



Massachusetts Cannabis Control Commission

Third Party Marijuana Transporter

General Information:

License Number: MT281556
Original Issued Date: 12/08/2020
Issued Date: 12/08/2020
Expiration Date: 12/08/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: MMM Transport, Inc.

Phone Number: 908-451-4601 Email Address: mmmtransportcompliance@gmail.com

Business Address 1: 376 Easthampton Road

Business Address 2:

Business City: Northampton Business State: MA

Business Zip Code: 01060

Mailing Address 1: 376 Easthampton Road

Mailing Address 2:

Mailing City: Northampton Mailing State: MA

Mailing Zip Code: 01060

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

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

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: Economic Empowerment Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD: n/a

Department of Public Health RMD Registration Number: n/a

Operational and Registration Status:

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

If no, describe the circumstances below: n/a

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 69 Percentage Of Control: 69

Role: Owner / Partner

Other Role:

First Name: Jean

Last Name: D'Ambrosio Suffix:

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: Some Other Race or Ethnicity

Specify Race or Ethnicity: Portugese

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 22

Percentage Of Control: 22

Role: Owner / Partner

Other Role:

First Name: Emanuel

Last Name: Tartaglione

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 3

Percentage Of Control: 3

Role: Other (specify)

Other Role: Convertible Note Capital Contributor

First Name: Michael

Last Name: Moore

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 3

Percentage Of Control: 3

Role: Other (specify)

Other Role: Convertible Note Capital Contributor

First Name: Charles

Last Name: Moore

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 5

Percentage Of Ownership: 3

Percentage Of Control: 3

Role: Other (specify)

Other Role: Convertible Note Capital Contributor

First Name: Christopher

Last Name: Kohn

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 69

Percentage of Ownership: 69

Entity Legal Name: JFLB Holdings LLC

Entity DBA:

DBA

City:

Entity Description: Jean Marie D'Ambrosio's ownership / holding company for MMM Transport, Inc.

Foreign Subsidiary Narrative:

Entity Phone: 908-451-7934

Entity Email:

mmmtransportcompliance@gmail.com

Entity Website:

Entity Address 1: 97 Independence Drive

Entity Address 2:

Entity City: Basking Ridge

Entity State: NJ

Entity Zip Code: 07920

Entity Mailing Address 1: 97 Independence Drive

Entity Mailing Address 2:

Entity Mailing City: Basking Ridge

Entity Mailing State: NJ

Entity Mailing Zip Code:

07920

Relationship Description: JFLB Holdings LLC has the following:

69% ownership of MMM Transport, Inc.

69% authority of MMM Transport, Inc.

Jean Marie D'Ambrosio has the following:

100% ownership of JFLB Holdings LLC

69% indirect ownership of MMM Transport, Inc.

69% direct authority of MMM Transport, Inc.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name:

Last Name: Kohn

Suffix:

Christopher

Types of Capital: Debt

Other Type of Capital: Convertible
Note

Total Value of the Capital Provided:
\$175000

Percentage of Initial Capital:
33.33

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Michael

Last Name: Moore

Suffix:

Types of Capital: Debt

Other Type of Capital:

Total Value of the Capital Provided: \$175000

Percentage of Initial Capital: 33.33

Capital Attestation: Yes

Individual Contributing Capital 3

First Name: Charles

Last Name: Moore

Suffix:

Types of Capital: Debt

Other Type of Capital:

Total Value of the Capital Provided: \$175000

Percentage of Initial Capital: 33.33

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 376 Easthampton Road

Establishment Address 2:

Establishment City: Northampton

Establishment Zip Code: 01060

Approximate square footage of the Establishment: 2000

How many abutters does this property have?: 7

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

HOST COMMUNITY INFORMATION

Date generated: 04/28/2021

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	MMM_Form_HCA_Certification.pdf	pdf	5f0dc44854fcae70383a7b38	07/14/2020
Plan to Remain Compliant with Local Zoning	376 Easthampton Rd 44-056.pdf	pdf	5f3489d564c153689b94a6b1	08/12/2020
Plan to Remain Compliant with Local Zoning	Table of Use Page 3 OI.pdf	pdf	5f3489d8193ee2646b47afc5	08/12/2020
Plan to Remain Compliant with Local Zoning	376 Eton GEARTH-2.pdf	pdf	5f3489daa24e76648176e7dd	08/12/2020
Plan to Remain Compliant with Local Zoning	ZONING-APPROVAL-FINAL.pdf	pdf	5f3489f1ead5bc6434e3b71e	08/12/2020
Plan to Remain Compliant with Local Zoning	Updated-Plan to Remain Compliant with Local Zoning.pdf	pdf	5f348ac83935fc643b5619e5	08/12/2020
Community Outreach Meeting Documentation	FULLY-REDACTED-UPDATED-Community-Attestation-Form_COMPLETED.pdf	pdf	5f348da0a24e76648176e7e3	08/12/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	V4-UPDATED-Positive Impact Plan.pdf	pdf	5f6e051c9193d007a21946e2	09/25/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner

Other Role:

First Name: Jean

Last Name: D'Ambrosio Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Owner / Partner

Other Role:

First Name: Emanuel

Last Name: Tartaglione Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Other (specify)

Other Role: Convertible Note Capital Contributor

First Name: Charles

Last Name: Moore Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 4

Role: Other (specify) Other Role: Convertible Note Capital Contributor

First Name: Michael Last Name: Moore Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 5

Role: Other (specify) Other Role: Convertible Note Capital Contributor

First Name: Christopher Last Name: Kohn Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Other (specify) Other Role: Holding Company for Jean Marie D'Ambrosio's ownership interest in MMM Transport Inc.

Entity Legal Name: JFLB HOLDINGS LLC Entity DBA:

Entity Description: Holding Company for Jean Marie D'Ambrosio's ownership interest in MMM Transport Inc.

Phone: 908-451-7934 Email: mmmtransportcompliance@gmail.com

Primary Business Address 1: 97 Independence Drive

Primary Business Address 2:

Primary Business City: Basking Ridge Primary Business State: NJ

Principal Business Zip Code: 07920

Additional Information: Organization Chart has been included in the application.

JFLB Holdings LLC

69% ownership of MMM Transport, Inc.

69% authority of MMM Transport, Inc.

Jean Marie D'Ambrosio

100% ownership of JFLB Holdings LLC

69% indirect ownership of MMM Transport, Inc.

69% direct authority of MMM Transport, Inc.

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	Bylaws - MMM.pdf	pdf	5f09f94e44827474644e7eb0	07/11/2020
Articles of Organization	Filed Articles.pdf	pdf	5f09fa29cfe2dd743cd658a6	07/11/2020
Secretary of Commonwealth - Certificate of Good Standing	MMM_Good-Standing.pdf	pdf	5f09fae954fcae70383a73e5	07/11/2020
Department of Revenue - Certificate of Good standing	Certificat of Good Standing DOR.pdf	pdf	5f09fafd1f0df7704a5de644	07/11/2020
Department of Revenue - Certificate of Good standing	Attestation-of-No-Employees.pdf	pdf	5f348f82f4c60d645c96545b	08/12/2020

No documents uploaded

Massachusetts Business Identification Number: 001439156

Doing-Business-As Name: n/a

DBA Registration City: Northampton

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Timeline.pdf	pdf	5f0a0408cb97e3700c532eff	07/11/2020
Plan for Liability Insurance	Plan for Liability Insurance.pdf	pdf	5f0d016acb97e3700c533490	07/13/2020
Business Plan	MMM Business Plan.pdf	pdf	5f0d04a173630b702d45b7b8	07/13/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Transportation of marijuana	MMM_Transport_Plan.pdf	pdf	5f0d076962a1117473fb5f36	07/13/2020
Storage of marijuana	MMM_Storage-of-Marijuana.pdf	pdf	5f0d146973630b702d45b7c9	07/13/2020
Inventory procedures	MMM_Inventory-Procedures.pdf	pdf	5f0d196062a1117473fb5f4a	07/13/2020
Security plan	MMM_Security Plan.pdf	pdf	5f0d8bf39a9ccf70437a4d8a	07/14/2020
Quality control and testing	MMM_Quality-Control-and-Testing.pdf	pdf	5f0d8e5b9a9ccf70437a4d8e	07/14/2020
Personnel policies including background checks	MMM_Personnel-Policies.pdf	pdf	5f0d93b64601b5701e61332d	07/14/2020
Record Keeping procedures	MMM_RecordKeeping-Procedures.pdf	pdf	5f0d9ced73630b702d45b814	07/14/2020
Maintaining of financial records	MMM_Maintenance-of-Financial-Records.pdf	pdf	5f0da41973630b702d45b841	07/14/2020
Qualifications and training	MMM_Qualifications-and-Training.pdf	pdf	5f0da7e19a9ccf70437a4dc0	07/14/2020
Storage of marijuana	MMM_Energy-Compliance.pdf	pdf	5f0dafa644827474644e853a	07/14/2020
Restricting Access to age 21 and older	UPDATED_MMM_Prevention-of-Diversion-&-Restriction-to-21.pdf	pdf	5f355933f6d8f5082e445b13	08/13/2020
Prevention of diversion	UPDATED_MMM_Prevention-of-Diversion-&-Restriction-to-21.pdf	pdf	5f35593d9fd04f085a975cc2	08/13/2020
Diversity plan	V3-UPDATED_MMM_Diversity-Plan.pdf	pdf	5f6b72b311982107a722fab3	09/23/2020

ATTESTATIONS

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

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

I certify that any entities who are required to be listed by the regulations above do not include any omitted individuals, who by themselves, would

be required to be listed individually in any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.:

I Agree

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 7:00 AM	Monday To: 8:00 PM
Tuesday From: 7:00 AM	Tuesday To: 8:00 PM
Wednesday From: 7:00 AM	Wednesday To: 8:00 PM
Thursday From: 7:00 AM	Thursday To: 8:00 PM
Friday From: 7:00 AM	Friday To: 8:00 PM
Saturday From: 7:00 AM	Saturday To: 8:00 PM
Sunday From: 7:00 AM	Sunday To: 8:00 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:

MMM Transport, Inc.

2. Name of applicant’s authorized representative:

Jean D'Ambrosio

3. Signature of applicant’s authorized representative:



4. Name of municipality:

Northampton

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

David J. Narkewicz, Mayor



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).*):

mayor@northamptonma.gov

8. Host community agreement execution date:

July 9, 2020



File # MP-2021-0008

APPLICANT/CONTACT PERSON MMM TRANSPORT
ADDRESS/PHONE 376 EASTHAMPTON RD (908) 358-3317

PROPERTY LOCATION 376 EASTHAMPTON RD
MAP 44 PARCEL 056 001 ZONE

THIS SECTION FOR OFFICIAL USE ONLY:
PERMIT APPLICATION CHECKLIST

	ENCLOSED	REQUIRED	DATE
ZONING FORM FILLED OUT			
Fee Paid	\$ 30	OK	7/14
Building Permit Filled out			
Fee Paid			
Type of Construction: ZPA - STORAGE FOR CANNIBUS TRANSPORTATION VEHICLES			
New Construction			
Non Structural interior renovations			
Addition to Existing			
Accessory Structure			
Building Plans Included:			
Owner/ Statement or License			
3 sets of Plans / Plot Plan			

**THE FOLLOWING ACTION HAS BEEN TAKEN ON THIS APPLICATION BASED ON
INFORMATION PRESENTED:**

☒ Approved ☐ Additional permits required (see below)

APPROVED BY RIGHT, TABLE OF
USE, OF DISTRICT

PLANNING BOARD PERMIT REQUIRED UNDER : § _____

Intermediate Project : _____ Site Plan AND/OR _____ Special Permit with Site Plan
Major Project: _____ Site Plan AND/OR _____ Special Permit with Site Plan

ZONING BOARD PERMIT REQUIRED UNDER: § _____

Finding _____ Special Permit _____ Variance* _____

_____ Received & Recorded at Registry of Deeds Proof Enclosed _____

_____ Other Permits Required:

_____ Curb Cut from DPW _____ Water Availability _____ Sewer Availability

_____ Septic Approval Board of Health _____ Well Water Potability Board of Health

_____ Permit from Conservation Commission _____ Permit from CB Architecture Committee

_____ Permit from Elm Street Commission _____ Permit DPW Storm Water Management



Signature of Building Official

7/30/20

Date

Note: Issuance of a Zoning permit does not relieve a applicant's burden to comply with all zoning requirements and obtain all required permits from Board of Health, Conservation Commission, Department of public works and other applicable permit granting authorities.

* Variances are granted only to those applicants who meet the strict standards of MGL 40A. Contact the Office of Planning & Development for more information.

RECEIVED

JUL 30 2020

File No. _____

ZONING PERMIT APPLICATION (\$10.2)

Please type or print all information and return this form to the Building Inspector's Office with the \$30 filing fee (check or money order) payable to the City of Northampton

1. Name of Applicant: MMM TRANSPORT, INC.
 Address: 376 EASTHAMPTON ROAD, NORTHAMPTON, MA Telephone: 908-358-3317
2. Owner of Property: FOURNIER FRANK N III TRUSTEE
 Address: 376 EASTHAMPTON ROAD, NORTHAMPTON, MA Telephone: 908-358-3317
3. Status of Applicant: Owner _____ Contract Purchaser _____ Lessee X Other (explain) _____
4. Job Location: 376 EASTHAMPTON ROAD, NORTHAMPTON, MA

Parcel Id: _____ Zoning Map# _____ Parcel# 44-0056-001 District(s): GENERAL INDUSTRIAL
 In Elm Street District _____ In Central Business District _____
 (TO BE FILLED IN BY THE BUILDING DEPARTMENT)

5. Existing Use of Structure/Property: VACANT MECHANIC GARAGE
6. Description of Proposed Use/Work/Project/Occupation: (Use additional sheets if necessary):
TO BE USED FOR THE STORAGE OF LICENSED THIRD PARTY CANNABIS TRANSPORTATION
VEHICLES. NO CANNABIS IS INTENDED TO BE STORED ON SITE. PURELY USED AS PARKING
AND OFFICE SPACE.
7. Attached Plans: Sketch Plan _____ Site Plan X Engineered/Surveyed Plans _____
8. Has a Special Permit/Variance/Finding **ever** been issued for/on the site?
 NO _____ DON'T KNOW X YES _____ IF YES, date issued: _____
 IF YES: Was the permit recorded at the Registry of Deeds?
 NO _____ DON'T KNOW X YES _____
 IF YES: enter Book _____ Page _____ and/or Document # _____
9. Does the site contain a brook, body of water or wetlands? NO _____ DON'T KNOW X YES _____
 IF YES, has a permit been or need to be obtained from the Conservation Commission?
 Needs to be obtained _____ Obtained _____, date issued: _____

(Form Continues On Other Side)

10. Do any signs exist on the property? YES _____ NO x

IF YES, describe size, type and location: _____

Are there any proposed changes to or additions of signs intended for the property? YES _____ NO x

IF YES, describe size, type and location: _____

11. Will the construction activity disturb (clearing, grading, excavation, or filling) over 1 acre or is it part of a common plan of development that will disturb over 1 acre? YES _____ NO x

IF YES, then a Northampton Storm Water Management Permit from the DPW is required.

12. ALL INFORMATION MUST BE COMPLETED, or PERMIT CAN BE DENIED DUE TO LACK OF INFORMATION

*This column reserved
for use by the Building
Department*

	EXISTING	PROPOSED	REQUIRED BY ZONING
Lot Size	0.49	0.49	
Frontage	unsure	will not change	
Setbacks			
Front			
Side	L: R:	L: R:	L: R:
Rear			
Building Height		will remain the same	
Building Square Footage		will remain the same	
% Open Space: (lot area minus building & paved parking)		will remain the same	
# of Parking Spaces		will remain the same	
# of Loading Docks		will remain the same	
Fill: (volume & location)		will remain the same	

13. Certification: I hereby certify that the information contained herein is true and accurate to the best of my knowledge.

Date: 6/10/20 Applicant's Signature Jean D'Ambrosio

NOTE: Issuance of a zoning permit does not relieve an applicant's burden to comply with all zoning requirements and obtain all required permits from the Board of Health, Conservation Commission, Historic and Architectural Boards, Department of Public Works and other applicable permit granting authorities.

