtual Meeting

ATTACHMENT D

Link to recording of virtual community outreach meeting:

[https://princelobel.zoom.us/rec/share/HF5\\_ZcuoSVD0KLXnnVCQW0z2FJhRtfdKaOeAH1spvjLKudvAzTofmCx1HAxe1foa.6xZJoHpwpO30FCDP](https://princelobel.zoom.us/rec/share/HF5_ZcuoSVD0KLXnnVCQW0z2FJhRtfdKaOeAH1spvjLKudvAzTofmCx1HAxe1foa.6xZJoHpwpO30FCDP)

Passcode: MCSE2020!

## Attachment E

### Virtual Meeting Presentation Handouts



**Community Outreach Meeting Presentation**  
561 Dudley Street, Boston, MA 02125  
December 29, 2020



# The Operators

We are a minority and family run business, and have lived in Boston for our entire lives. We are from the community and for the community. We are Boston Equity Applicants.

Our mission is to provide a wide variety of locally sourced quality products, while ensuring that each customer has a safe and rewarding experience. We pride ourselves on the local roots we bring to this cannabis establishment in order to ensure that our team exceeds expectations by providing a beneficial service to our customers and the community.





# Leadership

## **Brian Chavez , President and CEO**

A lifelong resident of Boston, Brian and his brother Jason own and operate their family run restaurant, Antonio's HiFi Pizzeria in Dorchester – the Fields Corner Business of the Year in 2016. Brian has a degree in economics from UMASS Boston. **Brian is the 100 percent owner of MCSE and a Boston Equity Applicant.**



## **Jaison Chavez, Cannabis Consultant**

A resident of Dorchester, Jaison went to live in California to familiarize himself with the emerging cannabis industry. While there, he attended classes and later worked at Oaksterdam University, America's first cannabis college.

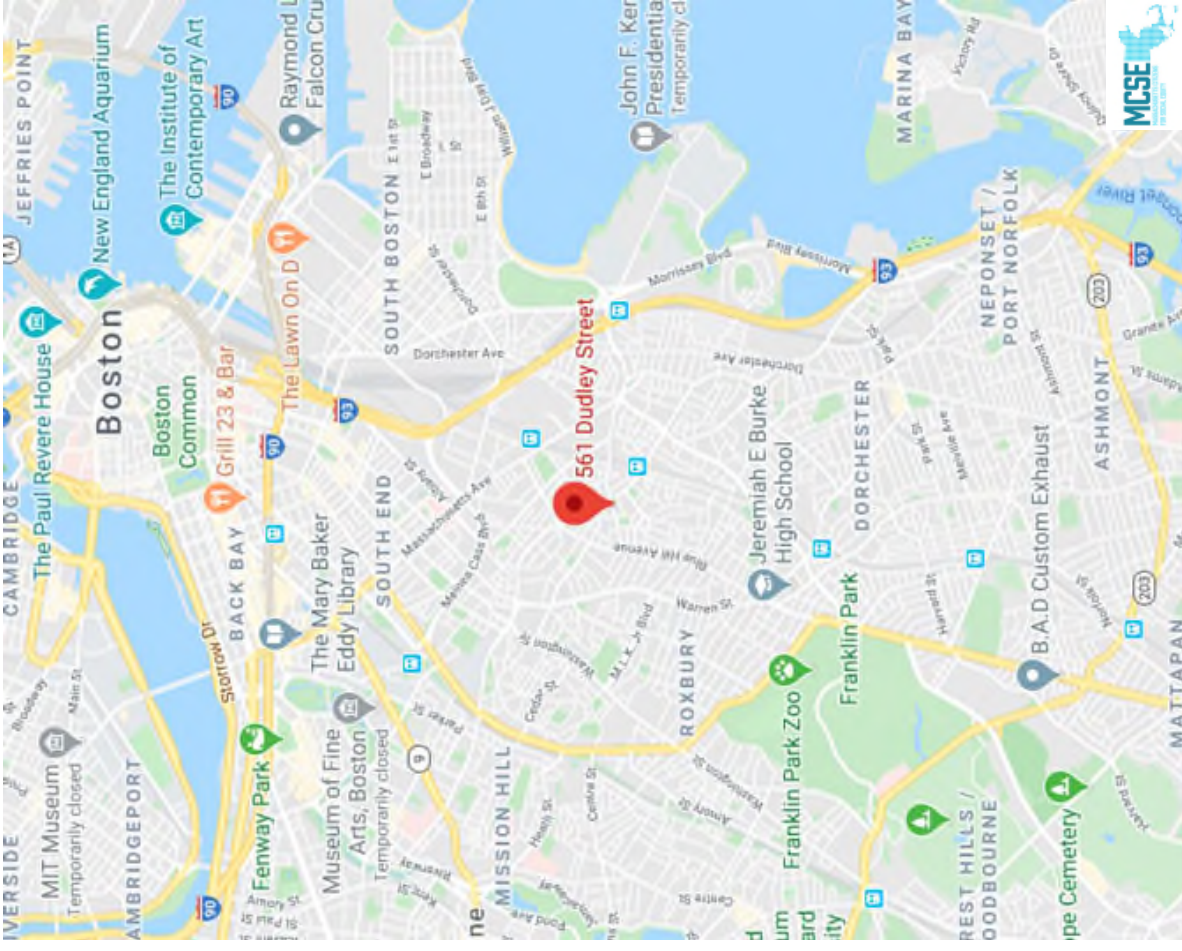


## **Desiree Franjul, Community Outreach Director**

A lifelong resident of Boston, Desiree has worked in a number of community outreach positions for various Boston based non-profits and organizations.

# Proposed Facility

- Retail Cannabis Establishment
- 561 Dudley Street, Roxbury, MA
- Approximately 4,600 square feet of retail space
- Accessible via MBTA Orange Line and bus as well as the Fairmont Line
- Proposed Hours 9:00am – 8:00pm Mon – Sun
- 15-20 employees, locally hired
- Available parking (12 spaces + 3 ADA)
- Off-street loading (small van with randomized delivery)





# Buffer Zone



Map Scale: 1"= 100 ft

Siting:

Any cannabis establishment shall be sited at least 500 feet from a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12.



Map Scale: 1"= 500 ft

Siting:

Any cannabis establishment shall be sited at least one-half mile or 2,640 feet from another existing cannabis establishment.

**BOSTON,** *Plan of Land in* **MASS.**  
 Hayes, Engineering, Inc.  
 Surveyors  
 6001  
 Weymouth, MA 01980  
 Telephone: 781.246.2800  
 Facsimile: 781.246.7596  
 www.hayesinc.com

Scale: 1" = 10'

0' 5' 10' 20' 30'

July 29, 2020  
REV. AUG. 4, 2020


561 Dudley Street, Ward 13

CITY OF BOSTON ZONING BOARD OF APPEALS CASE NO.



APPROVAL UNDER THE SUBDIVISION  
CONTROL LAW NOT REQUIRED  
BOSTON REDEVELOPMENT AUTHORITY

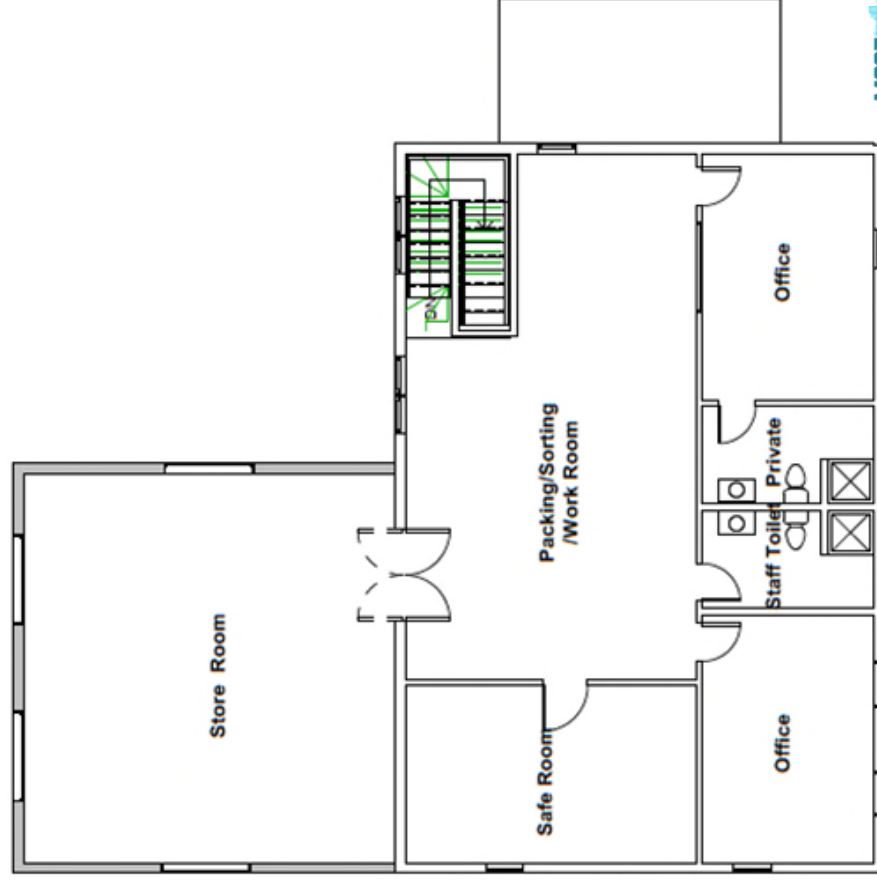
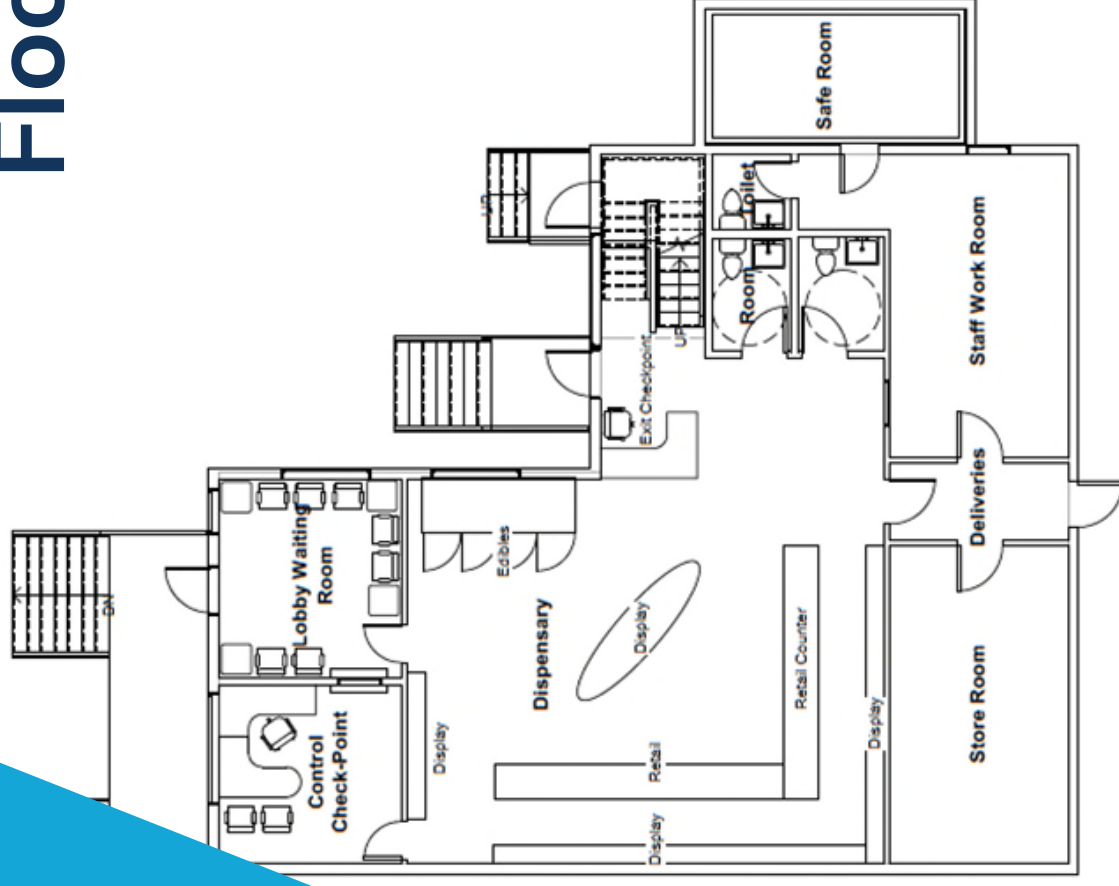
I CERTIFY THAT I HAVE CONFORMED WITH THE RULES AND REGULATIONS OF THE REGISTERS OF DEEDS IN PREPARING THIS PLAN.

  
HAYES ENGINEERING, INC.

HAYES ENGINEERING, INC.



# Floor Plan





# Existing Facility



561 Dudley Street, Boston, MA 02125

# Proposed Facility





# Nuisance Abatement

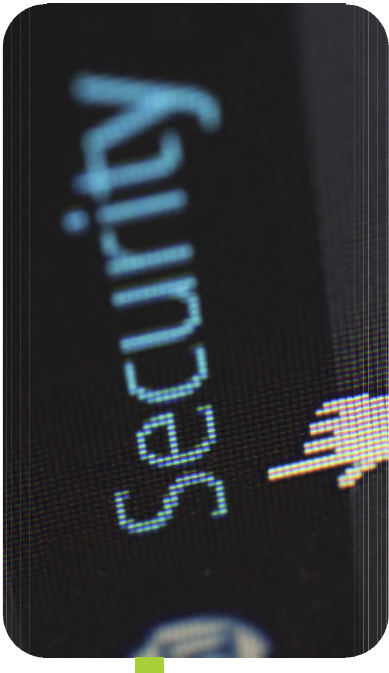
- Prepare and follow a detailed set of written operating procedures approved by the State.
- Handle and process marijuana in a safe and sanitary manner.
- Properly remove litter and waste so as to minimize the development of odor and minimize the potential for waste attracting and harboring pests.

# Diversion Prevention

- Use of state approved seed to sale tracking system.
- Development of chain of custody policies and procedures approved by the state.
- Daily product delivery using unmarked vehicles and randomized routes.
- Anti-diversion training for employees.
- Right to deny sales to any individual.
- Utilization of appropriate packaging and labeling.
- Storage of Marijuana in compliance with 935 CMR 500.105(11).

# Security

- Customers must be above 21 years of age.
- Employees are required to pass a series of state and national background checks all of which is regularly reviewed by state agency.
- Law enforcement and state officials are allowed access.
- Two-door entry way to ensure only approved persons may enter the facility.
- A description of the Marijuana Establishment's hours of operation and after-hours contact information shall be provided to the Cannabis Control Commission and made available to law enforcement officials upon request.



Limited Access

# Security

- Employing a live security guard during dispensary hours.
- Granting access to video access feeds to state and local police departments.
- Architectural and Operational Security measures address items such as perimeter barriers, lighting, critical building services, spatial adjacencies, control barriers, as well as staff and public access.
- Electronic Security measures address items such as access control and alarm monitoring, video surveillance, and security communications.
- Developing security protocols and systems that exceed the requirements set forth by the Commonwealth of Massachusetts.
- Implementing and patrolling state of the art interior and exterior video surveillance systems, alarms, and duress systems.
- Utilizing redundant systems that operate even in the instance of a power outage.

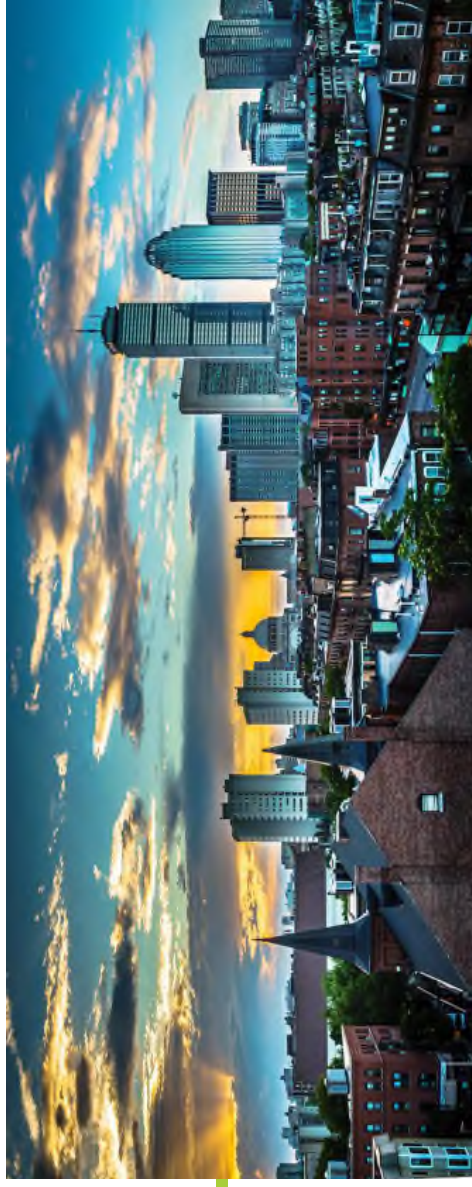


Secure Facility Design and Systems



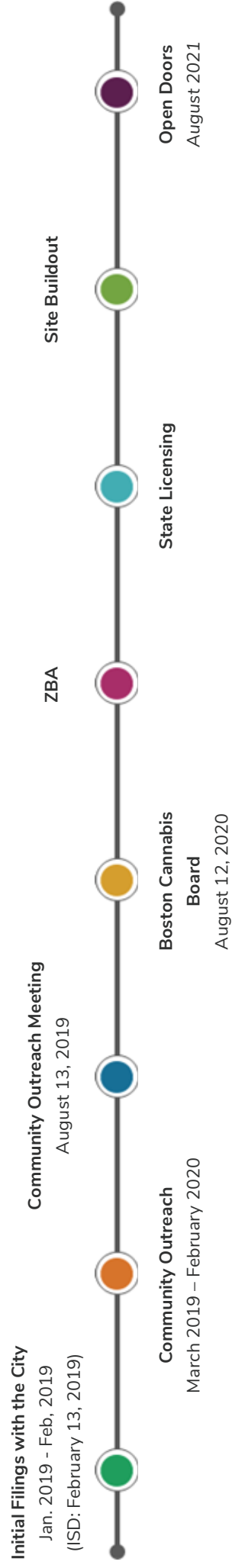
# Community Benefits

- Empowering local and diverse ownership
- Job creation (15 – 20 positions)
- Enhanced security in and outside the facility
- Community engagement and support for local initiatives
- Host Community Agreement with City of Boston and increased tax revenue
- Charitable Contributions
- Educational Seminars





# Timeline





# Questions?



August 30, 2022

Cannabis Control Commission  
Department of Planning and Development  
2 Washington Square  
Worcester, MA 01604

**Attention: TO WHOM IT MAY CONCERN**

**Re: Renewal Application – MR284009**

---

Massachusetts Citizens for Social Equity LLC (the “**Company**”) currently holds a license to operate a Marijuana Retailer at 561 Dudley Street, Boston, MA 02125 (the “**Property**”).

The Company has not yet commenced the operation of its Marijuana Retailer. As a result, the City of Boston has not begun to incur any costs related to the Company’s business and operation of the Marijuana Retailer.

Notwithstanding the foregoing, enclosed, please find a letter to the City of Boston's Mayor, Michelle Wu, requesting any documentation it has regarding the costs borne by the City of Boston as a result of the Company’s Marijuana Retailer. The Company issued the enclosed letter to Mayor Michelle Wu by certified mail on August 30, 2022.

This letter serves as the undersigned party’s attestation that the Company has not yet received a response from the City in that regard. The Company will keep the Commission informed of the City’s response, and will provide same to the Commission promptly upon receipt.

We hope this letter will suffice for the time being. Should you have any questions, please feel free to reach out to me directly by phone at 734-323-1822 or by email at [ankur@c3industries.com](mailto:ankur@c3industries.com).

Sincerely,

Ankur Rungta

**August 30, 2022**

Michelle Wu  
1 City Hall Square  
Boston, MA 02201

**Re: Request for Records of Costs Related to Massachusetts Citizens for Social Equity LLC's Boston Operations**

Dear Michelle:

Please be advised that as a requirement of Massachusetts Citizens for Social Equity LLC ("**MCSE**") license renewal application for its marijuana establishment located at 561 Dudley Street, in the City of Boston ("**Boston**" or "**City**"), the Cannabis Control Commission (the "**Commission**") is requiring MCSE to submit (1) documentation that it requested from its Host Community the records of any cost to the City, whether anticipated or actual, resulting from the licensee's operation within its borders, and (2) any response received from the Host Community in connection with such request, and if no response is received, an attestation to that effect.

