Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC282047

Original Issued Date: 02/11/2020

Issued Date: 06/30/2026

Expiration Date: 07/09/2027

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Pharmacannis Massachusetts, Inc.

Phone Number: 312-667-6245 **Email Address:** ma.licensing@pharmacann.com

Business Address 1: 465 Hopping Brook Rd **Business Address 2:**

Business City: Holliston **Business State:** MA **Business Zip Code:** 01746

Mailing Address 1: 60 West Superior Street **Mailing Address 2:** 2nd Floor

Mailing City: Chicago **Mailing State:** IL **Mailing Zip Code:** 60654

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RP201821

RMD INFORMATION

Name of RMD: PharmaCannis Massachusetts, Inc.

Department of Public Health RMD Registration Number: 042

Operational and Registration Status: Obtained Final Certificate of Registration and is open for business in Massachusetts

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 11.66 **Percentage Of Control:** 11.66

Role: Board Member **Other Role:** Investor

First Name: Stephen **Last Name:** Schuler **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 2

Percentage Of Ownership: 0.03 **Percentage Of Control:** 0.03

Role: Executive / Officer **Other Role:** Executive Director

First Name: Michelle **Last Name:** Stormo **Suffix:**

Gender: Female **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: 26.79 **Percentage Of Control:** 26.79

Role: Board Member **Other Role:** Investor

First Name: John **Last Name:** Lord **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: **Percentage Of Control:**

Role: Executive / Officer **Other Role:** VP Regulatory Affairs

First Name: Mackenzie **Last Name:** Wilcox **Suffix:**

Gender: **User Defined Gender:**

What is this person's race or ethnicity?:

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100 **Percentage of Ownership:** 100

Entity Legal Name: PharmaCann LLC **Entity DBA:** Verilife **DBA City:** Wareham

Entity Description: Parent company of PharmaCannis Massachusetts Inc.

Foreign Subsidiary Narrative:

Entity Phone: **Entity Email:** **Entity Website:** www.pharmacann.com

Entity Address 1: **Entity Address 2:**

Entity City: **Entity State:** **Entity Zip Code:**

Entity Mailing Address 1: **Entity Mailing Address 2:**

Entity Mailing City: **Entity Mailing State:** **Entity Mailing Zip Code:**

Relationship Description: PharmaCann Inc. is the parent company of PharmaCannis Massachusetts Inc. PharmaCann LLC was converted to PharmaCann Inc. in January 2020. This conversion was not the result of a change of ownership or control.

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Stephen **Last Name:** Schuler **Suffix:**

Describe the nature of the relationship this person has with the Marijuana Establishment: In March 2025, Mr. Schuler submitted his voluntary resignation from PharmaCann Inc.'s Board of Directors, to which PharmaCann submitted documentation to the Commission indicating his removal in a manner consistent with Massachusetts regulation. However, Mr. Schuler remains a Person With Direct or Indirect Control over PharmaCann's Massachusetts licensure due to his combined direct and indirect ownership percentage in PharmaCann Inc. exceeding the 10% threshold (in part, stemming from his ownership interest in Illinois MedTech).

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Stephen **Last Name:** Schuler **Suffix:**

Types of Capital: Monetary/ Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $5000013.33 **Percentage of Initial Capital:** 48.81

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Daniel **Last Name:** Tierney **Suffix:**

Types of Capital: Monetary/ Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $5000013.33 **Percentage of Initial Capital:** 48.81

Capital Attestation: Yes

Individual Contributing Capital 3

First Name: Norah **Last Name:** Scott **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $470 **Percentage of Initial Capital:** 14.35

Capital Attestation: Yes

Individual Contributing Capital 4

First Name: Teddy **Last Name:** Scott **Suffix:**

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of the Capital Provided:** $30 **Percentage of Initial Capital:** 1.16

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Inc. **Entity DBA:**

Entity Description: Dual-Use Cannabis Cultivation & Processing, Hemp Manufacturing & Transportation

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 28479 E 3200 North Road **Entity Address 2:**

Entity City: Dwight **Entity State:** IL **Entity Zip Code:** 60420 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 2

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PC IL 1, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.can

Entity Address 1: 2080 W Orchard Road **Entity Address 2:**

Entity City: North Aurora **Entity State:** IL **Entity Zip Code:** 60542 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 3

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PC IL 4, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 4100 North Columbus Street **Entity Address 2:**

Entity City: Ottawa **Entity State:** IL **Entity Zip Code:** 61350 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 4

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PC IL 2, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 1816 S Arlington Heights Rd **Entity Address 2:**

Entity City: Arlington Heights **Entity State:** IL **Entity Zip Code:** 60005 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 5

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann of New York, LLC **Entity DBA:**

Entity Description: Dual-Use Cannabis Cultivation & Processing

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 14 Hudson Crossing Drive **Entity Address 2:**

Entity City: Hamptongburg **Entity State:** NY **Entity Zip Code:** 12549 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 6

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann of New York, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 2 Wade Road **Entity Address 2:**

Entity City: Latham **Entity State:** NY **Entity Zip Code:** 12110 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 7

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Green Kiwi 5, LLC **Entity DBA:** LivWell

Entity Description: Former Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 101 W Railroad Avenue **Entity Address 2:**

Entity City: Mancos **Entity State:** CO **Entity Zip Code:** 81328 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 8

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann of New York, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 5841 Bridge Street **Entity Address 2:**

Entity City: East Syracuse **Entity State:** NY **Entity Zip Code:** 13057 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 9

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann of MD, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 11300 Georgia Avenue **Entity Address 2:**

Entity City: Silver Spring **Entity State:** MD **Entity Zip Code:** 20902 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 10

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Midwest Compassion Center Inc. **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 412 N Weber Road **Entity Address 2:**

Entity City: Romeoville **Entity State:** IL **Entity Zip Code:** 60446 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 11

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 1300 S Christopher Columbus Blvd **Entity Address 2:** Ste 11B

Entity City: Philadelphia **Entity State:** PA **Entity Zip Code:** 19147 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 12

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 520 N Shamokin St **Entity Address 2:**

Entity City: Shamokin **Entity State:** PA **Entity Zip Code:** 17872 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 13

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Ohio, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 5431 Ridge Ave **Entity Address 2:**

Entity City: Cincinnati **Entity State:** OH **Entity Zip Code:** 45213 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 14

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Ohio, LLC **Entity DBA:**

Entity Description: Dual-Use Cannabis Cultivation and Processing

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 4020 Hunts Landing Road **Entity Address 2:**

Entity City: Buckeye Lake **Entity State:** OH **Entity Zip Code:** 43008 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 15

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 875 Upland Avenue **Entity Address 2:** Unit 55

Entity City: Chester **Entity State:** PA **Entity Zip Code:** 19013 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 16

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn Plant LLC **Entity DBA:**

Entity Description: Medical Cannabis Cultivation and Processing

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 111 Life Science Drive **Entity Address 2:**

Entity City: Olyphant **Entity State:** PA **Entity Zip Code:** 18447 **Entity Country:** United States

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** United States

Business Interest in Other State 17

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PC Rosemont, LLC **Entity DBA:** Verilife

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 5540 Park Place **Entity Address 2:**

Entity City: Rosemont **Entity State:** IL **Entity Zip Code:** 60018 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 18

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PC AU 1, LLC **Entity DBA:** Verilife

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 60 W Superior Street **Entity Address 2:**

Entity City: Chicago **Entity State:** IL **Entity Zip Code:** 60654 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 19

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PC AU 3, LLC **Entity DBA:** Verilife

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 150 Barrington Road **Entity Address 2:**

Entity City: Schaumburg **Entity State:** IL **Entity Zip Code:** 60194 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 20

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PC AU 4, LLC **Entity DBA:** Verilife

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 115 Perry St **Entity Address 2:**

Entity City: Galena **Entity State:** IL **Entity Zip Code:** 61036 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 21

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Eagle Dispensaries 2, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 502 N Dixie Hwy **Entity Address 2:**

Entity City: Wapakoneta **Entity State:** OH **Entity Zip Code:** 45895 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 22

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Hillsboro, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 1098 N High St **Entity Address 2:**

Entity City: Hillsboro **Entity State:** OH **Entity Zip Code:** 45133 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 23

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PC Cultivator, LLC **Entity DBA:**

Entity Description: Dual-Use Cannabis Cultivation

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 5000 Sands Rd **Entity Address 2:**

Entity City: Lothian **Entity State:** MD **Entity Zip Code:** 20711 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 24

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: ForwardExtracts LLC **Entity DBA:**

Entity Description: Dual-Use Cannabis Processing

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 339 Log Canoe Circle **Entity Address 2:**

Entity City: Stevensville **Entity State:** MD **Entity Zip Code:** 21666 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 25

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 2300 E 3rd St **Entity Address 2:**

Entity City: Williamsport **Entity State:** PA **Entity Zip Code:** 17701 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 26

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Town Center Wellness, LLC **Entity DBA:** Verilife

Entity Description: Former Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 6309A New Hampshire Ave **Entity Address 2:**

Entity City: Takoma Park **Entity State:** MD **Entity Zip Code:** 20912 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: **Entity Mailing State:** IL **Entity Mailing Zip Code:** **Entity Mailing Country:**

Chicago 60654 USA

Business Interest in Other State 27

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Euphoria Wellness Maryland, LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 11717 Old National Pike **Entity Address 2:** Unit 16

Entity City: New Market **Entity State:** MD **Entity Zip Code:** 21774 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 28

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 601 W Germantown Pike **Entity Address 2:**

Entity City: Plymouth Meeting **Entity State:** PA **Entity Zip Code:** 19462 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 29

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell X, LLC **Entity DBA:** LivWell

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 1015 N 2nd Street **Entity Address 2:**

Entity City: Berthoud **Entity State:** CO **Entity Zip Code:** 80513 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 30