ZONING


OI USES ALLOWED


Uses Allowed By Right:


- All manufacturing
- Wholesale trade and distribution
- Non-retail sales and supply of goods/services
- Accessory uses to allowed uses: eating facilities, and retail sales, when not more than 10% of the gross floor area is devoted to sales and sales are limited to goods produced or distributed by the principal use
- Research and development
- Trades
- Any residential use - only above the first floor
- Within buildings built prior to 1939: restaurants, entertainment, commercial recreation, health/athletic club, retail, banking, repair services, community center
- Medical office allowed only in:
 1. Buildings with medical use in existence as of January 1, 2010; or
 2. Up to 50% of any building built prior to 1939
- Any other office, except banks
- Artist's space
- Mixed residential/work space, with all residential use above the first floor
- Single or multimodal passenger terminal, yards and rail freight service
- Marijuana manufacturing. All facilities must incorporate both high-efficiency particulate air handlers with activated carbon filters and exhaust systems designed with vents that force the air at least 10 feet above the roofline of the building. Alternatively, other technology may be used upon finding by the Planning Board through site plan approval process that such other technology will, to the extent practicable, limit odors from marijuana in any place where the public or clients are present.
- Temporary event
- Facilities for essential services, municipal facility
- Educational, religious use, day care, school-aged child-care program (MGL c. 28A, § 9), family day care (with registration with Building Commissioner), historical association, and nonprofit museum (residence of a caretaker above first floor only), agricultural uses
- Land and/or work within WSP-O:
 1. Lot size: 40,000 square feet
 2. Frontage/Width: 120 feet
 3. Depth: 140 feet
 4. Setbacks:
 - Front: 20 feet
 - Side: 15 feet
 - Rear: 20 feet
 5. Maximum height: 45 feet
 6. Open space: 85%
- Rooftop solar hot water and photovoltaic
- Solar photovoltaic of any size, ground-mounted, over any legal parking lot or driveway
- Accessory solar photovoltaic ground-mounted on a parcel with any building or use, provided that the PV is sized to generate no more than 200% of the annual projected electric use of the non-PV building or use.


376 Easthampton Rd


Legend

 212 Main St

 378 Easthampton Rd

 Feature 1

 NORTHAMPTON

 SILVIO O. CONTE NATIONAL FISH AND WILDLIFE REFUG

492 Easthampton Rd

376 Easthampton Rd also.

376 Easthampton Rd

MMM
Transport
(half of the
building)

10

376 Easthampton Road

Louis Hasbrouck <lhasbrouck@northamptonma.gov>Fri, Jul 31, 2020 at 10:36 AM

To: Drew Breuninger <drew@argonautadvisors.com>




Cc: Carolyn Misch <cmisch@northamptonma.gov>, Jonathan Flagg <jflagg@northamptonma.gov>

Drew,

The zoning application for MMM Transportation to store cannabis transportation vehicles is approved. That use is allowed by right (see attached permit and table of use allowances, page 3).

Louis Hasbrouck
Intermittent Building Inspector
City of Northampton
Town of Williamsburg
(413) 587-1240 office
(413) 587-1272 fax

3 attachments

-  (?)
ui=2&ik=afcc0721fd&view=att&th=173a54ce231c54e1&attid=0.1&disp=attd&realattid=f_kdabt02h0&safe=1&zw)
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Plan to Remain Compliant with Local Zoning

MMM Transport, Inc. ("MMM") will remain compliant at all times with the local zoning requirements set forth in the City of Northampton's Ordinances. In accordance Chapter 350 of the City of Northampton Code of Ordinances, MMM's proposed Third Party Transporter establishment is located in the GI Industrial District ("GI"), which allows Marijuana Manufacturing (which encompasses Transport after conversations with the City) by right.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12. Additionally, the property is not within 300 feet of a building containing another marijuana establishment; in which children commonly congregate in an organized ongoing formal basis; owned by or operated as part of the campus of any private or public institution of higher learning; housing a public library; and containing any residential use.

MMM will comply with all state and local signage requirements and not allow cannabis plants, products and paraphernalia to be visible from the outside of the building, nor will MMM store cannabis in any form outside or create nuisance conditions. No smoking, burning, or consumption or any product containing marijuana or marijuana-related products shall be permitted on the premises.

MMM has already completed a Site Plan Review with Louis Hasbrouck, former building commissioner and current intermittent building inspector from Easthampton. MMM has received approval from Northampton to proceed by right at the proposed location for the proposed use. MMM will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Third Party Transporter at MMM's proposed location.

MMM has already attended several meetings with various municipal officials and boards to discuss MMM's plans for a proposed Marijuana Third Party Transporter and has executed a Host Community Agreement with the City of Northampton. MMM will continue to work cooperatively with various municipal departments, boards, and officials to ensure that MMM's marijuana establishment remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

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): 06/24/2020
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: 06/10/2020
 - b. Name of publication: The Daily Hampshire Gazette
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: 06/10/2020
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: 06/16/2020
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:

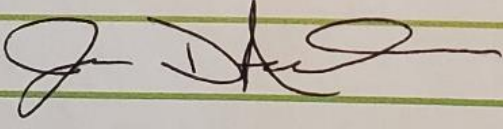
MMM Transport, Inc.

Jean D'Ambrosio, Owner & CEO

Name of applicant's authorized representative:

Jean D'Ambrosio

Signature of applicant's authorized representative:

A handwritten signature in dark ink, appearing to read "J D'Ambrosio", is written inside a rectangular box with a green border.



Drew Breuninger <drew@argonautadvisors.com>

Classified Ad Confirmation

legals@gazettenet.com <legals@gazettenet.com>
 To: drew@argonautadvisors.com

Mon, Jun 8, 2020 at 9:08 AM

Here is a proof with the date of June 24. You can call me directly at 413-585-5324 and i can take that payment over the phone :) Thanks! ~Pam

The Daily Hampshire Gazette

115 Conz Street, Northampton, MA

413-584-5000 | Fax: 413-584-5299 | Customer Service 413-586-1925

Advertising Invoice

CREDIT LEGALS
 115 CONZ ST
 (https://www.google.com/maps/search/115+CONZ+ST+%0D%0ANORTHAMPTON,+MA+01060?entry=gmail&source=g)
 NORTHAMPTON, MA 01060

Cust#:22224
 Ad#:43878
 Phone#:413-586-1700
 Date:06/08/2020

Salesperson: DANE KUTTLER

Classification: Legals

Ad Size: 1.0 x 2.20

Advertisement Information:

Description	Start	Stop	Ins.	Cost/Day	Total
Daily Hampshire Gazette	06/10/2020	06/10/2020	1	100.12	100.12

Payment Information:

Date:	Order#	Type
06/08/2020	43878	BILLED ACCOUNT

Total Amount: 100.12

Tax: 0.00

Amount Due: 100.12

 Aldrich HS20P0254EA - Thank you for your business!

Ad Copy

https://mail.google.com/mail/u/1?ik=afcc0721fd&view=pt&search=all&permmsgid=msg-f%3A1668936148831346489&simpl=msg-f%3A166893614883... 1/2

6/24/2020

Argonaut Mail - Classified Ad Confirmation

**Community Outreach Public
Notice - MMM Transport**

Content: Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Jun 24, 2020 07:00 PM Eastern Time on Zoom. The Zoom Meeting ID is 730 9960 2318. Please use "mmm" as the Zoom Meeting password. The proposed Marijuana Transporter is anticipated to be located at 376 Easthampton Rd, Northampton, MA, 01060. There will be an opportunity for the public to ask questions.

June 10

43878



Drew Breuninger <drew@argonautadvisors.com>

Community Outreach Meeting Notice for Social Equity / Economic Empowerment

Drew Breuninger <drew@argonautadvisors.com>

Wed, Jun 10, 2020 at 3:32 PM

To: ppowers@northamptonma.gov

Hi Pamela,

I hope this email finds you well. After speaking with Annie Lesko and Mayor Narkewicz, we are pushing forward with a community outreach meeting. I wanted to make sure that we have all of our ducks in a row on the compliance side. Please let me know if you need anything from me to formally file a notice with you. We have published in the necessary local newspaper as well as issue letters to all required abutters. We have sent the following:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Jun 24, 2020 07:00 PM Eastern Time on Zoom. The Zoom Meeting ID is 730 9960 2318. Please use "mmm" as the Zoom Meeting password. The proposed Marijuana Transporter is anticipated to be located at 376 Easthampton Rd, Northampton, MA, 01060. There will be an opportunity for the public to ask questions.

Thank you so much for your help.

Best,
Drew



Drew Breuninger <drew@argonautadvisors.com>

Host Community Agreement for Social Equity / Economic Empowerment

Annie Lesko <alesko@northamptonma.gov>

Wed, Jun 10, 2020 at 3:07 PM

To: Drew Breuninger <drew@argonautadvisors.com>

Northampton is a city so we have a City Clerk. You can notify her by email ppowers@northamptonma.gov (mailto:ppowers@northamptonma.gov) or cclerk@northamptonma.gov (mailto:cclerk@northamptonma.gov)

I don't have time to look at the guidelines at the moment but I believe there is language that indicates which authorities needs to be notified.

Annie Lesko
Administration, Licensing & Economic Development Coordinator
City of Northampton
Mayor's Office
210 Main St., 2nd Floor
Northampton, MA 01060
(413) 587-1212
(413) 587-1275 (fax)



[Quoted text hidden]

Attachment C

Jean D'Ambrosio
MMM Transport, Inc.
376 Easthampton Road
Northampton, MA 01060
10 June 2020

Dear Neighbor:

I would like to formally introduce myself. My name is Jean D'Ambrosio; I am the founder of a woman-owned business in Northampton. We hope to start a cannabis transportation and logistics business. I would like to invite you to our Community Outreach meeting where I will discuss my background, goals, and plans for community involvement, in addition to the following:

- Our Business Type: an overview of what a cannabis transportation company really does.
- Information About Security & Safety: our plans to demonstrate adequate internal protocols.
- Steps to Proactively 1) positively impact the community, 2) prevent diversion of cannabis to minors or unintended parties, and 3) demonstrate that we will maintain regulatory compliance at the state and local levels, never to become a nuisance as defined by law.
- Question & Answer Session: an open time for the public and community to ask questions.

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 24, 2020 07:00 PM Eastern Time on Zoom. The Zoom Meeting ID is 730 9960 2318. Please use "mmm" as the Zoom Meeting password. The proposed Marijuana Transporter is anticipated to be located at 376 Easthampton Rd, Northampton, MA, 01060 (Parcel ID 44 -056). There will be an opportunity for the public to ask questions.

Please feel free to reach out to me at any time. I look forward to both meeting you and becoming an asset for the community.

Sincerely,

Jean D'Ambrosio
Owner, MMM Transport, Inc.

Jean D'Ambrosio
MMM Transport, Inc.
3376 Easthampton Road
Northampton, MA 01060
10 June 2020

Dear Neighbor:

I would like to formally introduce myself. My name is Jean D'Ambrosio; I am the founder of a woman-owned business in Northampton. We hope to start a cannabis transportation and logistics business. I would like to invite you to our Community Outreach meeting where I will discuss my background, goals, and plans for community involvement, in addition to the following:

- **Our Business Type:** an overview of what a cannabis transportation company really does.
 - **Information About Security & Safety:** our plans to demonstrate adequate internal protocols.
 - **Steps to Proactively 1)** positively impact the community, **2)** prevent diversion of cannabis to minors or unintended parties, and **3)** demonstrate that we will maintain regulatory compliance at the state and local levels, never to become a nuisance as defined by law.
- Question & Answer Session:** an open time for the public and community to ask questions.

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for June 24, 2020 07:00 PM Eastern Time on Zoom. The Zoom Meeting ID is 730 9960 2318. Please use "mjm" as the Zoom Meeting password. The proposed Marijuana Transporter is anticipated to be located at 376 Easthampton Rd, Northampton, MA, 01060 (Parcel ID 44-056). There will be an opportunity for the public to ask questions.

Please feel free to reach out to me at any time. I look forward to both meeting you and becoming an asset for the community.

Sincerely,

Jean D'Ambrosio
Owner, MMM Transport, Inc.

Attachment C – Continued



Plan to Positively Impact Areas of Disproportionate Impact

MMM Transport, Inc. remains committed to positively impacting areas of disproportionate impact, particularly those in the immediate geographic region of MMM, Holyoke and Springfield. In doing so, we have developed a list of goals along with specific programming objectives, each with their own success measurement metrics and programming timelines. We anticipate achieving success on all of our goals and regular programming objectives within 6-months of being operational, and we acknowledge that, the goals, programs, and successes will be documented upon annual renewal of our license (one year from our provisional, and each year thereafter). We plan on keeping an overall, internal success score on a scale of 0 to 100 for our plan to positively impact areas of disproportionate impact. We will calculate our overall success quarterly as follows: we have 8 goals; each goal will be judged on a scale of 0 to 12.5 based on its individual success as determined by the goal's particular success measurement metrics; once each of the 8 goals' scores have been determined, we will add the scores together to see where will fall on the overall scale of 0 to 100. Our overall goal is to consistently score 90+ points on our combined success measurement goals to positively impact areas of disproportionate impact. MMM will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments. Any actions taken, or programs instated by MMM will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Goal #1

Hire and maintain for the life of the company 30% of individuals that currently reside in an area of disproportionate impact or have lived for five of the preceding ten years in an area of MMM Transport, Inc.

Programs

MMM's proposed retail establishment is in Northampton, MA which is a neighboring city of an identified area of disproportionate impact, Holyoke, MA. MMM plans to focus efforts on Holyoke, which is not only a local community, but it is also an area of disproportionate impact. However, MMM's efforts will not be limited to Holyoke, as our positive impact plan will be as expansive as possible in local areas of disproportionate impact to support as multiple areas which have had historically high rates of arrest, conviction, and incarceration related to marijuana crimes.

We will target our hiring efforts to the local community as well as Holyoke and Springfield, both areas of historically high rates of arrest, conviction and incarceration related to marijuana crimes. As we are not yet operational, we have not begun the hiring process. We plan to begin hiring during build out, through local job boards and career fairs. **We plan on attending career fairs quarterly.** Boosting the economy of our neighboring areas of impact by hiring local community members to good paying jobs with benefits is a priority for our company.

Measurement

Quarterly review and check in performed by the Chief Operating Officer of MMM. Each quarter the COO will review hiring reports to check that local community residents are being hired **at the 30% rate (calculated by local residents hired divided by overall hires)**, to evaluate the success of our plan and better adapt our strategies to benefit the Areas of Impact. Staffing reports will break down employees into the following groups to evaluate our numbers:

- Areas of Impact Local Residents
 - Employees with drug-related CORI backgrounds.
 - Outside Areas of Impact Employees
 - Employees with drug-related CORI backgrounds.
-

Goal #2

MMM will also strive to maintain for the life of the company a staff comprised of at least 20% of individuals that have a drug-related CORI but are otherwise legally employable in a cannabis-related enterprise.

Programs

We plan to begin hiring during build out. We will not deny applicants with past marijuana convictions on their records; instead, we plan to give them an opportunity to contribute to the economic growth of their local communities and businesses. We value their unique perspective on the industry, and they will be treated equally to all other employees. We will supervise management and all employees to ensure these employees are treated with respect and equal opportunity. Our educational efforts through community outreach, seminars which we will host quarterly will be posted in both the Daily Hampshire Gazette and in the Holyoke Chamber of Commerce event's calendar, will get the word out that we welcome past drug conviction records and will provide equal employment opportunity. We seek to partner with local organizations quarterly such as Holyoke Community College to continue these outreach efforts in new and creative ways. Initial discussion and outreach topics will include, but not be limited to the Benefits of Cannabis, Safe Consumption Practices, The Business and Stigma of Cannabis, and The Politics of National Legalization.

Measurement

MMM will perform quarterly review and check in of staffing reports to ensure we are meeting our **20% goal (calculated by those with drug-related offenses hired divided by overall hires)**, and adapting our strategies to better serve the local Areas of Impact. MMM will use qualitative & quantitative surveys during the hiring process to check background information of employees. The staffing reports will break employees into the following groups to evaluate our numbers:

- Areas of Impact Local Residents
 - Employees with drug-related CORI backgrounds.
 - Outside Areas of Impact Employees
 - Employees with drug-related CORI backgrounds.
-

Goal #3

To provide continuing service and reinvestment into areas of disproportionate impact, MMM is committed programming, restorative justice, jail diversion, workforce development, industry specific technical assistance, and mentoring services in areas of disproportionate impact. MMM is committed to hosting and participating in events that will support Holyoke, Springfield, and other areas of disproportionate impact in activities such as community service days, events, and educational seminars. MMM will provide and host these events at least 1 time a month.

Programs

We will be targeting hiring to their families when hiring begins, to provide more job opportunities for families in need.

Once we begin buildout, we plan to begin more participation and hosting of events that support Holyoke, Springfield, and other areas of disproportionate impact. These efforts will include community service days, events, and educational seminars that will provide guidance towards working in the marijuana industry, education on the positive impact the industry can have on local communities, and the new job opportunities that await. We plan to fundraise to help pay for registered agent fees for new employees who qualify. MMM remains open to all opportunities to help the local impact area as we value our partnership with these communities. As aforementioned, some initial discussion and outreach topics will include, but not be limited to the Benefits of Cannabis, Safe Consumption Practices, The Business and Stigma of Cannabis, and The Politics of National Legalization. In addition, we plan on hosting Resume Building workshops, Interview Tutorials, and "First-Week" Best Practices upon being hired into a new job. Our community service days will centered on helping those in need in the community by partnering with local non-profits such as local food banks that provides food to residents of the greater Holyoke area in addition to Holyoke roadside clean-up events once a month since we are in the transportation industry.

Measurement

- Number of people who attend these events and the percentage increase in events over time.
- Monthly check-in meetings with executive and establishment management to discuss our event coordination and progress. MMM will adapt best strategies on how to extend the reach of these programs and implement them in the local areas of impact.

Goal #4

MMM will require 100% attendance and participation of executives, managers, and employees to participate quarterly in at least one community service day.