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

Should you have any questions, please feel free to reach out to me directly by phone at 734-323-1822 or by email at [ankur@c3industries.com](mailto:ankur@c3industries.com).

Sincerely,

Ankur Rungta

**August 30, 2022**

Michelle Wu  
1 City Hall Square  
Boston, MA 02201

**Re: Request for Records of Costs Related to Massachusetts Citizens for Social Equity LLC's Boston Operations**

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Should you have any questions, please feel free to reach out to me directly by phone at 734-323-1822 or by email at [ankur@c3industries.com](mailto:ankur@c3industries.com).

Sincerely,

Ankur Rungta



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☐ Certified Mail Restricted Delivery \$0.00

☐ Adult Signature Required \$0.00

☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.60

Total Postage and Fees \$7.85

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City, State, ZIP+4®

Cambridge Central Comm.  
Planning & Development  
2 Washington Sq. Worcester, MA

Postmark  
Here

08/30/2022

7020 1290 0001 7411 3859



# U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

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**Boston, MA 02201**  
**OFFICIAL USE**

Certified Mail Fee **\$4.00**

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$ **\$0.00**

☐ Return Receipt (electronic) \$ **\$0.00**

☐ Certified Mail Restricted Delivery \$ **\$0.00**

☐ Adult Signature Required \$ **\$0.00**

☐ Adult Signature Restricted Delivery \$ **\$0.00**

Postage **\$0.60**

Total Postage and Fees **\$7.85**

Sent To

**Michelle WOB**

Street and Apt. No., or PO Box No.

**257 Hall St.**

City, State, ZIP+4®

**Boston, MA 02201**

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

08/30/2022

Postmark  
Here

0843  
18

7020 1290 0001 7411 3842





## **Plan for Positive Impact**

Massachusetts Citizens for Social Equity LLC (the “**Company**”) is proposing to site a Marijuana Establishment in the City of Boston, an area that has been identified by the Commission as an area of disproportionate impact (the “**Target Areas**”). Accordingly, the Company intends to focus its efforts in the Target Areas and on Massachusetts Residents who have, or have parents or spouses who have, past drug convictions.

The Company is currently one hundred percent (100%) owned by Brian Chavez. Brian is a victim of the war on drugs, a certified Boston Equity Applicant and eligible for the Commission’s Social Equity Program. Notwithstanding its goals to provide a positive impact to the Commonwealth as set forth herein, the establishment and success of the Company is consistent with the Commission’s goals and initiatives to foster equity in the cannabis industry.

During its first year of operations, the Company will implement the following goals, programs and measurements pursuant to this Plan for Positive Impact (the “**Positive Impact Plan**”).

### **Goals:**

The Company’s goals for this Positive Impact Plan are as follows:

1. Hire, in a legal and non-discriminatory manner, **at least 25% of its employees** from Target Areas, and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions;
2. Contribute **Five Thousand and 00/100 Dollars (\$5,000.00)** annually to the **Archdale Community Center Council Inc.** which serves the Target Areas and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions;
3. Provide educational programs and informational sessions geared towards individuals from the Target Areas and/or Massachusetts Residents who have, or have parents or spouses who have, past drug convictions that are interested in the cannabis industry, with specific focuses on marijuana retailers and entrepreneurship, at least **twice** a year. Such educational events will specifically include, but not be limited to, information on **licensing workshops (i.e., guidance on filing applications with the Commission), preparation of standard operating policies and procedures, Massachusetts cannabis market overview and METRC best practices.**

### **Programs:**

In an effort to reach the abovementioned goals, the Company shall implement the following practices and programs:

1. In an effort to ensure that the Company has the opportunity to interview, and hire, individuals from the Target Areas or Massachusetts residents who have past drug



convictions it shall post monthly notices for at least three (3) months during the hiring process at the municipal offices of the Target Areas and in newspapers of general circulation in the Target Areas, including but not limited to, the Boston Herald, these notices will state, among other things, that the Company is specifically looking for Massachusetts residents who are 21 years or older and either (i) live in a Target Area or another area of disproportionate impact as defined by the Commission; or (ii) have past drug convictions, for employment.

Such residency, or prior drug conviction status, will be a positive factor in hiring decisions, but this does not prevent the Company from hiring the most qualified candidates and complying with all employment laws and other legal requirements.

2. In an effort to ensure that it will meet its contribution goals, the Company has met with representatives from the Archdale Community Center Council, Inc. and confirmed their willingness to work with the Company. Please see the attached letter confirming the same.
3. In an effort to ensure that the Company provides opportunities for individuals from the Target Areas and/or Massachusetts residents who have past drug convictions to attend its educational events the Company shall post weekly notices at least two (2) weeks prior to hosting said educational programs or informational sessions in newspapers of general circulation in the Target Areas including but not limited to, the Boston Herald, and these notices will state, among other things, that the Company is specifically looking for Massachusetts residents who are 21 years or older and either (i) live in a Target Area or another area of disproportionate impact as defined by the Commission; or (ii) have past drug convictions to attend these events.

The Company respectfully submits that it will comply with the advertising, branding, marketing and sponsorship practices as outlined in 935 CMR 500.105(4). The abovementioned notices will not include any Company advertisements, marketing materials or branding. To the extent the Commission deems necessary, notices and event programming materials will be made available to the Commission for review and inspection prior to publishing.

### **Annual Review:**

Each year, the Company will review the following criteria in an effort to measure the success of its Positive Impact Plan.

1. Identify the number of individuals hired who (i) came from Target Areas, or other areas of disproportionate impact as defined by the Commission; or (ii) have past drug convictions;
2. Identify the amount of charitable donations the Company has made during the positive impact plan year, and to which organizations those donations went (documentation from said charities about whether or not they serve the Target Areas or other areas of disproportionate impact, or residents with previous drug convictions, will be available for inspection by the Commission upon request); and



3. Identify the number of educational events or informational sessions it holds and attendance at the same.

The Company affirmatively states that it: (1) has confirmed that all of the abovementioned charities will accept donations from the Company; (2) 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; (3) any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws; and (4) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of its provisional license.



**1**



Archdale Community Center Council Inc.  
BCYF Thomas M. Menino Community Center  
125 Brookway Road, Roslindale MA 02131  
617.635.5256 P 617.635.5258 F  
[MeninoCC@cityofboston.gov](mailto:MeninoCC@cityofboston.gov)

Archdale Community Center Council, Inc.  
125 Brookway Road, Roslindale 02131

February 25, 2021

To the Massachusetts Citizens for Social Equity;

The Archdale Community Center Council Inc. located at 125 Brookway Road, Roslindale, would be honored to accept the donation of \$5,000 a year from the Massachusetts Citizens for Social Equity on behalf of the Members of the Thomas M. Menino Community Center.

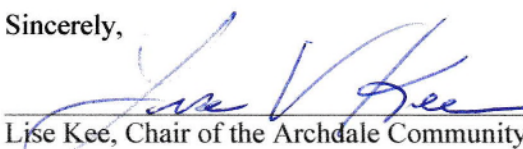
It is our non-profit organizations' duties to serve those in low-income families who are living in this neighborhood and has been disproportionate within these neighborhoods. We strive to make their lives better going into the future.

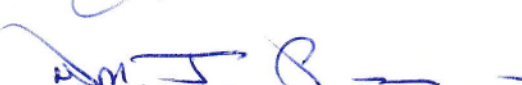
It is the Archdale Community Center Council Inc. who has the obligation and responsibility to insure these families have a voice and are heard, no longer being unequal to those who are more fortunate.

Members:

Lise kee – Chairperson  
Mertha Nee – Treasure  
Billy Owens – Member  
Maretta Johnson – Secretary  
Shera Rivera – Member  
Ashely Rose Solomon – Member  
Kerline Desir – Member

Sincerely,

  
Lise Kee, Chair of the Archdale Community Center Council, Inc.

  
Billy Owens, Member of the Board



**The Commonwealth of Massachusetts**  
**William Francis Galvin**

Minimum Fee: \$500.00

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

**Certificate of Organization**

(General Laws, Chapter )

Identification Number: 001362087

1. The exact name of the limited liability company is: MASSACHUSETTS CITIZENS FOR SOCIAL EQUITY LLC

2a. Location of its principal office:

No. and Street: 1508 DORCHESTER AVE  
 City or Town: DORCHESTER State: MA Zip: 02122 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:

No. and Street: 1508 DORCHESTER AVE  
 City or Town: DORCHESTER State: MA Zip: 02122 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:  
TO APPLY FOR LICENSE FOR MARIJUANA RETAIL AND CULTIVATION.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: BRIAN CHAVEZ  
 No. and Street: 1508 DORCHESTER AVE  
 City or Town: DORCHESTER State: MA Zip: 02122 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	BRIAN CHAVEZ	1508 DORCHESTER AVE DORCHESTER, MA 02122 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

**9. Additional matters:**

**SIGNED UNDER THE PENALTIES OF PERJURY, this 4 Day of January, 2019,**  
**BRIAN CHAVEZ**  
*(The certificate must be signed by the person forming the LLC.)*

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:

January 04, 2019 02:36 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*



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

William Francis Galvin  
Secretary of the  
Commonwealth

December 30, 2020

TO WHOM IT MAY CONCERN:

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

**MASSACHUSETTS CITIZENS FOR SOCIAL EQUITY LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **January 4, 2019.**

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

I also certify that the names of all managers listed in the most recent filing are: **BRIAN CHAVEZ**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **BRIAN CHAVEZ**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **NONE**



In testimony of which,

I have hereunto affixed the

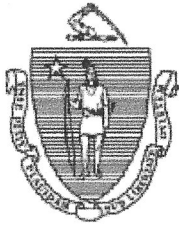
Great Seal of the Commonwealth

on the date first above written.

*William Francis Galvin*

Secretary of the Commonwealth





THE COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT  
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE

Charles D. Baker  
GOVERNOR

Karyn E. Polito  
LT. GOVERNOR



300862706

Rosalin Acosta  
SECRETARY

Richard A. Jeffers  
DIRECTOR

Massachusetts Citizens for Social Equity  
1508 DORCHESTER AVE  
DORCHESTER, MA 02122-1327

EAN: 22182060  
December 28, 2020

Certificate Id:43823

The Department of Unemployment Assistance certifies that as of 12/28/2020 ,Massachusetts Citizens for Social Equity is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189.

This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director

Department of Unemployment Assistance



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

mass.gov/dor

Letter ID: L0314349888  
Notice Date: January 5, 2021  
Case ID: 0-000-801-502



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



MASSACHUSETTS CITIZENS FOR SOCIAL  
1508 DORCHESTER AVE  
DORCHESTER MA 02122-1327

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

The Commissioner of Revenue certifies that, as of the date of this certificate, MASSACHUSETTS CITIZENS FOR SOCIAL EQUITY LLC 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, 9:00 a.m. to 4:00 p.m..

### *Visit us online!*

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

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

Edward W. Coyle, Jr., Chief  
Collections Bureau

# Massachusetts Citizens for Social Equity LLC

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## OPERATING AGREEMENT

### A Massachusetts Limited Liability Company

**THIS OPERATING AGREEMENT** of Massachusetts Citizens for Social Equity LLC (the “**Company**”) is made effective as of the 4<sup>th</sup> day of January, 2019 by and between Brian Chavez as the initial Manager of the Company (the “**Manager**”), and Brian Chavez as the sole member of the Company (the “**Member**”).

**NOW, THEREFORE**, the Member, the Manager, and the Company agree as follows:

## ARTICLE 1 - DEFINED TERMS

Section 1.1 **Definitions.** In addition to the terms defined elsewhere in this Agreement, the terms defined in this Article shall, for the purposes of this Agreement, have the meanings herein specified.

(a) “**Act**” means the Massachusetts Limited Liability Company Act, as the same may be amended from time to time (M.G.L. c. 156C).

(b) “**Certificate**” means the Certificate of Organization of the Company and any and all amendments thereto and restatements thereof filed on behalf of the Company pursuant to the Act.

(c) “**Code**” means the United States Internal Revenue Code of 1986, as amended from time to time, or any corresponding Federal tax statute enacted after the date of this Agreement.

(d) “**Person**” includes any individual, corporation, association, partnership (general or limited), joint venture, trust, estate, limited liability company, or other legal entity or organization.

(e) “**Profits**” or “**Losses**” means, for each fiscal year, an amount equal to the Company’s taxable income or loss for such fiscal year, determined in accordance with Section 703, 704, and 705 of the Code (but including in taxable income or loss, for this purpose, all items of income, gain, loss or deduction required to be stated separately pursuant to Section 703(a)(1) of the Code), with such adjustments as are required by the Code or are deemed necessary or desirable by the Manager.

(f) “**Regulations**” means the income tax regulations, including temporary regulations, promulgated under the Code, as such regulations may be amended from time to time (including corresponding provisions of succeeding regulations).

## ARTICLE 2 - FORMATION AND TERM

Section 2.1 **Formation.** The Member has formed the Company as a limited liability company pursuant to the provisions of the Act, and agree that the rights, duties, and liabilities of the Member shall be as provided in the Act, except as otherwise provided herein. The Manager shall execute, deliver, and file the Certificate and any and all amendments thereto and restatements thereof.

Section 2.2 **Term.** The term of the Company shall commence on the date the Certificate was filed with the Massachusetts Secretary of State’s Office, and shall continue until the Company is dissolved in accordance with the provisions of this Agreement and the Act.

Section 2.3 **Registered Agent and Office.** The Company’s registered agent and office shall be Brian Chavez, 1508 Dorchester Avenue, Dorchester, MA 02122. At any time, the Manager may designate another registered agent and/or registered office.

Section 2.4 Principal Place of Business. The principal place of business of the Company shall be located at 1508 Dorchester Avenue, Dorchester, MA 02122. At any time, the Manager may change the location of the Company's principal place of business.

Section 2.5 Purpose. The general character of the business of the Company shall be to engage in the cultivation, production, transportation and distribution of cannabis, and to engage in any all business in which a Massachusetts limited liability company is authorized to engage.

### **ARTICLE 3 - MEMBER**

Section 3.1 Powers of Member. The Member shall have no power with regard to the management of the Company except pursuant to the express terms of this Agreement.

Section 3.2 Distributions. Distributions to the Member shall be made as, if and when the Manager determines that such distributions are appropriate in his sole discretion.

### **ARTICLE 4 - CAPITAL ACCOUNTS, CONTRIBUTIONS AND ALLOCATIONS**

Section 4.1 Capital Accounts. A Capital Account shall be established and maintained for the Member. The Capital Account of the Member shall be maintained in accordance with Code Section 704(b) and the regulations issued thereunder. The Member has made a Capital Contribution to the Company and shall have initial Capital Account balances equal to the amount of his Capital Contribution.

Section 4.2 Profits and Losses. Profits and losses shall be allocated in a manner complying with the requirements of Code Sections 704, 705, and 706 and the Treasury Regulations thereunder.

Section 4.3 Member's Interest. The Member has no interest in specific Company property, unless and until distributed to such Member.

Section 4.4 Status of Capital Contributions. The Member shall not be required to lend any funds or make Capital Contributions to the Company or to make any additional Capital Contributions to the Company.

### **ARTICLE 5 - MANAGEMENT**

Section 5.1 Management of the Company. The Company shall be managed exclusively by the Manager. The Manager shall have full, sole and exclusive and complete discretion, right, power, and authority to manage, control and make all decisions affecting the business and affairs of the Company and to do or cause to be done any and all acts, at the expense of the Company on the terms provided herein, deemed by the Manager to be necessary or appropriate to effectuate the business, purposes and objectives of the Company as set forth in this Agreement. The Manager, with the consent of the Member, may amend this Agreement. A Manager may resign by giving at least five (5) days written notice to all of the Members. A Manager may be removed by the Member by an instrument in writing.

Section 5.2. Limitation of Liability. Except to the extent that the Massachusetts General Laws prohibits the elimination or limitation of liability of Manager for breaches of fiduciary duty, no Manager shall be personally liable to the Company or its Member for monetary damages for any breach of fiduciary duty as a Manager, officer, or agent of the Company, notwithstanding any provision of law imposing such liability. No amendment to or repeal of this provision shall apply to or have any effect on the liability or alleged liability of any Manager for or with respect to any acts or omissions occurring prior to such amendment.

Section 5.3 Indemnification. The Company shall, to the fullest extent permitted by law, indemnify any Manager made, or threatened to be made, a party to an action or proceeding, whether criminal, civil, administrative or investigative, by reason of being a Manager, officer or agent of the Company or any predecessor entity, provided, however, that the Company shall indemnify any such director or officer

in connection with a proceeding initiated by such Manager, officer or agent only if such proceeding was authorized by the Members of the Company.

(a) The indemnification provided for in this Section 5.3 shall: (i) not be deemed exclusive of any other rights to which those indemnified may be entitled under this Agreement or any other agreement or vote of members or disinterested managers or otherwise, both as to action in their official capacities and as to action in another capacity while holding such office, (ii) continue as to a person who has ceased to be a Manager, officer, or agent of the Company, and (iii) inure to the benefit of the heirs, executors and administrators of a person who has ceased to be a Manager, officer or agent of the Company. The Company's obligation to provide indemnification under this Section 5.3 shall be offset to the extent of any other source of indemnification or any otherwise applicable insurance coverage under a policy maintained by the Company or any other person.

(b) Expenses incurred by a Manager, officer or agent of the Company in defending a civil or criminal action, suit, or proceeding by reason of the fact that he or she is or was a Manager, officer, or agent of the Company shall be paid by the Company in advance of the final disposition of such action, suit, or proceeding upon receipt of an undertaking by or on behalf of such Manager, officer or agent of the Company to repay such amount if it shall ultimately be determined that applicable law requires that he or she not be indemnified by the Company. Notwithstanding the foregoing, the Company shall not be required to advance such expenses to a Manager, officer or agent of the Company who is a party to an action, suit or proceeding brought by the Company that alleges willful misappropriation of corporate assets, disclosure of confidential information or any other willful and deliberate breach by such Manager, officer or agent of the Company of his or her duty to the Company or its members.

(c) The foregoing provisions of this Section 5.3 shall be deemed to be a contract between the Company and each Manager, officer or agent who serves in such capacity at any time while this Agreement is in effect, and any repeal or modification thereof shall not affect any rights or obligations then existing with respect to any state of facts then or theretofore existing or any action, suit or proceeding theretofore or thereafter brought based in whole or in part upon any such state of facts.

Section 5.4 Reliance by Third Parties, Apparently Authority. Any person dealing with the Company may rely on a certificate signed by the Manager as to any of the following: (i) the identity of the Members and Manager hereunder; (ii) the existence or nonexistence of any fact or facts which constitute conditions precedent to acts by the Manager or the Members or are in any other manner germane to the affairs of this Company; (iii) whether a specified Person is authorized to execute and deliver any instrument or document of the Company; (iv) the authenticity of any copy of this Agreement and amendments thereto; or (v) any act or failure to act by the Company or as to any other matter whatsoever involving the Company or any Member or Manager.

## **ARTICLE 6 - BOOKS AND RECORDS**

Section 6.1 Books and Records. At all times during the continuance of the Company, the Company shall maintain at its registered office and principal place of business all records and materials the Company is required to maintain at such location under the Act.

## **ARTICLE 7 - DISSOLUTION, LIQUIDATION AND TERMINATION**

Section 7.1 Events Causing Dissolution. The Company shall be dissolved and its affairs shall be wound up upon the occurrence of any of the following events: (a) upon the election of the Member; (b) the entry of a decree of judicial dissolution under the Act; or (d) the sale or disposition of all or substantially all of the property of the Company.

Section 7.2 Liquidation. Upon dissolution of the Company, the Manager shall carry out the


winding up of the Company and shall immediately commence to wind up the Company's affairs; provided, however, that a reasonable time shall be allowed for the orderly liquidation of the assets of the Company and the satisfaction of liabilities to creditors so as to enable the Members to minimize the normal losses attendant upon a liquidation. The Company shall terminate when all of the assets of the Company, after payment of or due provision for all debts, liabilities and obligations of the Company, have been distributed to the Members in the manner provided for in this Article and the Certificate has been cancelled in the manner required by the Act.

**[SIGNATURES APPEAR ON THE FOLLOWING PAGES]**




**IN WITNESS WHEREOF**, the parties hereto have executed this Agreement to be effective as of the date first above written.

**MANAGER:**

  
\_\_\_\_\_  
Brian Chavez, individually

**MEMBER:**

  
\_\_\_\_\_  
Brian Chavez, individually



## **Business Plan**

### **OVERVIEW**

Massachusetts Citizens for Social Equity, LLC (“MCSE”), is a Massachusetts domestic limited liability company, organized January 4, 2019, to develop and operate three licensed retail cannabis stores in the City of Boston. MCSE is a locally-owned family operation.