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: 123 State OpCo, LLC **Entity DBA:** LivWell Enlightened Health

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 123 E State Street **Entity Address 2:**

Entity City: Cheboygan **Entity State:** MI **Entity Zip Code:** 49721 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 31

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell V, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 1239 Southgate Place **Entity Address 2:**

Entity City: Pueblo **Entity State:** CO **Entity Zip Code:** 81004 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 32

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell VI, LLC **Entity DBA:** LivWell

Entity Description: Former Adult-use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 124 Santa Fe Trail **Entity Address 2:**

Entity City: Trinidad **Entity State:** CO **Entity Zip Code:** 81082 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 33

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XII, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary & Off-Site Storage

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 130 Maine Street **Entity Address 2:** Unit A & B

Entity City: Log Lane Village **Entity State:** CO **Entity Zip Code:** 80705 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 34

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XIV, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 137 Nickle Street **Entity Address 2:**

Entity City: Broomfield **Entity State:** CO **Entity Zip Code:** 80020 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 35

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell X, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary and Former Delivery Permit

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 1401 N Peoria Street **Entity Address 2:**

Entity City: Aurora **Entity State:** CO **Entity Zip Code:** 80011 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 36

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell Michigan, LLC **Entity DBA:** LivWell Enlightened Health

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 14210 Eleven Mile Road **Entity Address 2:**

Entity City: Warren **Entity State:** MI **Entity Zip Code:** 48089 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 37

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Green Kiwi 4, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 1819 East Main Street **Entity Address 2:**

Entity City: Cortez **Entity State:** CO **Entity Zip Code:** 81321 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 38

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn, LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 1820 S Atherton Street **Entity Address 2:**

Entity City: State College **Entity State:** PA **Entity Zip Code:** 16801 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 39

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell X, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary and Former Delivery Permit

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 19201 East Colfax Avenue **Entity Address 2:**

Entity City: Aurora **Entity State:** CO **Entity Zip Code:** 80011 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 40

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell III, LLC **Entity DBA:** LivWell

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 1941 West Evans Avenue **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80223 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: **Entity Mailing State:** IL **Entity Mailing Zip Code:** **Entity Mailing Country:**

Chicago 60654 USA

Business Interest in Other State 41

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XVI, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary and former Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 2020 S Colorado Blvd **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80222 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 42

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn, LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 204 Shoemaker Road **Entity Address 2:** Suite A

Entity City: Pottstown **Entity State:** PA **Entity Zip Code:** 19464 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 43

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell Michigan, LLC **Entity DBA:** PharmaCann Michigan

Entity Description: Dual-Use Cannabis Cultivation & and Former Dual-Use Cannabis Processing

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 21550 Hoover Road **Entity Address 2:**

Entity City: Warren **Entity State:** MI **Entity Zip Code:** 48089 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 44

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn, LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 2359 Lincoln Hwy East **Entity Address 2:**

Entity City: Lancaster **Entity State:** PA **Entity Zip Code:** 17602 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 45

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann of New York, LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 25-27 W Fordham Road **Entity Address 2:**

Entity City: Bronx **Entity State:** NY **Entity Zip Code:** 10468 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 46

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell IV, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 2565 N Interstate 25 **Entity Address 2:**

Entity City: Pueblo **Entity State:** CO **Entity Zip Code:** 81008 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 47

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell I, LLC **Entity DBA:** LivWell

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 2647 8th Avenue **Entity Address 2:** Unit B

Entity City: Garden City **Entity State:** CO **Entity Zip Code:** 80631 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 48

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Denver Patients Group, LLC **Entity DBA:** LivWell

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 2863 Larimer Street **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80205 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 49

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XVI, LLC **Entity DBA:** LivWell

Entity Description: Former Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 3460 West 32nd Avenue **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80211 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 50

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XVI, LLC **Entity DBA:** LivWell

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 3600 South Wadsworth Blvd **Entity Address 2:** Units C, D & E

Entity City: Lakewood **Entity State:** CO **Entity Zip Code:** 80235 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 51

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XIII, LLC **Entity DBA:** LivWell

Entity Description: Former Dual-Use Cannabis Processing

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 3770 North Joliet Street **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80239 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 52

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XIII, LLC **Entity DBA:** LivWell

Entity Description: Former Dual-Use Cannabis Cultivation

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 3880 North Holly Street **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80207 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 53

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Green Kiwi 1, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary and Former Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 3955 North Oneida Street **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80207 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 54

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Beyond Broadway LLC **Entity DBA:** LivWell

Entity Description: Adul-Use Cannabis Dispensary and Former Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 432 South Broadway **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80209 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 55

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XVI, LLC **Entity DBA:** LivWell

Entity Description: Former Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 4625 East Colfax Avenue **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80220 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superor St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 56

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Beyond Broadway LLC **Entity DBA:** LivWell

Entity Description: Dual-Use Cannabis Cultivation & Processing

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 5141 N National Western Drive **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80216 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superor St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 57

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell I, LLC **Entity DBA:** LivWell

Entity Description: Dual-Use Cannabis Cultivation & Processing

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 5141 N National Franklin Drive **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80216 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 58

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell VIII, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 5846 Dahlia Street **Entity Address 2:**

Entity City: Commerce City **Entity State:** CO **Entity Zip Code:** 80022 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 59

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell X, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 7795 E Belleview Avenue **Entity Address 2:** Unit 2

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80237 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 60

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Green Kiwi 2, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 6651 North Tower Road **Entity Address 2:** Suite 120

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80249 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 61

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: DLD Enterprises, Inc. **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 700 Corporate Center Ct **Entity Address 2:** #K

Entity City: Westminster **Entity State:** MD **Entity Zip Code:** 21157 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 62

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Green Kiwi 2, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary and Former Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 706 East 17th Avenue **Entity Address 2:** Suite 102

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80203 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 63

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell IX, LLC **Entity DBA:** LivWell

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 8860 Federal Blvd **Entity Address 2:** Suite 66E

Entity City: Federal Heights **Entity State:** CO **Entity Zip Code:** 80260 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 64

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Penn, LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 895 South West End Blvd **Entity Address 2:**

Entity City: Quakertown **Entity State:** PA **Entity Zip Code:** 18951 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior Street **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 65

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell VII, LLC **Entity DBA:** LivWell

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 900 North College Avenue **Entity Address 2:**

Entity City: Fort Collins **Entity State:** CO **Entity Zip Code:** 80524 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 66

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Marie Bridge Investment Group, LLC **Entity DBA:** LivWell Enlightened Health

Entity Description: Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 759 W Spruce Street **Entity Address 2:**

Entity City: Sault Ste. Marie **Entity State:** MI **Entity Zip Code:** 49783 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 67

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Misty PC II, LLC **Entity DBA:** Misty Mountain Cannabis

Entity Description: Former Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** https://mistymountaincanna.com

Entity Address 1: 111 South Main Street **Entity Address 2:** 1st Floor

Entity City: Ann Arbaor **Entity State:** MI **Entity Zip Code:** 48104 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 68

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Misty PC 1, LLC **Entity DBA:** Misty Mountain Cannabis

Entity Description: Former Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** https://mistymountaincanna.com

Entity Address 1: 1871 Peck Street **Entity Address 2:**

Entity City: Muskegon **Entity State:** MI **Entity Zip Code:** 49441 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 69

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Misty PC 1, LLC **Entity DBA:** Misty Mountain Cannabis

Entity Description: Former Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** https://mistymountaincanna.com

Entity Address 1: 3772 Wilder Road **Entity Address 2:**

Entity City: Bay City **Entity State:** MI **Entity Zip Code:** 48706 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 70

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Misty PC 1, LLC **Entity DBA:** Misty Mountain Cannabis

Entity Description: Former Adult-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** https://mistymountaincanna.com

Entity Address 1: 702 Perry Avenue **Entity Address 2:**

Entity City: Big Rapids **Entity State:** MI **Entity Zip Code:** 49307 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 71

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: White Mountain Medicine, LLC **Entity DBA:** LivWell

Entity Description: Former Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 3234 N Nevada Avenue **Entity Address 2:**

Entity City: Colorado Springs **Entity State:** CO **Entity Zip Code:** 80907 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 72

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell II, LLC **Entity DBA:** LivWell

Entity Description: Former Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 570 N Murray Blvd **Entity Address 2:**

Entity City: Colorado Springs **Entity State:** CO **Entity Zip Code:** 80915 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 73

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell X, LLC **Entity DBA:** LivWell

Entity Description: Former Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 5926 East Colfax Avenue **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80220 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 74

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Green Kiwi 2, LLC **Entity DBA:** LivWell

Entity Description: Former Dual-Use Cannabis Cultivation

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 1660 E 40th Avenue **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80205 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 75

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Beyond Broadway LLC **Entity DBA:** LivWell

Entity Description: Former Medical Cannabis Cultivation

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 432 S Broadway **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80209 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 76

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: LivWell XI, LLC **Entity DBA:** LIvWell

Entity Description: Former Dual-Use Cannabis Cultivation & Processor

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.livwell.com

Entity Address 1: 1135 S Jason Street **Entity Address 2:**

Entity City: Denver **Entity State:** CO **Entity Zip Code:** 80223 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 77

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann Ohio LLC **Entity DBA:** Verilife

Entity Description: Dual-Use Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 30050 Aurora Rd **Entity Address 2:** Suite 300

Entity City: Solon **Entity State:** OH **Entity Zip Code:** 44139 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superior St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

Business Interest in Other State 78

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

Owner First Name: **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: PharmaCann of New York, LLC **Entity DBA:** Verilife

Entity Description: Medical Cannabis Dispensary

Entity Phone: 312-667-6245 **Entity Email:** compliance@pharmacann.com **Entity Website:** www.pharmacann.com