Programs

During the licensing process and when we approach operational capability, MMM will require executives, managers and all employees to participate in quarterly community service days in areas of disproportionate impact. Our community service days will centered on helping those in need in the community by partnering with local non-profits such as local food banks that provides food to residents of the greater Holyoke area in addition to Holyoke roadside clean-up events once a month since we are in the transportation industry. MMM will also remain cognizant of and participate in community service events / programs hosted by local organizations such as Springfield College and Holyoke Community College.

Measurement

- Monthly check-in meetings with executive and establishment management to discuss our event coordination and progress. MMM will adapt best strategies on how to extend the reach of these programs and implement them in the local areas of impact.

- MMM will meet monthly with employees to discuss the upcoming community events and hear feedback from employees on past events to allow us to evolve our outreach techniques and events.
 - Attendance sign-in records kept ensuring all employees are participating in events.
 - Percentage of growth quarter over quarter of service hours accomplished.
-

Goal #5

Conducting industry specific educational seminars at least 1 time every quarter in one or more of the following: marijuana safety, marijuana transportation, marijuana delivery, and marijuana business training.

Programs

As we approach operational status, MMM will begin to participate and host educational seminars in the areas of marijuana safety, transportation, delivery, and business training. These seminars will include hiring materials and educational materials, along with personalized guidance for prospective employees and patients/consumers. We want the local impact area to be well educated on the marijuana industries and its regulations, in order to provide a safer and accessible establishment for the local communities. MMM will get the word out about these seminars through multiple sources of advertising and target communities of disproportionate impact and diversity. These seminars will be advertised via the Daily Hampshire Gazette, Holyoke Chamber of Commerce, and Springfield Chamber of Commerce. Given the constraints of Covid-19, we will try to host in person events in public spaces limited in capacity by whatever the state of Massachusetts issues as guidance for attendance / capacity limitations. We will also record / livestream the seminars, so that we can reach as many people as possible.

Measurement

- Number of individuals who attend our seminars.
 - Percentage of growth quarter over quarter of attendees at our seminars.
 - Monthly check-in meetings with executive and establishment management to discuss our event coordination and progress. MMM will adapt best strategies on how to extend the reach of these programs and implement them in the local areas of impact.
-

Goal #6

Providing monthly financial mentoring services to at least 5 community members a month.

Programs

MMM plans to host organizations with expertise in providing financial mentoring services to the communities with our area of disproportionate impact. We want our consumer and employee base to understand responsible financial management in order to help them succeed. We will adopt a 10-topic platform for helping our community members gain increased financial literacy. Our 10 topics will include the following: 1) Organizing your finances, 2) Spending less than you earn, 3) Putting your money to work, 4) Limiting debt to Income-producing Assets, 5) Continuing to educate yourself, 6) Understanding

and assessing risk, 7) Diversifying more than just your investments, 8) Maximizing your employment benefits, 9) Prioritizing and understanding your taxes, and 10) Planning for the unexpected. We would anticipate this being an ongoing education, so we will have recorded sessions for each topic in addition to the live mentoring and Q&A days each month. We will plan to have at least 2 in-person Q&A days and at least 5 new community members joining the education each month. We will host these events at our office and virtually to ensure safety to all members of the community.

Measurement

- Number of individuals served mentored monthly.
 - Percentage of growth month over month of attendees for our mentorship services.
 - Monthly check-in meetings with executive and establishment management to discuss our financial mentoring services. MMM will adapt best strategies on how to extend the reach of this service and implement them in the local areas of impact.
-

Goal #7

Monthly informational sessions regarding the process for sealing and expunging criminal records. Partnership and support for organizations providing jail diversion and restorative justice programs. We will target at least 1 successful expunging of a criminal record per quarter.

Programs

After we begin the hiring phase, MMM will host monthly informational sessions to help employees or members of areas of impact with criminal records, understand the process of sealing and expunging criminal drug related records. We will also provide guidance on applying for jobs in the marijuana industry. We want community members of areas of impact to remain educated on the topic so they can spread the word that the marijuana industry is inclusive and provides new opportunities. These events will remain in partnership with organizations that provide support in jail diversion and restorative justice. Our sessions will be advertised via the Daily Hampshire Gazette, Holyoke Chamber of Commerce, and Springfield Chamber of Commerce. Given the constraints of Covid-19, we will try to host in person events in public spaces limited in capacity by whatever the state of Massachusetts issues as guidance for attendance / capacity limitations. We will also record / livestream the seminars, so that we can reach as many people as possible. When the implications of the pandemic begin to dissipate, we will host the sessions both on site at our office as well as online to continue to give opportunities for those that can't attend in person. MMM is committed to helping the areas of impact that we serve to remain good citizens and provide a pathway to restorative justice with new job opportunities, education, and community events where they can be an active participant in their communities. Show success / say we have built out some of the research and are in the process of developing the agendas for the first few sessions

Measurement

MMM management will check-in with monthly meetings to discuss plan implantation and organize events to evolve our strategies to include new best practices. Records from events will include the following information:

- Attendance records
- Number of topics discuss and topic description
- Number of records sealed and expunged

- Number of public information sessions performed
 - Areas of concern to consider for next session
-

Goal #8

With Transportation as the keystone of our business, our goal is to daily provide transportation support for employees in areas of impact. Any necessary accommodations that will be provided for individuals coming from areas of disproportionate impact. We will guarantee 100% of transportation for those that need it coming to work from areas of disproportionate impact.

Programs

MMM will provide transportation support to employees in areas of disproportionate impact to ensure they have safe and affordable transportation to work. Employees that have no transportation or cannot afford it will receive a monthly transportation stipend towards the local bus or Uber/Lyft. Lyft now offers a program for applicants to have free transportation to apply for jobs, interview and their first few weeks on the job. We will communicate this program and our ability to help with transportation costs to each prospective employee that needs it.

Accommodations for employees in need will be provided on a case by case basis. We are happy to assist in providing accommodations or temporary housing to employees for a three-month period, until they can afford their own accommodations near their place of work. MMM will ensure all employees have a safe roof over their head when they begin work in order to assist in the transition.

Measurement

MMM will perform monthly reviews of staffing records to provide the efficient assistance to employees in need. Monthly review of staffing records which will include:

- Number of employees who need transportation
- Transportation type needed and amount
- Number employees who need accommodations
- Accommodation type and amount needed
- Three-month plan for employees to obtain transportation or accommodations
- Amount of assistance needed after the three-month program

BYLAWS
OF
MMM Transport Inc.,
a Massachusetts Corporation

ARTICLE I

Section 1.1. Annual Meetings. An annual meeting of the shareholders of MMM Transport Inc. (the "Corporation") will be held for the election of directors on a date and at a time and place either within or without the State of Massachusetts fixed by resolution of the Board of Directors and within six months after the end of the fiscal year.

Any other proper business may be transacted at the annual meeting, except as limited by any notice or other requirements under the Massachusetts Business Corporation Act.

Section 1.2. Special Meetings. Special meetings of the shareholders may be called at any time by the holders of shares entitled to cast not less than 10% of the votes at the meeting, such meeting to be held on a date and at a time and place either within or without the Commonwealth of Massachusetts as may be stated in the notice of the meeting.

Section 1.3. Notice of Meetings. Whenever shareholders are required or permitted to take any action at a meeting a written notice of the meeting must be given not less than ten (10) nor more than sixty (60) days before the date of the meeting to each shareholder entitled to vote thereat, except that meetings to increase the number of shares or corporate indebtedness each require at least 60 days' notice.

Notice of a shareholders' meeting or any report must be given either personally or by first-class mail or other means of written communication, addressed to the shareholder at the address of such shareholder appearing on the books of the Corporation or given by the shareholder to the Corporation for the purpose of notice. The notice shall be deemed to have been given at the time when delivered personally or deposited in the mail or sent by other means of written communication.

Section 1.4. Adjournments. When a shareholders' meeting is adjourned to another time or place, except as otherwise provided in this Section, notice need not be given of any such adjourned meeting if the time and place thereof are announced at the meeting at which the adjournment is taken. At the adjourned meeting the Corporation may transact any business which might have been transacted at the original meeting. If the adjournment is for more than 45 days or if after the adjournment a new record date is fixed for the adjourned meeting, a notice of the adjourned meeting shall be given to each shareholder of record entitled to vote at the meeting.

Section 1.5. Validating Meeting of Shareholders; Waiver of Notice. The transactions of any meeting of shareholders, however called and noticed, and wherever held, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice or a consent to the holding of the meeting or an approval of the minutes thereof. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting. Attendance of a person at a meeting shall constitute a waiver of notice of and presence at such meeting, except when the person objects, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened and except that attendance at a meeting is not a waiver of any right to object to the consideration of matters required by law to be included in the notice but not so included, if such objection is expressly made at the meeting. Neither the business to be transacted at nor the purpose of any regular or special meeting of shareholders need be specified in any written waiver of notice, consent to the holding of the meeting or approval of the minutes thereof, except as required by the Massachusetts Business Corporation Act.

Section 1.6. Quorum. A majority of the shares entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of the shareholders.

The shareholders present at a duly called or held meeting at which a quorum is present may continue to transact business until adjournment notwithstanding the withdrawal of enough shareholders to leave less than a quorum, if any action taken (other than adjournment) is approved by at least a majority of the shares required to constitute a quorum. In the absence of a quorum, any meeting of shareholders may be adjourned from time to time by the vote of a majority of the shares represented either in person or by proxy, but no other business may be transacted, except as provided in this Section.

Section 1.7. Organization. Meetings of shareholders shall be presided over by the Chairman of the Board of Directors, if any, or in the absence of the Chairman of the Board of Directors by the Vice Chairman of the Board of Directors, if any, or in the absence of the Vice Chairman of the Board of Directors by the President, or in the absence of the foregoing persons by a chairman designated by the Board of Directors, or in the absence of such designation by a chairman chosen at the meeting. The Secretary, or in the absence of the Secretary, an Assistant Secretary, shall act as secretary of the meeting, or in their absence the chairman of the meeting may appoint any person to act as secretary of the meeting.

Section 1.8. Voting. Unless otherwise provided in the Articles of Organization, each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote of shareholders.

Any holder of shares entitled to vote on any matter may vote part of the shares in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal, other than elections to office, but, if the shareholder fails to specify the number of shares such shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares such shareholder is entitled to vote.

Directors shall be elected by a plurality of the votes of the shares present in person or represented by proxy at the meeting and entitled to vote on the election of directors.

In all other matters, unless otherwise provided by Massachusetts law or by the Articles of Organization or these bylaws, the affirmative vote of the holders of a majority of the shares entitled to vote on the subject matter at a meeting in which a quorum is present shall be the act of the shareholders. Where a separate vote by class or classes is required, the affirmative vote of the holders of a majority of the shares of such class or classes at a meeting in which a quorum is present shall be the act of such class or classes, except as otherwise provided by the State of Massachusetts law or by the Articles of Organization or these bylaws.

Section 1.9. Shareholder's Proxies. At all meetings of shareholders, a shareholder may vote by proxy executed in writing by the shareholder or by his or her duly authorized attorney-in-fact.

Such proxy shall be filed with the Secretary of the Corporation before or at the time of the meeting. No proxy shall be valid after the expiration of 11 months from the date thereof unless otherwise provided in the proxy. Every proxy continues in full force and effect until revoked by the person executing it prior to the vote pursuant thereto, except as otherwise provided in this Section. Such revocation may be effected by a writing delivered to the Corporation stating that the proxy is revoked or by a subsequent proxy executed by the person executing the prior proxy and presented to the meeting, or as to any meeting by attendance at such meeting and voting in person by the person executing the proxy.

Section 1.10. Inspectors. In advance of any meeting of shareholders the Board of Directors may appoint inspectors of election to act at the meeting and any adjournment thereof.

Section 1.11. Fixing Date for Determination of Shareholders of Record. In order that the Corporation may determine the shareholders entitled to notice of any meeting or to vote or to express consent to corporate action in writing without a meeting or entitled to receive payment of any dividend or other distribution or allotment of any rights or entitled to exercise any rights in respect of any other lawful action, the Board of Directors may fix, in advance, a record date, which shall not be more than 60 nor less than ten days prior to the date of such meeting nor more than 60 days prior to any other action.

If no record date is fixed:

- a) the record date for determining shareholders entitled to notice of or to vote at a meeting of shareholders shall be at the close of business on the business day next preceding the day on which notice is given or, if notice is waived, at the close of business on the business day next preceding the day on which the meeting is held;
- b) the record date for determining shareholders entitled to give consent to corporate action in writing without a meeting, when no prior action by the Board of Directors has been taken, shall be the day on which the first written consent is given; and
- c) the record date for determining shareholders for any other purpose shall be at the close of business on the day on which the Board of Directors adopts the resolution relating thereto or the 60th day prior to the date of such other action, whichever is later. When a determination of shareholders entitled to vote at any meeting of shareholders has been made as provided in this Section, such determination shall apply to any adjournment thereof.

Section 1.12. Consent of Shareholders in Lieu of Meeting. Except as otherwise provided in the Articles of Organization or under the Massachusetts Business Corporation Act, any action that may be taken at any annual or special meeting of the shareholders may be taken without a meeting and without prior notice, if a consent in writing, setting forth the action so taken, shall be signed by the holders of all outstanding shares.

ARTICLE II

Board of Directors

Section 2.1. Powers; Number; Qualifications. The business and affairs of the Corporation shall be managed by, and all corporate powers shall be exercised by or under, the direction of the Board of Directors, except as otherwise provided in these bylaws or Articles of Organization.

The number of directors comprising the initial Board of Directors shall be set forth in the Corporation's Articles of Organization. The Board of Directors may be enlarged by the shareholders at any meeting or by vote of a majority of the directors then in office, provided that, the number of directors shall not be less than three whenever the Corporation has three or more shareholders, and shall not be less than two whenever the Corporation has two shareholders. The number of directors comprising the initial Board of Directors shall initially be set forth in the Corporation's Articles of Organization. The Board of Directors may be enlarged by the shareholders at any meeting or by vote of a majority of the directors then in office.

Section 2.2. Election; Term of Office; Resignation; Vacancies. At each annual meeting of shareholders, directors shall be elected to hold office until the next annual meeting. Each director, including a director elected to fill a vacancy, shall hold office until the expiration of the term for which elected and until a successor has been elected and qualified. Any director may resign effective upon giving written notice to the Chairman of the Board of Directors, the Secretary of the Board of Directors, or the Board of Directors of the Corporation, unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected to take office when the resignation becomes effective.

Subject to the provisions of the Massachusetts Business Corporation Act, any director may be removed with or without cause at any time by the shareholders of the Corporation at a special meeting called for such purpose. In addition, any director may be removed for cause by action of the Board of Directors.

Unless otherwise provided in the Articles of Organization or these bylaws and except for a vacancy caused by the removal of a director, vacancies on the Board of Directors may be filled by appointment by the Board of Directors. The shareholders may elect a director at any time to fill a vacancy not filled by the Board of Directors.

Section 2.3. Regular Meetings. Regular meetings of the Board of Directors may be held without notice at such places within or without the Massachusetts and at such times as the Board of Directors may from time to time determine.

Section 2.4. Special Meetings; Notice of Meetings; Waiver of Notice. Special meetings of the Board of Directors may be held at any time or place within or without the State of Massachusetts whenever called by the Chairman of the Board of Directors, by the Vice Chairman of the Board of Directors, if any, or by any two directors. Subject to any greater notice requirements set forth in the Massachusetts Business Corporation Act, special meetings shall be held on five days' notice by mail or 48 hours' notice delivered personally or by telephone, telegraph or any other means of communication authorized by the Massachusetts Business Corporation Act. Notice delivered personally or by telephone may be transmitted to a person at the director's office who can reasonably be expected to deliver such notice promptly to the director.

Notice of a meeting need not be given to any director who signs a waiver of notice or a consent to holding the meeting or an approval of the minutes thereof, whether before or after the meeting, or who attends the meeting without protesting, prior thereto or at its commencement, the lack of notice to such director. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting. A notice, or waiver of notice, need not specify the purpose of any regular or special meeting of the Board of Directors.

Section 2.5. Participation in Meetings by Conference Telephone Permitted. Members of the Board of Directors, or any committee designated by the Board of Directors, may participate in a meeting of the Board or of such committee, as the case may be, through the use of conference telephone or similar communications equipment permitted by the Massachusetts Business Corporation Act, so long as all members participating in such meeting can hear one another, and participation in a meeting pursuant to this Section shall constitute presence in person at such meeting.

Section 2.6. Quorum; Adjournment; Vote Required for Action. At all meetings of the Board of Directors a majority of the authorized number of directors shall constitute a quorum for the transaction of business. Subject to the provisions of the Massachusetts Business Corporation Act, every act or decision done or made by a majority of the directors present at a meeting at which a quorum is present shall be the act of the Board unless the Articles of Organization or these bylaws shall require a vote of a greater number.

A majority of the directors present, whether or not a quorum is present, may adjourn any meeting to another time and place. If the meeting is adjourned for more than 24 hours, notice of any adjournment to another time or place shall be given prior to the time of the adjourned meeting to the directors who were not present at the time of the adjournment.