The founders have deep roots in the community and their family has operated numerous long-standing small businesses. While pursuing licensing by the Boston Cannabis Board, the Mayor’s Office initially opposed a 2nd license to be issued to MCSE, on the grounds that they wanted licenses to go out to different applicants. Community support for MCSE was so strong, that the Mayor’s office retracted their objection to multiple licenses being issued to MCSE. MCSE’s founders intend to build upon their community roots to develop locally-owned stores where the community will have a high degree of trust and affinity due to personal relationships developed with the various family-owned businesses over the years. This connection is expected to help draw customers to MCSE stores.

Once operating, our retail cannabis shops will offer consumers a broad product selection wide variety of cannabis product. We will dispense and showcase cannabis products from a modern, clean and urban space that will be reflective of the communities we serve. Our goal is to welcome all cannabis consumers while maintaining a tight knit relationship with neighbors, community members and nearby organizations/businesses already providing services to the area.

To demonstrate our commitment to the community, we will offer expungement clinics, cannabis career training and education, and participation in community efforts to ensure economic development and promote equity in the communities that we serve. Our commitment to the community is to be engaged neighbor, and actualize significant and meaningful participation in cannabis industry for communities that were affected by cannabis prohibition.

### **OBJECTIVES**

1. Hire and properly train local employees.
2. Maintain community relationships with residents, businesses and organization.
3. Generate \$950,000 by the end of the first operating year.
4. Help maintain quality of life in our communities by adhering to community commitments.
5. Offer customers a broad selection of exotic and high potency cannabis products.
6. Use our social equity status to bring economic growth into the communities.

### **MISSION**

To consistently rise above dispensary standards nationwide. MCSE objectives include economic and social development to the communities that we operate in, by bringing more foot traffic to neighboring businesses to offering training and employment to locals who were incarcerated or arrested in the past for drug violations.



## **VISION**

To use the cultivation expertise within our employment team to offer an exclusive array of high quality cannabis flower and products. To create a unique and exotic brand that will stand out from the rest through our core values on customer service and education, honesty integrity, community outreach, equity and the highest quality of standard.

## **CORE VALUES**

We are dedicated to serving our customers and community. By investing in our employees personal growth through training and cannabis education within and out of our establishment. By offering our community equity, sustainability and resilience through community engagement, education and workshops.

We intend to hire local people, pay a livable wage, and provide benefits that will create an environment where staff wants to stay long-term. The environment will stress a level of camaraderie such that staff wants to come to work and enjoy their time at the store. The experience should be rewarding for everyone who comes through our door, whether customers, staff, or even city officials.

We believe the front line customer personnel are critical to providing the warm and welcoming customer experience. To achieve that level of service, we strive to take good care of our staff so they will want to take good care of our customers.

To keep staff engaged we plan to create a constant learning environment. We plan to do this by creating and implementing staff development plans, rotating staff through different positions, and in our mind, stipulating that each person could become a store manager and so we need to keep them engaged and trained accordingly.

One measure of our success will be that competitors are constantly attempting to poach our staff but that the staff is treated well enough, and feels part of the team such that they don't care to leave.

## **MANAGEMENT**

Brian Chavez - (Owner/CEO) grew up in Dorchester, and understands the culture of Boston. Mr. Chavez is well known in the community as a business owner, and has experience in the food industry with product development, food safety, and adhering to city and state regulations for operating in a regulated retail industry. Mr. Chavez has established a reputation for community engagement and entrepreneurship in his community of Fields Corner in Dorchester with his current two businesses, Antonio's HiFi and Bosburger. He maintains his commitment to the neighborhood and nearby organizations through his participation in community events and donations to local organizations.



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

Massachusetts Citizens for Social Equity LLC (the “**Company**”) will work with an insurance broker licensed in the Commonwealth of Massachusetts to obtain insurance that meets or exceeds the requirements set forth in 935 CMR 500.105 (10).

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

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

The Company will submit reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000: *Adult Use of Marijuana*.

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



### **Separating Recreational from Medical Operations**

This policy is not applicable. Currently, Massachusetts Citizens for Social Equity LLC (the “**Company**”) is only applying for a Marijuana Retailer license at this location.

This policy may also be referred to by the Company as the “**Policy for Separating Recreational from Medical Operations**”.



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

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

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

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

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

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





### **Maintaining of Financial Records**

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

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

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

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



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

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

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



## **Diversity Plan**

Massachusetts Citizens for Social Equity LLC (the “**Company**”) understands and appreciates the importance of diversity and as such is committed to actively working to ensure a diverse work place is created in the Company.

The Company is currently **one hundred percent (100%) minority owned**.

It is a policy of the Company to promote equity among people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, veterans, persons with disabilities, and L.G.B.T.Q. + in the operation of the Marijuana Establishment. To the extent permissible by law, the Company will make jobs available to people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, veterans, persons with disabilities, and L.G.B.T.Q. +, but this does not prevent the Company from hiring the most qualified candidates and complying with all employment laws and other legal requirements.

To this end, the Company will deploy a plan for enhancing diversity and equity within the organization through a number of various outreach efforts. Specifically, as it relates to its own internal practices, the Company will implement the following policies in connection with its diversity plan:

### **Goals:**

- (1) The Company endeavors to provide job opportunities to people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, veterans, persons with disabilities, and L.G.B.T.Q. +. The Company shall seek parity in its work force based on the American Community Survey (ACS) 2010 U.S. Census. **Workforce availability statistics for the Total Civilian Labor Force in Massachusetts is as follows: Women 48.8%, Minorities 20.7%, Persons with Disabilities 12% and Veterans 3.5%<sup>1</sup> and 10% L.G.B.T.Q. +.**
- (2) It shall be a goal of the Company to ensure that **one hundred percent (100%)** of its employees receive **training on diversity and sensitivity**.

### **Programs:**

To the extent reasonably practicable, the Company shall Implement the following programs:

- In an effort to ensure it has the opportunity to interview, and hire a diverse staff, the Company will post **monthly notices** for **three (3) months** during the hiring process in newspapers of general circulation such as the **Boston Herald** and post a notice at the municipal offices in **the City of Boston** for **three (3) months** during the hiring process. The aforementioned notices

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<sup>1</sup> <https://www.mass.gov/files/2017-08/census-2010-workforce-availability.pdf>



will state that the Company is specifically looking for people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, veterans, persons with disabilities, or L.G.B.T.Q. +, to work for the Company.

- As described above, it is a goal of the Company to seek parity in its workforce. Accordingly, the Company shall form a diversity and equity committee to monitor the Company's progress towards meeting those goals. This committee will meet quarterly to review and assess the Company's hires and hiring practices. Meeting Minutes will be provided to the Commission on request and for the Company's annual license renewal application.
- The Company shall require that one hundred percent (100%) of its employees receive education on diversity, implicit biases and sensitivity within the first ninety (90) days of employment and once annually thereafter. The Company's educational programs on diversity, implicit biases and sensitivity shall include, but not be limited to: (1) Harassment, Diversity & Sensitivity Training; (2) Sexual Harassment Prevention & Awareness Training; (3) Discrimination Free Workplace; (4) Violence in the Workplace; (5) Harassment in the Workplace (for Management); (6) Diversity and Sensitivity in the Workplace (for Management); (7) Unconscious Bias Training; (8) Ethics; and (9) Drug and Alcohol-Free Workplace.

To the extent reasonably practicable and as allowed by law, the Company shall implement the following measurements:

- a. Pursuant to 935 CMR 500.103(4)(a) the Company's diversity and equality committee shall prepare an annual report identifying the Company's efforts to encourage diversity in the work place, in compliance with 935 CMR 500.101(1)(c)(8)(k) and this *Diversity Policy*. Specifically, said report shall identify the demographics of its employee population including but not limited to identifying the gender, race, sexual orientation and disabled status of its employees without identifying the employee specifically and to the extent each employee is willing to share such information.

Additionally, this report will include the following metrics:

- i. Number of individuals from the target demographic groups who were hired and retained after the issuance of a license;
- ii. Number of promotions for people falling into the target demographics since initial licensure and number of promotions offered;
- iii. Number of jobs created since initial licensure;
- iv. Number of job postings in publications with supporting documentation; and



- v. Number and subject matter of internal trainings held on diversity, implicit biases and sensitivity and the number of employees in attendance.

The Company affirmatively states that: (1) it acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; (2) any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws and (3) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of its provisional license.

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



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Massachusetts Citizens for Social Equity LLC (the “**Company**”) has developed its standard operating procedures to ensure compliance with all state and local rules and regulations, as amended from time-to-time (the “**Applicable Laws**”), including the rules set forth by the Massachusetts Cannabis Control Commission (the “**Commission**”).

## **Hiring Process and Procedures**

### **Personnel requisitions**

Personnel requisitions must be completed to fill vacant positions. Requisitions must be initiated by the Store Manager and approved by the corporate human resource department.

Personnel requisitions should indicate, at a minimum, the following:

- (i) Position title;
- (ii) Position hours/shifts;
- (iii) Essential job functions and qualifications (or a current job description may be attached); and
- (iv) Any special recruitment advertising instructions.

### **Job postings**

HR will create job postings that briefly describe the job opening and communicate the Company brand. All job openings will be posted internally and externally with sources appropriate for the position being filled. Jobs will remain posted until the position is filled.

The Store Manager, concurrently with the HR department, will be responsible for tracking all applicants and retaining applications and resumes as required. The Company shall screen prospective employees against the requirements listed in all Applicable Laws.

### **Internal applicants**

Current employees with a satisfactory employment status may apply for internal job openings. All applicants for a posted vacancy will be considered based on their qualifications and ability to perform the job successfully.

### **Interview process**

The Store Manager and the HR department will screen applications and resumes prior to scheduling interviews. Initial interviews are generally conducted by the Store Manager and the HR department using behavior-based interview questions and a structured interview process.

### **Reference checks**

The HR department will conduct professional reference checks and employment verification on the top candidates.

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### **Job offers**

After a decision has been made to hire a candidate, an offer will be made contingent on the satisfactory completion of required background checks and testing. Background checks will vary depending on the position and may include criminal history, credit history, driving record, drug testing or any other relevant information for the job. The Company shall record confirmation of criminal history background checks within the employee's personnel records and provide same to the Commission.

Internal applicants must complete required background checks, including the CORI forms. Once the HR department receives satisfactory results from all required background checks and tests, candidates will be provided with a final job offer. The Company shall have a policy in place that requires employees to report any new or pending charges or convictions.

The Company will ensure all employees apply for a Registration Card to be authorized as a Marijuana Establishment Agent. All employees will be required to renew their respective Registration Cards on an annual basis in accordance with 935 CMR 500.030(5). Employees are required to always carry their Registration Card while performing any job duties at the Center.

### **Employee Dismissal**

The Company shall immediately dismiss any employee who has diverted marijuana, engaged in unsafe practices in respect of the operation of the Center, or who has been convicted or entered a guilty plea for a felony charge of distribution to a minor.

In the event an employee is found to have:

- (i) diverted marijuana, the Company shall promptly notify local law enforcement and the Commission; or
- (ii) engaged in any unsafe practices, the Company shall promptly notify the Commission.

If an employee is no longer employed by the Company, then the Company shall remove access and permissions to the Center and the statewide monitoring system. The Company will notify the Commission no more than one business day after an employee, registered as a Marijuana Establishment Agent, ceases to be associated with the Company.

### **Staffing**

The Company intends to maintain sufficient employment levels to operate in a lean manner, yet employ enough individuals to maintain safety, security and customer service. An example of the Company's Center staffing plan is as follows:

1. **Store Manager:** The Store Manager is primarily responsible for the day-to-day operations of the Center. The Store Manager shall oversee the Company's employees

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working at the Center and all dispensing of marijuana. Specifically, the Store Manager will:

- a. Lead recruiting, training and supervision of Center staff;
  - b. Interact with customers and ensure customer satisfaction;
  - c. Manage inventory receipts and compliance with Applicable Laws;
  - d. Oversee selling process and compliance with Applicable Laws;
  - e. Lead health and safety efforts for employees and customers;
  - f. Manage the Center's operating budget with the direction of corporate team; and
  - g. Oversee administrative items and compliance with the direction of corporate team.
2. **Assistant Manager:** The Assistant Manager will work directly with the Store Manager to lead day-to-day operations of the Center. The Assistant Manager will be capable of completing the Store Manager's tasks in their absence. Specifically, the Assistant Manager will:
  - a. Work directly with Budtenders to promote superior customer service;
  - b. Provide exceptional training to Budtenders on the Company's point-of-sale system;
  - c. Be the first line of communication with Budtenders and customers to resolve issues;
  - d. Lead opening and/or closing procedures for the Center;
  - e. Oversee "cash drops", i.e. the process of transferring currency from the register to the limited-access vault; and
  - f. Assist the Store Manager to ensure compliance with Applicable Laws.
3. **Sales Associate:** The Sales Associate interacts directly with customers to provide an exceptional customer experience while complying with all Applicable Laws.
  - a. Cheerfully interact with customers from greeting to final sale;
  - b. Demonstrate excellent knowledge of Company product offerings and make knowledgeable recommendations to customers based on experience and knowledge of products;
  - c. Ability to explain the effects and differences of indica, sativa or a hybrid strain and recommend strains;
  - d. Ability to distinguish the different types of marijuana and the different therapeutic effects caused by consumption;
  - e. Ensure selling procedures are carried out safely and sanitary;
  - f. Upsell customers via current coupons and/or promotions;
  - g. Assist other Budtenders as needed; and
  - h. Carry out sales transactions on Company point-of-sale software.
4. **Receptionist:** The Receptionist supports all Center staff through clerical management.
  - a. Greet customers and communicate Company and regulatory policies;
  - b. Gather required customer documentation;

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- c. Manage inbound and outbound phone calls;
  - d. Support data entry and point-of-sale system management as needed; and
  - e. Other tasks as assigned by the Assistant Manager or Store Manager.
5. **Shift Leads:** Responsible for performing management functions when no other Managers are on duty while also guiding the patients through the process of understanding, selecting and acquiring cannabis products that fit their needs.
  6. **Inventory Specialist:** Responsible for intaking and labeling new product, monitoring the store's inventory, and packaging and labeling orders to ensure operational efficiencies and compliance with all Applicable Laws.
  7. **Security:** Responsible for safe-guarding all entries to the Center, as well as handling emergency security situations. Security employees report directly to the Store Manager.

*Please refer to Exhibit "A" to review the job description the Company will use during the hiring process for the above noted employment positions.*

## **Training**

The Company will originally hire all employees on a probationary basis. During this probationary period, candidates will complete a comprehensive training program and will be evaluated for suitability in a restricted-access environment. Training will be highly customized based on the role of each employee and the employee's level of experience and training.

### **Responsible Vendor Training**

The Director of Human Resources is responsible for ensuring that all individuals at Company that are involved in the handling or sale of marijuana for adult use, either at the time of licensure or at renewal, have attended and successfully completed a Responsible Vendor Training Program.

The Director of Human Resources must ensure employees complete:

1. Responsible Vendor Basic Core Curriculum.
2. Responsible Vendor Advanced Core Curriculum, once Basic Core Curriculum is complete.

The Director of Human Resources may choose to exempt administrative employees who do not handle or sell marijuana from mandatory Responsible Vendor Training.

The Director of Human Resources must ensure that new employees complete Responsible Vendor Training within ninety (90) days of hire.

The Company will maintain all records of compliance with all training requirements required by law ("Training Records" for a period of not less than four (4) years. The Training Records will be available for inspection upon request.

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## **Employee Training Modules**

In addition to Responsible Vendor Training, the Director of Human Resources, with the assistance of the Store Manager, must ensure that all employees are well prepared for their employment duties. Prior to being granted access to any secure areas, handling any marijuana products, or engaging in any customer transactions, the Director of Human Resources must ensure employees receive the following training:

1. Overview of the Company's Employee Handbook, including the Company's employment policies and procedures.
2. Security procedures and responsibilities.
3. Confidentiality and privacy policies.
4. Recordkeeping and inventory management requirements.
5. Compliance and regulatory review.
6. Anti-diversion protocols.
7. Workplace safety and emergency protocols.
8. Customized training for the individual's specific job function, by the employee's supervisor or manager. This must include a review of all Company written operating policies and procedures.
9. For those employees responsible for entering product into Metrc, seed-to-sale tracking training in a form and manner determined by the Commission.

## **Estimated Staffing Levels**

During our hours of operation (which are subject to change), the Company's employees will be available for customers to assist with any questions they may have, provide information that is relevant to the patient's condition, and complete sales transactions using a POS system.

The number of employees on-site will vary depending on operational needs. Agents will be dedicated to filling orders and ensuring products are properly labeled pursuant to the Company's SOP requirements prior to dispensing.

## **Employee Records**

The Company maintain its records in accordance with all Applicable Laws, which records will be available for inspection by the Commission upon request.

The Company's records will contain the following personnel records:



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1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent, which same shall be maintained for a period of at least twelve (12) months after termination of the individual's affiliation with the Company and shall include, at a minimum, the following:
  - a. All materials submitted to the commission pursuant to 935 CMR 500.030(2), including, but not limited to:
    - i. full name, date of birth and address of the individual;
    - ii. all aliases used previously or currently in use by the individual, including maiden name, if any;
    - iii. a copy of the individual'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;
    - iv. an attestation that the individual will not engage in the diversion of marijuana;
    - v. a written acknowledgment by the individual of any limitation on his or her authorization to dispense marijuana;
    - vi. all background information required under the Applicable Laws, including criminal convictions, civil or administrative actions, professional licensing, and business licensing;
3. Documentation of verification of references;
4. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
5. 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;
6. Documentation of periodic performance evaluations;
7. A record of any disciplinary action taken;
8. Notice of completed responsible vendor and eight-hour related duty training; and
9. A staffing plan that demonstrates accessible business hours;

### **Hours of Operation and After-Hours Contact**

The Company will maintain and publish its after-hours contact information and hours of operation in accordance with 935 CMR 500.000.

The following hours of operation and after-hours contact information will be provided to the Commission and made available to law enforcement officials upon request:

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### ***Hours of Operation***

Monday – Sunday: 10:00 a.m. – 9:00 p.m.

### ***After-Hours Contact Information***

Ankur Rungta  
734-323-1822  
ankur@c3industries.com

The Company will update the after-hours contact information and business hours in accordance with 935 CMR 500.000.

### **External Agencies / Departments Contact**

Massachusetts Cannabis Control Commission:	617-701-8400
Massachusetts State Police:	508-820-2300
Boston Fire Department:	617-343-3415
Department of Public Health:	617-624-6000
Boston Police Department HQ:	617-343-4633

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**Exhibit "A"**  
**Job Descriptions**

**See attached.**

**Massachusetts Citizens for Social Equity LLC**  
**Job Description**

<b>JOB TITLE</b> Assistant Store Manager	<b>REPORTS TO</b> Store Manager	<b>WORK LOCATION</b> Massachusetts
<b>DEPARTMENT</b> High Profile x Bodega	<b>JOB TYPE</b> Full Time	<b>FLSA STATUS</b> Exempt

**JOB SUMMARY:**

The Assistant Store Manager is to support the manager in the daily operations of the store, including supervising employees, working with customers, and to effectively drive sales through exceptional customer service.

**JOB DUTIES:**

Core duties and responsibilities include the following. Other duties may be assigned.

- Assist Store Manager in planning and implementing strategies to attract and retain repeat customers.
- Serve as a role model for store employees in sales generation and customer service by making the customer experience the priority; regularly work sales floor and register.
- Track the progress of weekly, monthly, quarterly, and annual goals.
- Monitor and maintain inventory levels and communicate discrepancies to upper Management.
- Contribute in management and store meetings, offering suggestions for employee development, sales opportunities, and organizational improvements.
- Maintain visual standards, including merchandise presentation, signage, lighting and general maintenance.
- Assisting Store Manager with developing store schedule to ensure proper store coverage during peak hours.
- Handle and mitigate customer complaints in a professional manner to ensure their overall satisfaction.
- Educate and coach store employees on product knowledge, loss prevention procedures, and safety protocol.
- Comply with company cash handling policies and perform daily cash management responsibilities and compliance reporting per company policy.
- Split tips, within company guidelines, amongst team members at the end of the business day when Store Manager is not present.
- Create reports, analyze and interpret data, such as store sales, units per sale, and sales per hour.
- Assist Store Manager with hiring, training and development new and current employees.
- Ensure all employees adhere to companies' policies and guidelines, and act as store representative when Store Manager is not present.