Entity Address 1: 3760 Union Road **Entity Address 2:**

Entity City: Cheektowaga **Entity State:** NY **Entity Zip Code:** 14225 **Entity Country:** USA

Entity Mailing Address 1: 60 W Superor St **Entity Mailing Address 2:** Floor 2

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** 60654 **Entity Mailing Country:** USA

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Stephen **Last Name:** Schuler **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Shrewsbury **Marijuana Establishment State:** MA

Individual 2

First Name: Stephen **Last Name:** Schuler **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Wareham **Marijuana Establishment State:** MA

Individual 3

First Name: MIchelle **Last Name:** Stormo **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Shrewsbury **Marijuana Establishment State:** MA

Individual 4

First Name: Michelle **Last Name:** Stormo **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Wareham **Marijuana Establishment State:** MA

Individual 5

First Name: Stephen **Last Name:** Schuler **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Newton **Marijuana Establishment State:** MA

Individual 6

First Name: Michelle **Last Name:** Stormo **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Newton **Marijuana Establishment State:** MA

Individual 7

First Name: Michelle **Last Name:** Stormo **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Holliston **Marijuana Establishment State:** MA

Individual 8

First Name: Stephen **Last Name:** Schuler **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Holliston **Marijuana Establishment State:** MA

Individual 9

First Name: John **Last Name:** McCarthy **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Wareham **Marijuana Establishment State:** MA

Individual 10

First Name: John **Last Name:** McCarthy **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Newton **Marijuana Establishment State:** MA

Individual 11

First Name: John **Last Name:** McCarthy **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Shrewsbury **Marijuana Establishment State:** MA

Individual 12

First Name: John **Last Name:** McCarthy **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Holliston **Marijuana Establishment State:** MA

Individual 13

First Name: Mackenzie **Last Name:** Wilcox **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Wareham **Marijuana Establishment State:** MA

Individual 14

First Name: Mackenzie **Last Name:** Wilcox **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Newton **Marijuana Establishment State:** MA

Individual 15

First Name: Mackenzie **Last Name:** Wilcox **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Shrewsbury **Marijuana Establishment State:** MA

Individual 16

First Name: Mackenzie **Last Name:** Wilcox **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Holliston **Marijuana Establishment State:** MA

Individual 17

First Name: John **Last Name:** Lord **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Wareham **Marijuana Establishment State:** MA

Individual 18

First Name: John **Last Name:** Lord **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Newton **Marijuana Establishment State:** MA

Individual 19

First Name: John **Last Name:** Lord **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Shrewsbury **Marijuana Establishment State:** MA

Individual 20

First Name: John **Last Name:** Lord **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Holliston **Marijuana Establishment State:** MA

Individual 21

First Name: Patrick **Last Name:** Unzicker **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Shrewsbury **Marijuana Establishment State:** MA

Individual 22

First Name: Patrick **Last Name:** Unzicker **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Newton **Marijuana Establishment State:** MA

Individual 23

First Name: Patrick **Last Name:** Unzicker **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Retailer

Marijuana Establishment City: Wareham **Marijuana Establishment State:** MA

Individual 24

First Name: Patrick **Last Name:** Unzicker **Suffix:**

Marijuana Establishment Name: PharmaCannis Massachusetts, Inc. **Business Type:** Marijuana Cultivator

Marijuana Establishment City: Holliston **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 465 Hoppingbrook Rd

Establishment Address 2:

Establishment City: Holliston **Establishment Zip Code:** 01746

Approximate square footage of the Establishment: 57000 **How many abutters does this property have?:** 5

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

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

FEE QUESTIONS

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Executed HCA	Holliston - Host Community Agreement - 06-12-24.pdf	pdf	692616fbcd24c46cc642f1af	11/25/2025
Plan to Remain Compliant with Local Zoning	Holliston - Plan to Remain Compliant with Local Zoning - 02-03-25.pdf	pdf	6a19c18de48965e1201d97d0	05/29/2026

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.: $1

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Holliston - 2024 Plan for Positive Impact - 12-02-24.pdf	pdf	6751ed97b92cff00089b69b9	12/05/2024
Plan for Positive Impact	Holliston - 2025 Positive Impact Plan.pdf	pdf	69320dabfe58050a08c98d5c	12/04/2025

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: **Other Role:**

First Name: Stephen **Last Name:** Schuler **Suffix:**

RMD Association: RMD Owner

Background Question: yes

Individual Background Information 2

Role: **Other Role:**

First Name: Michelle **Last Name:** Stormo **Suffix:**

RMD Association: RMD Owner

Background Question: no

Individual Background Information 3

Role: **Other Role:**

First Name: John **Last Name:** Lord **Suffix:**

RMD Association: RMD Owner

Background Question: yes

Individual Background Information 4

Role: **Other Role:**

First Name: Mackenzie **Last Name:** Wilcox **Suffix:**

RMD Association: RMD Manager

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company **Other Role:** Holding Company

Entity Legal Name: PharmaCann LLC **Entity DBA:**

Entity Description: Parent company of PharmaCann Mass LLC

Phone: 312-667-6245 **Email:** compliance@pharmacann.com

Primary Business Address 1: 60 W Superior Street **Primary Business Address 2:** Floor 2

Primary Business City: Chicago **Primary Business State:** IL **Principal Business Zip Code:** 60654

Additional Information: PharmaCann LLC was converted to PharmaCann Inc. in January 2020. This conversion was not the result of a change of ownership or control.

PharmaCann Inc. is the parent company of PharmaCann Mass LLC. PharmaCann Mass LLC is the parent company of PharmaCannis Massachusetts Inc.

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	3 Articles of Organization- Brighton Health Advocates, Inc..pdf	pdf	5cc1c9cf73349d44fd62ad94	04/25/2019
Articles of Organization	4 Articles of Entity Conversion.pdf	pdf	5cc1c9d1df25934c58f86022	04/25/2019
Bylaws	5 Pharmacannis Massachusetts Signed Bylaws.pdf	pdf	5cc1c9d2e2695d45078d780b	04/25/2019

Secretary of Commonwealth - Certificate of Good Standing	PharmaCannis Massachusetts, Inc. Good Standing 6.5.2019.pdf	pdf	5cf926e133099617d79447b3	06/06/2019
Department of Revenue - Certificate of Good standing	MA DOR Cert of Compliance.pdf	pdf	5cf926ecfe6a8617e208dff5	06/06/2019

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	PharmaCannis Massachusetts Inc - Certificate of Good Standing - Department of Revenue - 06-15-26.pdf	pdf	6a316a539a48c409564a8d80	06/16/2026
Secretary of Commonwealth - Certificate of Good Standing	PharmaCannis Massachusetts Inc - Certificate of Good Standing - Secretary of Commonwealth - 04-07-26.pdf	pdf	6a316a5bf1df6c218d6f4322	06/16/2026
Department of Unemployment Assistance - Certificate of Good standing	PharmaCann USA Inc - Certificate of Good Standing - Department of Unemployment - 04-22-26.pdf	pdf	6a330a4cf1df6c218d70f24f	06/17/2026

Massachusetts Business Identification Number: 001317349

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	FINAL - MA Cultivator App Business Plan (1).pdf	pdf	5d0299a9bbb965134133c14d	06/13/2019
Proposed Timeline	Holliston - Proposed Timeline - Cultivation - 12-04-25.pdf	pdf	69320b6278e4c85baa06493c	12/04/2025
Capitalization Table	PharmaCannis Massachusetts Inc - Cap Table - 07-25-25 .pdf	pdf	69320be278e4c85baa064a45	12/04/2025
Operating Agreement or Articles of Incorporation	PharmaCannis Massachusetts Inc - Bylaws - 04-02-18.pdf	pdf	69320d1b78e4c85baa064bba	12/04/2025

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Security plan	MA-CUL-042-Cultivation Security Plan.pdf	pdf	5d0d0331622b7c1357f72e49	06/21/2019
Storage of marijuana	Storage of Marijuana Plan .pdf	pdf	5d44ac90cfc708389d723446	08/02/2019
Quality control and testing	Quality Control and Testing Procedures (1).pdf	pdf	5d44aca86e3bd533dbcfdcab	08/02/2019
Personnel policies including background checks	Personnel Policies.pdf	pdf	5d44acbcad2c7633c9198bf1	08/02/2019
Maintaining of financial records	Maintaining of Financial Records (1).pdf	pdf	5d44acd46e3bd533dbcfdcaf	08/02/2019

Qualifications and training	Qualification and Intended Training for Agents .pdf	pdf	5d44acfff0e76e38a87ceebf	08/02/2019
Policies and Procedures for cultivating.	Cultivation Plan.pdf	pdf	5d44b52c54bcfa38af03579e	08/02/2019
Inventory procedures	Pharmacannis -Inventory Procedures.pdf	pdf	5db9fe73ba9d562b3e032e99	10/30/2019
Policies and Procedures for cultivating.	Pharmacannis -Policies and Procedures for Cultivating.pdf	pdf	5db9fe804b00122fe39a042d	10/30/2019
Prevention of diversion	Pharmacannis -Prevention of Diversion Plan.pdf	pdf	5db9fe8e73225f2fcd766db5	10/30/2019
Record Keeping procedures	Pharmacannis -Record Keeping Procedures.pdf	pdf	5db9fe9bd5c8962b282dcad9	10/30/2019
Restricting Access to age 21 and older	Pharmacannis -Restricting Access to Age 21 or Older.pdf	pdf	5db9fea7b207f82b12a9561a	10/30/2019
Transportation of marijuana	Pharmacannis -Transportation Plan.pdf	pdf	5db9feb3b35b62300f5da382	10/30/2019
Energy Compliance Plan	Pharmacannis - Energy Efficiency and Conservation.pdf	pdf	5fd2974c4a175107ac953ae3	12/10/2020
Diversity plan	Holliston - 2024 Diversity Plan - 12-02-24.pdf	pdf	6751ed58b92cff00089b68cf	12/05/2024

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notifcation: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN - PRE FEBRUARY 27, 2024

Progress or Success Goal 1

Description of Progress or Success: License MC282047 is a Provisional License that is not yet operational, therefore, PharmaCannis of Massachusetts, Inc. does not have updates to report at this time associated with the Positive Impact Plan. A copy of the Positive Impact Plan is provided below.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: License MC282047 is a Provisional License that is not yet operational, therefore, PharmaCannis of Massachusetts, Inc. does not have updates to report at this time associated with the Diversity Plan. A copy of the Diversity Impact Plan is provided below.