Section 2.7. Organization. Meetings of the Board of Directors shall be presided over by the Chairman of the Board of Directors, or in the absence of the Chairman of the Board by the Vice Chairman of the Board of Directors, if any, or in their absence by a chairman chosen at the meeting. The Secretary, or in the absence of the Secretary, an Assistant Secretary, will act as secretary of the meeting, but in the absence of the Secretary and any Assistant Secretary the chairman of the meeting may appoint any person to act as secretary of the meeting.

Section 2.8. Action by Directors Without a Meeting. Any action required or permitted to be taken by the Board of Directors, or any committee thereof, may be taken without a meeting if all members of the Board or of such committee, as the case may be, shall individually or collectively consent in writing to such action. Such written consent or consents shall be filed with the minutes of the proceedings of the Board of Directors. Such action by written consent shall have the same force and effect as a unanimous vote of such directors.

Section 2.9. Compensation of Directors. The Board of Directors shall have the authority to fix the compensation of directors for services in any capacity.

ARTICLE III

Executive and Other Committees

Section 3.1. Executive and Other Committees of Directors. The Board of Directors, by resolution adopted by a majority of the authorized number of directors, may designate an executive committee and other committees, each consisting of two or more directors, to serve at the pleasure of the Board of Directors, and each of which, to the extent provided in the resolution but subject to the Massachusetts Business Corporation Act, will have all the authority of the Board.

The Board of Directors may designate one or more directors as alternate members of any such committee, who may replace any absent member or members at any meeting of such committee.

Unless the Board of Directors otherwise provides, each committee designated by the Board may adopt, amend and repeal rules for the conduct of its business. In the absence of a provision by the Board of Directors or a provision in the rules of such committee to the contrary, each committee shall conduct its business in the same manner as the Board of Directors conducts its business pursuant to Article II of these bylaws.

ARTICLE IV

Officers

Section 4.1. Officers; Election. As soon as practicable after the annual meeting of shareholders each year, the Board of Directors shall appoint a President, a Treasurer and a Secretary. The Board may also elect one or more Vice Presidents, one or more Assistant Secretaries, and such other officers as the Board may deem desirable or appropriate and may give any of them such further designations or alternate titles as it considers desirable. Any number of offices may be held by the same person.

Section 4.2. Term of Office; Resignation; Removal; Vacancies. Except as otherwise provided in the resolution of the Board of Directors electing any officer, each officer will hold office until his or her successor is elected and qualified or until his or her earlier resignation or removal. Any officer may resign at any time upon written notice to the Board or to the Chairman of the Board or the Secretary of the Corporation. Such resignation will take effect when the notice is delivered, unless the notice specifies a later time, and unless otherwise specified therein no acceptance of such resignation will be necessary to make it effective. The Board may remove any officer with or without cause at any time. Any such removal will be without prejudice to the contractual rights of such officer, if any, with the Corporation, but the election of an officer will not of itself create contractual rights. Any vacancy occurring in any office of the Corporation by death, resignation, removal or otherwise may be filled for the unexpired portion of the term by the Board at any regular or special meeting.

Section 4.3. Powers and Duties. The officers of the Corporation will have such powers and duties in the management of the Corporation as are stated in these bylaws or in a resolution of the Board of Directors that is not inconsistent with these bylaws and, to the extent not so stated, as generally pertain to their respective offices, subject to the control of the Board of Directors. The Secretary will have the duty to record the proceedings of the meetings of the shareholders, the Board of Directors and any committees in a book to be kept for that purpose.

Section 4.4. Salaries. The salaries, compensation and other benefits, if any, of the officers will be fixed from time to time by the Board of Directors, and no officer will be prevented from receiving such salary by reason of the fact that he or she is also a Director of the Corporation.

ARTICLE V

Forms of Certificates; Loss and Transfer of Shares

Section 5.1. Forms of Certificates. Every holder of shares in the Corporation is entitled to have a certificate signed in the name of the Corporation by (1) the President, any Vice President, Chairman of the Board or Vice Chairman, and by (2) the Chief Financial Officer, Treasurer, Assistant Treasurer, or Secretary of the Corporation, certifying the number of shares and the class or series of shares owned by such shareholder. If such certificate is manually signed by at least one officer or manually countersigned by a transfer agent or by a registrar, then any other signature on the certificate may be a facsimile signature. In case any officer, transfer agent or registrar who has signed or whose facsimile signature has been placed upon a certificate shall have ceased to be such officer, transfer agent or registrar before such certificate is issued, it may be issued by the Corporation with the same effect as if such person were such officer, transfer agent or registrar at the date of issue.

Section 5.2. Lost, Stolen or Destroyed Share Certificates; Issuance of New Certificates. The Corporation may issue a new share certificate or a new certificate for any other security in the place of any certificate theretofore issued by it, alleged to have been lost, stolen or destroyed, and the Corporation may require the owner of the lost, stolen or destroyed certificate, or such owner's legal representative, to give the Corporation a bond sufficient to indemnify it against any claim that may be made against it (including any expense or liability) on account of the alleged loss, theft or destruction of any such certificate or the issuance of such new certificate.

ARTICLE VI

Records and Reports

Section 6.1. Shareholder Records. The Corporation shall keep at its principal executive office or at the office of its transfer agent or registrar a record of the names and addresses of all shareholders and the number and class of shares held by each shareholder.

Section 6.2. Corporate Documents and Bylaws. The Corporation shall keep at its principal executive office the original or a copy of the Articles of Organization and bylaws as amended to which shall be open to inspection by the shareholders at all reasonable times during office hours. The Corporation shall, upon the written request of any shareholder, furnish to that shareholder a copy of the Articles of Organization or bylaws as amended to date.

Section 6.3. Minutes and Accounting Records. The minutes of proceedings of the shareholders, the Board of Directors, and committees of the Board, and the accounting books and records will be kept at the principal executive office of the Corporation, or at such other place or places as designated by the Board of Directors. The minutes will be kept in written form, and the accounting books and records will be kept either in written form or in a form capable of being converted into written form.

Section 6.4. Inspection by Directors. Subject to applicable Massachusetts law, every director shall have the right at any reasonable time to inspect all books, records, and documents of every kind and the physical properties of the Corporation and each of its subsidiary corporations for purposes relating to his or her status as director. This inspection by a director may be made in person or by an agent or attorney and the right of inspection includes the right to copy and make extracts of documents.

Section 6.5. Annual Report to Shareholders. Subject to the Massachusetts Business Corporation Act, for as long as the Corporation has fewer than the number of shareholders specified in the applicable statute, if any, any requirement of an annual report to shareholders is expressly waived. However, nothing in this provision shall be interpreted as prohibiting the Board of Directors from issuing annual or other periodic reports to the shareholders, as the Board considers appropriate.

At the annual meeting of shareholders, or the meeting held in lieu thereof, the Corporation shall lay before the shareholders a financial statement consisting of:

- a) A balance sheet containing a summary of the assets, liabilities, stated capital, if any, and surplus (showing separately any capital surplus arising from unrealized appreciation of assets, other capital surplus, and earned surplus) of the Corporation as of the end of the Corporation's most recent fiscal year, except that, if consolidated financial statements are laid before the shareholders, the consolidated balance sheet shall show separately or disclose by a note the amount of the consolidated surplus that does not constitute earned surplus of the Corporation or any of its subsidiaries and that is not classified as stated capital or capital surplus on the consolidated balance sheet; and
- b) A statement of profit and loss and surplus, including a summary of profits, dividends or distributions paid, and other changes in the surplus accounts of the Corporation for the period commencing with the date marking the end of the period for which the last preceding statement of profit and loss required under this Section was made and ending with the date of said balance sheet, or in the case of the first statement of profit and loss, from the incorporation of the Corporation to the date of said balance sheet.

Section 6.6. Financial Statements. The Corporation shall keep a copy of each annual financial statement, quarterly or other periodic income statement, and accompanying balance sheets prepared by the Corporation on file in the Corporation's principal office for 3 years. These documents shall be exhibited at all reasonable times, or copies provided, to any shareholder on demand.

Section 6.7. Form of Records. Any records maintained by the Corporation in the regular course of its business, with the exception of minutes of the proceedings of the shareholders, and of the Board of Directors and its committees, but including the Corporation's stock ledger and books of account, may be kept on, or be in the form of magnetic tape, photographs, microphotographs or any other information storage device, provided that the records so kept can be converted into clearly legible form within a reasonable time. The Corporation shall so convert any records so kept upon the request of any person entitled to inspect the same.

ARTICLE VII

Miscellaneous

Section 7.1. Principal Executive or Business Offices. The Board of Directors shall fix the location of the principal executive office of the Corporation at any place either within or without the State of Massachusetts.

Section 7.2. Fiscal Year. The fiscal year of the Corporation must be determined by the Board of Directors.

Section 7.3. Seal. The Corporation may have a corporate seal which shall have the name of the Corporation inscribed thereon and shall be in such form as may be approved from time to time by the Board of Directors. The corporate seal may be used by causing it or a facsimile thereof to be impressed or affixed or in any other manner reproduced.

Section 7.4. Indemnification. The Corporation shall have the power to indemnify, to the maximum extent and in the manner permitted by the Massachusetts Business Corporation Act, each of its directors, officers, employees and agents against expenses, judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with any proceeding arising by reason of the fact that such person is or was an agent of the Corporation.

Section 7.5. Contracts. The Board of Directors may authorize any officer or officers, agent or agents, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances.

Section 7.6. Dividends. The Board of Directors may from time to time declare, and the Corporation may pay dividends on its outstanding shares in the manner and upon the terms and conditions provided by Massachusetts law and its Articles of Organization.

Section 7.7. Amendment of Bylaws. To the extent permitted by law, these bylaws may be amended or repealed, and new bylaws adopted, by the Board of Directors. The shareholders entitled to vote, however, retain the right to adopt additional bylaws and may amend or repeal any bylaw whether or not adopted by them.

Unless otherwise stated in the Articles of Organization, these bylaws may be amended or repealed, and new bylaws adopted, only by action of the shareholders.

[Remainder Intentionally Left Blank.]



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

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

Identification Number: 001439156

ARTICLE I

The exact name of the corporation is:

MMM TRANSPORT INC.

ARTICLE II

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

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CWP	\$0.00100	10,000,000	\$10,000.00	10,000,000

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

ARTICLE IV

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

ARTICLE V

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

ARTICLE VI

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

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

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

Name: UNITED STATES CORPORATION AGENTS, INC.
No. and Street: 101BILLERICA AVE., BLDG. 5, SUITE 204
City or Town: NORTH BILLERICA State: MA Zip: 01862 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	JEAN M. DAMBROSIO	390 RIVERWAY #18 BOSTON, MA 02115 USA
TREASURER	MANNY TARTAGLIONE	390 RIVERWAY #18 BOSTON, MA 02115 USA
SECRETARY	ABEL PATTON	390 RIVERWAY #18 BOSTON, MA 02115 USA
DIRECTOR	JEAN M. DAMBROSIO	390 RIVERWAY #18 BOSTON, MA 02115 USA
DIRECTOR	MANNY TARTAGLIONE	390 RIVERWAY #18 BOSTON, MA 02115 USA
DIRECTOR	ABEL PATTON	390 RIVERWAY #18 BOSTON, MA 02115 USA

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

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

TRANSPORTATION SERVICES

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

No. and Street: 390 RIVERWAY #18
City or Town: BOSTON State: MA Zip: 02115 Country: USA

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

No. and Street: 390 RIVERWAY #18
City or Town: BOSTON State: MA Zip: 02115 Country: USA
which is
☒ its principal office ☐ an office of its transfer agent
☐ an office of its secretary/assistant secretary ☐ its registered office

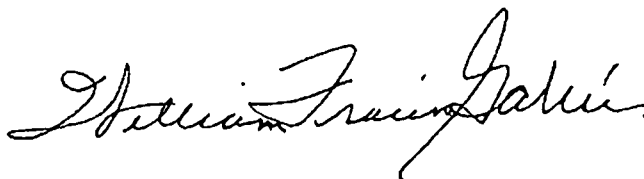
Signed this **22 Day of May, 2020 at 8:37:39 AM** by the incorporator(s). (*If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.*)

LEGALZOOM.COM, INC., A CALIFORNIA CORPORATION, CHEYENNE MOSELEY, ASSISTANT SECRETARY

THE COMMONWEALTH OF MASSACHUSETTS

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

May 22, 2020 08:36 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



William Francis Galvin
Secretary of the
Commonwealth

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

Date: June 05, 2020

To Whom It May Concern :

I hereby certify that according to the records of this office,

MMM TRANSPORT INC.

is a domestic corporation organized on **May 22, 2020** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

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

Secretary of the Commonwealth

Certificate Number: 20060125440

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

Processed by: mas



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

mass.gov/dor

Letter ID: L0943923776
Notice Date: June 11, 2020
Case ID: 0-000-754-720



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



MMM TRANSPORT INC
390 RIVERWAY APT 18
BOSTON MA 02115-6444

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

I, Jean D'Ambrosio, attest that MMM Transport, Inc. does not have any employees. Because we do not have any employees, we are unable to furnish a certificate of good standing from Department of Unemployment Assistance.

Plan for Obtaining Liability Insurance

MMM Transport, Inc. ("MMM") plans to contract with Alera Group to source 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 coverage for no less than \$1,000,000 per occurrence & \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. MMM will consider additional coverage based on availability & cost-benefit analysis. If adequate coverage is unavailable at a reasonable rate, MMM will place in escrow at least \$250,000 to be expended for liabilities coverage. Any withdrawal from such escrow replenished within 10 business days. MMM will keep reports documenting compliance with 935 CMR 500.105(10).

MMM Transport, Inc.

Business Plan

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1. EXECUTIVE SUMMARY

1.1 Mission Statement and Message from the CEO

MMM Transport, Inc. (“MMM”) is a Third-Party Transporter company (“TPT”) committed to creating a safe and clean community environment providing consistent, high quality cannabis transportation and logistics to legal cannabis businesses in the state of Massachusetts.

MMM is more than just a company – it is a mindset. It is our mission to guarantee that customers and ultimately end consumers receive compassionate service and quality through superior transportation and logistics. Integrity is the core value of our organization. MMM Transport is dedicated to creating a strong connection with our community; we want to help the mission of bettering the lives of those living in pain, while spreading advocacy for cannabis as a staple to wellness overall.

1.2 Service / Product Solutions

MMM will offer transportation services for a variety of cannabis products dependent upon our business partners’ needs. We anticipate transporting products that will range from traditional flower to topical and edibles. We will courier a selection of non-euphoric products with high CBD, low THC profiles for those targeting CBD users. We will only transport product lines that are compliant with the guidelines and regulations set out by the CCC. We will only transport between licensed adult-use Marijuana Establishments (“MEs”) and Medical Marijuana Treatment Center (“MTCs”)

In addition to traditional sativa, indica, and hybrid cannabis flower, MMM anticipates transporting a wide range of products that will allow MMM to help MEs serve customers with a wide variety of needs.

Products MMM will be prepared to transport include but will not be limited to:

1. Topical Salves/ Sprays
2. Creams/Lotions/Bath Oils
3. Transdermal Patches
4. Oral Mucosal/ Sublingual Dissolving Tablets
5. Tinctures
6. Concentrates: Wax/Shatter/Oils/Live Resin
7. Inhalation Ready to Use CO2 Extracted Hash Oils
8. Pre-Dosed Oil Vaporizers
9. Ingestion Capsules
10. Edible Food/Beverages

1.3 Customers

MMM’s target customers include licensed Marijuana Cultivators, Craft Marijuana Cooperatives, Marijuana Product Manufacturers, Marijuana Retailers, Microbusinesses, and Laboratories. MMM plans to attract businesses owned by people of all races, religions, genders, ages, or sexual orientations.

1.4 What Drives Us

MMM’s goals include:

- Create strong, lasting relationships with our host community.
- Give back to host community through fundraising, education and local charity.
- Eco-friendly, organic and sustainable operations.
- Earn the reputation of an iconic cannabis transportation brand
- Spread advocacy for cannabis as a staple to wellness.

- Build a team of dynamic industry professionals and alliances.
- Create network of contributors and exclusive partnerships with top cannabis companies.
- Exceed customer expectations with fair market pricing, compassionate care, expert logistics, delivery, online functionalities and superior management.
- Diversify as law and market change.
- Unmatched focused woman's leadership program.
- Promote female and minority leadership in the marijuana industry.
- Educate customers and community through support services and counseling.

2. COMPANY DESCRIPTION

2.1 Structure

MMM is a Massachusetts domestic corporation interested in applying for a Certificate of Registration from the Massachusetts Cannabis Control Commission (the “**Commission**”) to operate a Third-Party Transporter (“**TPT**”) business in the Commonwealth.

MMM will file, in a form and manner specified by the Commission, an application for licensure as a TPT.

2.2 Operations

MMM will be located in Northampton, Massachusetts and has leased a facility at 376 Easthampton Road, Northampton, Massachusetts.

The facility is well positioned, and it matches the ideal picture of a cannabis transportation facility. Before taking over the facility, it was used as an automotive shop and it remains in good condition. The business will be launching with just one location in Northampton, but we have plans to open other operations in key locations in Massachusetts.