**SUPERVISORY RESPONSIBILITIES:**

Directly supervises Shift Leads, Sales Associates and Receptionists when Store Manager is not present, within given retail store.

**JOB REQUIREMENTS:**

- 1-3 years retail management experience or equivalent.
- Proven ability to motivate and influence others through personal actions and examples.
- Experience with POS and inventory management systems.
- Ability to open and close the store independently.
- Proven ability to establish strong credibility and build relationships and operate in an environment of ambiguity.
- Strong results-orientation and commitment to quality, performance and deliverables.
- Effective multi-tasker with demonstrated ability to prioritize.
- Demonstrate strong oral and written communication skills; ability to correspond in a professional, businesslike manner.

**PHYSICAL REQUIREMENTS, WORKING CONDITIONS & UNIFORM REQUIREMENTS:**

- Employee is occasionally required to sit, climb or balance, stoop, kneel, crouch, or crawl; the employee is frequently required to stand, walk, talk or hear; the employee is regularly required to use hands or fingers to, handle or feel, reach with hands and arms.
- Employee is occasionally required to lift up to 50 pounds; the employee is frequently required to lift up to 25 pounds.
- The Employee uniform would consist of either a sponsored High Profile or Cloud Cover Cannabis top. Until the employee receives their High Profile or Cloud Cover Cannabis apparel, the employee can wear all black clothing.

Employee signature below constitutes employee's understanding of the requirements, essential functions and duties of the position as listed above.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## Massachusetts Citizens for Social Equity LLC

### Job Description

<b>JOB TITLE</b> Sales Associate	<b>REPORTS TO</b> Store Manager	<b>WORK LOCATION</b> Massachusetts
<b>DEPARTMENT</b> High Profile x Budega	<b>JOB TYPE</b> Full Time/ Part Time	<b>FLAS STATUS</b> Non- Exempt

#### **JOB SUMMARY:**

The Sales Associate is responsible for guiding the patients through the process of understanding, selecting and acquiring cannabis products that fit their needs, while providing world class customer service.

#### **JOB DUTIES:**

Core duties and responsibilities include the following. Other duties may be assigned.

- Provide the highest level of customer service to patients by making the patient's experience the priority.
- Assist patients to better understand product offerings and benefit.
- Educate patients on cannabis properties and selection of proper genetics according to their desired effect, relief for patients' ailments or per request.
- Handle customer complaints in a professional manner; escalate to management when needed.
- Maintain product knowledge and keep up on current cannabis trends.
- Accurately use and maintain Point of Sale (POS) system.
- Comply with company cash handling policies and perform daily cash management responsibilities and compliance reporting per company policy.
- Ensure sales floor is properly stocked and the presence of the store is well maintained during down time.
- Assist with store operations including opening and closing of the store, intake of product and inventory counts.
- Work closely with management team to increase sales and foot traffic.
- Daily compliance with dispensary policies, including but not limited to the following: state/local regulation compliance, security protocols, access protocols, inventory tracking, dress code, and work schedules.
- Maintain compliance with local and state regulations, company policies and SOPs.

#### **SUPERVISORY RESPONSIBILITIES:**

None

#### **JOB REQUIREMENTS:**

- 1+ years' customer service experience, High school diploma or General Education Diploma (GED)
- Experience with POS systems, and cash handling practices.
- Commitment to reaching Key Performance Indicators on a regular basis.
- Effective multi-tasker with demonstrated ability to prioritize tasks.
- Ability to work independently with little or no direct supervision.
- Demonstrate strong oral and written communication skills; ability to correspond in a professional and businesslike manner.



- Knowledge of state and local regulations preferred.
- Ability to pass a background check and is 21 years of age.

**PHYSICAL REQUIREMENTS, WORKING CONDITIONS & UNIFORM REQUIREMENTS :**

- Employee is occasionally required to sit, climb or balance, stoop, kneel, crouch, or crawl; the employee is frequently required to stand, walk, talk or hear; the employee is regularly required to use hands or fingers to, handle or feel, reach with hands and arms.
- Employee is occasionally required to lift up to 50 pounds; the employee is frequently required to lift up to 25 pounds.
- The Employee uniform would consist of either a sponsored High Profile or Cloud Cover Cannabis top. Until the employee receives their High Profile or Cloud Cover Cannabis apparel, the employee can wear all black clothing.

Employee signature below constitutes employee's understanding of the requirements, essential functions and duties of the position as listed above.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## Massachusetts Citizens for Social Equity LLC

### Job Description

<b>JOB TITLE</b> Inventory Specialist	<b>REPORTS TO</b> Store Manager	<b>WORK LOCATION</b> Massachusetts
<b>DEPARTMENT</b> High Profile x Bodega	<b>JOB TYPE</b> Full Time	<b>FLAS STATUS</b> Non - Exempt

#### **JOB SUMMARY:**

The Inventory Specialist will be responsible for intaking and labeling new product, monitoring the store's inventory, and packaging and labeling orders to ensure operational efficiencies and compliance with state and local laws.

#### **JOB DUTIES:**

Core duties and responsibilities include the following. Other duties may be assigned.

- Assist with intaking product received to the store into current inventory tracking software in a timely manner; train applicable employees on store SOP's for intake, packaging, labeling and inventory tracking.
- Ensure product matches manifest description; escalate to management to ensure corrective action is taken when needed.
- Label and package incoming customer orders in a timely manner, in accordance with state compliance.
- Maintain a database with SKU/UPC numbers; ensure all reconciliation is regularly completed including matching physical inventory to METRC inventory.
- Perform cycle counts daily, weekly and monthly as needed.
- Create and maintain inventory reports for all products on hand in the store; implement corrective actions to resolve discrepancies.
- Ensure all product is labeled accurately and in a timely manner under company SOP's.
- Maintain active knowledge of incoming inventory and inventory levels on hand.
- Record and monitor all items with shelf-life daily and notify Management when material has expired or is damaged.
- Organize and maintain backroom inventory areas for efficient material storage and handling.
- Provide hands-on training of inventory tracking system and inventory procedures for new and current employees.
- Maintain compliance with local and state regulations, company policies and SOPs.
- Assist in other day to day functions of the store.

#### **SUPERVISORY RESPONSIBILITIES:**

None.

#### **JOB REQUIREMENTS:**

- 1+ years' experience in inventory management, High school diploma or General Education Diploma (GED)
- Experience with POS systems, inventory tracking systems, required; METRC experience preferred.
- Excellent organization skills, with a high attention to detail.

- Effective multi-tasker with demonstrated ability to prioritize tasks.
- Ability to work independently with little or no direct supervision.
- Demonstrate strong oral and written communication skills; ability to correspond in a professional and businesslike manner.
- Knowledge of state and local regulations preferred.
- Ability to pass a background check and is 21 years of age.

**PHYSICAL REQUIREMENTS WORKING CONDITIONS & UNIFORM REQUIREMENTS:**

- Employee is occasionally required to sit, climb or balance, stoop, kneel, crouch, or crawl; the employee is frequently required to stand, walk, talk or hear; the employee is regularly required to use hands or fingers to, handle or feel, reach with hands and arms.
- Employee is occasionally required to lift up to 50 pounds; the employee is frequently required to lift up to 25 pounds.
- Specific vision abilities required by this job include close vision and the ability to adjust focus.
- The Employee uniform would consist of either a sponsored High Profile or Cloud Cover Cannabis top. Until the employee receives their High Profile or Cloud Cover Cannabis apparel, the employee can wear all black clothing.

Employee signature below constitutes employee's understanding of the requirements, essential functions and duties of the position as listed above.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## **Massachusetts Citizens for Social Equity LLC**

### **Job Description**

<b>JOB TITLE</b> Shift Lead	<b>REPORTS TO</b> Store Manager	<b>WORK LOCATION</b> Massachusetts
<b>DEPARTMENT</b> High Profile x Bodega	<b>JOB TYPE</b> Full Time	<b>FLAS STATUS</b> Non- Exempt

#### **JOB SUMMARY:**

The Shift Lead is responsible for performing management functions when no other Managers are on duty while also guiding the patients through the process of understanding, selecting and acquiring cannabis products that fit their needs.

#### **JOB DUTIES:**

Core duties and responsibilities include the following. Other duties may be assigned.

- Provide the highest level of customer service by making the patient's experience the priority.
- Assist patients to better understand product offerings and benefit.
- Educate patients on cannabis properties and selection of proper genetics according to their desired effect, relief for patients' ailments or per request.
- Serve as a role model for store employees in sales generation and customer service by making the customer experience the priority.
- Handle customer complaints in a professional manner; handle escalated manners when Store Manager or Assistant Manager are not present.
- Maintain product knowledge and keep up on current cannabis trends.
- Accurately use and maintain Point of Sale (POS) system; assist in training employees on an as needed basis.
- Comply with company cash handling policies and perform daily cash management responsibilities and compliance reporting per company policy.
- Utilize down time productively to ensure sales floor is properly stocked for team members and next shift; Delegate and confirm team members are completing shift duties.
- Open and close the store, assist with intake of product, inventory counts, and daily cash balancing
- Split tips, within company guidelines, amongst team members at the end of the business day when Store Manager is not present.
- Contribute in management and store meetings, offering suggestions for employee development, sales opportunities, and organizational improvements.
- Ensure daily compliance with dispensary policies, including but not limited to the following: state/local regulation compliance, security protocols, access protocols, inventory tracking, dress code, and work schedules.
- Ensure all employees adhere to companies' policies and guidelines, and act as store representative when Store Manager or Assistant Store Manager are not present.

#### **SUPERVISORY RESPONSIBILITIES:**

Directly supervises stores Sales Associates and Receptionists when Store Manager and Assistant Store Manager are not present.

**JOB REQUIREMENTS:**

- 3+ years' customer service experience, High school diploma or General Education Diploma (GED)
- Experience opening and closing a retail store or restaurant preferred.
- Experience with POS systems, and cash handling practices.
- Commitment to reaching Key Performance Indicators on a regular basis.
- Effective multi-tasker with demonstrated ability to prioritize tasks.
- Ability to work independently with little or no direct supervision.
- Demonstrate strong oral and written communication skills; ability to correspond in a professional and businesslike manner.
- Knowledge of state and local regulations preferred.
- Ability to pass a background check and is 21 years of age.

**PHYSICAL REQUIREMENTS, WORKING CONDITIONS & UNIFORM REQUIREMENTS:**

- Employee is occasionally required to sit, climb or balance, stoop, kneel, crouch, or crawl; the employee is frequently required to stand, walk, talk or hear; the employee is regularly required to use hands or fingers to, handle or feel, reach with hands and arms.
- Employee is occasionally required to lift up to 50 pounds; the employee is frequently required to lift up to 25 pounds.
- The Employee uniform would consist of either a sponsored High Profile or Cloud Cover Cannabis top. Until the employee receives their High Profile or Cloud Cover Cannabis apparel, the employee can wear all black clothing.

Employee signature below constitutes employee's understanding of the requirements, essential functions and duties of the position as listed above.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## Massachusetts Citizens for Social Equity LLC

### Job Description

<b>JOB TITLE</b> Store Manager	<b>REPORTS TO</b> Regional Manager	<b>WORK LOCATION</b> Massachusetts
<b>DEPARTMENT</b> High Profile x Bodega	<b>JOB TYPE</b> Full Time	<b>FLAS STATUS</b> Exempt

#### **JOB SUMMARY:**

The Store Manager will oversee day to day operations of the store, including supervising employees, inventory management, working with customers, and effectively driving sales through exceptional customer service.

#### **JOB DUTIES:**

Core duties and responsibilities include the following. Other duties may be assigned.

- Oversee and drive all aspects of store performance, ensuring efficient and sound operations, maximum profit and a best in class store experience.
- Ensure Key Performance Indicators (KPI) are being tracked and achieved on a weekly, monthly and yearly basis.
- Create sales reports, analyze and report data, such as store sales, units per sale, and sales per hour.
- Handle and mitigate customer complaints in a professional manner to ensure their overall satisfaction, train team on best practices.
- Collaborate and lead Assistant Store Managers in planning and implementing strategies to attract and retain repeat customers.
- Serve as a role model for store employees in sales generation and customer service by making the customer experience the priority.
- Work closely with Regional Manager to establish and promote Customer Loyalty Programs.
- Ensure best in class customer experience exists by staying connected to customer needs, anticipating changes, and preparing teams to meet consumer challenges.
- Ensure employee training of POS systems, METRC, and other inventory control systems.
- Monitor and maintain inventory levels and communicate discrepancies to Management.
- Run internal store meetings, provide feedback for employee development, sales opportunities, and organizational improvements.
- Maintain visual standards, including merchandise presentation, signage, lighting and general maintenance.
- Develop store's schedule to ensure proper sales floor coverage during peak selling hours; approve employees time off requests to ensure proper store coverage.
- Educate and coach store employees on product knowledge, shrink protocol, and safety protocol.
- Comply with company cash handling policies and perform daily cash management responsibilities and compliance reporting per company policy.
- Split tips, within company guidelines, amongst team members at the end of the business day.
- Work closely with the Human Resource Department with hiring new employees, training and development new and current employees.



- Partner with cross functional leaders to ensure adequate inventory levels, proper merchandising and other operational aspects to optimize store performance.
- Ensure implementation and adherence to all local and state laws and inspection requirements.

**SUPERVISORY RESPONSIBILITIES:**

Directly supervises Assistant Store Managers, Shift Leads, Sales Associates and Receptionists.

**JOB REQUIREMENTS:**

- Bachelor's degree and 3-5 years retail management experience preferred, or equivalent.
- Comprehensive knowledge of retail operations, merchandising, and sales.
- Proficient in Microsoft Office applications, POS systems; experience with METRC preferred.
- Proven ability to motivate and influence others through personal actions and examples.
- Ability to drive proven improvements across all areas managed
- Proven ability to establish strong credibility and build relationships and operate in an environment of ambiguity.
- Ability to build and lead a best in class retail team.
- Strong results-orientation and commitment to quality, performance and deliverables.
- Effective multi-tasker with demonstrated ability to prioritize.
- Demonstrate strong oral and written communication skills; ability to correspond in a professional, businesslike manner.

**PHYSICAL REQUIREMENTS, WORKING CONDITIONS & UNIFORM REQUIREMENTS:**

- Employee is occasionally required to sit, climb or balance, stoop, kneel, crouch, or crawl; the employee is frequently required to stand, walk, talk or hear; the employee is regularly required to use hands or fingers to, handle or feel, reach with hands and arms.
- Employee is occasionally required to lift up to 50 pounds; the employee is frequently required to lift up to 25 pounds.
- Specific vision abilities required by this job include close vision and the ability to adjust focus.
- The Employee uniform would consist of either a sponsored High Profile or Cloud Cover Cannabis top. Until the employee receives their High Profile or Cloud Cover Cannabis apparel, the employee can wear all black clothing.

Employee signature below constitutes employee's understanding of the requirements, essential functions and duties of the position as listed above.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

# **Qualifications and Training**

## **Marijuana Retailer Application**

### **561 Dudley Street, Boston, MA 02125**

### **Massachusetts Citizens for Social Equity LLC**

#### **Introduction**

Massachusetts Citizens for Social Equity LLC (the “**Company**”) is seeking to operate a retail Marijuana Establishment (the “**Center**”) at 561 Dudley Street, Boston, MA 02125 (the “**Property**”). The Company is a subsidiary of a large multi-state operator that holds cannabis licenses for cultivation, production and retail facilities in several states, including Massachusetts, Missouri, Oregon and Michigan. The Company has extensive operational experience and policies and procedures in place to provide extensive training and education to all employees.

#### **Training**

The Company will originally hire all employees on a probationary basis. During this probationary period, candidates will complete a comprehensive training program and will be evaluated for suitability in a restricted-access environment. Training will be highly customized based on the role of each employee and the employee’s level of experience and training. In accordance with 935 CMR 500.105(2)(a), the Company will ensure that all hired staff will complete training prior to performing job functions.

The Company will fully train staff members of the Center on all aspects of the business before operations are commenced. Training and education will be all-encompassing, covering:

1. General Training;
2. Responsible Vendor Training;
3. Health and Sanitation;
4. Legal Compliance, including privacy and confidentiality;
5. Safety and Security;
6. Inventory Monitoring and Reporting/Recordkeeping;
7. Marijuana Product Education; and
8. Job Specific Roles.

#### **General Training**

The Company’s general training will include, but is not limited to the following topics:

1. Recordkeeping – The Company will train its employees on its stringent recordkeeping protocols that ensure data acquired by all logging and tracking systems is responsibly and accurately maintained.
2. Inventory Monitoring and Reporting – The Company will ensure all employees are proficient in the Center’s inventory protocols with respect to tracking, monitoring and reporting all marijuana products sold at the Center.
3. Acceptable Forms of Identification – The Company will ensure all employees are familiar with inspecting identification, including how to spot false identification, policies regarding

confiscation of fraudulent identification and best practices regarding common mistakes made during the identification process.

4. Cash Handling – The Company will ensure all incoming employees are properly trained and informed of their cash handling responsibilities.
  - a. Employees will also be trained to recognize counterfeit currency and will receive general fraud protection training.
5. Center Information – The Company will provide all requisite information to ensure all staff members are fully informed on the important Center specific information, such as understanding what the limited access areas are and the Center’s hours of operations.

For certainty, the Company will ensure its general training seminars in respect of inventory and recordkeeping protocols address all statutory requirements set out in the Applicable Laws, including, but not limited to 935 CMR 500.105(8) and 935 CMR 500.105(9), respectively.

## **Responsible Vendor Training**

The Company will have its Center designated as a “responsible vendor” by ensuring all current owners, manager, and employees attend and successfully complete a responsible vendor program, as required by 935 CMR 500.105(2)(b). Pursuant to 935 CMR 500.105(2)(b)(2), all new employees of the Company will also participate in a responsible vendor training program within their first ninety (90) days of service. Once an agent has completed a responsible vendor training program, they must, in accordance with 935 CMR 105(2)(b)(3), complete the program annually to ensure the Company maintains status as a responsible vendor. Pursuant to 935 CMR 500.105(2)(b)(5), the Company will maintain records of responsible vendor training compliance for at least four (4) years. Administrative employees who do not handle or sell marijuana may take the responsible vendor program voluntarily.

## **Health and Sanitation Training**

The Company will provide thorough training to all employees to mitigate potential sanitation or safety risks. An emphasis will be placed on the regular cleaning and sanitation of all areas where products may be present.

Health and sanitation training will focus primarily on contamination prevention and employees will learn best practices for preventing contamination of marijuana products from biological contaminants (e.g. parasites, mold, bacteria), physical contaminants (e.g. dirt, dust, glass) and chemical contaminants (e.g. cleaning compounds, sanitizing agents, solvents). The Company’s health and sanitation training will primarily focus on the following topics:

1. Inventory inspections – Procedure for inspecting marijuana products for signs of damage (e.g. water damage), pests and expiration dates.
2. Cleaning and sanitizing – Procedures for:
  - a) regular cleaning of equipment, utensils and surfaces to protect against contamination; and
  - b) cleaning and sanitization of display cabinets, countertops and other service areas at the beginning and end of each shift, and throughout the day as needed.
3. Storage of chemicals – Procedures for identifying and storing chemicals, including cleaning compounds, sanitizing agents and solvents.

4. Handling of marijuana products – Protocol for proper sanitation and personal hygiene prior to handling any marijuana product.

Health and sanitation training will also include the protocol for handling, storing and disposing of marijuana waste. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12). These policies and training programs are aimed at ensuring all employees are informed on how to safely handle and dispense marijuana products in a sanitary manner.

## **Legal Compliance Training**

Legal compliance training will educate employees on all Applicable Laws that the Company and the Center may be subject to. The legal compliance training will focus particularly on the Applicable Laws that inform the day-to-day operations of the Center. Legal compliance training will include, but is not limited to, the following topics:

1. Inventory tracking compliance;
2. Required labeling and packaging of marijuana products;
3. Recordkeeping, privacy and confidentiality;
4. Prevention of illegal diversion of marijuana; and
5. Disposal of marijuana waste.

Employees will complete initial legal compliance training at new employee orientation and will receive additional training from time-to-time as necessary to track any relevant changes to any Applicable Laws.

## **Safety and Security Training**

Each successful employee applicant shall undergo safety and security training before beginning their work at the Company. As a part of the employee orientation process, all employees will be provided with a copy of the final security plan of the Center, as well as security and safety training. Security and safety training shall consist of examination and discussion of the security plan, premises orientation, emergency training, and situational training.