HOURS OF OPERATION

Monday From: 6:00 AM	**Monday To:** 6:00 PM
Tuesday From: 6:00 AM	**Tuesday To:** 6:00 PM
Wednesday From: 6:00 AM	**Wednesday To:** 6:00 PM
Thursday From: 6:00 AM	**Thursday To:** 6:00 PM
Friday From: 6:00 AM	**Friday To:** 6:00 PM
Saturday From: Closed	**Saturday To:** Closed
Sunday From: Closed	**Sunday To:** Closed

PharmaCannis Massachusetts Inc.
Holliston Manufacturing Facility

Plan to Remain Compliant

The purpose of this plan is to outline how PharmaCannis Massachusetts, Inc.'s ("PharmaCann") marijuana cultivation and processing facility located at 465 Hopping Brook Road, Holliston, MA 01746 (the "Holliston Manufacturing Facility") currently complies with all local zoning and licensing requirements for adult-use marijuana cultivation and processing operations in the Town of Holliston, Massachusetts. This plan will further outline how PharmaCann will ensure compliance with the aforementioned requirements on an ongoing basis upon receiving final licensure from the Massachusetts Cannabis Control Commission (the "Commission") to commence operations. For background, the Holliston Manufacturing Facility is currently an approved, operational medical marijuana establishment licensed by PharmaCann under Commission License #RMD805.

On January 25, 2018, the Town of Holliston's Planning Board approved PharmaCann's application for site plan review of the property on which the Holliston Manufacturing Facility sits (the "Site Plan Review Approval"), authorizing it for cannabis production and processing activities, subject to the terms and conditions stated therein. (For clarity, Brighton Health Advocates, Inc. was the name of the operational entity at the time, which was then duly converted to PharmaCannis Massachusetts, Inc. on February 22, 2018). Given this Site Plan Approval is also applicable for adult-use operations, PharmaCann will continue to adhere to these requirements as a condition of the Holliston Manufacturing Facility's adult-use licensure. For ease of reference, a copy of the Site Plan Review Approval is provided as *Exhibit A*.

Additionally, after months of diligent communication and cooperation, PharmaCann and the Town of Holliston mutually signed a host community agreement on June 12, 2024 (the "Holliston HCA"), as host community agreements are required for final licensure under Commission regulation. In sum, the Holliston HCA between PharmaCann and the Town of Holliston sets forth both parties' understanding of PharmaCann continuing to operate the Holliston Manufacturing Facility within Holliston's municipal boundaries. The Commission approved the Holliston HCA on December 10, 2024, indicating its compliance with final licensure requirements with respect to host community agreements. PharmaCann will continually adhere to the Holliston HCA's requirements with respect to the Holliston Manufacturing Facility's adult-use marijuana operations. For ease of reference, a copy of the Holliston HCA is provided as *Exhibit B*.

With the foregoing in mind, PharmaCann will continuously maintain its compliance with all local zoning and licensing requirements for adult-use marijuana cultivation and processing in the Town of Holliston, including all provisions of the Site Plan Review Approval and all terms of the Holliston HCA. To the extent any of this documentation is changed (either through re-negotiation with local authorities or changes passed by the Holliston Select Board or Holliston Planning Board), PharmaCann will diligently and promptly update its practices to bring its Holliston Manufacturing Facility into compliance.

[*Exhibits to Follow*]

PharmaCannis Massachusetts Inc.
Holliston Manufacturing Facility

Exhibit A: Holliston Manufacturing Facility Site Plan Review Approval

TOWN OF HOLLISTON
PLANNING BOARD
TOWN HALL

HOLLISTON, MASSACHUSETTS 01746

2018 JAN 30 PM 12: 28
OFFICE OF THE
TOWN CLERK
HOLLISTON, MASS.

CERTIFICATE OF ACTION
SITE PLAN REVIEW – 465 HOPPING BROOK ROAD

Decision Date:	**January 25, 2018**
Applicant:	**Brighton Health Advocates, Inc.**
Address:	**81 Technology Park Drive, East Falmouth, MA 02536**
Owner:	**Same**
Site Location:	**465 Hopping Brook Road (Lot 1)**
Assessors' Reference:	**Map 4, Block 6, Lot 15**
Zoning District:	**Industrial**

It is hereby certified by the Planning Board of the Town of Holliston, Massachusetts, in accordance with the Rules and Regulations of the Holliston Planning Board, Article VII, Site Plan Review, a duly called and properly posted public meeting of said Planning Board was held on December 14, 2017 and continued on January 11 and January 25, 2018. At a duly posted meeting on January 25, 2018, it was voted to **approve** this site plan application with conditions.

The Applicant filed with the Planning Board the following, which are contained in the records at the Planning Board office and are incorporated into this Decision by reference:

1. Application for Site Plan Review filed with the Planning Board on December 8, 2017.
2. Plans entitled "465 Hopping Brook Road, A Definitive Site Plan in Holliston, Massachusetts" dated December 7, 2017 (revised January 8, 2018), prepared by Engineering Design Consultants, Inc., along with a Soil Absorption Plan dated December 5, 2017.
3. Architectural drawings entitled "BHA-Hopping Brook, Grower/Processor Facility, Lot 1, 465 Hopping Brook Rd., Holliston, MA 01746" dated December 7, 2017, prepared by Filoramo Talsma Architecture.
4. Correspondence from Jeremy S. Unruh of PharmaCann dated January 23, 2018.

FINDINGS

Having reviewed all the Plans and Reports filed by the Applicant and its representatives and the representatives of the Town and having viewed the site, the Planning Board has determined that the Application for Site Plan Review is consistent with the requirements of Sections III and VII of the Holliston Zoning By-Laws and Sections 7.3 and 7.5 of the Planning Board Special Permit and Site Plan Regulations. The Board also finds that the proposal meets the General Conditions for Approval specified in Section VII (2)(a-g) of the Holliston Zoning By-Law and Sections 7.5 Medical Marijuana Treatment Center/Registered Medial Marijuana Dispensaries (MTC) and 7.11 of the Planning Board Regulations.

Brighton Health Advocates, Inc., proposes to construct a 57,874 +/- s.f. cannabis production and processing facility with 50 parking spaces, loading zone, complete site circulation and the ability to double its size with future expansion possibilities located at 465 Hopping Brook Road.
A detailed floor plan of the premises that describes the functional areas of the facility including but not limited to cultivation, processing, food preparation, storage and sales has been provided. The site development has been segmented into three phases – Phase I consists of the area designated as Temporary Facility Area on the site plans. It consists of several temporary trailers and five space parking area. Phase II consists of the greenhouse and processing headhouse as well as the parking and circulation, loading, landscaping, and security measures. Phase III has not been fully developed on the plans but generally represents a doubling of the facility.

The Board acknowledges the default 500' buffer zone described in the Department of Public Health "Guidance for Municipalities Regarding the Medical Use of Marijuana". No sensitive receptors have been identified other than abutting private residences. The Police Chief has not identified any concern for additional security measures.

CONDITIONS OF APPROVAL

The Board's decision to grant the Application for Site Plan Review is subject to the following conditions:

General Conditions

1. **The revised plan set shall be endorsed by the Planning Board and presented to the Inspector of Buildings with the application for building permit.** Unless amended with the approval of the Planning Board, the endorsed plan set shall be the plan of record and construction shall proceed in accordance with the improvements shown on said plan and this Certificate of Action.
2. No corrections, additions, substitutions, alterations or any changes shall be made in any plans, proposals, and supporting documents approved and endorsed by the Planning Board without the written approval of the Planning Board. Any requests for modifications shall be made in writing to the Planning Board for review and approval and shall include a description of the proposed modification, reasons the modification is necessary, and any supporting documentation.
3. A copy of this decision shall be kept on site and shall be made available to all site contractors.

4. Prior to commencement of authorized site activity, the Applicant shall provide to the Planning Board Office the name, address and business phone number of the individual(s) who shall be responsible for all activities on the site. Additionally, the Police and Fire Departments should be provided with an emergency notification sheet.
5. Prior to issuance of a Certificate of Occupancy from the Inspector of Buildings, the Applicant shall submit an as-built plan stamped by a professional engineer certifying that all site improvements are completed in accordance with the approved plan. The Applicant shall submit a statement certifying that all conditions of approval of this decision have been met.