The location encompasses a total of 2,000 square feet with a large work bay with a lift that will fit two cars easily, and another work bay with a lift that has a separate garage overhead door. The facility is perfect for the secure storage of cannabis transportation vehicles while not in use. The facility also provides for ample office space, private bathrooms, and a storage supply room.

MMM will establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana products in the process of transportation, and finished, stored marijuana (as-needed); conduct a monthly inventory of marijuana in the process of transportation, and finished, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

MMM will tag and track all marijuana seeds, clones, plants, and marijuana products that it transports or stores, using a seed-to-sale methodology in a form and manner to be approved by the Commission.

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

MMM will maintain records, including all records required in any section of 935 CMR 500.000, which will be available for inspection by the Commission, upon request. The records shall be maintained in accordance with generally accepted accounting principles. Records shall be maintained for at least 12 months.

MMM 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, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

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

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing shall be disposed of in compliance with all applicable state and federal requirements.

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

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

MMM and MMM agents shall comply with all local rules, regulations, ordinances, and bylaws.

We have achieved:

1. Priority Applicant Status
2. Community Outreach Meetings
3. Host Community Agreement

2.3 Security

MMM will contract with a professional security and alarm company to design, implement and monitor a comprehensive security plan to ensure that the facility and all transportation vehicles are safe and secure for employees and the local community.

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

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

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

The exterior of the property and surrounding area will be sufficiently lit and foliage will always be minimized to ensure clear visibility of the area .

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

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

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

MMM will have a security personnel on-site during business hours.

2.4 Benefits to the Municipality

MMM looks forward to working cooperatively with Town of Northampton. MMM anticipates establishing a mutually beneficial relationship with the Town in exchange for permitting MMM to site and operate in Northampton. The Town stands to benefit in various ways, including but not limited to the following:

- **Jobs**
 - The marijuana establishment facility will add several full-time jobs, in addition to hiring qualified, local contractors and vendors.
- **Monetary Benefits**
 - Donations made by MMM to the local community in addition to local property taxes
- **Access to Quality Product**
 - MMM via expert transport services will help qualified consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants
- **Control**
 - In addition to the CCC, the Northampton Police Department and other municipal departments will have oversight over MMM's security systems and processes.
- **Responsibility**
 - MMM is comprised of experienced transportation experts and professionals who will be thoroughly background checked and scrutinized by the CCC.
- **Economic Development**
 - MMM's use of 376 Easthampton Street will revitalize the industrial area of Northampton and contribute to the overall economic development of the local community.

2.5 Zoning

MMM Transport, Inc. ("MMM") will remain compliant at all times with the local zoning requirements set forth in the City of Northampton's Ordinances. In accordance Chapter 350 of the City of Northampton Code of Ordinances, MMM's proposed Third Party Transporter establishment is located in the GI Industrial District ("GI"), which allows Marijuana Manufacturing (which encompasses Transport after conversations with the City) by right.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12. Additionally, the property is not within 300 feet of a building containing another marijuana establishment; in which children commonly congregate in an organized ongoing formal basis; owned by or operated as part of the campus of any private or public institution of higher learning; housing a public library; and containing any residential use.

MMM will comply with all state and local signage requirements and not allow cannabis plants, products and paraphernalia to be visible from the outside of the building, nor will MMM store cannabis in any form outside or create nuisance conditions. No smoking, burning, or consumption or any product containing marijuana or marijuana-related products shall be permitted on the premises.

Only as necessary, MMM will apply for a Special Permit and Site Plan Review from the Zoning Board of Appeals and will apply for any other local permits required to operate a Marijuana Third Party Transporter at the proposed location. MMM will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Third Party Transporter at MMM's proposed location.

MMM has already attended several meetings with various municipal officials and boards to discuss MMM's plans for a proposed Marijuana Third Party Transporter and has executed a Host Community Agreement with the City of Northampton. MMM will continue to work cooperatively with various municipal departments, boards, and officials to ensure that MMM's marijuana establishment remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

In accordance with Easthampton's Zoning Bylaws, the proposed property is located in Easthampton's Industrial District.

In accordance with the CCC's regulations set forth in 935 CMR 500.110(3), the property is not located within 500 feet of a public or private school providing education to children in kindergarten or grades 1 through 12.

3. MARKET RESEARCH

3.1 Industry

MMM's proposed location is located in Northampton. Surrounding areas include Easthampton, Southamptton, Amherst, Holyoke, Springfield, Greenfield, West Hampton, Hadley, Granby, South Hadley.

3.2 Customers

In Massachusetts, sales are expected to increase from ~\$420 Million in 2019 to eventually \$1.4 billion in 2025, according to New Frontier Data.

3.3 Competitors

MMM's competitors in the transport space include Eagle Eyes Transport, Berkshire Roots, Sira Naturals, and Tree Beard.

3.4 Competitive Advantage

MMM's competitive advantages over their competition include a dynamic team and advisors of industry professionals, women and minorities. Our management team is made up of the best in the transport industry and will ensure successful operations.

Our location is centrally located to the Pioneer Valley, seeing a greater number of traffic and located near densely populated cannabis business operations.

Our leadership rating will surpass competition as we will target inclusion of diverse employees and customers. We will focus on equality opportunity for all races, religion, gender, sexual orientations. Our female leadership will be welcomed in the community and the marijuana industry.

In every business, there is competition, however, the cannabis industry is known to be highly competitive. MMM possesses several strengths which will allow us to stand apart from our competition. The industry is rapidly growing, and customers are scrutinizing the service offered, the location of the vendors, discounts offered for the services. We believe that we will excel in expert transport services, offer a superior location, and have the most competitive pricing in the market.

3.5 Regulations

MMM is a Third-Party Transport, consistent with the objectives of 935 CMR 500.000 and 935 CMR 501.000.

MMM will be registered to do business in the Commonwealth as a domestic for profit corporation or another domestic business entity in compliance with 935 CMR 500.000 and maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue.

MMM will apply for all state and local permits and approvals required to renovate and operate the facility in addition to outfitting the necessary transport vehicles.

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

MMM's facility will remain under 24/7 security and remain compliant to the CCC regulations.

4. PRODUCT / SERVICE

4.1 Service Offering

TRANSPORT OPERATIONS:

To ensure compliance with 935 CMR 500.105(13) and 935 CMR 501.105(13) , MMM will ensure that all transported marijuana and marijuana products are only transported to other licensed establishments. Any marijuana products will be transported between licensed MEs and MTCs by registered marijuana establishment agents. As a part of our core business MMM plans on contracting with licensed MEs to transport marijuana products between licensed MEs and MTCs. MMM will always confirm that originating and receiving licensed MEs and MTCs are ensuring that all transported marijuana products are linked to seed-to-sale tracking programs compliant with CCC regulations. For the purposes of tracking, seeds and clones will be properly tracked and labeled in a form and manner determined by the CCC. Any marijuana product that is undeliverable or is refused by the destination ME/MTC will be transported back to the originating establishment. MMM vehicles transporting marijuana products will be staffed with a minimum of two ME/MTC agents. One agent will always remain with the vehicle when the vehicle contains marijuana or marijuana products.

Prior to leaving any ME/MTC for the purpose of transporting marijuana products, MMM will ensure that the originating ME/MTC has weighed, tracked inventory, and accounted for, on video, all marijuana products to be transported. Within eight hours after arrival at the destination ME/MTC, MMM will ensure that the destination establishment will reweigh, re-inventory, and account for, on video, all marijuana products were transported. While videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, MMM will ensure that the video shows each product being weighed, the weight, and the manifest. All marijuana products will be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.

In the case of an emergency stop during the transportation of marijuana products, MMM will maintain a log describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle. MMM will ensure that all transportation times and routes are randomized and that all transport routes remain within the Commonwealth.

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

MMM vehicles will be equipped with a video system that includes one or more video cameras in the storage area of the vehicle and one or more video cameras in the driver area of the vehicle and which will remain operational at all times during the entire transportation process and which will have both the ability to produce a clear color still photo whether live or recorded and a date and time stamp embedded in all recordings which will always be synchronized and set correctly and will not significantly obscure the picture.

MMM will thoroughly train their employees. MMM agents will document and report any unusual discrepancy in weight or inventory to the Commission and Law Enforcement Authorities not more than 24 hours of the discovery of such a discrepancy. MMM agents will report to the Commission and Law Enforcement Authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours of such accidents, diversions, losses, or other reportable incidents.

All MMM vehicles used for transporting marijuana products will be owned or leased by MMM. The vehicles will be properly registered, inspected, and insured in the Commonwealth (documentation of such status will be maintained as records of MMM, and will be made available to the Commission on request). Each MMM Vehicle will be equipped with an alarm system approved by the Commission, and equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products. No marijuana products will be visible from outside the vehicle. No MMM vehicle used to transport marijuana products will bear any markings indicating that the vehicle is being used to transport marijuana products, nor indicate any name of any MEs/MTCs or the MMM. There will be no advertising, marketing or branding, including, but not limited to, vinyl-wrapped vehicles, signs, logos or markings, indicating that the vehicle is being used to transport marijuana on transportation vehicles or company cars. While transporting marijuana products, no other products will be transported or stored in the same MMM vehicle. No firearms will be located within the vehicle or on any ME/MTC/MMM Agent.

All marijuana products will be transported in a secure, locked storage compartment that is a part of the MMM vehicle transporting the marijuana products. The storage compartment will be sufficiently secure, so that it cannot be easily removed. If MMM is transporting marijuana products for more than one ME at a time, the marijuana products for each ME will be kept in a separate locked storage compartment during transportation and separate manifests will be maintained for each ME/MTC.

All MMM vehicles used to transport Marijuana Products will contain a global positioning system (GPS) monitoring device that is not a mobile device that is easily removable. The MMM GPS system will always be attached to the vehicle while the vehicle contains marijuana products. The GPS system will be monitored by MMM during transport of marijuana products and inspected by the commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.

Each MMM Agent transporting marijuana products will always have access to a secure form of communication with personnel at the originating location when the vehicle contains marijuana and marijuana products. MMM may employ several types of secure communication including, but not limited to: two-way digital or analog radio (UHF or VHF); cellular phone; or satellite phone. When choosing one or more types of secure communications, MMM will consider the following: cellular signal coverage; transportation area; base capabilities; antenna coverage; and frequency of transportation.

Prior to, and immediately after leaving the originating location, the MMM Agents will use the secure form of communication to contact the originating location to test communications and GPS operability. If communications or the GPS system fail while on route, the MMM Agents transporting marijuana products will return to the originating location until the communication system or GPS system is operational. The MMM Agents transporting marijuana products will contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, no less than every 30 minutes. MMM will ensure that the originating location has a ME Agent assigned to monitoring the GPS unit and secure form of communication, who will log all official communications with the MMM Agent who is transporting marijuana products.

A manifest will be filled out in triplicate, with the original manifest remaining with the originating ME/MTC, a second copy provided to the destination ME/MTC on arrival, and a copy that will be kept with the MMM Agent during transportation and returned to MMM on completion of the transportation. Prior to transport, the manifest will be securely transmitted to the destination ME by facsimile or email. On arrival at the destination ME/MTC, MMM will ensure that a ME/MTC Agent at the destination

ME/MTC compares the manifest produced by MMM to the copy transmitted by facsimile or email. This manifest will, at a minimum, include:

- The originating ME/MTC name, address, and registration number;
- The names and registration numbers of the MMM Transport agents who transported the Marijuana Products;
- The name and registration number of the ME/MTC Agent who prepared the manifest;
- The destination ME/MTC name, address, and registration number;
- A description of the marijuana products being transported, including the weight and form or type of product;
- The mileage of the transporting MMM vehicle at departure from originating ME/MTC and mileage on arrival at destination ME/MTC, as well as mileage on return to originating ME/MTC or MMM;
- The date and time of departure from originating ME/MTC and arrival at destination ME/MTC for each transportation;
- A signature line for the ME/MTC Agent who receives the marijuana products;
- The weight and inventory before departure and on receipt;
- The date and time that the transported products were reweighed and re-inventoried;
- The name of the ME Agent at the destination ME/MTC who re-weighed and re-inventoried products;
- The vehicle make, model, and license plate number.

The manifest will be maintained within the MMM vehicle during the entire transportation process, until the delivery is completed. MMM will retain all transportation manifests for no less than one year and make them available to the Commission on request.

Each MMM employee or agent transporting or otherwise handling marijuana products for MMM will be registered as a ME/MTC Agent and have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicles that the MMM agent will operate for MMM prior to transporting or otherwise handling marijuana products. All MMM Agents will carry his or her Agent Registration Card at all times when transporting marijuana products and will produce his or her Agent Registration Card to the Commission or Law Enforcement Authorities on request.

MMM will use best management practices to reduce energy and water usage, engage in energy, conservation, and mitigate other environmental impacts.

MMM will ensure that only all proper and licensed individuals will have access to the MMM facility or MMM vehicles. As needed, the following individuals will have access to a ME/MTC, MMM facility, or MMM transportation vehicle:

1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55, M.G.L. c. 94G, and 935 CMR 500.000;
2. Representatives of other state agencies of the Commonwealth; and
3. Emergency responders in the course of responding to an emergency.

4.2 Pricing Structure

MMM pricing structure will be a variable percentage-based transport agreement dependent upon the value of any of the marijuana products or other products being transported. We are targeting a percentage range of 3-6%.

4.3 Intellectual Property Rights

MMM intellectual property rights for our service includes:

- Corporation Name: MMM Transport, Inc.
- All supporting documentation for State of Massachusetts
- Business plans
- Branding (in-development)
- Logo (in-development)
- Website (in-development)

4.4 Research and Development

MMM research and development activities include market data research, need of use, diversion prevention, population analysis, statistics, financial predictions, logistics research, outreach. Hosted community outreach meetings for advocacy and customer education.

5. MARKETING and SALES

5.1 Growth Strategy

MMM's plan to grow the company includes:

- Team building of industry professionals
- Community leadership and relations
- Marketing and media presence (within allowable regulatory constraints)
- Strong board of directors aligned with mission of company
- Building local alliances
- Hiring locally and diversely
- Marijuana advocacy and education

5.2 Communication

MMM will engage in reasonable marketing, advertising, and branding practices that are not otherwise prohibited in 935 CMR 500.105(4)(b) that do not jeopardize the public health, welfare or safety of the general public or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising and branding created for viewing by the public shall include the statement "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and shall include a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the face of the advertisement. MMM is a business to business model, so we do not anticipate the need for much outbound public marketing.

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

MMM will utilize potential communication channels such as social media, website, phone, and other communication methods such as email.

5.3 Sales

MMM will sell its service by excellent customer service directly to other licensed MEs in the State.

MMM shall ensure that all marijuana products that are transported to other MEs are done so in tamper or child-resistant packaging. Packaging for marijuana products sold or displayed for MEs, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, shall not be attractive minors.

5.4 Logo

MMM is in the process of developing a logo for potential labeling, signage, and other materials such as letterhead and distributed materials.

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

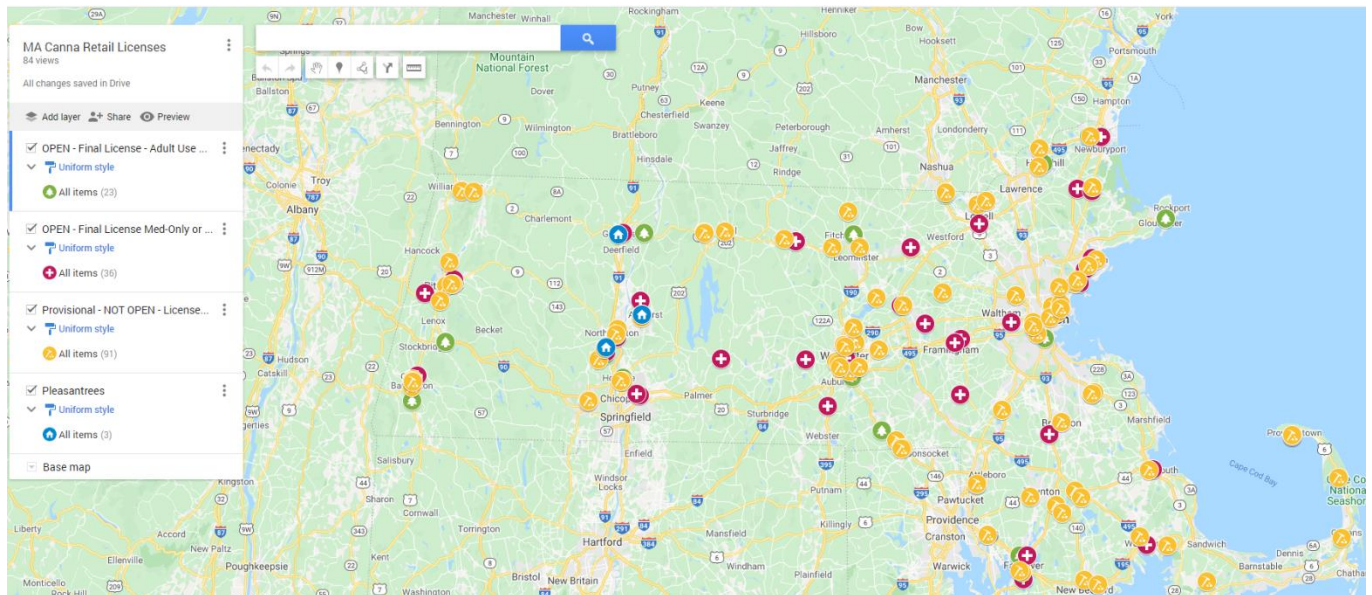
6. FINANCIAL PROJECTIONS

Financial Projections					
	1st Year	2nd Year	3rd Year	4th Year	5th Year
Customers (B2B)	3	7	16	25	40
Avg. Monthly Revenue by Customer	\$30,000	\$30,000	\$25,000	\$25,000	\$24,000
Revenue	\$1,080,000	\$2,520,000	\$4,800,000	\$7,500,000	\$11,520,000
COGs	\$561,600	\$1,310,400	\$2,496,000	\$3,900,000	\$5,990,400
GM	\$518,400	\$1,209,600	\$2,304,000	\$3,600,000	\$5,529,600
OPEX	\$115,836	\$270,285	\$514,829	\$804,420	\$1,235,589
EBITDA	\$402,564	\$939,315	\$1,789,171	\$2,795,580	\$4,294,011

6.1 Demand Assumptions

Recreational Forecast:

- Direct Region is ~475,000
- Massachusetts population ~6,745,000
- The direct MA-CT Board Region is 2 Million
- The Tri-State Region NY, NJ, PA, CT is 20 Million
- Boarder states VT, NH, RI, and visitors – approximately 1 Million.
- 14% is the national average of adult use, that is 1 out of 7 adults use marijuana
- End consumer demand will drive our B2B business



MMM has mapped out the current and potential retail MEs and MTCs in the Massachusetts market as well as start discussion regarding the potential frequency of the transportation needs. We anticipate the ability to capture several MEs in our immediate region right away with significant monthly contract values ranging between \$20-40k/month.