Initial employee safety and security training shall include, but is not limited to, the following topics:

1. Building orientation and access authority, which shall include:
  - a) The proper use and display of employee's identification and access badge for entry into the Center and main building entrance;
  - b) The proper use and display of employee's identification and access badge for entry into employee's authorized access areas;
  - c) The Center's standard business hours and protocol for entry and exit outside standard business hours;
  - d) Employee's authorized entry and exit points;
  - e) Employee's locker; and
  - f) Restroom and sink facilities.
2. Measures and controls for the prevention of diversion, theft or loss of marijuana products, which shall include:

- a) Necessity of keeping all limited access areas locked and secure at all times;
  - b) Prohibited activities such as entrance into unauthorized access areas;
  - c) Awareness of video monitoring; and
  - d) Requirement to report any unusual activity, security concern, or loitering.
3. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies, including, but not limited to:
- a) Accident prevention training;
  - b) How to respond to an emergency;
  - c) Emergency service provider location;
  - d) Emergency service contact information;
  - e) Emergency first aid kit locations; and
  - f) Emergency exits and panic button locations.

## **Recordkeeping & Inventory Management Training**

The Company's inventory and recordkeeping training will also ensure employees are proficient in the operation and data entry procedures to utilize the point-of-sale system used at the Center and the statewide seed-to-sale tracking system.

The Company's recordkeeping training will notify employees of each type of records that must be well documented and maintained, including:

- (i) Inventory records required by 935 CMR 500.105(8);
- (ii) Seed-to-sale tracking records for all marijuana products, as required by 935 CMR 500.105(8)(e);
- (iii) All written operating policies and procedures implemented by the Company, as required by 935 CMR 500.105(1);
- (iv) All personnel records listed in 935 CMR 500.105(9)(d);
- (v) The staffing plan implemented by the Company;
- (vi) All personnel policies and procedures applicable to the Company;
- (vii) All background check reports obtained in accordance with Applicable Laws;
- (viii) All business records listed in 935 CMR 500.105(9)(e); and
- (ix) All waste disposal records, if applicable, as required under 935 CMR 500.105(12).

The Company's training program and standard operating procedures will guide its employees to ensure all appropriate steps are taken to properly document the above noted records.

The Company will ensure its inventory is maintained in said seed-to-sale tracking system in real-time by implementing proper inventory controls and procedures, as well comprehensive inventory review protocols. The Company will utilize best practices and standard operating procedures it has already successfully implemented within its existing retail dispensaries.

## **Marijuana Product Education Training**

The Company will provide comprehensive training of employees regarding various aspects the marijuana products to be sold at the Center. Such training will aim to provide all employees with a thorough understanding of the following topics:

1. The various marijuana strains, and the benefits and drawbacks of each;
2. The various marijuana products and consumption methods, and the benefits and drawbacks of each;
3. The various cannabinoids (including THC and CBD) found in marijuana products and the benefits and drawbacks of each;
4. Dosage information, cannabinoid content and serving size for different marijuana products; and
5. Warnings of the potential differing effects of various strains of marijuana products.

Marijuana product education training sessions will be held periodically to keep employees informed on new marijuana products and information on marijuana strains that will be acquired and sold by the Company at the Center.

### **Annual Training**

Pursuant to 935 CMR 500.105(2)(a), the Company will ensure all of its employees receive at least eight (8) hours of on-going training annually. This training could cover a variety of topics ranging from updated laws and regulations to cannabis education. The Store Manager is ultimately responsible for the topics covered in annual on-going training. The Company will utilize both internal and external experts and professionals in fostering on-going training. On-going training will be recorded and stored with the individual's personnel records in accordance with 935 CMR 500.105(9)(d).



# High Profile × ***BUDEGA***

**Cannabis Shop**

## **Massachusetts Citizens for Social Equity LLC Employee Handbook**

**Massachusetts Citizens for Social Equity LLC  
Last Updated on July 1, 2022**

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## **Welcome**

Massachusetts Citizens for Social Equity LLC (“MCSE” or the “Company”)! We are delighted that you have chosen to join our organization and hope that you will enjoy a long and successful career with us. As you become familiar with our culture and mission, we hope you will take advantage of opportunities to enhance your career and further the Company’s goals.

Massachusetts Citizens for Social Equity LLC was founded in 2019 with goal of becoming a leading cannabis retailer, with a focus on superior quality for the discerning cannabis consumer. Together, our leadership has over 5 decades of experience in various disciplines. Our team and talent are our biggest asset, and we look to continuously improve our capabilities and bring in new people when and where appropriate. Our employees use their creativity and skills to create the highest quality cannabis products. With your hard work, creativity, and talent, MCSE will continue to achieve its goals. We sincerely hope you will take pride in being an important part of the Company's success.

Please take time to review the policies contained in this handbook. If you have questions, feel free to ask your supervisor or to contact the Human Resources Department.

## **Introduction**

This Employee Handbook (“Handbook”) is a compilation of personnel policies, practices and procedures currently in effect at Massachusetts Citizens for Social Equity LLC (“MCSE” or the “Company”).

The Handbook is designed to introduce you to our Company, familiarize you with Company policies, provide general guidelines on work rules, benefits and other issues related to your employment, and help answer many of the questions that may arise in connection with your employment.

This Employee Handbook is not a contract of employment and does not create a contract of employment. Like most US companies, Massachusetts Citizens for Social Equity LLC generally does not offer individual employees formal employment contracts with the Company. This Handbook does not create a contract, express or implied, guaranteeing you any specific term of employment, nor does it obligate you to continue your employment for a specific period of time. The purpose of the Handbook is simply to provide you with a convenient explanation of present policies and practices at the Company. This Handbook is an overview or a guideline. It cannot cover every matter that might arise in the workplace. For this reason, specific questions regarding the applicability of a particular policy or practice should be addressed to the Human Resources Department.

The Company reserves the right to modify any of our policies and procedures, including those covered in this Handbook, at any time. We will seek to notify you of such changes by email and other appropriate means. However, such a notice is not required for changes to be effective.



# **General Employment Policies and Practices**

## **Equal Employment Opportunity**

The Company provides equal employment opportunities to all employees and applicants for employment without regard to race, color, ancestry, national origin, gender, sexual orientation, marital status, religion, age, disability, gender identity, results of genetic testing, or service in the military. Equal employment opportunity applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training.

MCSE expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is absolutely not tolerated.

## **Commitment to Diversity**

The Company is committed to creating and maintaining a workplace in which all employees have an opportunity to participate and contribute to the success of the business and are valued for their skills, experience, and unique perspectives. This commitment is embodied in company policy and the way we do business at MCSE and is an important principle of sound business management.

## **Employment at Will**

Employment at MCSE is on an at-will basis unless otherwise stated in a written individual employment agreement signed by an executive of the Company.

This means that either the employee or the Company may terminate the employment relationship at any time, for any reason, with or without notice.

Nothing in this employee handbook is intended to or creates an employment agreement, express or implied. Nothing contained in this or any other document provided to the employee is intended to be, nor should it be, construed as a contract that employment or any benefit will be continued for any period of time.

Any salary figures provided to an employee in annual or monthly terms are stated for the sake of convenience or to facilitate comparisons and are not intended and do not create an employment contract for any specific period of time.

Nothing in this statement is intended to interfere with, restrain, or prevent concerted activity as protected by the National Labor Relations Act. Such activity includes employee communications regarding wages, hours, or other terms or conditions of employment. Company employees have the right to engage in or refrain from such activities.

## **Recruitment and Hiring**

The Company's primary goal when recruiting new employees is to fill vacancies with persons who have the best available skills, abilities, or experience needed to perform the work. Decisions regarding the recruitment, selection, and placement of employees are made on the basis of job-related criteria.

When positions become available, qualified current employees are encouraged and are welcome to apply for the position. As openings occur, notices relating general information about the position are posted. For information on how to apply, please reach out to Human Resources.

We encourage current employees to recruit new talent for our Company.

## **Employee Referral Program**

**Recommending a Potential Employee.** MCSE employees may refer potential candidates by emailing Talent Acquisition the following information:

- Candidate name
- Phone Number
- Email Address
- Current Resume

Employees may still refer potential candidates regardless of whether an opening exists. The candidate's information will be added to our Applicant Tracking System and their account will be flagged for future opportunities.

**The Hiring Process.** All candidates, referred or not, will go through the same hiring process established by Talent Acquisition.

**The Referral Rebate.** If a referred candidate is hired, a referral bonus, less applicable payroll taxes, will be paid to the employee following a 90-day waiting period. The Talent Acquisition Team will be responsible for tracking this time frame and the referral bonus will be paid during the first payroll following the referred employee's 90th day.

The standard Referral Rebates that are listed below will be distributed unless otherwise noted. Rebate amounts are subject to change at any time.

- Hourly/Entry Level: \$100
- Salaried/Professional/Supervisor: \$250
- Manager Level: \$500
- Executive & Director Level: \$750

The Talent Acquisition Team may increase the referral bonus for a specific requisition based on factors such as the current job market, the position, the location, time of year and various other factors. Those values will be announced once a specific requisition is opened.

**Exclusions.** Directors and Managers are not eligible for referral rebates in situations where the new hire is a member of their own team.

## **Employment of Relatives and Romantic Relationships**

Relatives and employees engaged in any kind of romantic relationship may be hired by the company if approved by a Company executive. For the purposes of this policy, "relatives" are defined as spouses, children, siblings, parents, or grandparents. A "romantic relationship" is generally defined as a committed relationship between two individuals this can include, but is not limited to dating, a confirmed relationship status, or a domestic partnership.

Current employees that are relatives or those who marry each other or become involved in a romantic relationship will be permitted to continue employment with the company provided they don't work in a direct supervisory relationship with each other or otherwise pose difficulties as mentioned above. If relatives or employees who are engaged in a romantic relationship do work in a direct supervisory relationship with each other, the company will attempt to reassign one of the employees to another position for which he or she is qualified if such a position is available. If no such position is available, one of the employees may be required to leave the company.

Individuals in supervisory or managerial roles and those with authority over others' terms and conditions of employment are subject to more stringent requirements under this policy due to their status as role models, their access to sensitive information, and their ability to affect the employment of individuals in subordinate positions. In the event a manager, supervisor, or any other company official enters any type of romantic relationship with another employee, that must be disclosed immediately to a member in HR. In the event the relationship constitutes a conflict of interest or there is potential risk identified, the Company will work to resolve the conflict of interest. Resolving the conflict can range from job reassignment to requiring an individual to leave the company dependent on the nature of the relationship.

This policy does not preclude or interfere with the rights of employees protected under the National Labor Relations Act or any other applicable statute concerning the employment relationship.

## **Employment Classifications**

In order to determine eligibility for benefits and overtime status and to ensure compliance with federal and state laws and regulations, MCSE classifies its employees as shown below. The Company may review or change employee classifications at any time.

### **Exempt Employees**

Exempt employees are not subject to the overtime pay provisions of the federal Fair Labor Standards Act (FLSA). An exempt employee is one whose specific job duties and salary meet all of the requirements of the U.S. Department of Labor's regulations.

### **Non-Exempt Employees**

Nonexempt employees are eligible to receive overtime pay for overtime hours worked per the guidelines outlined in the federal Fair Labor Standards Act (FLSA). Nonexempt employees are generally paid on an hourly basis.

### **Full-Time Employees**

Full-time employees are those who are regularly scheduled to work at least 40 hours per week that are not hired on a temporary basis.

### **Part-Time Employees**

Part-time employees are those who are regularly scheduled to work fewer than 40 hours per week that are not hired on a temporary basis. Part-time employees are not eligible for Company-paid benefits, except as required by law.

### **Temporary Employees**

Temporary employees are hired for an interim period of time, usually to fill in for vacations, leaves of absence, or projects of a limited duration. Temporary employees are not eligible for Company-paid benefits, except as required by law.

### **Seasonal Employees**

Seasonal employees are those hired into a position for which the customary annual employment is 6 months or less. Seasonal employees are generally not eligible for benefits.

If your status changes from temporary or seasonal to part-time or full-time, you are considered hired on the date you become a full-time or part-time employee for purposes of calculating eligibility for benefits that require a minimum term of employment.

## **Conflicts of Interest**

MCSE expects all employees to conduct themselves and company business in a manner that reflects the highest standards of ethical conduct, and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests.

Exactly what constitutes a conflict of interest or an unethical business practice is both a moral and a legal question. MCSE recognizes and respects the individual employee's right to engage in activities outside of employment which are private in nature and do not in any way conflict with or reflect poorly on the company.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. If a situation arises where there is a potential conflict of interest, the employee should discuss this with a manager for advice and guidance on how to proceed. The list below suggests some of the types of activity that indicate improper behavior, unacceptable personal integrity, or unacceptable ethics:

1. Simultaneous employment by another firm that is a competitor of or supplier to MCSE.
2. Carrying on company business with a firm in which the employee, or a close relative of the employee, has a substantial ownership or interest.
3. Holding a substantial interest in, or participating in the management of, a firm to which the company makes sales or from which it makes purchases.
4. Borrowing money from customers or firms, other than recognized loan institutions, from which our company buys services, materials, equipment, or supplies.
5. Accepting substantial gifts or excessive entertainment from an outside organization or agency.
6. Speculating or dealing in materials, equipment, supplies, services, or property purchased by the company.

7. Participating in civic or professional organization activities in a manner that divulges confidential company information.
8. Misusing privileged information or revealing confidential data to outsiders.
9. Using one's position in the company or knowledge of its affairs for personal gains.
10. Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of company business.

## **Standards of Conduct**

MCSE expects its employees to conduct themselves in a professional and polite manner and to comply with all company policies and procedures. Conduct that interferes with the orderly and efficient business operation is unacceptable. Examples of unacceptable behavior include but is not restricted to violation of the company's policies and safety rules; insubordination; unauthorized or illegal possession, use or sale of alcohol and/or controlled substances on work premises or during working hours while engaged in company activities; use or sale of weapons, firearms or explosives on work premises; theft or dishonesty; physical or sexual harassment; disrespect toward fellow employees, visitors or other members of the public; performance of outside work while on company time; unauthorized use of company property, equipment or facilities; poor attendance or poor performance.

Any individual displaying unacceptable behavior will be subject to disciplinary action which may include a verbal warning, written warning, suspension, or termination of employment. The company does not guarantee that one form of action will necessarily precede another. Nothing in this policy is designed to modify our employment-at-will policy.

## **Outside Employment**

Employees are permitted to work a second job as long as it does not interfere with their job performance with MCSE. Employees with a second job are expected to work their assigned schedules. A second job will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, or refusal to work overtime or different hours.

If outside work activity causes or contributes to job-related problems, it must be discontinued, or the employee may be subject to disciplinary action, up to and including termination.

## **Confidential Information**

The protection of confidential business information and trade secrets is vital to the interests and success of MCSE. Confidential information is any and all information disclosed to or known by you because of employment with the company that is not generally known to people outside the company about its business. Company techniques, processes, floorplans, equipment and general design are considered confidential; therefore, photos and recordings of facility interiors are prohibited.

An employee who improperly uses or discloses trade secrets or confidential business information will be subject to disciplinary action up to and including termination of employment and legal action, even if he or she does not actually benefit from the disclosed information.

All inquiries from the media must be referred to a Company executive.

This provision is not intended to, and should not be interpreted to, prohibit employees from discussing wages and other terms and conditions of employment if they so choose.

## **Diversions**

Diversions are the unwanted movement and sale of legal marijuana into an illegal market, locally or over Massachusetts state lines. MCSE prohibits employees from participation in diversions and will make all efforts to eliminate diversions from the Company's business. MCSE has a zero-tolerance policy regarding diversions and, as such, any employee found to engage in diversions will be dismissed immediately. For questions about diversions, please ask your manager or HR representative.

## **Black Market**

Like diversions, the Company views participation in the black market as any illegally produced marijuana or marijuana product sold into an illegal market, locally or over Massachusetts state lines. MCSE prohibits employees from participation in the black market. Any employee found to engage in black market activities will be dismissed immediately. For questions about black market activity, please ask your manager or HR representative.

## **Pending Charges or Convictions**

Employees are required to report any new or pending charges or convictions to the MCSE Human Resources Department immediately. This Cannabis Control Commission must be notified in writing within 10 days of an arrest, summons and/or disposition on the merits of the underlying charge.

Failure to report pending charges or convictions in a timely manner will result in disciplinary action, up to and including termination.

## **Agent Registration**

All employees are required to obtain and retain a valid Agent Registration from the Massachusetts Cannabis Control Commission (MCCC). Once an offer of employment has been accepted; the process for the Agent Registration will begin.

Agent Registrations are valid for one year for the first year and then 3 years afterwards. Agent Registrations must be renewed for continued employment. Employees must pass background check and Criminal Offender Record Information (CORI) report in order to obtain a valid Agent Registration. The cardholder must have their Agent Registration Card accessible to them at all times while performing work.

## **Orientation and Training**

To help you become familiar with the Company and our way of doing things, the Company will provide an orientation and onboarding support. Some of the content of the session will depend in large part on the nature of your responsibilities, while other parts will be applicable to all employees.

The Company may periodically offer additional training or educational programs. Some programs may be voluntary, while others will be required.

At a minimum, all employees are required to participate in a total of eight hours of training annually. Of those eight hours, a minimum of four hours of training shall be from Responsible Vendor Training Program courses.

## **Immigration Law Applicable to All Employees**

The Company complies with the Immigration Reform and Control Act of 1986 by employing only U.S. citizens and non-citizens who are authorized to work in the United States. All employees are asked on their first day of work to provide original documents verifying the right to work in the United States and to sign a verification form required by federal law (Form I-9). If you cannot verify your right to work in the United States within three (3) days of hire, the Company is required by law to terminate your employment.

## **Work Week and Hours of Work**

The standard workweek is from Sunday 12:00 a.m. until Saturday 11:59 p.m. Work hours will be determined by the appropriate supervisor and will vary based on department and location. Individual work schedules vary depending on the needs of each department.

## **Meal and Rest Breaks**

### **Massachusetts Facility**

Facility employees are required to take a 30-minute unpaid meal break each day. If a nonexempt employee is required to work through a meal break, they will be paid for the 30-minute period. Employees are also entitled to two 10-minute paid rest periods or one 20-minute paid rest period each day. Meal and rest breaks will be scheduled by the department supervisor or manager. Employees who fail to return on time from rest or meal breaks will be subject to disciplinary action.

### **Massachusetts Retail**

Retail employees working a shift of more than three hours, but less than six hours are entitled to one 10-minute paid rest period. Employees working a shift of six or seven hours are entitled to one 30-minute unpaid meal break and one 10-minute paid rest period. Employees working a shift of eight hours or more are entitled to one 30-minute unpaid meal break and two 10-minute paid rest periods. If a nonexempt employee is required to work through a meal break, they will be paid for the time worked during that 30-minute period. Meal and rest breaks will be scheduled by the department supervisor or manager. Employees who fail to return on time from rest or meal breaks will be subject to disciplinary action.

## **Time Records**

All asset level and/or non-exempt employees are required to complete accurate weekly time reports within Zenefits that show all time actually worked. These records are required by governmental regulations and are used to calculate regular and overtime pay. The Company will provide a platform for recording hours to each employee. Hours worked must be approved by a



supervisor each week. Employees are responsible for ensuring time reports are accurate. Discrepancies should be addressed with a supervisor as soon as possible.

## **Overtime Hours**

When required due to the needs of the business, you may be asked to work overtime. Overtime is actual hours worked in excess of 40 in a workweek. Non-exempt employees will be paid time and one half their regular rate of pay for all hours actually worked in a workweek. Paid leave, such as holiday, PTO, bereavement time, and jury duty does not apply toward work time. All overtime work must be approved in advance by a supervisor or manager.

## **Attendance and Punctuality**

Punctual and regular attendance is an essential responsibility of each employee at MCSE. Employees are expected to report to work as scheduled, on time and prepared to start working. Employees also are expected to remain at work for their entire work schedule. Late arrival, early departure or other absences from scheduled hours are disruptive and must be avoided.

This policy does not apply to absences covered by the Family and Medical Leave Act (FMLA), leave provided as a reasonable accommodation under the Americans with Disabilities Act (ADA) or time off that is protected under any other state or federal laws. These exceptions are described in separate policies.

### **Absence**

“Absence” is defined as the failure of an employee to report for work when he or she is scheduled to work. The two types of absences are defined below:

- *Excused absence* occurs when the following conditions are met:
  - The employee provides to his or her supervisor sufficient notice and the absence request is approved in advance by the employee’s supervisor.
  - OR*
  - The employee calls out due to covered sickness/illness as defined by state law or the employee calls out due to an unforeseen personal emergency.
  - AND*
  - The employee has been with the company for at least 90 days and has accrued enough paid time off (PTO) to cover the absence.
- *Unexcused absence* occurs when the above conditions are not met.
  - Any absence that is deemed unexcused is unpaid, even if the employee has paid time off available.