Special Conditions

1. All elements of Phases I and II shall be constructed within one year of this decision and the temporary facility area shall be fully restored prior to May 1, 2019. These deadlines may be extended at the discretion of the Planning Board. Any extension request should be made one month in advance of the expiration and shall contain a detailed construction schedule for completion of the improvements permitted.
2. The Applicant shall guarantee performance of the conditions of this decision regarding temporary facility decommissioning with a $20,000 surety bond or other security satisfactory to the Planning Board. Said surety shall be posted prior to issuance of a building permit.
6. Phase III of the project shall require additional Site Plan Review approval by the Planning Board.
7. The Applicant shall meet all the permitting requirements of the Department of Public Health and shall provide the Inspector of Buildings and Planning Board with a copy of all permits issued by agencies of the Commonwealth prior to grant of an occupancy permit.
8. Any backflow prevention device(s) shall be designed per determined degree of hazard and approved and inspected by the Holliston Department of Public Works.
9. Liquid waste containing marijuana, by-products of marijuana processing, and fertilizers and other agrochemicals shall be disposed of in compliance with requirements for discharge per 314 CMR, as appropriate in the given circumstance.
10. Solid waste dumpsters and waste bins must meet all state and local laws, and when not in use, are kept in Restricted Access Areas.
11. Preparation of Marijuana Infused Products will follow Holliston Board of Health protocols, if any.
12. Procedures on Security, Cultivation, and Lab and Kitchen Operations should be made available to the Police Department and Board of Health Agent prior to occupancy.
13. Deliveries shall not occur between 9 p.m. and 7:00 a.m.
14. All exterior lighting shall be compliant with Section 7.4.1 of the Planning Board's Performance Standards for Nonresidential Development and shall comply with the Dark Sky Initiative standards of the Illuminating Engineering Society.
15. The Applicant represented that the facility will be staffed 24 hours per day, with the full operational, administrative, maintenance and security staff working during the day Monday – Saturday and limited staffing Sundays and overnight.
16. The MTC shall not create a nuisance to abutters or to the surrounding area, or create any hazard, including but not limited to fumes, smoke, odors, and vapors.
17. Written notice shall be provided to the Town of Holliston Inspector of Building and planning Board a minimum of 48 hours prior to initial commencement of work, including tree cutting.

18. The site shall immediately be posted with signs indicating "No Trespassing".
19. Because of the scale and complexity of the project, installation of site access drives and stormwater management features shall be subject to periodic monitoring and inspections by an agent of the Planning Board to be paid for by the Applicant under the provisions of MGL, c.44, s.53G (593 Account) and the Board's Rules and Regulations for Project Review Fees.
20. The Applicant shall provide evidence of semi-annual stormwater management system inspection and maintenance in accordance with the drainage operation and maintenance plan of record.

Planning Board Vote
The Board's vote in favor of granting Site Plan approval for 465 Hopping Brood Road is as follows on a motion by Mr. Santoro, seconded by Mr. Chamberlain:

David Thorn	Yes
Karen Apuzzo-Langton	Yes
Josh Santoro	Yes
Warren Chamberlain	Yes
Jason Santoro	Yes

HOLLISTON PLANNING BOARD
BY ITS CHAIRMAN

David Thorn D.C.

TOWN CLERK'S CERTIFICATION OF NO APPEAL

I hereby certify that 20 days have passed since this decision has been filed and no appeals have been taken in accordance with MGL, c. 40A.

Elizabeth Greendale
Town Clerk

5/29/2018
Date:

PharmaCannis Massachusetts Inc.
Holliston Manufacturing Facility

Exhibit B: Holliston Host Community Agreement

Host Community Agreement

Between
The Town of Holliston
and
Pharmacannis Massachusetts Inc.

This Host Community Agreement (the "Agreement") is entered into and executed on this 12th day of June 2024 (the "Effective Date") by and between Pharmacannis Massachusetts Inc., d/b/a Verilife, a subsidiary of PharmaCann Inc., a business entity certified and recorded with the Massachusetts Secretary of the Commonwealth with a principal office address of 190 South LaSalle Street, Suite 2900, Chicago, IL 60603 (the "Company") currently holding licenses issued by the Cannabis Control Commission (the "Commission") and the Town of Holliston, acting by and through its Select Board, with a principal address of 703 Washington Street, Holliston, MA 01746 (the "Municipality").

Recitals

WHEREAS, the Company operates a licensed Marijuana Establishment for the purpose of cultivating and manufacturing medical and recreational marijuana in the Company's existing 58,000 square foot space located at 465 Hopping Brook Road (the "Facility") in accordance with the laws of the Commonwealth of Massachusetts ("MA Law") and those of the Municipality ("Local Law"); and

WHEREAS, the Parties have previously executed a separate Host Community Agreement on December 9, 2015, for the Company's medical marijuana cultivation and product manufacturing operations at the Facility, as well as a Supplemental Host Community Agreement for the expansion of recreational cultivation and manufacturing operations at the Facility on December 10, 2018; and

WHEREAS, Company desires to be a responsible corporate citizen and contributing member or the business community of the Municipality, and in the event the contingencies noted below are met, intends to provide certain benefits to the Municipality as a consequence of the unique impacts affecting the Municipality as a result of the Company operating in the Municipality; and

WHEREAS, the Company and the Municipality (collectively, the "Parties") intend by executing this Agreement to comply and satisfy the provisions of G.L. c. 94G, § 3(d), as applicable to the licensed operations of the Marijuana Establishment, with such operations to be done in accordance with applicable zoning, laws, bylaws, and/or ordinances of the Municipality.

NOW THEREFORE, in consideration of the mutual promises and covenants set forth herein, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows:

1. Terms

Where applicable, the following terms shall hold the same meaning and definitions as defined by the Commission in 935 CMR 500.00 *et seq.* and 935 CMR 501.000 *et seq.*, as applicable:

a) Marijuana Establishment (ME): a Marijuana Cultivator (indoor or outdoor), Craft Marijuana Cooperative, Marijuana Product Manufacturer, Marijuana Microbusiness, Independent Testing Laboratory, Marijuana Retailer, Marijuana Transporter, Marijuana Delivery Operator, Marijuana Courier, Marijuana Research Facility Licensee (as defined in 935 CMR 500.002), Social Consumption Establishment (as defined in 935 CMR 500.002), or any other type of licensed Marijuana-related business, except a Medical Marijuana Treatment Center (MTC).

b) Provisional Marijuana Establishment License: a license issued by the Commission confirming that a Marijuana Establishment has completed the application process and satisfied the qualifications for initial licensure.

c) Final License: a certificate of final licensure issued by the Commission pursuant to its authority under G.L. c. 94G.

d) Community Impact Fee (CIF): impact fee(s) claimed by the Municipality which have been certified by the Commission or ruled upon by a court of competent jurisdiction as being reasonably related to the actual costs imposed by the Company.

e) Reasonably Related: a demonstrable nexus between the actual operations of a ME and an enhanced need for a Municipality's goods or services in order to offset the impact of operations. Fees customarily imposed on other non-marijuana businesses operating in a Municipality shall not be considered reasonably related.

f) Area of Disproportionate Impact: a geographic area identified by the Commission for the purposes identified in M.G.L. c. 94G, § 4(a½)(iv), and which has had historically high rates of arrest, conviction, and incarceration related to marijuana crimes.

Should there be a conflict between these definitions and those contained in 935 CMR 500.000 *et seq.* and/or 935 CMR 501.000 *et seq.*, the Commission's regulations shall control. Additionally, any term used in this Agreement but not identified and defined in this section shall hold the same meaning and definition as so defined in the Commission's regulations.

2. Authorized Operations

The parties stipulate that this Agreement provides permission for the Company to operate the following license types within the Municipality:

1. Medical Marijuana Cultivation and Processing
   Final Licensure, State License No. RMD805

2. Adult-Use Cultivation
   Provisional Licensure, State License No. MC282047

3. Adult-Use Processing
   Provisional Licensure, State License No. MP282063

The Company shall immediately notify the Municipality of any and all final licensure issuance from the Commission and any renewal thereof.

3. Annual Payment Responsibilities

The Parties agree to the following provisions regarding annual payment responsibilities:

a) CIF:

1. There may be additional expenses and impacts including but not limited to impacts on the Municipality's infrastructure systems, law enforcement, fire protection services, inspectional services, as well as unforeseen expenses and impacts on the Municipality that are reasonably related to the operation of the Marijuana Establishment.

2. To mitigate the reasonably related expenses and impacts due to the operations of the Marijuana Establishment, the Company shall pay an annual CIF to the Municipality.

3. In order to calculate the annual CIF payment amount, the Municipality must provide an annual itemized invoice of the impact fees claimed by the Municipality that are reasonably related to the operations of the Company within one (1) month of the anniversary of the date on which the Company received or receives final licensure from the Commission for each license held by the Company located within the Municipality.

   a. All subsequent, one-year invoice periods shall be consistent with the anniversary of the Company's final licensure dates.

b. Failure to provide said invoice within the prescribed time shall result in the Municipality forfeiting any CIF payment it may have been entitled to for the applicable year of the Company's operation.

4. The Municipality's itemized invoice must specifically describe how the claimed impact fees were spent, including a line item for each good or service charged, and a statement of its cost, purpose, and relation to the Company's particular operations.

5. A claimed impact fee must not exceed three (3) percent of the gross sales of the Company, and must not be calculated on a certain percentage of the Company's sales.

6. The Company shall annually pay any undisputed CIF no later than the end of the current fiscal year or within ninety (90) days of the date of the Commission's CIF certification, whichever is later.

7. The Company shall not be required to pay a claimed CIF while the claimed CIF is the subject of a non-frivolous legal dispute either through the Commission's administrative hearing process or before a court of competent jurisdiction.

8. The Municipality shall not attempt to collect fees relating to any operations occurring to the date the Company is granted final licensure by the Commission for a particular Marijuana Establishment.

9. No impact fees shall be assessed after the eighth year of the Company's operations.

10. The Municipality shall not attempt to collect impact fees from the Company that has held final licensure for more than nine (9) years for a particular Marijuana Establishment.