6.2 Profit and Loss

Financial Projections					
	1st Year	2nd Year	3rd Year	4th Year	5th Year
Customers (B2B)	3	7	16	25	40
Avg. Monthly Revenue by Customer	\$30,000	\$30,000	\$25,000	\$25,000	\$24,000
Revenue	\$1,080,000	\$2,520,000	\$4,800,000	\$7,500,000	\$11,520,000
COGs	\$561,600	\$1,310,400	\$2,496,000	\$3,900,000	\$5,990,400
GM	\$518,400	\$1,209,600	\$2,304,000	\$3,600,000	\$5,529,600
OPEX	\$115,836	\$270,285	\$514,829	\$804,420	\$1,235,589
EBITDA	\$402,564	\$939,315	\$1,789,171	\$2,795,580	\$4,294,011

6.3 Cash Flow

The Sources & Uses Budget detailed below reflects the approximate funds required for launch of MMM Transport, Inc. as a Third-Party Transporter company in Massachusetts.

Sources	
Founder's Capital	\$ 500,000
Total Sources	\$ 500,000
Uses	
Securing Property	\$ 25,000
Vehicle Acquisitions	\$ 150,000
Security Enhancements	\$ 50,000
Employees	\$ 100,000
Working Capital	\$ 110,000
Legal & Other Professional	\$ 40,000
Miscellaneous	\$ 25,000
Total Uses	\$ 500,000

7. TEAM

7.1 General

MMM has put together a team to implement the operations of the Marijuana Establishment. MMM intends to create approximately 10-20 full-time staff positions within the first three years of operations in Northampton.

MMM's experience team of business, transportation, and other industry professionals will utilize their leadership, skills and knowledge to successfully manage MMM operations. No individual on the MMM team is a controlling person over more than three licenses in a particular class of license. No individual on the MMM team has any interests in any other state in addition to Massachusetts.

7.2 Executive Leadership

1. Jean D'Ambrosio, Co-Founder / CEO

Ms. D'Ambrosio has a multidisciplinary background. Ms. D'Ambrosio has experience managing her own business by starting and managing a recycling company. She consistently runs her business with integrity and upholds standards by maintaining professional customer care, compliance with licensure and laws, and ensuring a workforce that embraces diversity and inclusion. Ms. D'Ambrosio obtained transportation logistics and business-to-business experience while managing the transportation routes and logistics of her employees and customers. Driven by a passion to provide superior service to customers, Ms. D'Ambrosio has seen much success as an entrepreneur. Ms. D'Ambrosio has attended multiple marijuana business seminars to gain knowledge, expertise, and network. She has become an expert through comprehensive study, market analysis, and data research in this industry. Ms. D'Ambrosio has integrity, she is effective and resilient from her professional experiences and community service. Aside, she is a proud mom who values her family and volunteers for advocacy groups. Ms. D'Ambrosio is passionate and wants to lead change towards more acceptance, education and convenience in the field of marijuana.

2. Emanuel Tartaglione, Co-Founder

Mr. Tartaglione will be highly involved the operations and safe practice of MMM Transport, Inc. Mr. Tartaglione has been around facility management his entire life hailing from a family owned and operated maintenance business in the TriState region, RJR Maintenance. Leveraging the lessons he learned at RJR, Mr. Tartaglione focuses on the details of the facility so his partners are free to focus on the business. He plans on transplanting unrivaled team management while developing the new transportation venture with expertise, accountability and 24/7 immediate response times – wherever and whenever the need arises. Mr. Tartaglione is committed to the environment and uses sustainable practices to create the optimal environment for employees, customers, and the community at large. He fully embraces the green approach for all businesses. He has gained valuable skills of managing staff, schedules, and providing over the top customer service. His experience has instilled the necessary skills and knowledge to run a successful marijuana transportation operation and deliver unmatched compassionate care to the community. Mr. Tartaglione continues to study industry best practices and has volunteered time over the past 5-years to benefit his community. Mr. Tartaglione is an advocate for marijuana reform laws and is dedicated to the medical marijuana movement.

7.3 Head of Security

Head of Security: Under the supervision of the Chief Executive Officer, the Head of Security is responsible for the development and overall management of the Security Policies and Procedures for

MMM, implementing, administering, and revising the policies as needed. In addition, the Head of Security will perform the following duties:

- Provide general training to MMM agents during new hire orientation or re-current trainings throughout the year;
- Provide training specific for Security Agents prior to the Security Agent commencing job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team – follow up with security agent if needed;
- Maintain lists of agents authorized to access designated areas of the MMM facility, including any surveillance and network equipment room, and other highly sensitive areas of the MMM facility;
- Lead a working group comprised of the Chief Executive Officer, Chief Operating Officer, Head of Security, and any other designated advisors to ensure the current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of MMM agents and assets;
- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Maintain all security related records, incident reports and other reports written by security agents;
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times; and
- Maintain frequent contact with the Northampton Police and Fire Department.

Quality Control and Testing

Quality Control

MMM Transport, Inc. (“MMM”) has developed quality control and testing procedures compliant with 935 CMR 500.105(3); 500.160 and 935 CMR 501.105(3); 501.160. As applicable, MMM will comply with the following sanitary requirements:

1. Any MMM agent whose job includes contact with marijuana or nonedible marijuana products, including, cultivation, production, packaging, or transportation 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 MMM agent working in direct contact with 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. MMM’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 MMM’s production 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. MMM’s facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. MMM 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. MMM’s floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. MMM’s facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. MMM’s buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. MMM 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 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. MMM will ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable;
12. MMM'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. MMM will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. MMM 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. MMM 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.

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

MMM will ensure that MMM's facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

MMM 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 MMM to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated 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.

Testing

As applicable, MMM will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has

not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160. Testing of MMM's marijuana products will be performed by an Independent Testing Laboratory in compliance with the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, as amended in November 2016, published by the DPH. Testing of MMM's environmental media will be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the DPH.

MMM's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. Such notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

MMM will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of MMM's marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to MMM for disposal or by the Independent Testing Laboratory disposing of it directly.

Personnel Policies Including Background Checks

Overview

MMM Transport, Inc. (“MMM”) has developed in-depth personnel policies that will comply with 935 CMR 500.105(1) and 935 CMR 501.105(1). MMM will maintain personnel records as a separate category of records due to the sensitivity and importance of information concerning agents, including registration status and background check records. MMM will keep, at a minimum, the following personnel records:

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

Job Descriptions

Director of Security: Under the supervision of the Chief Executive Officer, the Director of Security is responsible for the development and overall management of the Security Policies and Procedures for MMM, while implementing, administering, and revising the policies as needed. In addition, the Director of Security will perform the following duties:

- Provide general training to MMM agents during new hire orientation or re-current trainings throughout the year;
- Provide training specific for Security Agents prior to the Security Agent commencing job functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team—follow up with security agent if needed;
- Maintain lists of agents authorized to access designated areas of the MMM facility, including cash and product storage vaults, the surveillance and network equipment room, and other highly sensitive areas of the MMM facility;
- Lead a working group comprised of the Chief Executive Officer, Chief Operating Officer, and any other designated advisors to ensure the current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of MMM agents and assets;
- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Maintain all security-related records, incident reports and other reports written by security agents;
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times; and

- Maintain frequent contact with local law enforcement authorities.

Security Agent: Security Agents monitor MMM's security systems including alarms, video surveillance, transportation plans, and motion detectors. Security Agents are responsible for ensuring that only authorized individuals are permitted access to the MMM facility by verifying appropriate ID cards and other forms of identification. In addition, Security Agents perform the following duties and other duties upon request:

- Investigate, communicate, and provide leadership in the event of an emergency such as an intrusion, fire, or other threat that jeopardizes customers, authorized visitors, and MMM agents;
- Respond and investigate security situations and alarm calls; clearly document the incident and details surrounding the incident in a written report for the Director of Security;
- Oversee the entrance to the facility and verify credentials of each person seeking access to the MMM facility;
- Answer routine inquiries;
- Log entries, and maintain visitor log;
- Escort authorized visitors in restricted access areas; and
- Escort MMM agents from the facility during non-business hours and perform security checks at designated intervals.

Inventory/Storage Manager: The Inventory Manager is responsible for inventory on a day-to-day basis as well as the weekly and monthly inventory counts and waste disposal requirements. The inventory manager will perform the comprehensive annual inventory in conjunction with the executive management team. As applicable, additional duties include, but are not limited to:

- Implementing inventory controls to track and account for all dispensary inventory;
- Implementing procedures and notification policies for proper disposal;
- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal, and ending inventory; and
- Proper storing, labeling, tracking, and reporting of inventory.

Inventory/Storage Associate: Inventory Associates support the Inventory Manager during day-to-day operations. As applicable, responsibilities include, but are not limited to:

- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal and ending inventory;
- Ensuring products are properly stored, labeled, and recorded in the proper systems;
- Ensuring waste is properly stored; and

- Coordinating the waste disposal schedule and ensuring MMM's policies and procedures for waste disposal are adhered to.

Human Resources Manager: The Human Resources Manager at MMM will support the executive management team on a day-to-day basis to effectively implement all personnel policies and procedures for MMM, including hiring processes. The Human Resources Manager will:

- Oversee hiring and release of MMM agents;
- Review and revise MMM personnel policies and procedures in consultation with the executive management team and department managers;
- Develop training schedules and policies for MMM agents under the supervision of the executive management team and department managers;
- Handle any and all agent discipline as necessary;
- Ensure compliance with any and all workplace policy laws and requirements; and
- Be responsible for such additional human resources tasks as determined by the executive management team.

Retail/B2B Client Manager: Responsible for overseeing all Member Services Agents and managing day-to-day operations of the facility and retail b2b operations of MMM. This includes, but is not limited to:

- Implementing inventory tracking;
- Training retail staff;
- Ensuring customer satisfaction through feedback tools;
- Reporting all incidents and complaints to the executive team; and
- Working with bookkeeping to ensure precise data flow.

B2B Member Services Agent: As applicable, Member Services Agents ensure that each customer is treated with respect while at an MMM facility and that each potential customer receives the appropriate amount of individualized attention in order to address his/her specific needs and questions. Member Services Agent responsibilities include, but are not limited to:

- Maintaining a clean, safe, healthy, and productive environment ensuring that customers have a positive experience at an MMM facility;
- Answering customer questions regarding products including but not limited to transportation and types of products, such as flowers, concentrates, tinctures, and edibles;
- Being knowledgeable of strains and various types of products MMM is transporting;
- Properly setting up product displays pursuant to MMM policies and procedures;
- Executing and enforcing compliance with Commission regulations and MMM policies and procedures;
- Understanding sales transactions using proper software systems;
- Understanding individual customer goals;
- Reconciling cash from sales transactions, sales reports, and other forms of task management daily; and

- Participating in ongoing education and professional development as required.

Agent Personnel Records

Personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent's affiliation with MMM 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;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training;
- Results of initial background investigation, including CORI reports; and
- Documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident.

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

Staffing Plan and Business Hours

Hiring and Recruitment

MMM's Human Resource Manager will engage the executive management team and management staff on a regular basis to determine if vacancies are anticipated or whether specific positions need to be created in response to company needs. MMM's hiring practices will include but are not limited to the following and apply to all types of working situations including hiring, firing, promotions, harassment, training, wages and benefits:

- Equal Employment Opportunity Commission (EEOC) Compliance;
- MMM's Diversity Plan and Community Initiatives;
- MMM's Plan to Positively Impact Areas of Disproportionate Impact;
- Background Checks and References;
- Mandatory reporting of criminal convictions (and termination if necessary);
- State and Federal Family Leave Act;
- Workplace Safety Laws;
- State and Federal Minimum Wage Requirements; and

- Non-Disclosure and Non-Complete Agreements

Standards of Conduct

MMM is committed to maintaining an environment conducive to the health and wellbeing of customers and employees. It is MMM's mission to provide a professional workplace free from harassment and discrimination for employees. MMM will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, gender expression, or any other trait or characteristic protected by any applicable federal, state, or local law or ordinance. Harassment or discrimination on the basis of any protected trait or characteristic is contrary to MMM's values and is a violation of the Company Code of Conduct. Harassment is a form of discrimination. There is a broad range of behavior that could constitute harassment. In general, harassment is any verbal or physical conduct that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive working environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Adversely affects an individual's employment opportunities.

Employees are expected to maintain the highest degree of professional behavior. All harassment or discrimination by employees is strictly prohibited. Further, harassing or discriminatory behavior of non-employees directed at MMM employees or customers also is condemned and will be promptly addressed.

Violence and Weapons in the Workplace

Any and all acts of violence in the workplace will result in immediate dismissal of the employee, customer, or parties involved. Law enforcement will be contacted immediately in the case of a violent event. Weapons are not permitted on site by employees, customers, or other parties. Employees found carrying weapons on MMM facilities will be immediately terminated. Customers found carrying weapons on the premises will be asked to leave and/or the police will be notified accordingly.

At-Will Employment

In the state of Massachusetts, employment is assumed to be at-will unless otherwise stated. At-will employment implies that employer and employee alike may terminate the work relationship at any given moment and for any legitimate purpose. Wrongful termination may be more difficult to prove in an at-will arrangement because of the freedom that each party has to end the employment. However, there are still many instances wherein a termination or discharge can be called wrongful, even in an at-will employment.

Workplace Attire

The required attire for registered agents at MMM varies based upon required duties. New hire training and the onboarding process will go over the workplace attire specific to each role and the department manager will be responsible for ensuring compliance with all requirements is met.

Business Hours for MMM Transport & Logistics Services Establishment

Monday: 8:00 a.m. - 8:00 p.m.
Tuesday: 8:00 a.m. - 8:00 p.m.
Wednesday: 8:00 a.m. - 8:00 p.m.
Thursday: 8:00 a.m. - 8:00 p.m.
Friday: 8:00 a.m. - 8:00 p.m.
Saturday: 8:00 a.m. - 8:00 p.m.
Sunday: 8:00 a.m. - 8:00 p.m.

Note: Hours are subject to change and are dependent on Commission and municipal approvals.

Overview of Personnel Policies and Procedures

Standard Employment Practices

MMM values the contributions of its management and staff positions. MMM will strive to be the industry leader in workplace satisfaction by offering highly competitive wage and benefits packages and developing a culture that values a proper work-life balance, boasts a transparent and accessible executive management team, and fosters a work ethic that focuses on the mission of the company and spirit of the adult-use marijuana program in Massachusetts.

Advancement

The organization will be structured in a relatively flat manner, with promotional opportunities within each department. Participation in training and bi-annual performance evaluations will be critical for any promotions or pay increases.

Written Policies

MMM's written policies will address, inter alia, the Family and Medical Leave Act (FMLA), the Consolidated Omnibus Budget Reconciliation Act (COBRA), equal employment opportunity, discrimination, harassment, the Employee Retirement Income Security Act (ERISA), disabilities, maintenance of personnel files, privacy, email policy, 935 CMR 500.000 et. Sq., holidays, hours, sick time, personal time, overtime, performance reviews, disciplinary procedures, working hours, pay rates, overtime, bonuses, veteran preferences, drug testing, personnel policies, military leaves of absence, bereavement leave, jury duty, CORI checks, smoking, HIPAA, patient confidentiality, and compliance hotline.