An unexcused absence counts as one occurrence for the purposes of discipline under this policy.

Employees with three or more consecutive days of excused absences because of illness or injury must give MCSE proof of physician’s care and a fitness for duty release prior to returning to work.

Employees must take earned PTO for every absence unless otherwise allowed by company policy (e.g., leave of absence, bereavement, jury duty).

## **Tardiness and Early Departures**

Employees are expected to report to work and return from scheduled breaks on time. If employees cannot report to work as scheduled, they must notify their supervisor no later than their regular starting time. This notification does not excuse the tardiness but simply notifies the supervisor that a schedule change may be necessary.

Employees who must leave work before the end of their scheduled shift must notify a supervisor immediately.

Tardiness and early departures are each one-half an occurrence for the purpose of discipline under this policy.

## **Communication**

If unable to arrive at work on time, or if an employee will be absent for an entire day, the employee must contact the supervisor via phone call or text message as soon as possible and at least one hour before the start of their shift. E-mail messages are not acceptable except in certain emergency circumstances.

## **Job Abandonment**

Failure to show up or call in for a scheduled shift without prior approval may result in termination. If an employee fails to report to work or call in to inform the supervisor of the absence for two (2) consecutive days or more, the employee will be considered to have voluntarily resigned employment.

## **Disciplinary Action**

Excessive absenteeism is defined as one (1) or more occurrence(s) of unexcused absence in a 30-day period and may result in disciplinary action. Multiple occurrences of unexcused absence in a 12-month period are considered grounds for termination.

## **Emergency Closings**

MCSE will always make every attempt to be open for business. In situations in which some employees are concerned about their safety, management may advise supervisors to notify their departments that the office is not officially closed, but anyone may choose to leave the office if he or she feels uncomfortable.

If the office is officially closed during the course of the day to permit employees to leave early, nonexempt employees who are working on-site as of the time of the closing will be paid for a full day. If you leave earlier than the official closing time, you will be paid only for actual hours worked, or you can take PTO time. Exempt employees will be paid for a normal full day but are expected to complete their work at another time.

## **Dress and Grooming**

The Company provides a casual yet professional work environment for its employees. Specific dress code for each employee will be based on their department and function and will be set by their supervisor. The Company believes that it is important to always project a professional image

to our customers, visitors, and coworkers. All employees are expected to dress in a manner consistent with good hygiene, safety, and good taste. Please use common sense.

Retail employees must appear casual, yet polished and wear clothing that reflects the professional image of The Company. Clothing worn in a retail environment must be Company branded with the most current branding and the outer most layer being Company Branded. No other company logo's should be visible. Employee's working in retail must wear dark bottoms such as jeans, or blue or black pants. Skirts worn in the retail space must be below the knee or floor length. Shoes must be closed toed, have limited wear, and allow for easy movement for job requirements. Hats and beanies with Company Branding are encouraged to be worn.

Retail employees should be fragrant free. Perfume, cologne, body spray, and other strong fragrances deter from the customer experience.

Managers and/or supervisors are expected to inform employees when they are violating the dress and grooming policy. Retail Employees that arrive to work wearing apparel that is not reflective of the Company brand will be found in violation of this policy. Employees in violation are expected to immediately correct the issue. This may include having to leave work to change clothes.

Any questions or complaints regarding the appropriateness of attire should be directed to the Human Resources department.

## **Workspace**

Employees are responsible for maintaining the workspace assigned to them. A clean, orderly workspace provides an environment conducive to working efficiently. Employees should keep in mind that their workspace is part of a professional environment that portrays the Company's overall dedication to providing quality service to its clients. Therefore, your workspace should be clean, organized and free of items that are not required to perform your job.

## **Personnel Records**

It is important that the Company maintain accurate personnel records at all times. You are responsible for updating any change in name, home address, telephone number, immigration status, or any other pertinent information inside of the Human Resource Information System. By promptly updating the system with such changes, you will avoid compromise of your benefit eligibility, the return of W-2 forms, or similar inconvenience.

## **Access to Personnel Records**

Employee files are maintained by the Human Resources department and are considered confidential. Managers and supervisors may only have access to personnel file information on a need-to-know basis. Personnel file access by current employees and former employees upon request will generally be permitted within 10 days of the request unless otherwise required under state law. Personnel files are to be reviewed in the Human Resources department. Employee files may not be taken outside the department. Representatives of government or law enforcement agencies, in the course of their duties, may be allowed access to file information. The Company will furnish copies of personnel files upon request.

## **Performance Management and Salary Reviews**

### **90 Day Review**

MCSE utilizes a 90-day review process to ensure that new employees or employees that are new to a role are given formal feedback on how they are settling in. This is an opportunity for both the employee as well as the manager to provide each other candid feedback.

HR will engage with and coordinate this process with the applicable manager.

### **Ongoing Performance Reviews**

The performance appraisal process provides a means for discussing, planning and reviewing the performance of each employee.

Performance appraisals influence salaries, promotions and transfers, and it is critical that managers are objective in conducting performance reviews and in assigning overall performance ratings.

All full-time and part-time employees are provided performance review(s) and are considered for merit pay increases at the end of each calendar year or as warranted. Employees must have completed all required training to be eligible for merit increases.

HR will establish the format and timing of all review processes. The completed evaluations will be retained in the employee's personnel file.

## **Separation from Employment**

In all cases of voluntary resignation (one initiated by the employee), employees are asked to provide a written notice to their supervisors at least 10 working days in advance of the last day of work. The 10 days must be actual working days. Holidays and paid time off (PTO) will not be counted toward the 10-day notice. Employees who provide the requested amount of notice will be considered to have resigned in good standing and generally will be eligible for rehire.

In most cases, Human Resources will conduct an exit meeting on or before the last day of employment to collect all company property, and to discuss final pay. If applicable, information regarding benefits continuation through the Consolidated Omnibus Budget Reconciliation Act (COBRA) will be sent to the employee's home address.

Should it become necessary because of business conditions to reduce the number of employees or work hours, this will be done at the discretion of the company.

## **Bulletin Boards**

All required governmental postings are posted on the boards located in the break room. These boards may also contain general announcements.

Employees are able to submit notices of general interest, such as for-sale notices; recreational-type announcements and/or club functions (e-mail should not be used for the aforementioned); postcards; expressions of gratitude or sympathy; and notices looking for/offering carpools, tickets, roommates, or pets.

The company reserves the absolute right to refuse permission to post or to take down any announcement. Items deemed inappropriate will be removed. All notices posted by employees will be removed after 2 weeks unless otherwise stipulated.

## **Solicitation**

Employees should be able to work in an environment that is free from unnecessary annoyances and interference with their work. In order to protect our employees and visitors, solicitation by employees is strictly prohibited while either the employee being solicited or the employee doing the soliciting is on “working time.” “Working time” is defined as time during which an employee is not at a meal, on break, or on the premises immediately before or after his or her shift.

Employees are also prohibited from distributing written materials, handbills, or any other type of literature on working time and, at all times, in “working areas,” which includes all office areas. “Working areas” do not include break rooms, parking lots, or common areas shared by employees during nonworking time.

Nonemployees may not trespass or solicit or distribute materials anywhere on company property at any time.

## **Computers, Internet, Email and Other Resources**

The company provides a wide variety of communication tools and resources to employees for use in running day-to-day business activities. Whether it is the telephone, voice mail, scanner, Internet, intranet, e-mail, text messaging, or any other company-provided technology, use should be reserved for business-related matters during working hours. All communication using these tools should be handled in a professional and respectful manner.

Employees should not have any expectation of privacy in their use of company computer, phone, or other communication tools. All communications made using company-provided equipment or services including email and internet activity, are subject to inspection by the company. Employees should keep in mind that even if they delete an email, voicemail or other communication, a copy may be archived on the company’s systems.

E-mails that are not job-related have the potential to drain, rather than enhance, productivity and system performance. You should also be aware that information transmitted through e-email is not completely secure, and information you transmit and receive could damage the reputation and/or competitiveness of the company.

The company encourages employees to use this tool only to communicate with fellow employees, suppliers, customers, or potential customers regarding company business. Internal and external e-mails are considered business records and may be subject to discovery in the event of litigation. Be aware of this possibility when sending e-mails within and outside the company.

Refrain from using e-mail in a manner that violates any of our company guidelines/policies, including but not limited to the Equal Opportunity and Harassment policies, the Conflict of Interest Policy, etc. Delete any e-mail messages prior to opening that are received from unknown senders and advertisers.

It is the company's goal to respect the dignity of employees at all times. Because e-mail, telephone and voice mail, and internet communication equipment are provided for company business purposes and are critical to the company's success, your communications may be accessed without further notice by Information Technology department administrators and company management to ensure compliance with this guideline.

The electronic communication systems are not secure and may allow inadvertent disclosure, accidental transmission to third parties, etc. Sensitive information should not be sent via unsecured electronic means.

Office telephones are for business purposes. While the company recognizes that some personal calls are necessary, these should be kept as brief as possible and to a minimum. Personal use of the company's cell phones, long-distance account, or toll-free numbers is strictly prohibited. Abuse of these privileges is subject to corrective action up to and including termination.

The company reserves the right to monitor customer calls to ensure employees abide by company quality guidelines and provide appropriate levels of customer service. Employees working in sales and customer service will be subject to telephone monitoring. Should an employee need to make or receive a personal call during work hours, a telephone designated for that purpose should be used. Should the subject matter of the conversation become personal while monitoring is taking place, monitoring of the call will immediately be discontinued.

It is also against company policy to turn off antivirus protection software or make unauthorized changes to system configurations installed on company computers. Violations of this policy may result in disciplinary action up to and including termination.

## **Social Media Acceptable Use**

The company encourages employees to share information with co-workers and with those outside the company for the purposes of gathering information, generating new ideas, and learning from the work of others. Social media provide inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public and, therefore, the company has established the following guidelines for employee participation in social media.

**Note:** As used in this policy, "social media" refers to blogs, forums, and social networking sites, such as Twitter, Facebook, LinkedIn, YouTube, Instagram, and Snapchat, among others.

**Off-duty use of social media.** Employees may maintain personal websites or web logs on their own time using their own facilities. Employees must ensure that social media activity does not interfere with their work. In general, the company considers social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas.

**On-duty use of social media.** Employees may only engage in social media activity during work time provided it is directly related to their work, approved by their manager, and does not identify or reference company clients, customers, or vendors without express permission. The company monitors employee use of company computers and the Internet, including employee blogging and social networking activity. Personal smart phones, tablets and computers will not be used to update Company social media accounts or used to post about the company, directly or indirectly.

**Respect.** Demonstrate respect for the dignity of the company, its owners, its customers, its vendors, and its employees. A social media site is a public place, and employees should avoid inappropriate comments. For example, do not use ethnic slurs, personal insults, or obscenity, or use language that may be considered inflammatory. Even if a message is posted anonymously, it may be possible to trace it back to the sender.

**Post disclaimers.** If an employee identifies himself or herself as a company employee or discusses matters related to the company on a social media site, the site must include a disclaimer on the front page stating that it does not express the views of the company and that the employee is expressing only his or her personal views. For example: “The views expressed on this website/Web log are mine alone and do not necessarily reflect the views of my employer.” Place the disclaimer in a prominent position and repeat it for each posting expressing an opinion related to the company or the company’s business. Employees must keep in mind that if they post information on a social media site that is in violation of company policy and/or federal, state, or local law, the disclaimer will not shield them from disciplinary action.

**Competition.** Employees should not use a social media to criticize the company’s competition and should not use it to compete with the company.

**Confidentiality.** Do not identify or reference company clients, customers, or vendors without express permission. Employees may write about their jobs in general but may not disclose any confidential or proprietary information. For examples of confidential information, please refer to the confidentiality policy. When in doubt, ask before publishing.

**Products and facilities.** Employees are prohibited from posting pictures and/or videos of company products or facilities on their personal social media accounts without express written permission.

**New ideas.** Please remember that new ideas related to work or the company’s business belong to the company. Do not post them on a social media site without the company’s permission.

**Links.** Employees may provide a link from a social media site to the company’s website during employment (subject to discontinuance at the company’s sole discretion). Employees should contact the Web design group to obtain the graphic for links to the company’s site and to register the site with the company.

**Trademarks and copyrights.** Do not use the company’s or others’ trademarks on a social media site or reproduce the company’s or others’ material without first obtaining permission.

**Avoid statements about the company’s future.** Writing about projected growth, sales and profits, future products or services, marketing plans violates Company policy.

**Legal.** Employees are expected to comply with all applicable laws, including but not limited to, Federal Trade Commission (FTC) guidelines, copyright, trademark, and harassment laws.

**Discipline.** Violations of this policy may result in discipline up to and including immediate termination of employment.

Note: Nothing in this policy is meant to, nor should it be interpreted to, in any way limit your rights under any applicable federal, state, or local laws, including your rights under the National Labor Relations Act to engage in protected concerted activities with other employees to improve terms and conditions of employment, such as wages and benefits.



## Employee Privacy

In this age of the Internet where privacy has become an increasing concern, we take your privacy very seriously. The privacy and security of your personal data ("Personal Information") which we collect from you is important to us. It is equally important that you understand how we handle this data. The Company will not knowingly collect or use Personal Information in any manner not consistent with this policy, as it may be amended from time to time, and applicable laws.

**Collection of Information.** In the course of conducting our business and complying with federal, state, and local government regulations governing such matters as employment, tax, insurance, etc., we must collect Personal Information from you. The nature of the information collected varies somewhat for each employee, depending on your employment responsibilities, the location of the facility where you work, and other factors. We collect Personal Information from you solely for business purposes, including those related directly to your employment with the Company, and those required by governmental agencies.

**Use of the Information Collected.** The primary purposes for collection, storage and/or use of your Personal Information include, but are not limited to:

**Human Resources Management.** We collect, store, analyze, and share (internally) Personal Information in order to attract, retain, and motivate a highly qualified workforce. This includes recruiting, compensation planning, succession planning, reorganization needs, performance assessment, training, employee benefit administration, compliance with applicable legal requirements, and communication with employees and/or their representatives.

**Business Processes and Management.** Personal Information is used to run our business operations including, for example, scheduling work assignments, managing Company assets, reporting and/or releasing public data (e.g., annual reports, etc.); and populating employee directories. Information may also be used to comply with government regulation.

**Safety and Security Management.** We use such Personal Information as appropriate to ensure the safety and protection of employees, assets, resources, and communities.

**Communication and Identification.** We use your Personal Information to identify you and to communicate with you.

**Limited Disclosure.** The Company acts to protect your Personal Information and ensure that unauthorized individuals do not have access to such information by using security measures to protect Personal Information. We will not knowingly disclose, sell, or otherwise distribute your Personal Information to any third party without your knowledge and, where appropriate, your express written permission, except where disclosure is reasonably necessary to comply with the law.

**Security of Personal Information.** We employ reasonable security measures and technologies, such as password protection, encryption, physical locks, etc., to protect the confidentiality of your Personal Information. Only authorized employees have access to Personal Information. If you are an employee with such authorization it is imperative that you take the appropriate safeguards to protect such information. Paper and other hard copy containing Personal Information (or any other confidential information) should be secured in a locked location when not in use. Computers and other access points should be secured when not in use by logging out or locking. Passwords

and user IDs should be guarded and not shared. When no longer necessary for business purposes, paper and hard copies should be immediately destroyed using paper shredders or similar devices. Do not leave copies in unsecured locations waiting to be shredded or otherwise destroyed. Do not make or distribute unauthorized copies of documents or other tangible medium containing Personal Information. Electronic files containing Personal Information should only be stored on secure computers and not copied or otherwise shared with unauthorized individuals within or outside of the Company.

The Company will make reasonable efforts to secure Personal Information stored or transmitted electronically from hackers or other persons who are not authorized to access such information.

Any violation or potential violation of this policy should be reported to your immediate supervisor, designated manager, or Human Resources Department. The failure by any employee to follow these privacy policies may result in discipline up to and including discharge of the employee. Any questions or suggestions regarding this policy may also be directed to your immediate supervisor, designated manager, or Human Resources Department.

## **Company Communication Platforms and Personal Phone Usage**

Access to the Company Communication platforms, including but not limited to Teams and Zoom, is given principally for work-related activities or approved educational/training activities. Incidental and occasional personal use is permitted. This privilege should not be abused and must not affect the employee's performance of employment-related activities. Usage should be based upon cost-effective practices that support the Company's mission and should comply with applicable rules and regulations.

The Companies Communication Platforms are at all times the property of the Company. By accessing the provided systems, you acknowledge that the Company has the right to monitor usage to ensure that employees are using the system for its intended purposes.

You should use common sense and your best judgment when making or receiving personal cellular phone calls at work. Personal cell phone calls are allowed during breaks and/or lunch times. The use of cameras on cell phones during work hours is prohibited to protect the privacy of the Company as well as of fellow employees. However, this restriction will not apply to any recordings made in the exercise of any rights granted to an employee by federal law.

The Company prohibits the use of hand-held cellular devices while driving. Employees are strongly encouraged to use a hands-free cellular device while driving, should the use become a necessity in the course of employment. Sending and/or receiving text messages is expressly prohibited while operating any vehicle.

## **Smoke-Free Workplace**

Smoking is not allowed in company buildings or work areas at any time. "Smoking" includes the use of any tobacco products, electronic smoking devices, and e-cigarettes containing nicotine cartridges.

Smoking is only permitted during break times in designated outdoor areas. Employees using these areas are expected to dispose of any smoking debris safely and properly.

## **Drug-Free Workplace**

It is the policy of MCSE to maintain a drug- and alcohol-free work environment that is safe and productive for employees and others having business with the company.

The unlawful use, possession, purchase, sale, distribution, or being under the influence of any illegal drug and/or the misuse of legal drugs while on company or client premises or while performing services for the company is prohibited. The State of Massachusetts prohibits the consumption and unauthorized distribution of marijuana and marijuana infused products in licensed facilities. MCSE employees are prohibited from any consumption or unauthorized distribution of marijuana on site.

Compliance with this policy is a condition of employment. Notwithstanding any provision herein, this policy will be enforced at all times in accordance with applicable state and local law.

Any employee violating this policy is subject to discipline, up to and including termination, for the first offense.

## **Safety and Accident Rules**

Safety is a joint venture at the Company. We strive to provide a clean, hazard-free, healthy, safe environment in which to work, and we make every effort to comply with all relevant federal, state and local occupational health and safety laws, including the federal Occupational Safety and Health Act. As an employee, you have a duty to comply with the safety rules of the Company, and you are expected to take an active part in maintaining this hazard-free environment. You must observe all posted safety rules, adhere to all safety instructions provided by your supervisor, and use safety equipment where required. Your workspace should be kept neat, clean and orderly. You are required to report any accidents or injuries – including any breaches of safety – and to promptly report any unsafe equipment, working condition, process or procedure to a supervisor. In addition, if you become ill or get injured while at work, you must notify your manager immediately. Failure to do so may result in a loss of benefits under the state workers' compensation law.

Failure to abide by the Company's safety and accident rules may result in disciplinary action, up to and including termination.

## **Security**

Due to the nature of the business, employees are asked to treat personal and company security as a top priority. For safety purposes and to remain compliant with the Massachusetts Cannabis Control Commission, all company office space, retail locations, and production facilities are under 24/7 video surveillance. The Company's security procedures are outlined in its standard operating procedures and all employees will receive security training covering such procedures.

## **Workplace Violence Prevention**

MCSE is committed to providing a safe, violence-free workplace for our employees. Due to this commitment, we discourage employees from engaging in any physical confrontation with a violent or potentially violent individual or from behaving in a threatening or violent manner. Threats, threatening language, or any other acts of aggression or violence made toward or by any employee

will not be tolerated. A threat may include any verbal or physical harassment or abuse, attempts to intimidate others, menacing gestures, stalking, or any other hostile, aggressive, and/or destructive actions taken for the purposes of intimidation. This policy covers any violent or potentially violent behavior that occurs in the workplace or at company-sponsored functions.

All MCSE employees bear the responsibility of keeping our work environment free from violence or potential violence. Any employee who witnesses or is the recipient of violent behavior should promptly inform their supervisor, manager, or the Human Resources Department. All threats will be promptly investigated. No employee will be subject to retaliation, intimidation, or discipline as a result of reporting a threat in good faith under this guideline.

Any individual engaging in violence against the company, its employees, or its property will be prosecuted to the full extent of the law. All acts will be investigated, and the appropriate action will be taken. Any such act or threatening behavior may result in disciplinary action up to and including termination.