11. The Municipality shall not explicitly or implicitly require the Company to make a promise of future monetary payments, in-kind contributions, or charitable contributions to the Municipality, notwithstanding the CIF payment provision allowed under G.L. c. 94G, § 3.

b) Waiver of Community Impact Fee

A Municipality may not assess an impact fee or may choose to not collect impact fees in a particular year. Any such election shall not operate as a

waiver of the Municipality's rights under this Agreement to collect a CIF in subsequent years.

c) Generally Occurring Fees

Generally occurring fees are those that are customarily imposed by the Municipality on non-cannabis businesses operating within its confines and must not be considered a CIF. These fees may include, but are not limited to, sewer and water connection, waste collection, and local taxes. The Municipality agrees to notify the Company in writing of any generally occurring fees and to only assess such fees as would pertain to a general, non-cannabis operating business within its jurisdiction.

d) Local Taxes

Property, both real and personal, owned or operated by the Company shall be treated as taxable, and all applicable taxes for that property shall be paid either directly by the Company or by its landlord.

e) Other Taxes

Notwithstanding any previously identified provisions, the Company acknowledges and affirms its obligation to pay any and all fees associated with sales tax, excise tax on marijuana and marijuana products, or other taxes or fees otherwise provided for in G.L. c. 94G, G.L. c. 64H, and G.L. c. 64N.

4. Security

The Company shall maintain security at the Facility in accordance with the security plan approved by the Commission. A copy of the approved security plan will be available to the Municipality upon request. In addition, the Company shall at all times comply with all applicable laws and regulations regarding the security and operations of the Facility, as applicable.

Additionally, the Company shall, within a reasonable period of time, report to the Holliston Police Department the discovery of any of the following: diversion of marijuana; unusual discrepancies identified during inventory indicating theft, loss, and/or any criminal action; unusual discrepancy in weight or inventory during transportation; any diversions, losses, or other reportable incidents that occur during transport; any suspicious act involving the sale, distribution, and delivery of marijuana by any person; unauthorized destruction of marijuana; any loss or unauthorized alteration of records

related to marijuana; an alarm activation or other event that requires response by public safety personnel; failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours; and any other breach of security.

5. Equity and Local Opportunities

a) Vendors

The Company, to the extent such practice and its implementation are consistent with applicable laws and regulations, shall make good faith efforts to give priority to qualified businesses and vendors located within the Municipality, as well as in surrounding areas defined as areas of disproportionate impact by the Commission, in the provision of goods and services called for in the construction, maintenance, and continued operation of the Facility.

In doing so, the Company, to the extent such practice and its implementation are consistent with applicable laws and regulations, shall make good faith efforts to have goals, programs, and metrics, and make progress towards those goals, to hire and utilize businesses owned and operated by those identifying as people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, Veterans, persons with disabilities, and LGBTQ+ people.

b) Employment and Salaries

The Company, to the extent such practice and its implementation are consistent with applicable laws and regulations, shall make good faith efforts to hire qualified residents of the Municipality, as well as residents in surrounding areas defined as areas of disproportionate impact by the Commission, as employees of the Facility.

In doing so, the Company, to the extent such practice and its implementation are consistent with applicable laws and regulations, shall make good faith efforts to have goals, programs, and metrics, and make progress towards those goals, to hire individuals identifying as people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, Veterans, persons with disabilities, and LGBTQ+ people.

c) The Company will work cooperatively with all necessary municipal departments, boards, commissions, and agencies to ensure that the Company's operations are compliant with all of the Municipality's codes, rules, and regulations.

6. Odor Control

The Company agrees that in the event all cannabis related odors cannot be contained onsite, it will install and utilize sufficient odor control technologies, including but not limited to appropriate ventilation and air handling equipment and odor resistant packaging. Any complaints received by the Town concerning odors that are detectable at abutting properties or units must be addressed thoroughly and expediently by the Company, including but not limited to the installation of said odor control technology.

7. Effective Date, Term, and Termination

a) This Agreement shall be in full force and effect beginning on the date as set forth in the preamble herein.

b) This Agreement shall terminate five (5) years from the Effective Date.

c) At the conclusion of the term of this Agreement, the Parties may negotiate a new Agreement in accordance with the current prevailing regulations and laws as such regulations and laws may be amended or replaced. The Parties agree to work in good faith to codify a new Agreement, as necessary. Alternatively, the Parties may negotiate and execute an HCA Waiver.

d) The Municipality shall not discontinue relations with the Company in bad faith and shall provide the Company with written notice of the Municipality's intention to discontinue relations with reasonable advance notice.

e) In the event the Company ceases operations of its Facility in the Municipality for a period of greater than sixty (60) days without substantial action to reopen, or relocates such operations outside of the Municipality, this Agreement shall become null and void.

f) In the event of cessation or relocation of operations, the Company shall provide notice to the Municipality no less than ninety (90) days prior to the change(s) in operations.

g) In the event the Company loses or has its licenses, approvals, and/or permits to operate in the Municipality revoked by the Commission or the Municipality, this Agreement shall become null and void.

8. Governing Law and Severability

This agreement shall be governed and construed in accordance with the laws of the Commonwealth of Massachusetts. The Parties expressly waive any defense to enforcement based upon nonconformance with federal law regarding the illegality of marijuana.

If any term or condition of this Agreement or any application thereof shall to any extent be held invalid, illegal, or unenforceable by a court of competent jurisdiction, the validity, legality, and enforceability of the remaining terms and conditions of this Agreement shall not be deemed affected thereby, unless one or both Parties would be substantially or materially prejudiced.

9. Confidentiality

The Parties agree that all records in the possession of the Municipality are governed by G.L. c. 66, § 10, the Public Records Law.

10. Amendments and Waivers

The Parties may make amendments to this Agreement or waive its terms, conditions, duties, or obligations only by a mutually executed written agreement in accordance with the current prevailing regulations and laws as such regulations and laws may be amended or replaced.

11. Successors and Assigns

This Agreement is binding on the Parties hereto, their successors, assignees, and legal representatives. The Municipality shall not assign, sublet, or otherwise transfer its rights nor delegate its obligations under this Agreement, in whole or in part, without the prior written consent from the Company, which shall not be unreasonably delayed, conditioned, or withheld. The Company shall not assign, sublet, or otherwise transfer its rights nor delegate its obligations under this Agreement, in whole or in part, without the prior written consent from the Municipality, which shall not be unreasonably delayed, conditioned, or withheld.

12. Counterparts

This Agreement may be signed in any number of counterparts all of which taken

together, each of which is an original, and all of which shall constitute one and the same instrument, and any Party hereto may execute this Agreement by signing one or more counterparts.

13. Entire Agreement

This Agreement constitutes the entire integrated agreement between the Parties with respect to the matters described. This Agreement supersedes all prior agreements, negotiations and representations, either written or oral, and it shall not be modified or amended except by a written document executed by the Parties hereto.

14. Signatures

Facsimile and electronic signatures affixed to this Agreement shall have the same weight and authority as an original signature. The individuals signing below have full authority to do so by the entity on whose behalf they have signed.

15. Notices

Except as otherwise provided herein, any notices, consents, demands, requests, approvals, or other communications required or permitted under this Agreement shall be made electronically to the email addresses identified below for the respective parties:

Email Address(es) for the Municipality:	ahernt@holliston.k12.ma.usEmail
Address(es) for the Company:	ma.licensing@pharmacann.com

IN WITNESS THEREOF, the Parties hereto have executed this Agreement on the day and year first written above.

TOWN OF HOLLISTON

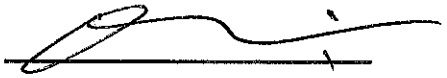
Tina Hein
Chair, Select Board

Benjamin Sparrell

PHARMACANNIS MASSACHUSETTS, INC.

Brett Novey
Chief Executive Officer, PharmaCann Inc.

Vice Chair, Select Board



Damon Dimmick
Clerk, Select Board

From: **Issy Alarcon** issy.alarcon@pharmacann.com
Subject: Municipal Cost Request Letter - Verilife CCC License Renewal Holliston
Date: October 20, 2023 at 12:41 PM
To: ahernt@holliston.k12.ma.us
Cc: Shelley Stormo shelley.stormo@pharmacann.com, Licensing@pharmacann.com

Good afternoon, Mr. Ahern.

I hope that this email finds you well.

As part of the state license renewal, we are required to send this request to the Town annually. If you could please let us know if the Town will be able to provide a response we would appreciate it. A response will be a crucial part of our state license renewal application.

Please let us know if you have any questions or require additional information.

Regards,

Israel (Issy) Alarcon
Associate Director | Licensing
400 E 84th Ave Ste W-5 | Thornton, CO 80229
814.880.8034 CELL | issy.alarcon@pharmacann.com

PHARMACANN
verilife LivWell #1

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Holliston Municipal Cost Letter Request - 10-20-23.pdf
235 KB

Changing the way people view cannabis.

190 SOUTH LASALLE STREET
SUITE 2950
CHICAGO, IL 60603
312.667.6260

pharmacann.com

PHARMACANN

October 20, 2023

SENT VIA EMAIL

Travis Ahern
Town Administrator
Town of Holliston
703 Washington Street
Holliston, MA 01746

Re: PharmaCannis Massachusetts, Inc. d/b/a Verilife – Municipal Cost Request

Dear Mr. Ahern,

As you know, PharmaCannis Massachusetts, Inc. ("PharmaCann") currently holds a Medical Marijuana Treatment Center ("MTC") license for its cultivation and processing site located at 465 Hopping Brook Road in Holliston in addition to a provisional Marijuana Establishment license for future operations as an Adult Use Marijuana Cultivator. Pursuant to 935 CMR 500.103(4) and 501.103(4), PharmaCann must submit an application for the annual renewal of its licenses to operate in Holliston from the Cannabis Control Commission ("CCC"). As a condition of that renewal, the CCC has required that we request from Holliston, our host community, the records of any cost to the city anticipated or actual, resulting from the operation of our Medical Marijuana Treatment Center and or provisional Marijuana Establishment license. Please note that in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26."