Investigations

MMM will set forth policies and procedures to investigate any complaints or concerns identified or raised internally or externally in order to stay in compliance with 935 CMR 500.000 et. seq.

Designated Outside Counsel

MMM may retain counsel specializing in employment law to assist the Human Resources Manager with any issues and questions.

Job Status

Job Classifications

Positions at MMM are categorized by rank and by department. The executive management team oversees the overall success of mission of the company; the CEO is responsible for implementation of the mission and the executive management team as a whole is responsible for ensuring that all departments are properly executing their functions and responsibilities. Job classification is comprised of three rank tiers: Executive Management, Management, and NonManagement Employee.

Work Schedules

Work schedules will be either part-time, full-time, or salaried, depending of the specific position. Schedules will be set according to the needs of each department as determined by the department manager and the executive manager they report to. It is the department manager's responsibility to develop and implement a work schedule that provides necessary duty and personnel coverage but does not exceed what is required for full implementation of operations. It is also the department manager's responsibility to ensure that adequate coverage occurs on a daily basis and does not lead to unnecessary utilization of overtime coverage.

Mandatory Meetings and Community Service Days

There will be a mandatory reoccurring company-wide meeting on a monthly basis. All required personnel will be notified of their required attendance. Certain personnel, such as house-keeping staff, may not be required to attend. Each department will have a mandatory weekly meeting schedule by the department manager. The department managers will provide agendas for all meeting and will report to their executive manager.

Breaks

Daily breaks, including lunch breaks, will comply with the laws of the Commonwealth.

Performance Reviews

Performance reviews will be conducted by executive or department managers. Reviews will be conducted at three-month intervals for new employees during the first year and at 6-month intervals thereafter. A written synopsis must be provided to, and signed by, the employee under

review. Reviews must be retained in each employee's employment file. Performance reviews must take into account positive performance factors and areas requiring improvement. Scoring systems may be utilized to help reflect the employee's overall performance.

Leave Policies

MMM leave policies will comport with all state and federal statutes. All full-time employees will receive two 40-hour weeks of paid vacation per annum. Additional leave must be requested at least 2 weeks in advance and approved by the employee's department manager. MMM will determine which holidays will be observed and which departments will not be required to work. MMM will offer paid maternity leave. Additional leave will not be paid and must be approved by the department manager.

MMM anticipates observing the following holidays:

- New Year's Day;
- Martin Luther King Day;
- Presidents' Day;
- Memorial Day;
- Independence Day;
- Labor Day;
- Thanksgiving;
- Christmas Day.

Disciplinary Policies

Purpose

MMM's discipline policy and procedure is designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable behavior and/or performance issues. The steps outlined below of MMM's discipline policy and procedure have been designed consistent with MMM's organizational values, best practices, and employment laws.

MMM reserves the right to combine or skip steps depending upon facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered depend upon whether the offense is repeated despite coaching, counseling, and/or training; the employee's work record; and the impact the conduct and performance issues have on MMM's organization.

Procedure

Step 1: Counseling and Verbal Warning

Step 1 creates an opportunity for the immediate supervisor to schedule a meeting with an employee to bring attention to the existing performance, conduct, or attendance issue. The supervisor should discuss with the employee the nature of the problem or violation

of company policies and procedures. The supervisor is expected to clearly outline expectations and steps the employee must take to improve performance or resolve the problem.

Within five business days, the supervisor will prepare written documentation of a Step 1 meeting. The employee will be asked to sign the written documentation. The employee's signature is needed to demonstrate the employee's understanding of the issues and the corrective action needed.

Step 2: Written Warning

While it is hoped that the performance, conduct, or attendance issues that were identified in Step 1 have been corrected, MMM recognizes that this may not always be the case. A written warning involves a more formal documentation of the performance, conduct, or attendance issues and consequences.

During Step 2, the immediate supervisor and a department manager or director will meet with the employee and review any additional incidents or information about the performance, conduct, or attendance issues as well as any prior relevant corrective action plans. Management will outline the consequences for the employee of his or her continued failure to meet performance and/or conduct expectations. A formal performance improvement plan (PIP) requiring the employee's immediate and sustained corrective action will be issued within five business days of a Step 2 meeting. A warning outlining that the employee may be subject to additional discipline up to and including termination if immediate and sustained corrective action is not taken may also be included in the written warning.

Step 3: Suspension and Final Written Warning

There may be performance, conduct, or safety incidents so problematic and harmful that the most effective action may be the temporary removal of the employee from the workplace. When immediate action is necessary to ensure the safety of the employee or others, the immediate supervisor may suspend the employee pending the results of an investigation.

Suspensions that are recommended as part of the normal progression of this progressive discipline policy and procedure are subject to approval from a next-level manager and the Human Resources Manager.

Depending upon the seriousness of the infraction, the employee may be suspended without pay in full-day increments consistent with federal, state and local wage-and-hour employment laws. Nonexempt/hourly employees may not substitute or use an accrued paid vacation or sick day in lieu of the unpaid suspension. Due to Fair Labor Standards

Act (FLSA) compliance issues, unpaid suspension of salaried/exempt employees is reserved for serious workplace safety or conduct issues. The Human Resources Manager will provide guidance so that the discipline is administered without jeopardizing the FLSA exemption status.

Pay may be restored to the employee if an investigation of the incident or infraction absolves the employee.

Step 4: Recommendation for Termination of Employment

The last and most serious step in the progressive discipline procedure is a recommendation to terminate employment. Generally, MMM will try to exercise the progressive nature of this policy by first providing warnings, a final written warning, and/or suspension from the workplace before proceeding to a recommendation to terminate employment. However, MMM reserves the right to combine and skip steps depending upon the circumstances of each situation and the nature of the offense. Furthermore, employees may be terminated without prior notice or disciplinary action.

Management's recommendation to terminate employment must be approved by the Human Resources Manager and department manager or designee. Final approval may be required from the CEO or designee.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling nor should anything in this policy be read or construed as modifying or altering the employment-at-will relationship between MMM and its employees.

Appeal Process

Employees will have the opportunity to present information that may challenge information management has used to issue disciplinary action. The purpose of this process is to provide insight into extenuating circumstances that may have contributed to the employee performance and/or conduct issues while allowing for an equitable solution.

If the employee does not present this information during any of the step meetings, he or she will have five business days after that meeting to present information.

Performance and Conduct Issues Not Subject to Progressive Discipline

Behavior that is illegal is not subject to progressive discipline and may be reported to local law enforcement. Theft, intoxication at work, fighting and other acts of violence are also not subject to progressive discipline and may be grounds for immediate termination.

Documentation

The employee will be provided copies of all progressive discipline documentation, including all performance improvement plans. The employee will be asked to sign copies of this documentation attesting to their receipt and understanding of the corrective action outlined in these documents. Copies of these documents will be placed in the employee's official personnel file.

Separation of Employment

Separation of employment within an organization can occur for several different reasons. Employment may end as a result of resignation, retirement, release (end of season or assignment), reduction in workforce, or termination. When an employee separates from MMM, his or her supervisor must contact the Human Resources Manager to schedule an exit interview, typically to take place on employee's last workday.

Types of Separation

1. Resignation

Resignation is a voluntary act initiated by the employee to end employment with MMM. The employee must provide a minimum of two (2) weeks' notice prior to resignation. If an employee does not provide advance notice or fails to actually work the remaining two weeks, the employee will be ineligible for rehire. The resignation date must not fall on the day after a holiday.

2. Retirement

An employee who wishes to retire is required to notify his or her department director and the Human Resources Manager in writing at least one (1) month before planned retirement date. It is the practice of MMM to give special recognition to employees at the time of their retirement.

3. Job Abandonment

An employee who fails to report to work or contact his or her supervisor for two (2) consecutive workdays will be considered to have abandoned the job without notice effective at the end of the employee's normal shift on the second day. The department manager will notify the Human Resources Manager at the expiration of the second workday and initiate the paperwork to terminate the employee. Employees who are separated due to job abandonment are ineligible for rehire.

4. Termination

Employees of MMM are employed on an at-will basis, and the company retains the right to terminate an employee at any time.

5. Reduction in Workforce

An employee may be laid off due to changes in duties, organizational changes, lack of funds, or lack of work. Employees who are laid off may not appeal the layoff decision through the appeal process.

6. Release

Release is the end of temporary or seasonal employment. The Human Resources Manager, in consultation with the department manager, will inform the temporary or seasonal worker of their release according to the terms of the individual's temporary employment.

Exit Interview

The separating employee will contact the HR department as soon as notice is given to schedule an exit interview. The interview will be on the employee's last day of work or other day, as mutually agreed upon.

Return of Property

The separating employee must return all company property at the time of separation, including but not limited to uniforms, cell phones, keys, computers, and identification cards. Failure to return some items may result in deductions from final paycheck. An employee will be required to sign the Wage Deduction Authorization Agreement to deduct the costs of such items from the final paycheck.

Termination of Benefits

An employee separating from MMM is eligible to receive benefits as long as the appropriate procedures are followed as stated above. Two weeks' notice must be given, and the employee must work the full two work weeks. Accrued vacation leave will be paid in the last paycheck. Accrued sick leave will be paid in the last paycheck.

Health Insurance

Health insurance terminates on the last day of the month of employment, unless employee requests immediate termination of benefits. Information about the Consolidated Omnibus Budget Reconciliation Act (COBRA) continued health coverage will be provided. Employees will be required to pay their share of the dependent health and dental premiums through the end of the month.

Rehire

Former employees who left in good standing and were classified as eligible for rehire may be considered for reemployment. An application must be submitted to the Human Resources

Manager, and the applicant must meet all minimum qualifications and requirements of the position, including any qualifying exam, when required.

Department managers must obtain approval from the Human Resources Manager or designee prior to rehiring a former employee. Rehired employees begin benefits just as any other new employee. Previous tenure will not be considered in calculating longevity, leave accruals, or any other benefits.

An applicant or employee who is terminated for violating policy or who resigned in lieu of termination from employment due to a policy violation will be ineligible for rehire.

Compensation

As an employer, MMM believes that it is in the best interest of both the organization and MMM's employees to fairly compensate its workforce for the value of the work provided. It is MMM's intention to use a compensation system that will determine the current market value of a position based on the skills, knowledge, and behaviors required of a fully-competent incumbent. The system used for determining compensation will be objective and non-discriminatory in theory, application and practice. The company has determined that this can best be accomplished by using a professional compensation consultant, as needed, and a system recommended and approved by the executive management team.

Selection Criteria

1. The compensation system will price positions to market by using local, national, and industry specific survey data.
2. The market data will primarily include marijuana-related businesses and will include survey data for more specialized positions and will address significant market differences due to geographical location.
3. The system will evaluate external equity, which is the relative marketplace job worth of every marijuana industry job directly comparable to similar jobs at MMM, factored for general economic variances, and adjusted to reflect the local economic marketplace.
4. The system will evaluate internal equity, which is the relative worth of each job in the organization when comparing the required level of job competencies, formal training and experience, responsibility and accountability of one job to another, and arranging all jobs in a formal job-grading structure.
5. Professional support and consultation will be available to evaluate the compensation system and provide on-going assistance in the administration of the program.
6. The compensation system must be flexible enough to ensure that the company is able to recruit and retain a highly-qualified workforce, while providing the structure necessary to effectively manage the overall compensation program.

Responsibilities

The executive management team and will give final approval for the compensation system that will be used by MMM.

1. On an annual basis the executive management team will review and approve, as appropriate, recommended changes to position-range movement as determined through the vendor's market analysis process.
2. As part of the annual budgeting process, the executive management team will review and approve, as appropriate, funds to be allocated for total compensation, which would include base salaries, bonus, variable based or incentive-based pay, and all other related expenses, including benefit plans.

Management Responsibility

1. The CEO is charged with ensuring that MMM is staffed with highly-qualified, fully competent employees and that all programs are administered within appropriate guidelines and within the approved budget.
2. The salary budget will include a gross figure for the following budget adjustments, but the individual determinations for each employee's salary adjustment will be the exclusive domain of the CEO: determining the appropriate head count, titles, position levels, merit and promotional increases and compensation consisting of salary, incentive, bonus, and other discretionary pay for all positions.
3. The CEO will ensure that salary ranges are updated at least annually, that all individual jobs are market priced at least once every two years, and that pay equity adjustments are administered in a fair and equitable manner.

Agent Background Checks

- In addition to completing the Commission's agent registration process, all agents hired to work for MMM will undergo a detailed background investigation prior to being granted access to an MMM facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for MMM pursuant to 935 CMR 500.100 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.101(1), MMM will consider:
 - a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.

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

copy of their right to dispute the contents of the report, who to contact to do so and the opportunity to provide a supplemental statement

- After 10 business days, if the applicant is not disputing the contents of the report and any provided statement does not alter the suitability determination, an adverse action letter will be issued providing the applicant information on the final determination made by MMM along with any legal notices required.
- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.
- As deemed necessary, individuals in key positions with unique and sensitive access (e.g. members of the executive management team) will undergo additional screening, which may include interviews with prior employers or colleagues.
- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by MMM or the Commission.

Recordkeeping Procedures

General Overview

MMM Transport, Inc. (“MMM”) has established policies regarding recordkeeping and record retention, pursuant to 935 CMR 500.105(1); 500.105(8); 500.105(9) and 935 CMR 501.105(1); 501.105(8); 501.105(9), in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of MMM documents. Records will be stored at MMM in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

Recordkeeping

To ensure that MMM is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of MMM’s quarter-end closing procedures. In addition, MMM’s operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- **Corporate Records**: are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:
 - Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
 - 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
- **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;
 - 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, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with MMM, including members, if any.
- 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 marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with MMM 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 and, as applicable, safe cultivation conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030.
- Handling and Testing of Marijuana Records
 - MMM will maintain the results of all testing for a minimum of one (1) year.
- 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 applicable.
- Seed-to-Sale Tracking Records

- MMM, as applicable, will use point-of-sale software to maintain real-time inventory. The point-of sale software's inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
 - Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory (as applicable).
- Incident Reporting Records
 - Within ten (10) calendar days, MMM will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the Police Department 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 MMM 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 of, MMM will create and maintain a written 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 MMM agents present during the disposal or handling, with their signatures. MMM will keep disposal records for at least three (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
 - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.

- 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.
- Transportation Records
 - MMM 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, 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).
- Closure
 - In the event MMM closes, all records will be kept for at least two (2) years at MMM's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, MMM 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 MMM'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 and 935 CMR 501.110,
 - Agent security policies, including personal safety and crime prevention techniques;
 - A transport plan seeking to optimize efficiency, safety, and security in compliance with 935 CMR 500.105(13) and 935 CMR 501.105(13);
 - A description of MMM's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000;
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - As applicable, description of the various strains of marijuana to be cultivated, processed, transported or sold, as applicable, and the form(s) in which marijuana will be dispensed;
 - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160 and 935 CMR 500.105(8);
 - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
 - A staffing plan and staffing records in compliance with 935 CMR 500.105(9);

- 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 will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted marijuana, which will be reported the Police Department and to the Commission;
 - Engaged in unsafe practices with regard to MMM operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all executives of MMM, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on MMM's website. ○
- Policies and procedures for the handling of cash on MMM premises including but not limited to storage, collection frequency and transport to financial institution(s).
- 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 will 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 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.

Record-Retention

MMM will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

Maintaining of Financial Records

MMM Transport, Inc.'s ("MMM") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's regulations 935 CMR 500.105(9); 500.140 and 935 CMR 501.105(9); 501.140. Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any.
- As applicable, all sales recording requirements under 935 CMR 500.140(6) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Conducting a monthly analysis of its equipment and sales date, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
 - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500; and
 - If co-located with a medical marijuana treatment center, maintaining and providing the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).

- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.

Qualifications and Training

MMM Transport, Inc. (“MMM”) will ensure that all employees hired to work at an MMM facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner pursuant to 935 CMR 500.105(2) and 935 CMR 501.105(2) .

Qualifications

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

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

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of MMM’s agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. Agent training will at least include the Responsible Vendor Program and eight (8) hours of on-going training annually.

Prior to operations, pursuant to regulations, all of MMM’s current owners, managers, and employees will have attended and successfully completed a Responsible Vendor Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of responsible vendor training to marijuana establishment agents. MMM’s new, non-administrative employees will complete the Responsible Vendor Program within 90 days of the date they are hired. MMM’s owners, managers, and employees will then successfully complete the program once every year thereafter. MMM will also encourage administrative employees who do not handle or sell marijuana to take the responsible vendor program on a voluntary basis to help ensure compliance. MMM’s records of responsible vendor training program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other state licensing authority upon request.

As part of the Responsible Vendor program, MMM’s agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana’s effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;

2. Best practices for diversion prevention and prevention of sales to minors;
3. Compliance with tracking requirements;
4. Acceptable forms of identification, including verification of valid photo identification and medical marijuana registration and confiscation of fraudulent identifications;
5. Such other areas of training determined by the Commission to be included; and
6. Other significant state laws and rules affecting operators, as applicable, such as:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability and license sanctions and court sanctions;
 - Waste disposal and health and safety standards;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitted hours of sale and conduct of establishment;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records and privacy issues; and
 - Prohibited purchases and practices.