The Company prohibits the possession of weapons on its property at all times, including our parking lots or company vehicles. Additionally, while on duty, employees may not carry a weapon of any type. Weapons include, but are not limited to, handguns, rifles, automatic weapons, and knives that can be used as weapons (excluding pocketknives, utility knives, and other instruments that are used to open packages, cut string, and for other miscellaneous tasks), martial arts paraphernalia, stun guns, and tear gas. Any employee violating this policy is subject to discipline up to and including dismissal for the first offense.

The company reserves the right to inspect all belongings of employees on its premises, including briefcases, purses and handbags, gym bags, and personal vehicles on company property.

## **Anti-Discrimination & Harassment**

### **Discrimination is Prohibited**

The Company is an equal opportunity employer and makes all employment decisions without regard to race, religion, color, sex (including pregnancy, childbirth, medical condition related to pregnancy or childbirth, sexual orientation, and gender identity), national origin, disability, age, genetic information, height, weight, marital status, or any other status protected under applicable federal, state, or local laws. This policy applies to all terms and conditions of employment, including but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, benefits, compensation, and training. We seek to comply with all applicable federal, state and local laws related to discrimination, and will not tolerate the interference with the ability of any of the Company's employees to perform their job duties.

The Company makes decisions concerning employment based strictly on an individual's qualifications and ability to perform the job under consideration, the comparative qualifications and abilities of other applicants or employees, and the individual's past performance within the organization.

If you believe that an employment decision has been made that does not conform with management's commitment to equal opportunity, you should promptly bring the matter to the attention of your immediate supervisor, designated manager, or Human Resources Department. Your complaint will be promptly, thoroughly and impartially investigated. There will be no retaliation against any employee who files a complaint in good faith, even if the result of the investigation produces insufficient evidence to support the complaint.

### **Americans with Disabilities Act**

The federal Americans with Disabilities Act (ADA) prohibits discrimination against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, fringe benefits, job training, and other terms, conditions and privileges of employment. The ADA does not alter the Company's right to hire the best-qualified applicant, but it does prohibit discrimination against a qualified applicant or employee because of his or her disability, or because of a perceived disability. As a matter of Company policy, the Company prohibits discrimination of any kind against people with disabilities.

### **Disabled Defined**

An applicant or employee is considered disabled if he or she (1) has a physical or mental impairment that substantially limits one or more major life activities; (2) has a record or past history of such an impairment; or (3) is regarded or perceived (correctly or incorrectly) as having such impairment.

A qualified employee or applicant with a disability is an individual who satisfies the requisite skill, experience, education and other job-related requirements of the position held or desired, and who, with or without reasonable accommodation, can perform the essential functions of that position.

## **Reasonable Accommodation**

A reasonable accommodation is any change in the work environment (or in the way things are usually done) to help a person with a disability apply for a job, perform the duties of a job, or enjoy the benefits and privileges of employment.

Qualified applicants or employees who are disabled should request reasonable accommodation from the Company in order to allow them to perform a particular job. If you are disabled and you desire such reasonable accommodation, contact your immediate supervisor, designated manager, or Human Resources Department. On receipt of your request we will meet with you to discuss your disability. We may ask for information from your health care provider(s) regarding the nature of your disability and the nature of your limitations or take other steps necessary to help us determine viable options for reasonable accommodation. We will then work with you to determine whether your disability can be reasonably accommodated, and if it can be accommodated, we will explore alternatives with you and endeavor to implement a mutually agreeable accommodation.

Reasonable accommodation may take many forms and it will vary from one employee to another. Please note that according to the ADA and Massachusetts law, the Company does not have to provide the exact accommodation you want, and if more than one accommodation works, we may choose which one to provide. Furthermore, the Company does not have to provide an accommodation if doing so would cause undue hardship to the Company.

## **Lactation Accommodation**

The company will provide a reasonable amount of break time to accommodate an employee's need to express breast milk for the employee's infant child. The company will make a reasonable effort to provide the employee with the use of a room or other location in close proximity to the employee's work area for the employee to express milk in private that meets lactation accommodation requirements.

An employee may request an accommodation for lactation breaks by notifying their supervisor or a member of the HR Department. Upon notification, HR will meet directly with the employee to discuss the lactation accommodation.

The requested break time should, if possible, be taken concurrently with other scheduled break periods. Non-exempt employees must clock out for any lactation breaks that do not run concurrently with normally scheduled rest periods. Any such breaks will be unpaid.

## **Workplace Harassment**

The Company is committed to providing a work environment that provides employees equality, respect, and dignity. In keeping with this commitment, the Company has adopted a policy of “zero tolerance” with regard to employee harassment. Harassment is defined under federal law as unwelcome conduct that is based on race, color, religion, sex (including pregnancy, sexual orientation and gender identity), national origin, age (40 or older), disability, or genetic information. Harassment becomes unlawful where: (1) enduring the offensive conduct becomes a condition of continued employment; or (2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

This policy applies to all aspects of your employment. Harassment of any other person, including, without limitation, fellow employees, contractors, visitors, clients, or customers, whether at work or outside of work, is grounds for immediate termination. The Company will make every reasonable effort to ensure that its entire community is familiar with this policy and that all employees are aware that every complaint received will be promptly, thoroughly, and impartially investigated, and resolved appropriately. The Company will not tolerate retaliation against anyone who complains of harassment or who participates in an investigation.

## **Sexual Harassment**

It is the goal of the Company to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by the Company. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because the Company takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment. Where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

### **Definition of Sexual Harassment**

In Massachusetts, the legal definition for sexual harassment is this: “sexual harassment” means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- submission to or rejection of such advances, requests, or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or
- such advances, requests, or conduct have the purpose or effect of unreasonably interfering with an individual’s work performance by creating an intimidating, hostile, humiliating, or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.



The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct, which, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances – whether they involve physical touching or not
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess
- Displaying sexually suggestive objects, pictures, or cartoons
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments
- Inquiries into one's sexual experiences, and
- Discussion of one's sexual activities

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization. The Company encourages reporting of all perceived incidents of sexual harassment, regardless of who the offender may be. Every employee is encouraged to raise any questions or concerns with his or her immediate supervisor, designated manager, or the Human Resources Department. Additionally, the appropriate state and federal employment discrimination enforcement agencies, and directions as to how to contact such agencies, can be found on the Labor Law Posters.

## **Supervisors' Responsibilities**

All managers are expected to ensure that the work environment is free from sexual and other harassment. They are responsible for the application and communication of this policy within their work areas. Managers should:

- Encourage employees to report any violations of this policy before the harassment becomes severe or pervasive.
- Make sure Human Resources Department is made aware of any inappropriate behavior in the workplace.
- Create a work environment where sexual and other harassment is not permitted.

## **Procedures for Reporting and Investigating Harassment**

Employees should report incidents of inappropriate behavior or sexual harassment as soon as possible after the occurrence. Employees who believe they have been harassed, regardless of whether the offensive act was committed by a manager, co-worker, vendor, visitor, or client,

should promptly notify their immediate supervisor, designated manager, or Human Resources Department. If the employee's immediate supervisor is involved in the incident, the employee should report the incident to Human Resources. The Company takes claims of harassment seriously, no matter how trivial a claim may appear. All complaints of harassment, sexual harassment, or other inappropriate sexual conduct will be promptly and thoroughly investigated by the Company.

The Company prohibits retaliation against any employee who files or pursues a harassment claim. To the extent possible, all complaints and related information will remain confidential, except to those individuals who need the information to investigate, educate, or take action in response to the complaint.

All employees are expected to cooperate fully with any ongoing investigation regarding a harassment incident. Employees who believe they have been unjustly charged with harassment can defend themselves verbally or in writing at any stage of the investigation.

To protect the privacy of persons involved, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances. Investigations may include interviews with the parties involved, and, where necessary, individuals who may have observed the alleged conduct or who may have relevant knowledge.

At the conclusion of a harassment investigation, the complainant and the alleged "harasser" will be informed of the determination.

## **Penalties for Violation of Anti-Harassment Policy**

If it is determined that inappropriate conduct has occurred, the Company will act promptly to eliminate the offending conduct, and take such action as is appropriate under the circumstances. Such action may range from counseling to termination of employment and may include such other forms of disciplinary action (such as, for example, suspension), as the Company deems appropriate under the circumstances and in accordance with applicable law.

## **Compensation**

### **Payroll Practices**

The Company's pay date for all employees is biweekly on Friday. If pay day falls on a federal holiday, employees will receive their paycheck on the preceding workday.

### **Deductions from Pay/Safe Harbor**

The Company does not make improper deductions from the salaries of exempt employees and complies with the salary basis requirements of the Fair Labor Standards Act (FLSA). Employees classified as exempt from the overtime pay requirements of the FLSA will be notified of this classification at the time of hire or change in position.

**Permitted deductions.** The FLSA limits the types of deductions that may be made from the pay of an exempt employee. Deductions that are permitted include:

- Deductions that are required by law, e.g., income taxes;
- Deductions for employee benefits when authorized by the employee;
- Absence from work for one or more full days for personal reasons other than sickness or disability;
- Absence from work for one or more full days due to sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing compensation for salary lost due to illness;
- Offset for amounts received as witness or jury fees, or for military pay; or
- Unpaid disciplinary suspensions of one or more full days imposed in good faith for workplace conduct rule infractions.

During the week an exempt employee begins work for the company or during the last week of employment, the employee will only be paid for actual hours worked. In addition, an employee may be paid only for hours worked during a period when the employee is using unpaid leave under the Family and Medical Leave Act (FMLA).

**Improper deductions.** If an employee classified as exempt believes that an improper deduction has been taken from his or her pay, the employee should immediately report the deduction to the Human Resources Department. The report will be promptly investigated and if it is found that an improper deduction has been made, the company will reimburse the employee for the improper deduction.

### **Direct Deposit**

Paychecks may be directly deposited into your checking and/or savings accounts. For employees that participate in direct deposit, digital paycheck stubs can be acquired by accessing MCSE's payroll system. Please contact your HR representative for details regarding online access.

## **Benefits**

### **General**

This section describes the benefits currently provided by the Company. Details regarding each benefit plan will be provided to you by the Human Resources Department. Benefit plans governed by the federal Employee Retirement Income Security Act (ERISA) may be further described in formal Summary Plan Descriptions or other legal documents, which are available for your review.

Employees meeting the eligibility criteria for particular benefits may participate in the various insurance programs offered by the Company. Periodically there will be an Open Enrollment period. If you decline to participate in these programs on your initial eligibility date, you may request entry into the plan during Open Enrollment or Special Enrollment.

### **Medical Insurance**

The Company offers medical insurance to all eligible employees. Details of the plan(s) may be found in the HRIS portal. This Handbook does not constitute such a legal document. The Company offers medical coverage for eligible employees and their eligible dependents. Your Summary Plan Description (SPD) contains more details. In the event of any conflict between the information contained in this Handbook and in the Company's SPDs, the SPDs shall govern. The plan(s) is subject to change at the Company's discretion.

### **Dental Insurance**

The Company offers a dental plan for eligible employees. Please refer to the dental Summary Plan Description for an explanation of the plan benefits and limitations.

### **Vision Insurance**

The Company offers a vision plan for eligible employees. Please refer to the vision Summary Plan Description for an explanation of the plan benefits and limitations.

### **Short Term and Long Term Disability**

The Company offers a Short Term and Long Term Disability plan for eligible employees. Please refer to the STD and/or LTD Summary Plan Description for an explanation of the plan benefits and limitations.

### **Life Insurance**

The Company offers a Life Insurance plan for eligible employees. Please refer to the Life Insurance Summary Plan Description for an explanation of the plan benefits and limitations.

### **Employee Contributions**

The Company's benefit package is contributory; that is, you are responsible for a portion of the premium for your benefits. A portion of the premium, up to a maximum per month, is contributed by the Company. Your contributory cost is deducted from your paycheck.

## **Continuation of Health Coverage**

Federal law generally requires employers with 20 or more employees to give employees, spouses, and dependent children the right to continue group health benefits for limited periods of time under certain circumstances, such as voluntary or some types of involuntary job loss, reduction in hours worked, death, divorce and other life events. Employees ordinarily may continue their health coverage for up to 18 months when their employment is terminated.

## **401(k)**

MCSE provides a 401(k) Retirement Savings Plan (the Plan) to help employees accumulate financial resources for retirement.

### **Eligibility**

To be eligible to join the 401(k) Plan, an employee must complete 12 months of service and have worked a minimum of 1,000 hours.

### **Contributions**

Subject to statutory limits on tax deductibility, the Plan allows employees to elect how much of their salary they want to contribute to the Plan and to direct the investment of their funds into professionally managed investment funds. An employee is fully vested in his or her own contributions and entitled to those contributions upon termination of employment regardless of the length of employment.

### **Plan Termination**

The company reserves the right to terminate the Plan at any time.

## **Workers' Compensation Insurance**

Workers' compensation is a "no-fault" system that provides compensation for medical expenses and wage losses to employees who are injured or who become ill because of employment.

MCSE pays the entire cost of workers' compensation insurance. The insurance provides coverage for related medical and rehabilitation expenses and a portion of lost wages to employees who sustain an injury on the job.

The company abides by all applicable state workers' compensation laws and regulations.

If an employee sustains a job-related injury or illness, it is important to notify the supervisor and Human Resources immediately. The supervisor will complete an injury report with input from the employee and return the form to the Human Resources department. Human Resources will file the claim with the insurance company. In cases of true medical emergencies, report to the nearest emergency room.

Workers' compensation benefits (paid or unpaid) will run concurrently with FMLA leave, if applicable, where permitted by state and federal law.

## **Employee Discounts, Purchases, and Returns**

### **Discount Eligibility**

All current MCSE employees, pursuant to any applicable state laws, are allowed to make discounted online purchases on Cloud Cover and High Profile webstores and in person at any High Profile dispensary. Discounts are applied to the full retail value of the product and no other discounts may be applied with the use of an employee discount. In-store purchases made using an employee discount may not exceed a retail value of \$500.00 per month per employee, regardless of which High Profile location is visited in any given instance.

In order to receive a discount, eligible employees must:

- Have their current employment status verified by the applicable store manager
- Present a valid photo ID as well as any additional documentation required by state law
- Be present at the time of purchase
- Pay for their own purchases. Purchases may not be made with someone else's check, debit or credit card
- Complete purchases with the appropriate level of discount (see Discount Percentages by Classification)

### **Discount by Merchandise & Employee Classification**

Discounts vary by state, employee classification and product line and are subject to change based on market and availability. Current employee discounts can be confirmed at High Profile locations.

### **Discount Transaction Policies and Procedures**

Only members of the store management team (Store Manager, Assistant Manager, Shift Lead) may ring employee purchases and the highest-ranking manager in the store at the time must perform the transaction. Managers and shift leads are prohibited from ringing their own sale. For manager purchases, any other member of management may ring the transaction. All purchases must be made before or after a shift, or on an employee's day off. Purchases cannot be made during a break. Non-exempt employees purchasing items must be clocked out prior to making a purchase.

The employee discount is not applicable with any other deals or discounts, however, the employee may opt to utilize the in-store promotion in lieu of their employee discount on a given purchase. Discounts may be limited on certain products, based on overall product availability.

### **Employee Returns**

Defective items outlined below may be returned within 7 days with a receipt.

- Leaking cartridges
- Expired products (if purchased within the 7-day return window policy)

Returns on flower, extracts, concentrates, tinctures, topicals, patches and/or edibles are not permitted. Returns on any products are at the discretion of the Store Manager.

## Purchase Tracking Policies and Procedures

Store Managers are responsible for tracking and reporting on all employee purchases made in their stores. Reports detailing the following are to be submitted to the Accounting Department no later than the 10<sup>th</sup> of the month for the preceding month:

- Employee Name
- Transaction Date
- Total Value of Product Sold
- Order ID
- Notes, if applicable

The MCSE Accounting Department will review and reconcile manager employee purchase reports on a monthly basis and will report on/escalate any issues or discrepancies.

Employees are responsible for ensuring they do not exceed their monthly purchase limit and are encouraged to track each purchase. Employees should also connect with the Manager of the High Profile location they frequent or the Accounting Department for current purchase information.

## Violations

Violations of this policy include, but are not limited to:

- Trading discounts
- Accepting reimbursement for purchased items, other than from a family member
- Providing discounts greater than allowed in this policy
- Exceeding your monthly purchase limit
- Reselling product in any capacity
- Purchases by store employees made for the purpose of meeting that store's sales goal

Exceeding the monthly purchase limit will result in:

- First Offense – Warning
- Second Offense – Warning and employee discount eligibility revoked for 3 months
- Third Offense – Employee discount eligibility revoked

Any violation or abuse of this Employee Discount Policy may result in disciplinary action up to and including termination of employment. Such a violation or abuse must be reported to an immediate supervisor or the HR department immediately.



## **Holidays, Vacation and Other Leave**

### **Holidays**

Our company normally observes the following holidays during the year:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving
- Christmas

For employees that work a Monday through Friday work week schedule: Holidays falling on a Saturday will be observed on the preceding Friday. Holidays falling on Sunday will be observed on the following Monday. Each year in January the company will issue a listing of the specific dates on which each holiday will be observed for that year.

For employees that work a regular work schedule that is NOT Monday through Friday: Holidays that fall on a day the employee is not regularly scheduled to work will be observed on the next closest regularly scheduled workday. Employees that work an alternate will be provided a holiday observation schedule by their direct supervisor.

Additionally, all full-time corporate and facility employees as well as full-time salaried retail employees will be provided the ability to schedule two (2) floating holidays per calendar year. Dates are subject to supervisor approval and employees are eligible to use floating holidays after completing their first 90 days of employment. Employees who provide advance written notice of their resignation may not use floating holidays during their notice period. Floating holidays do not roll over from year to year and will expire at the end of the calendar year. Floating Holidays must be requested in advance and may only be used in 8-hour increments.

**Holiday Pay.** Full-time employees receive holiday pay immediately upon joining the company, part-time employees and hourly retail employees are not eligible for holiday pay.

From time to time employees may be required to work on an observed holiday. Retail employees required to work on an observed holiday will be paid time and a half on that day. Salaried facility employees required to work on an observed holiday will receive an additional floating holiday and hourly facility employees will receive holiday pay plus pay for any hours worked on an observed holiday. Floating Holidays must be requested in advance and may only be used in 8-hour increments.

Employees are required to work their scheduled workday before and after the holiday in order to be paid for the holiday, unless they are absent with prior permission from their supervisor.

Employees on an approved Leave of Absence will not be paid for Holidays that occur during the leave.

## **Paid Time Off (PTO)**

MCSE employees are eligible for paid time off (PTO). PTO can be used as vacation time, sick time, or time to take care of personal matters and may be taken for one or more hours at a time. Employees are eligible to use PTO after completing their first 90 days of employment.

PTO is earned on a pro-rata basis throughout the year depending on employment status, position and seniority. For example, an employee provided with 2 weeks of PTO, or 80 hours, per year will earn 3.076 hours per pay period. Individuals who are on an approved Leave of Absence do not accrue PTO while out on leave.

We feel it is extremely important for employees to take time away from work. To facilitate this goal only 80 hours, or 10 days, of unused, earned PTO may be carried over from employment year to employment year by each employee. Hours in excess of 80 at the end of the pay period in which the employee's anniversary date occurs will be forfeited. Because MCSE's HR system provides current readily available PTO balance information, each employee is responsible for monitoring their unused PTO.

Upon termination, employees who provide at least two weeks' advance written notice of their resignation, or who are terminated by the company other than for cause, will be paid for accrued but unused PTO up to a maximum of 40 hours. All other terminating employees will not be paid for accrued but unused PTO. Hourly (full and part time) retail employees will not be paid for unused PTO at the time of termination. Employees who provide advance written notice of their resignation may not use PTO during their notice period. If an employee does not work all scheduled hours during their notice period, they will not receive a PTO payout.

## **Requesting Time Off**

Requests for time off should be submitted to your manager as early as possible. For planned vacations or personal business, time off requests should be made no later than two weeks prior to the time requested. Requests for time off are granted whenever possible, but the Company reserves the right to ask employees to change their request in order to meet business needs.

Regarding time off requests that are protected under Massachusetts's Family Leave Act; employees are asked to provide notice for foreseeable circumstances (e.g., a planned medical treatment) whenever possible. However, if the need for sick time off is not foreseeable, employees are asked to notify their supervisor as soon as is practical. Please note, if an employee misses three (3) or more consecutive days because of illness, MCSE may require the employee to provide a physician's written permission to return to work.