In order to comply with this condition of our renewal, we are submitting to your office our formal request for records of any cost incurred by the Town of Holliston over the last past year as a result of our operations. Please send any documentation to by mail and e-mail to:

PharmaCannis Massachusetts, Inc.
Michelle Stormo – Vice President of Retail Operations
112 Main Street
Wareham, MA 02571
Ma.licensing@pharmacann.com

Changing the way people view cannabis.

190 SOUTH LASALLE STREET
SUITE 2950
CHICAGO, IL 60603
312.667.6260

pharmacann.com

PHARMACANN

We thank you for your attention to this matter. Please do not hesitate to reach out should you have any questions.

Sincerely,

Michelle Stormo

Michelle Stormo
Vice President of Retail Operations

Changing the way people view cannabis.

190 SOUTH LASALLE STREET
SUITE 2950
CHICAGO, IL 60603
312.667.6260

pharmacann.com

PHARMACANN

I, Michelle Stormo, hereby certify that:

1. Pursuant to 935 CMR 500.103(4)(f), on October 20, 2023, on behalf of PharmaCannis Massachusetts, Inc., submitted a formal request for records of any cost incurred by the Town of Holliston over the past year as a result of our operations to Travis Ahern, the town manager of the Town of Holliston.

2. As of December 1, 2023, no response has been received from the Town Of Holliston.

Signed:

Michelle Stormo
Michelle Stormo

12/01/2023
Date:

PharmaCannis Massachusetts Inc.
Holliston Manufacturing Facility

Plan for Positive Impact

STATEMENT OF PURPOSE

PharmaCannis Massachusetts Inc. d/b/a Verilife ("PharmaCann") is committed to bringing tangible benefits to communities that have been disproportionately impacted by the prohibition of cannabis as a licensed cannabis operator in the State of Massachusetts. Pursuant to 935 C.M.R. § 500.101(1)(a)11. and 935 C.M.R. § 501.101(1)(a)11., and in accordance with the guidance made available by the Massachusetts Cannabis Control Commission (the "Commission"), the purpose of this Plan for Positive Impact is to promote and encourage full participation in the cannabis industry by individuals from communities disproportionately impacted and to positively impact those communities. PharmaCann recognizes its responsibility to contribute to the communities in which it operates and the surrounding areas in need with particular attention to Commission-identified Areas of Disproportionate Impact ("ADI(s)"). PharmaCann is fully committed to ensuring that it creates a positive and lasting contribution to ADIs as part of its business practices and intended local community engagement activities, as described in greater detail below.

GOALS, INITIATIVES, AND MEASUREMENTS

Goal #1: Coordinate and Conduct Localized Community Engagement and Volunteer Activities.

Proposed Initiative:

As part of its commitment to benefiting ADIs in Massachusetts, PharmaCann's Retail Operations Department has an internal initiative of conducting community engagement activities within the specific local communities in which PharmaCann operates. This initiative was designed to coordinate specific activities within PharmaCann's local communities on a cadenced basis as a means to provide material benefits to ADIs, such as sponsorships, community clean-ups, and other community-specific volunteer support. PharmaCann has allocated financial resources within its annual budget specifically dedicated for these engagement activities (among other community-related events) to be conducted at least once per quarter. PharmaCann's volunteer initiatives have and will continue to respond to the needs of local Massachusetts communities.

Measurement and Evaluation:

With respect to PharmaCann's planned community engagement activities, PharmaCann's Retail Operations Department will quantify and record all pertinent information obtained as part of its planned engagement activities. For each community engagement activity conducted, PharmaCann personnel will record and retain the following information (where applicable):

- The date(s) of the event conducted;
- The organization(s) worked with;
- The facility(ies) participating in the initiative and the number of personnel involved;
- The number of volunteer hours provided;
- The mission of the organization(s) by which the initiative supports;
- The community and individuals supported; and
- Any other relevant information or documentation requiring retention for recordkeeping purposes, such as letters of acceptance or recognition.

These metrics will be quantified and can be compared annually to ensure that PharmaCann maintains a positive impact, aligned with the needs of the targeted ADIs near its operations. PharmaCann's Retail Operations Department will further track the quality of these activities by soliciting feedback from local stakeholders to ensure the activities produce the desired and intended end benefits in the community. Other opportunities for community engagement may also include tours of its operational facilities as well as pop-up job fairs to enlist prospective employees within the organization, in accordance with PharmaCann's Diversity Plan.

Goal #2: Conduct or Sponsor Monetary or Tangible Support Donation Drives with Charitable or Non-Profit Organizations.

Proposed Initiative:

PharmaCann will initiate certain donation drives through partnerships with charitable or non-profit organizations that seek to provide financial support or other necessities to individuals in need and ADIs. PharmaCann will specifically seek out organizations that were organized with the purpose of providing a net positive impact to ADIs in Massachusetts. Through strategic coordination of its time, personnel, and financial resources, PharmaCann will engage in localized donations, including monetary donations to charitable foundations and food or other necessity drives, in coordination with non-profit organizations that support veterans returning from service, justice-involved individuals, and communities in need.

Measurement and Evaluation:

With respect to PharmaCann's planned charitable or philanthropic activity, PharmaCann will quantify and record the monetary or other tangible impact such efforts have either within a specific local community or otherwise, statewide across Massachusetts. Accordingly, for such efforts, PharmaCann will record and retain the following information (where applicable):

- The date(s) of the event conducted;
- The organization(s) worked with;
- The facility(ies) participating in the initiative and the number of personnel involved;
- The amount of financial capital committed to the activity or initiative (if applicable);
- The amount of food, clothing, or other tangible items raised and/or donated as part of the effort (if applicable);
- The mission of the organization(s) by which the initiative supports;
- The community/individuals in which the organization(s) supports; and
- Any other relevant information or documentation requiring retention for recordkeeping purposes, such as letters of acceptance or recognition.

These metrics will be quantified and can be compared annually to ensure a quantifiable, measured, and continued positive result on ADIs. PharmaCann's Retail Operations Department will further track the quality of these activities by soliciting feedback from local stakeholders to ensure the activities produce the desired and intended end benefits in the community.

REGULATORY ACKNOWLEDGMENTS

As required by the Commission, PharmaCann acknowledges and understands its obligations to the following:

1) PharmaCann is aware and will adhere to the requirements set forth in 935 C.M.R. § 500.105(4) and 935 C.M.R. § 501.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every cannabis Establishment and cannabis Treatment Center, respectively.
2) Any actions taken or programs instituted by PharmaCann will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

PharmaCannis Massachusetts Inc.
Holliston Manufacturing Facility

Plan for Positive Impact

(Updated in 2025)

STATEMENT OF PURPOSE

PharmaCannis Massachusetts Inc. d/b/a Verilife ("PharmaCann") is committed to bringing tangible benefits to communities that have been disproportionately impacted by the prohibition of cannabis as a licensed cannabis operator in the State of Massachusetts. Pursuant to 935 C.M.R. § 500.101(1)(a)11. and 935 C.M.R. § 501.101(1)(a)11., and in accordance with the guidance made available by the Massachusetts Cannabis Control Commission (the "Commission"), the purpose of this Plan for Positive Impact is to promote and encourage full participation in the cannabis industry by individuals from communities disproportionately impacted and to positively impact those communities. PharmaCann recognizes its responsibility to contribute to the communities in which it operates and the surrounding areas in need with particular attention to Commission-identified Areas of Disproportionate Impact ("ADI(s)"). PharmaCann is fully committed to ensuring that it creates a positive and lasting contribution to ADIs as part of its business practices and intended local community engagement activities, as described in greater detail below.

GOALS, INITIATIVES, AND MEASUREMENTS

Goal #1: Coordinate and Conduct Localized Community Engagement Through Volunteer Activities, Sponsorships, and/or Monetary or Tangible Support Donation Drives with Charitable or Non-Profit Organizations.

Proposed Initiative:

PharmaCann will seek out partnerships with various Massachusetts-based charitable or non-profit organizations whose core mission is to provide financial support or other necessities to individuals in need and ADIs. PharmaCann will specifically seek out organizations that were organized with the purpose of providing a net positive impact to ADIs in Massachusetts. Through strategic coordination of its time, personnel, and financial resources, PharmaCann will engage in localized donations, including monetary donations to charitable foundations and food or other necessity drives, in coordination with non-profit organizations that support veterans returning from service, justice-involved individuals, and communities in need.

Additionally, as part of its commitment to benefiting ADIs in Massachusetts, PharmaCann's Operations Department has an internal initiative of conducting community engagement activities within the specific local communities in which PharmaCann operates. This initiative was designed to coordinate specific activities within PharmaCann's local communities on a cadenced basis as a means to provide material benefits to ADIs, such as sponsorships, community clean-ups, and other community-specific volunteer support. PharmaCann has allocated financial resources within its annual budget specifically dedicated for these engagement activities to be conducted at least once per quarter. PharmaCann's volunteer initiatives have and will continue to respond to the needs of local Massachusetts communities.

Measurement and Evaluation:

PharmaCann's Operations Department will quantify and record all pertinent information obtained as part of its planned community engagement activities. For each community engagement activity, PharmaCann personnel will record and retain the following information:

- The date(s) of the event conducted;
- The organization(s) worked with and their philanthropic mission to be supported;
- The facility(ies) participating in the initiative and the number of personnel involved;
- The community/individuals in which the organization(s) supports;
- The number of volunteer hours provided (if applicable);
- The amount of financial capital committed to the activity or initiative (if applicable);
- The amount of food, clothing, or other tangible items raised and/or donated as part of the effort (if applicable); and
- Any other relevant information or documentation requiring retention for recordkeeping purposes, such as letters of acceptance or recognition.