Prevention of Diversion & Restricting Access to Individuals 21 or Older

MMM Transport Inc.'s ("MMM") operating policies and procedures ensure prevention of diversion, theft, and illegal or unauthorized conduct pursuant to the Commission's Adult Use of Marijuana regulations codified in 935 CMR 500.000 and the Medical Regulations codified in 935 CMR 501.000. Considerations regarding diversion prevention measures include, but are not limited to, marijuana establishment agent and consumer accountability, and identifying, recording, and reporting diversion, theft, or loss. Marijuana in the process of transport, analysis, or retail sale is to be stored and tracked in a manner that prevents diversion, theft, or loss. While MMM's core competency is transport and logistics, we wanted to develop a holistic and overarching plan to ensure the prevention of diversion.

More specifically, diversion measures include policies and procedures requiring that:

- Identification is verified on the premises to ensure that only individuals 21 years or older are permitted in MMM's facility or any affiliated ME/MTC.
- All employees and registered agents will be 21 years of age or older subject to 935 CMR 500.029 or 500.030.
- While we are solely focused on transport, if any of MMM's adult-use operations/ME is co-located with an MTC, operations of the marijuana establishment and RMD will be separated at the point of sale, and the adult use operation is restricted to those individuals 21 years of age or older pursuant to 935 CMR 500.101(2)(e)(4).
- Providing samples or giving away marijuana to consumers is prohibited (except in the case of colocated facilities where RMD applicants are providing reduced cost or free marijuana to patients with documented verified financial hardship per 105 CMR 725.100(A)(6)).
- MMM Employees are made aware of crime prevention techniques pursuant to 935 CMR 500.105(1)(b).
- Any MMM or marijuana establishment agent who has diverted marijuana is immediately dismissed, and this is reported to law enforcement and to the Commission pursuant to 935 CMR 500.105(1)(l).
- All MMM employees involved in the handling and sale of marijuana for adult use complete a responsible vendor training program with a curriculum covering diversion prevention and prevention of sales to minors, and comply with all other marijuana establishment agent training requirements under 935 CMR 500.105(2).
- Display samples of each product offered for sale are displayed in secure, locked cases, subject to the requirements of 935 CMR 500.110.
- MMM only engage in reasonable marketing, advertising, and branding practices that do not promote the diversion of marijuana, and comply with all other marketing and advertising requirements under 935 CMR 500.105(4).

- Warning statements required by the Commission's regulations are affixed to all applicable products, and that MMM's labels comply with all other labeling of marijuana and marijuana products requirements under 935 CMR 500.105(5).
- Tamper or child-resistant packaging is used for applicable marijuana products, and that MMM's products comply with all other packaging of marijuana and marijuana products requirements under 935 CMR 500.105(6).
- MMM maintain real-time inventory, and tracking and tagging (as applicable) all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.
- Records are kept for inventory, seed-to-sale tracking for all marijuana products, personnel (including documentation of the completion of required training), and waste disposal, and that MMM comply with all other record keeping requirements under 935 CMR 500.105(9).
- Marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, is stored in a separate area, until such products are destroyed; and that MMM comply with all other storage requirements under 935 CMR 500.105(11).
- Two or more marijuana establishment agents witness and document how the marijuana waste is disposed or otherwise handled, and that MMM comply with all other waste disposal requirements under 935 CMR 500.105(12).
- All transported marijuana products are linked to the seed-to-sale tracking program, that all MMM vehicles transporting marijuana are staffed with a minimum of two marijuana establishment agents, and that any vehicle accidents, diversions, or other reportable incidents that occur during transport are reported to the Commission and law enforcement within 24 hours, and that MMM comply with all other transportation requirements under 935 CMR 500.105(13).
- All security requirements under 935 CMR 500.110 are followed, including:
 - Implementing sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at any potential MMM's adult-use marijuana retail locations;
 - Adopting procedures to prevent loitering and to ensure that only individuals engaging in activity expressly or by necessary implication permitted by the Commission's regulations and its enabling statute are allowed to remain on the premises;
 - Storing all finished marijuana products in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss;
 - Restricting access to employees, agents or volunteers specifically permitted by MMM, agents of the Commission, state and local law enforcement and emergency personnel, and all other limited access areas requirements under 935 CMR 500.110(4);

- Implementing an adequate security system to prevent and detect diversion, theft or loss of marijuana, notifying law enforcement and the Commission within 24 hours of a diversion, theft or loss of any marijuana product, and all other security and alarm requirements under 935 CMR 500.110(5); and
 - Obtaining, at MMM's own expense, a security system audit by a vendor approved by the Commission, and all other security audits requirements under 935 CMR 500.110(8).
- While not the main focus of MMM, the company will ensure that all other operating requirements for retail sale under 935 CMR 500.140 are followed, including:
 - Limiting sales to one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction;
 - Utilization of a point-of-sale (POS) system approved by the Commission, in consultation with the DOR;
 - Providing educational materials to consumers stating that they may not sell marijuana to any other individual and which include information regarding penalties for possession and distribution of marijuana in violation of Massachusetts law.

Diversity Plan

MMM Transport, Inc. ("MMM") believes in creating and sustaining a robust policy of inclusivity and diversity. MMM recognizes that diversity in the workforce is key to the integrity of a company's commitment to its community. MMM is dedicated to creating a diverse culture with a commitment to equal employment opportunity for all individuals. MMM's diversity plan is designed to promote equity among minorities, women, veterans, people with disabilities, and LGBTQ+. MMM will make every effort to employ and advance in employment qualified and diverse people at all levels within the company. In doing so, we have developed a list of goals along with specific programming objectives, each with their own success measurement metrics and programming timelines. We anticipate achieving success on all of our goals and regular programming objectives within 6-months of being operational, and we acknowledge that, the goals, programs, and successes will be documented upon annual renewal of our license (one year from our provisional, and each year thereafter). We plan on keeping an overall, internal success score on a scale of 0 to 100 for our diversity, equity, and inclusion plan. We will calculate our overall success quarterly as follows: we have 5 goals; each goal will be judged on a scale of 0 to 20 based on its individual success as determined by the goal's particular success measurement metrics; once each of the 5 goals' scores have been determined, we will add the scores together to see where we will fall on the overall scale of 0 to 100. Our overall goal is to consistently score 90+ points on our combined success measurement goals for our diversity plan. MMM will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments. Any actions taken, or programs instated by MMM will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

MMM's executives and leadership are committed to successful implementation of MMM's Diversity Plan. MMM's executive management team believes that increased diversity will provide MMM with a richer perspective and approach to its business. MMM executive team consists of women and minorities who are dedicated to serving underserved communities and inclusion.

MMM believes in creating and sustaining a robust policy of inclusivity and diversity because MMM recognizes that diversity in the workforce is key to the integrity of a company's commitment to the community where it is established. Coupled with that vision, MMM also wants to ensure that its customers see themselves in the makeup of MMM's employees.

Unique identities and perspectives are essential to moving this company forward, driving innovation, and serving the diverse communities of Massachusetts. MMM's comprehensive diversity empowerment plan is a pillar of its purpose-driven company. To better serve MMM's customers, MMM aims to create an environment where personal identities, race, military service, sexual orientation, and heritage are utilized, celebrated, and valued. MMM's diversity initiatives and strategies are designed to attract, develop, and advance the most talented individuals regardless of their race, sexual orientation, religion, age, gender, disability status, or any other dimension of diversity.

Goal #1 - Diversity Recruitment and Sourcing

MMM Transport, Inc. remains committed to diversity in the workplace. As such, we plan on hiring at least:

- 60% women
- 50% minorities
- 25% veterans
- 25% LGBTQ+
- 10% persons with disabilities

Program:

MMM will establish and maintain an inclusive and diverse workforce to serve its customers through innovative corporate recruitment of underrepresented and minority communities. MMM has developed strategic corporate initiatives to ensure a diverse and qualified staff stands ready to serve MMM customers' needs. These strategic corporate initiatives include:

- Hosting career fairs in underrepresented and minority communities every quarter. These career fairs will be hosting at Holyoke Community College, Springfield College, and the Chambers of Commerce for Northampton, Holyoke, and Springfield amongst other places;
- Provide cultural training on cultural sensitivity and recognizing unconscious bias to its executives, workforce, and the public. Topics will include, but not be limited to the following: Navigating Intercultural Conflict, Implicit Bias, Safe Zone Training, Exploring the Gender Behind the Binary, and Antiracism Activism. We will plan on hosting trainings at least 1 time a month both in-person and online for virtual attendance. We will initially cap our attendance based on the limitation set forth by the State for safe size gatherings during a pandemic; and
- Using suppliers who are also committed to diversity and inclusion.
- MMM will focus hiring and education efforts on diverse populations including individuals from Black, African American, Hispanic or Latino descent.

MMM's recruitment efforts are designed to maintain a steady flow of qualified diverse applicants and includes the following steps:

- Developing relationships with organizations serving minorities, women, LGBTQ+, veterans, and persons with disabilities for employment referrals.
- Providing briefings to representatives from recruitment sources concerning current and future job openings.
- Encouraging employees from diverse groups to refer applicants for employment;
- Participating in career day programs and encouraging MMM's diverse employees to participate whenever possible.
- Establishing recruitment efforts at higher learning institutions, and institutions with special programs that reach diverse people, such as Holyoke Community College, Smith College, Springfield College, and the University of Massachusetts, Amherst.
- Developing relationships with community childcare, housing, transportation, and other programs designed to improve employment opportunities for diverse persons;

- Ensuring that job openings are sent to community partners.
- Utilizing Zip Recruiter to reach over 100 online career and job websites, as well as social media.

Measurement:

- Number of persons hired that are women, minorities, veterans, LBGTQ+, and persons with disabilities.
- Percentage of persons hired that are women, minorities, veterans, LBGTQ+, and persons with disabilities.
- MMM will count the number of individuals hired who are women, minorities, LBGTQ+, veterans, and persons with disabilities. This number will be assessed from the total number of individuals hired to ensure that the percentages of all individuals hired fall within the aforementioned goal % range.

Goal #2, Goal #3, and Goal #4 - Employee Retention, Training and Development

MMM wants the most inclusive work environment possible. In order to maintain a safe environment, **we will have a goal of 100% attendance** and participation in ongoing, monthly trainings surrounding diversity, equity, and inclusions. Further, we will strive **to have 0% reports of harassment and/or discrimination** within our organization every year. It is our belief that diverse community workplace that is educated in diversity, equity, and inclusion will result in a safe and harmonious environment. MMM is also committed to the advancement of these individuals and is devoted to promotions from within the company. **We plan on having 75% of new opportunities be filled from internal promotions for persons are women, minorities, veterans, LBGTQ+, and persons with disabilities.**

Program:

MMM will offer promotions, career counseling, and training every month to provide all employees with equal opportunity for growth and to decrease turnover. MMM will ensure that all employees are given equal opportunities for promotion by communicating opportunities, training programs, and clearly defined job descriptions. MMM will ensure that all employees receive equal opportunity for career counseling, counsel employees on advancement opportunities, and provide training programs to assist them in career development. MMM will instruct managers and supervisors to refer employees seeking career counseling to the Human Resources Manager.

MMM's diversity awareness training emphasizes MMM's zero-tolerance commitment of harassment and discrimination and MMM's strict adherence to take corrective action should any issues, concerns, or complaints arise. All MMM employees are required to complete the diversity awareness training program during employee orientation. Training will begin immediately upon hiring, and all new employees will be required to participate in an orientation program that will introduce and stress the importance of the Diversity Plan.

Upon completion of the orientation program, new hires will be equipped to describe, discuss, and implement the Diversity Plan. Following successful completion of the general orientation program, employees will undergo additional diversity training that will be tailored to the employee's specific job

function. All employees will also be required to undergo ongoing diversity training to ensure knowledge of newly determined best practices and policies and continued familiarity and compliance with the Diversity Plan.

Awareness of Diversity Plan goals and MMM's efforts to create an open culture with zero tolerance for discrimination, harassment, or retaliation, is crucial to MMM's success. Management, staff, associates, vendors, contractors, and the general public all benefit from being informed of the Diversity Plan objectives and procedures. Dissemination of information of the Diversity Plan includes the following:

- Inclusion of MMM's Equal Employment Opportunity and Reasonable Accommodation statement in the Employee Handbook.
- Inclusion of MMM's zero-tolerance policies for harassment, discrimination, bullying, and other actions which oppose MMM's goal for a diverse workforce;
- Postings in suitable areas for employee communication;
- Diversity training programs for all employees;
- Quarterly progress evaluation meetings with appropriate personnel; and
- Formal presentations made to management and employees on diversity initiatives.

Measurement:

- Number of persons promoted that are women, minorities, veterans, LBGTQ+, and persons with disabilities.
- Percentage of persons promoted that are women, minorities, veterans, LBGTQ+, and persons with disabilities.
- MMM will count the number of individuals promoted who are women, minorities, LBGTQ+, veterans, and persons with disabilities. This number will be assessed from the total number of individuals promoted to ensure that the percentages of all individuals promoted fall within the aforementioned goal % range.
- Number of employees in attendance at monthly trainings on diversity, equity, and inclusion.
- Percentage of employees in attendance at monthly trainings on diversity, equity, and inclusion.
- Number of reports of harassment and/or discrimination within the calendar year.

Goal #5 - Strategic Partnerships, Suppliers and Vendors

For all partnership, supplier, and vendor needs, **MMM will partner with at least 50% local organizations focused on inclusion and opportunity for minorities, women, veterans, groups concerned with persons with disabilities, and LBGTQ+.**

Program:

MMM will promote diversity and support the local economy through purchasing goods and services from vendors, contractors, and professional service providers that are owned and operated by individuals that have cultural and ethnically diverse characteristics. In selecting potential contractors, subcontractors, vendors and suppliers, MMM will first contract with small and diverse businesses.

MMM's goal is to maintain diverse organization, vendor, and contractor spending at or above 20% of total related expenses.

External communication efforts that align with MMM's Diversity Plan will include:

- Advertising in employment and business sections of appropriate types of media such as the Daily Hampshire Gazette every quarter;
- Participating in employment and business notification programs; and
- Distribution of literature to organizations actively supportive of minorities, women, disabled persons, the LGBTQ community, and veterans.

Measurement:

- Number of strategic partners, suppliers and vendors contracted with that are women, minorities, veterans, LGBTQ+, and persons with disabilities.
- Percentage of strategic partners, suppliers and vendors contracted with that are women, minorities, veterans, LGBTQ+, and persons with disabilities.
- MMM will count the number of strategic partners, suppliers and vendors contracted with who are women, minorities, LGBTQ+, veterans, and persons with disabilities. This number will be assessed from the total number of strategic partners, suppliers and vendors contracted with to ensure that the percentages of all strategic partners, suppliers and vendors contracted with fall within the aforementioned goal % range.

Measuring Progress Overall

MMM has established a Diversity Committee (the "Committee") to assist the executive management team and the EEO Officer, Jean D'Ambrosio, with the implementation and growth of the Diversity Plan. The initial members of the Committee were selected based on their diverse status and their personal commitments to diversity. Initial Members of the Committee are Jean D'Ambrosio and Emanuel Tartaglione. Additional members of the Committee may be added at the discretion of MMM's executive management team. Overtime, MMM plans to add more members from the community to represent different diversity areas.

The Committee will be responsible for:

- Developing Equal Employment Opportunity (EEO) statements, policies, programs, and internal and external communication procedures in support of the goals of the Diversity Plan.
- Assisting in the identification of problematic areas for EEO, including receiving, reviewing, and resolving any complaints of discrimination or other non-compliance with regards to equal opportunity and fair treatment of all employees.
- Assisting management in arriving at effective solutions to problems regarding issues of diversity and inclusion.
- Designing and implementing internal reporting systems that measure the effectiveness of programs designed to support a company culture that fosters diversity.
- Keeping the company informed of equal opportunity progress through quarterly reports.

- Reviewing the Diversity Plan with management at all levels of MMM to ensure that the Diversity Plan is understood.
- Auditing MMM's internal and external job postings to ensure information follows MMM's diversity policies and procedures.

The Chief Operating Officer at MMM will be responsible for auditing the Diversity Plan. The audit report setting forth the Company's performance in fulfilling the goals of the Plan will contain:

- Employment data, including information on minority, women, disabled, and veteran representation in the workforce in all job classifications; average salary ranges; recruitment and training information (all job categories); and retention and outreach efforts;
- The total number and value of all contracts and/or subcontractors awarded for goods and services;
- An identification of each subcontract awarded to a member of a diverse group and the actual value of such subcontract;
- A comprehensive description of all efforts made by MMM to monitor and enforce the Diversity Plan;
- Information on diverse group investment, equity ownership, and other ownership or employment opportunities initiated or promoted by MMM;
- Other information deemed necessary or desirable by the Commission to ensure compliance with the rules and regulations governing marijuana establishments in Massachusetts; and
- Quarterly, a workforce utilization report including the following information for each job category at MMM:
 - The total number of persons employed
 - The total number of men employed
 - The total number of women employed
 - The total number of veterans
 - The total number of service-disabled veterans
 - The total number of members of each racial minority employed.
 - The total number of LGBTQ members employed.
 - Ages of all employees.
 - Religious affiliation of all employees.