## **Bereavement Leave**

Employees with more than 3 months' service may take up to 3 days of paid bereavement leave upon the death of a member of their immediate family. "Immediate family members" are defined as an employee's spouse, domestic partner, parents, stepparents, siblings, children, stepchildren.

The company may require verification of the need for the leave. The employee's supervisor and Human Resources will consider this time off on a case-by-case basis.

Payment for bereavement leave is computed at the regular hourly rate to a maximum of 8 hours for 1 day. Time off granted in accordance with this policy shall not be credited as time worked for the purpose of computing overtime.

## **Military Service Leave**

MCSE supports the military obligations of all employees and grants leaves for uniformed service in accordance with applicable federal and state laws. Any employee who needs time off for uniformed service should immediately notify the Human Resources department and his or her supervisor, who will provide details regarding the leave. If an employee is unable to provide notice before leaving for uniformed service, a family member should notify the supervisor as soon as possible.

Upon return from military leave, employees will be granted the same seniority, pay, and benefits as if they had worked continuously. Failure to report for work within the prescribed time after completion of military service will be considered a voluntary termination.

All employees who enter military service may accumulate a total absence of 5 years and still retain employment rights.

## **Personal Leave of Absence**

In an effort to recognize the need of employees who require time off in addition to other types of leave, MCSE may consider an unpaid personal leave of absence without pay for up to a maximum of 30 days. PTO will not accrue while out on an approved personal leave. Additionally, Holidays that occur during the approved leave will not paid.

**Eligibility.** All regular employees employed by MCSE for a minimum of 90 days are eligible to apply for an unpaid personal leave of absence. Job performance, absenteeism and departmental requirements all will be taken into consideration before a request is approved. Approvals of the immediate supervisor, department director and human resources are required. Requests for unpaid personal leave may be denied or granted by the company for any reason or no reason and are within the sole discretion of the company. MCSE reserves the right to terminate employment for any reason or no reason during the leave of absence.

### **Procedures**

**Employee.** An eligible employee should submit a request in writing to his or her immediate supervisor. The requesting employee will be asked to acknowledge in writing his or her understanding that all requests for personal leaves are not granted.

**Supervisor.** The immediate supervisor will:

- Review the request taking workload scheduling and departmental requirements into consideration
- Make a recommendation to and obtain a decision from the department director/manager
- Submit the department-level decision to human resources for final approval
- Return a decision to the employee as soon as feasible after receipt of the written request

If the request is approved, the supervisor will notify human resources as soon as possible. Once the employee returns, the supervisor will immediately notify human resources that the employee has returned to active status.

**Human Resources.** HR is responsible for ensuring that any employee on an approved personal leave of absence is not paid.

**Return to work/extension of leave.** An employee is required to return from the unpaid personal leave on the originally scheduled return date. If the employee is unable to return, he or she must request an extension of the leave in writing. If MCSE declines to extend the leave, the employee must then return to work on the originally scheduled return date or be considered to have voluntarily resigned from his or her employment. Extensions of leave will be considered on a case-by-case basis. In the event the approved leave was due to a medical purpose, MCSE retains the right to require a note from a physician that returns them back to work with or without restrictions.

## **Massachusetts Paid Family Leave Act**

Under state law, you are eligible for paid family and medical leave (PFML) if you meet Massachusetts' requirements for unemployment benefits.

You may take up to 12 weeks of paid family leave in a benefit year, which is defined as a period of 52 consecutive weeks beginning on the Sunday immediately preceding the first day that job-protected leave begins, for any of the following reasons:

- The birth of a son or daughter and in order to care for that son or daughter (leave to be completed within 12 months of the child's birth).
- The placement of a son or daughter with you for adoption or foster care and in order to care for the newly placed son or daughter (leave to be completed within 12 months of the child's placement).
- To care for a family member with a serious health condition.
- A qualifying exigency of a family member who is a military member on covered active duty or called to covered active duty status (or has been notified of an impending call or order to covered active duty).

You may take up to 26 weeks of paid family leave in a benefit year to care for a family member who is a covered service member and who has a serious injury or illness related to active duty service.

You may take up to 20 weeks of medical leave in a benefit year to care for your own serious health condition, which renders you unable to perform any of the essential functions of your position.

PFML leave is limited to a combined maximum of 26 weeks per benefit year.

PFML taken under this policy runs concurrent with FMLA leave and leave taken under the Massachusetts Parental Leave Act. PFML taken under this policy will run concurrently with all other applicable time off policies provided by MCSE.

PMFL can be used intermittently. Your employee health benefits will be maintained while you are on leave and you will be restored to your prior (or similar) position upon your return.

State law also requires that you provide the Company with appropriate notice. If you know in advance that you will need PFML, you must notify the Human Resources Department at least 30 days in advance. When a 30-day advance notice is not possible, you must notify the Human Resources Department as soon as practicable.

## **Family and Medical Leave**

MCSE complies with the federal Family and Medical Leave Act (FMLA), which requires employers to grant unpaid leaves of absence to qualified workers for certain medical and family-related reasons. The company abides by any state regulated leave laws. The more generous of the two laws will apply to the employee if the employee is eligible under both federal and state laws. Where applicable state and federal leaves will run concurrently.

Please note there are many requirements, qualifications, and exceptions under these laws, and each employee's situation is different. Contact the Human Resources department to discuss options for leave.

**General Provisions.** MCSE will grant up to 12 weeks of leave during a 12-month period to eligible employees (or up to 26 weeks of military caregiver leave to care for a covered servicemember with a serious injury or illness).

**Eligibility.** Employees are eligible for FMLA if they have worked for the company for at least 12 months, at least 1,250 hours over the past 12 months, and work at a location where the company employs 50 or more employees within 75 miles. Whether an employee has worked the minimum 1,250 hours of service is determined according to FLSA principles for determining compensable hours or work.

**Calculation.** MCSE will utilize the rolling 12-month period calculation method for determining the available amount of FMLA leave. Using this method, the company will look back over the last 12 months from the date of the request, add all FMLA time the employee has used during the previous 12 months and subtract that total from the employee's 12-week leave allotment.

**Reasons for Taking Leave.** Under federal law, unpaid leave may be requested for a serious health condition, pregnancy and prenatal care; preplacement activities, birth, adoption, or foster placement of a child; or the serious health condition of a child, spouse, parent, domestic partner, or the employee. State law may have additional reasons defined.

**Certification.** The company reserves the right to require a medical certification to be completed by a health care provider that supports the need for leave either for a serious health condition of the employee or the employee's immediate family member. The company will allow an employee

at least 15 calendar days to obtain the medical certification. Failure to provide a fully completed Medical Certificate may result in delay or denial of leave. The company reserves the right to seek a second or third opinion if deemed necessary.

**Military Family Leave Entitlements.** Under federal law, unpaid leave may also be requested by eligible employees who have any qualifying exigency arising out of the fact that the spouse or a son, daughter, parent, domestic partner, or next of kin of the employee is on covered active duty (or has been notified of an impending call or order to covered active duty) in the armed forces and may use their 12-week entitlement to address certain qualifying circumstances. Qualifying circumstances may include deploying on short notice, attending certain military events, arranging for alternative childcare and school activities, addressing certain financial and legal arrangements, attending certain counseling sessions, engaging in rest and recuperation, and attending post deployment reintegration briefings.

The federal FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. This leave applies if the employee is the spouse, son, daughter, parent, domestic partner, or next of kin caring for a covered military service member or veteran recovering from an injury or illness suffered while on active duty in the armed forces or that existed before the beginning of the member's active duty and was aggravated by service or that manifested itself before or after the member became a veteran.

**Leave Designation.** If an employee does not expressly request FMLA leave, the company reserves the right to designate a qualifying absence as FMLA leave and will give notice of the FMLA designation to the employee. If an absence is a qualifying event under FMLA, the leave will run concurrent with short-term disability, long-term disability, PTO, workers' compensation, and/or any other leave where permitted by state and federal law.

**Benefits.** Under federal law, employers must continue healthcare benefits during FMLA leave as though the employees were still at work and must pay the employer's part of the premium. The employee will continue to be responsible for the employee's portion of the premium as well. While on unpaid leave, the employee must continue to make this payment, either in person or by mail. The payment must be received by the HR department no later than the first day of each month. If the payment is more than 30 days late, the employee's health care coverage may be dropped for the duration of the leave. The company will provide 15 days' notification prior to the employee's loss of coverage.

**Interaction with Accrued Paid Time Off.** FMLA leave and paid time off will run concurrently as provided under company policy except where prohibited by state law. Employees on an approved Leave of Absence under FMLA will be in a "leave status" and will not accrue PTO while out on approved leave. Additionally, employees will not be paid for holidays that occur during the leave.

**Job Protection.** An employee's job, or an equivalent job, is protected while the employee is on leave. Both federal and applicable state laws require that employees be returned to their positions or to another job of like pay and status at the end of FMLA leave.

*Note:* If an employee is unable to return to work after the expiration of federal or state FMLA, an extension may be granted if the condition constitutes a disability under the Americans with Disabilities Act (ADA) or in certain workers' compensation cases.

**Return-to-Work Policy.** When such work is available, the company will attempt to provide an employee with a temporary modified or light-duty assignment in accordance with documented medical restrictions. On a basis that does not discriminate against employees on FMLA leave, the company may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

## **Time Off for Voting**

The Company encourages all employees to vote. Most polling facilities for elections for public office have hours that are scheduled to accommodate working voters. The Company, therefore, requests that employees schedule their voting for before or after their work shifts. An employee who expects a conflict, however, should notify his or her supervisor, in advance, so that schedules can be adjusted if necessary.

## **Jury Duty/Court Appearances**

The company supports employees in their civic duty to serve on a jury. Employees must present any summons to jury duty to their supervisor as soon as possible after receiving the notice to allow advance planning for an employee's absence.

Employees will be paid for up to 2 weeks of jury duty service at their regular rate of pay minus any compensation received from the court for the period of service. Employees may use any accrued time off if required to serve more than 2 weeks on a jury.

If an employee is released from jury duty after 4 hours or less of service, he or she must report to work for the remainder of that workday.

Time for appearance in court for personal business will be the individual employee's responsibility. Normally, personal days or vacation days will be used for this purpose.

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Massachusetts Citizens for Social Equity LLC (the “**Company**”) has developed its standard operating procedures to ensure compliance with all state and local rules and regulations, as amended from time-to-time (the “**Applicable Laws**”), including the rules set forth by the Massachusetts Cannabis Control Commission (the “**Commission**”).

## **Overview**

The Company will demonstrate consideration of the following factors:

1. Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;
2. 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;
3. Strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage); and
4. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

To the extent updates are required to the information provided for initial licensure, the Company will submit an updated energy compliance standard operating procedure. The Company will 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.

## **Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities.**

The Company has extensive experience designing and building out licensed cannabis facilities, including both production facilities and retail stores. The Company has an in-house Director of Design, as well as a long-time third-party architectural and engineering team that leads the design of all of its facilities. Our electrical and mechanical engineers have extensive experience evaluating LED lighting options as well as energy-efficient HVAC equipment and controls and will go through that process for this project.

In our design process for the facility, we evaluated a number of different technologies (including for lighting and HVAC) in order to be as energy-efficient as possible within our operational and budgetary parameters. Our electrical and mechanical engineers have extensive experience evaluating LED lighting options as well as energy-efficient HVAC equipment and controls and will go through that process for this project.



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In the event of any facility upgrade, renovation or expansion, or in the event of equipment replacement, we will utilize the same team described above and the same process to select a path that is as energy-efficient as possible within the Company's operational and budgetary parameters. We plan to apply and qualify for an energy efficiency incentive with Eversource.

**Consideration of opportunities for renewable energy generation, including, where available, 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.**

As part of our electrical engineering design process, we explored renewable energy generation to see if it was feasible for this project.

It was not possible in this case for several reasons:

- We are leasing our unit
- Our budget for an interior retail buildout could not support the extensive capital needed for this equipment
- The small energy usage of our retail store would likely not support a third-party financing of a generator for our unit

In the event of any other facility upgrades, renovations or expansions, or in the event of equipment replacement, we will utilize the same team described above and the same process to select a path that is as energy-efficient as possible within the Company's operational and budgetary parameters.

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

The project features new HVAC and lighting equipment and controls and has been designed with energy efficiency in mind. The Company will regularly monitor the energy demand of the facility and make adjustments to operations based on the data it collects.

The facility will have procedures in place to minimize energy usage during off hours including turning off lights, adjustment of temperature setpoints etc. The Manager will be responsible for managing utility costs and pursuing energy saving opportunities.

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

As mentioned above, we plan to apply and qualify for an energy efficiency incentive with Eversource. Now that the construction work is nearing completion we will submit the final paperwork and receive the incentive.

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In the event of any other facility upgrades, renovations or expansions, or in the event of equipment replacement, we will again work with Eversource to select a path that is as energy-efficient as possible within the Company's operational and budgetary parameters and to apply for any available incentives.

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Massachusetts Citizens for Social Equity LLC (the “**Company**”) has developed its standard operating procedures to ensure compliance with all state and local rules and regulations, as amended from time-to-time (the “**Applicable Laws**”), including the rules set forth by the Massachusetts Cannabis Control Commission (the “**Commission**”).

The Company has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Records will be stored in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request. The Company records are only accessible to the authorized employees as necessary as well as Commission staff.

The Company will ensure it is maintaining all records as noted in this policy, reviewing corporate records, business records, and personnel records to ensure completeness, accuracy, and timeliness of such documents. In addition, the Company’s operating procedures will be updated on an ongoing basis as needed.

### **Corporate Records**

Those records that require, at a minimum, annual reviews, updates, and renewals, including:

- Insurance Policies
- Third-Party Laboratory Contracts
- Commission Requirements:
  - Annual Agent Registration
  - Annual Marijuana Establishment Registration
- Local Compliance:
  - Certificate of Occupancy
  - Special Permits
  - Variances
  - Site Plan Approvals
  - As-Built Drawings
- Corporate Governance:
  - Annual Report
  - Secretary of State Filings
  - Board of Directors Meetings
  - Minutes from Board of Directors Meetings

### **Business Records**

Records that require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:

- Assets and liabilities;

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- Monetary transactions;
- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Salary and wages paid to each agent, or stipend, and any executive compensation, bonus, benefit, or item of value paid to any individual having direct or indirect control over the Company;
- List of all executives of the Company, and members, if any, which must be made available upon request by any individual.

### **Personnel Records**

At a minimum will include:

- Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each Company agent. Such records will be maintained for at least 12 months after termination of the agent's affiliation with the Company and will include, at a minimum, the following:
  - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
  - Documentation of verification of references;
  - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
  - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
  - Documentation of periodic performance evaluations; and
  - A record of any disciplinary action taken.
  - Notice of completed responsible vendor and eight-hour related duty training.
- A staffing plan that will demonstrate accessible business hours;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

### **Inventory Records**

The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory. As further detailed in our protocols regarding inventory, audits will be conducted at minimum, monthly with a comprehensive inventory conducted annually.

### **Seed-to-Sale Tracking Records**

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The Company will use Metrc to maintain real-time inventory. Metrc inventory reporting will meet the requirements specified by the Commission, including, at a minimum, an inventory of marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

The Company's Point of Sale System, Leaf Logix, will integrate with the Metrc system and update records in real-time.

### **Incident Reporting Records**

Within ten (10) calendar days, the Company will provide written notice to the Commission of any incident by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the local law enforcement and Commission were notified within twenty-four (24) hours of discovering the breach, and any other relevant information.

Reports and supporting documents, including photos and surveillance video related to a reportable incident, will be maintained by the Company for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

### **Visitor Records**

A visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.

### **Waste Disposal Records**

When marijuana or marijuana products are disposed or handled, the Company will create and maintain an electric record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Company agents present during the disposal or handling, with their signatures. The Company will keep disposal records for at least 3 years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

### **Security Records**

Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the Commission upon request and that are retained for at least ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer. A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.

### **Transportation Records**

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The Company will retain all shipping manifests for a minimum of one (1) year and make them available to the Commission upon request.

### **Agent Training Records**

Documentation of all required training, including training regarding privacy and confidentiality requirements, Responsible Vendor Training and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).

### **Vendor Sample Records**

Upon the Company providing vendor samples to our employee's, the Company will record:

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

### **Closure**

In the event the Company closes, all records will be kept for at least 2 years at the Company's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, the Company will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.

### **Written Operating Policies and Procedures**

Policies and Procedures related to the Company's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:

- Security measures in compliance with 935 CMR 500.110;
- Employee security policies, including personal safety and crime prevention techniques;
- 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 Authorities on request, and updated pursuant to 935 CMR 500.000;
- Storage and waste disposal of Marijuana in compliance with 935 CMR 500.105(11);
- Description of the various strains of Marijuana to be sold, as applicable, and the form(s) in which Marijuana will be sold;
- Procedures to ensure accurate recordkeeping, including inventory protocols for Transfer and inventory in compliance with 935 CMR 500.105(8) and (9);
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

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- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how Confidential Information and other records required to be maintained confidentially will be maintained;
- A policy for the immediate dismissal of any Marijuana Establishment Agent who has:
  - Diverted Marijuana, which shall be reported to Law Enforcement Authorities and to the Commission;
  - Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  - Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of any Other Jurisdiction
- A list of all board of directors, members and Executives of a Marijuana Establishment, and Members, if any, of the Licensee must be made available on request by any individual. This requirement may be fulfilled by placing this required information on the Marijuana Establishment's website;
- Policies and procedure for the handling of cash on Marijuana Establishment Premises including, but not limited to, storage, collection frequency, and transport to financial institution(s), to be available on inspection.
- Policies and procedures to prevent the diversion of Marijuana to individuals younger than 21 years old;
- Policies and procedures for energy efficiency and conservation that shall include:
  - 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;
  - 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;
  - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
  - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.

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### **Record-Retention**

The Company will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

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Massachusetts Citizens for Social Equity LLC (the “**Company**”) has developed its standard operating procedures to ensure compliance with all state and local rules and regulations, as amended from time-to-time (the “**Applicable Laws**”), including the rules set forth by the Massachusetts Cannabis Control Commission (the “**Commission**”).

### **Quality Control & Sanitation**

The Company will comply with the following sanitary requirements:

1. Any Company agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any Company agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
  - a. Maintaining adequate personal cleanliness; and
  - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. The Company’s hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Company’s working areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. The Company’s facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. The Company will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. The Company’s floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. The Company’s facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. The Company’s buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. The Company will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces 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

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- labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products;
  11. The Company will ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable;
  12. The Company's plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and waste water lines;
  13. The Company will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
  14. The Company will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
  15. The Company will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

The Company will ensure that the Center is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

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

### **Product Recalls**

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

Upon notification of a received complaint, the Company will begin its investigation process. Initially the Company will gather information about the nature of the product complaint. The Company will determine whether the product in question must be withdrawn or recalled. The Company will comply with any public notices, issued by the Commission, regarding product recalls.

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Upon a determination that a product recall will occur, the facility shall:

1. Gather all information collected in the tracking process;
2. Detain and segregate products to be recalled that are in the facility's control and post a DO NOT DISTRIBUTE sign;
3. Complete the Withdrawal and Recall Log;
4. Send a Notification of Recall or Withdrawal to the affected customers that purchased said product;
5. Ensure the following information is accurately provided:
  - a. Name and Product Code of the recalled product(s);
  - b. Production date(s) of the withdrawn or recalled product(s);
  - c. Reason for the withdrawal or recall;
  - d. Quantity of recalled product(s) distributed;
  - e. Quantity of recalled product(s) in inventory (for internal use only);
  - f. Area(s) of distribution and customers affected (for internal use only); and
6. Coordinate and monitor the recovery of all affected product(s) in the Company's possession.

## **Testing**

1. The Company will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as otherwise allowed.
2. Test results for products pending wholesale transfer to the Company's facility will be reviewed by the Retail Manager and compared against the packaging and labeling information prior to accepting the shipment.
3. Marijuana will be tested for the Cannabinoid Profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant growth regulators, and the presence of pesticides.
4. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products must be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Co-located Marijuana Operations.
5. In compliance with the Protocol, testing for all production batches of finished plant material will include pesticides and plant growth regulators and production batches to be dispensed as finished Product will be tested for Metals, Bacteria, fungi, mycotoxins, and Cannabinoid profile.
6. All Products sold as resin or concentrates will be tested for Solvents (if used) and Metals with only production batches to be dispensed as finished product tested for

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- bacteria, fungi, mycotoxins and Cannabinoid profile. Edibles, tinctures and topicals will be tested for bacteria, fungi, mycotoxins and Cannabinoid profile.
7. All Products will be tested in accordance with Commission guidance and orders in place at the time of testing.
  8. Single-servings of marijuana products tested for potency will be subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

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