These metrics will be quantified and can be compared annually to ensure that PharmaCann maintains a positive impact, aligned with the needs of the targeted ADIs near its operations. PharmaCann's Retail Operations Department will further track the quality of these activities by soliciting feedback from local stakeholders to ensure the activities produce the desired and intended end benefits in the community. Other opportunities for community engagement may also include tours of its operational facilities as well as pop-up job fairs to enlist prospective employees within the organization, in accordance with PharmaCann's Diversity Plan.

Goal #2: Provide an Annual Financial Contribution Toward the Massachusetts Cannabis Social Equity Trust Fund.

Proposed Initiative:

The Commonwealth of Massachusetts created the Massachusetts Cannabis Social Equity Trust Fund ("CSETF") under Chapter 180 of the Acts of 2022, in part to allow for private industry's financial contribution toward direct disbursements of capital to individuals disproportionately harmed by cannabis prohibition. Pursuant to the Commission's February 2024 Guidance on Licensure, PharmaCann intends to incorporate a financial contribution to the CSETF as part of its commitment toward benefiting those who have been disproportionately impacted by the prohibition of cannabis. Accordingly, PharmaCann will make an annual contribution to the CSETF as part of its commitment to furthering social equity initiatives and opportunities for individuals disproportionately impacted by the prohibition of cannabis in Massachusetts.

Measurement and Evaluation:

PharmaCann will commit a percentage of its overall annual financial budget allocated toward community engagement activities to contribute to the CSETF. PharmaCann will provide the Commission with the precise monetary donation amount to the CSETF, the receipt of payment from the Commission's designee for such funds, and provide the percentage that its CSETF contribution is relative to its overall Massachusetts-based community engagement budget. This will permit PharmaCann to demonstrably quantify its impact in a manner that pledges significant contribution to ADIs yet retain its observance of its own fiscal responsibility through its operations year-over-year.

REGULATORY ACKNOWLEDGMENTS

As required by the Commission, PharmaCann acknowledges and understands its obligations to the following:

1) PharmaCann is aware and will adhere to the requirements set forth in 935 C.M.R. § 500.105(4) and 935 C.M.R. § 501.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every cannabis Establishment and cannabis Treatment Center, respectively.

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

The Commonwealth of Massachusetts
William Francis Galvin

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

Minimum Fee: $35.00

Special Filing Instructions

Articles of Organization
(General Laws, Chapter 180)

Federal Employer Identification Number: 463307025 *(must be 9 digits)*

ARTICLE I

The exact name of the corporation is:

BRIGHTON HEALTH ADVOCATES INC.

ARTICLE II

The purpose of the corporation is to engage in the following business activities:

TO ENGAGE IN CIVIC, EDUCATIONAL, AND BENEVOLENT ACTIVITIES PER MGL CH. 180 §4

ARTICLE III

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

ARTICLE IV

Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:
(If there are no provisions state "NONE")

1. MEETINGS OF MEMBERS, IF ANY, ARE AUTHORIZED TO TAKE PLACE ANYWHERE WITHIN THE UNITED STATES. 2. THE DIRECTOR MAY MAKE, AMEND, OR REPEAL THE BY-LAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH BY LAW, THE ARTICLES OF ORGANIZATION, OR THE BY-LAWS REQUIRE ACTION BY THE MEMBERS. 3. NO DIRECTOR SHALL BE PERSONALLY LIABLE TO THE CORPORATION FOR MONETARY DAMAGES FOR BREACH OF FIDUCIARY DUTY AS DIRECTOR NOTWITHSTANDING ANY PROVISION OF LAW IMPOSING SUCH LIABILITY, PROVIDED HOWEVER THAT THIS PROVISION SHALL NOT ELIMINATE THE LIABILITY OF A DIRECTOR, TO THE EXTENT THAT SUCH LIABILITY IS IMPOSED BY APPLICABLE LAW; A. FOR ANY BREACH OF THE DIRECTORS' DUTY OF LOYALTY TO THE CORPORATION. B. FOR ACTS OR OMISSIONS NOT IN GOOD FAITH OR WHICH INVOLVE INTENTIONAL MISCONDUCT OR KNOWING VIOLATION OF LAW; AND C. FOR ANY TRANSACTION FROM WHICH THE DIRECTOR DERIVED AN IMPROPER PERSONAL BENEFIT.

Notes: The preceding four (4) atricles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a *later* effective date is desired, specify such date which shall not be more than *thirty days* after the date of filing.

08/14/2013

ARTICLE VII

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

a. The street address *(post office boxes are not acceptable)* of the principal office of the corporation *in Massachusetts* is:

No. and Street: 81 TECHNOLOGY PARK DR
City or Town: EAST FALMOUTH State: MA Zip: 02536 Country: USA

b. The name, residential street address and post office address of each director and officer of the corporation is as follows:

Title	**Individual Name** First, Middle, Last, Suffix	**Address** (no PO Box) Address, City or Town, State, Zip Code	**Expiration of Term**
PRESIDENT	MICHELLE MARIE STORMO	33 PORTSIDE DR POCASSET, MA 02559 USA 33 PORTSIDE DR POCASSET, MA 02559 USA	December 2014
TREASURER	MICHELLE MARIE STORMO	33 PORTSIDE DR POCASSET, MA 02559 USA 33 PORTSIDE DR POCASSET, MA 02559 USA	December 2014
CLERK	HOLLY ELISABETH CARROLL	26 TROTTING PARK RD FALMOUTH, MA 02536 USA 26 TROTTING PARK RD FALMOUTH, MA 02536 USA	December 2014
VICE PRESIDENT	HOLLY ELISABETH CARROLL	26 TROTTING PARK RD FALMOUTH, MA 02536 USA 26 TROTTING PARK RD FALMOUTH, MA 02536 USA	December 2014
DIRECTOR	DAVID GLENN AUBREY	9 MALLARD WAY NORTH FALMOUTH, MA 02556 USA 9 MALLARD WAY NORTH FALMOUTH, MA 02556 USA	December 2014
DIRECTOR	OWEN JAY STORMO	430 TERRACE RD SANTA BARBARA, CA 93109 USA 430 TERRACE RD SANTA BARBARA, CA 93109 USA	December 2014
DIRECTOR	ROBERT S CARROLL	BOX 684 EAST LONGMEADOW, MA 01028 USA BOX 684 EAST LONGMEADOW, MA 01028 USA	December 2014

c. The fiscal year (i.e., tax year) of the business entity shall end on the last day of the month of:
December

d. The name and business address of the resident agent, if any, of the business entity is:

Name:
No. and Street:
City or Town: State: Zip: Country:

I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain:

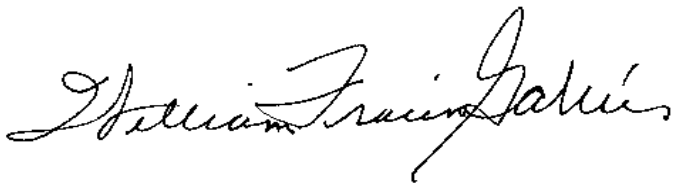
IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address (es) beneath each signature do hereby associate with the intention of forming this business entity under the provisions of General Law, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 13 Day of August, 2013. *(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.)*
MICHELLE MARIE STORMO

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THE COMMONWEALTH OF MASSACHUSETTS

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

August 13, 2013 08:54 PM



WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

D

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

Brighton Health Advocates, Inc. is a registrant with the Department of Public Health in accordance with 105 CMR 725.100(C) as of February 27, 2018.
Bryan Harter
Director
Medical Use of Marijuana Program
Bureau of Healthcare Safety and Quality
Massachusetts Department of Public Health

FORM MUST BE TYPED

Articles of Entity Conversion of a Domestic Non-Profit with a Pending Provisional or Final Certification to Dispense Medical Use Marijuana to a Domestic Business Corporation

FORM II

(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

46 3307025

(1) Exact name of the non-profit: Brighton Health Advocates, Inc.

(2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01:

Pharmacannis Massachusetts Inc.

(3) The plan of entity conversion was duly approved in accordance with the law.

(4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

ARTICLE I

The exact name of the corporation upon conversion is:

Pharmacannis Massachusetts Inc.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:*

To transact business as a marijuana establishment in accordance with Chapter 55 of the Acts of 2017, and to engage in the cultivation, processing, and sale of marijuana and marijuana infused products, and to engage in any other lawful business.

5

P.C.

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.

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
Common	1,000			

ARTICLE IV

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

All common shares shall have the same rights, privilege, preference, and priority.

ARTICLE V

The restrictions, if any, imposed by the articles or organization upon the transfer of shares of any class or series of stock are:

None.

ARTICLE VI

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

See attachment VI

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

ATTACHMENT VI

(a) **Personal liability of directors.** No director shall have personal liability to the corporation for monetary damages for breach of his or her fiduciary duty as a director notwithstanding any provision of law imposing such liability, provided that this provision shall not eliminate or limit the liability of a director: (i) for any breach of the director's duty of loyalty to the corporation or its shareholders; (ii) for acts of omissions not in good faith or which involve intentional misconduct or a knowing violation of law; (iii) for improper distributions under Section 6.40 of Chapter 156D of the General Laws of Massachusetts; or (iv) for any transaction from which the director derived an improper personal benefit. Any repeal or modification of this provision, directly or indirectly, such as by adoption of an inconsistent provision of these Articles, shall not adversely affect any right or protection of a Director of the Corporation existing at the time of such repeal or modification.

(b) **Authorization of directors to make, amend, or repeal bylaws.** The board of directors may make, amend or repeal the bylaws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in Chapter 156D of the General Laws of Massachusetts, these Articles or the bylaws requires action by the shareholders.

(c) **Shareholder action without a meeting by less than unanimous consent.** Action required or permitted by Chapter 156D of the General Laws of Massachusetts to be taken at a shareholders' meeting may, pursuant to Section 7.04 of Chapter 156D, be taken without a meeting by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting.

(d) **Shareholder vote required to approve matters acted on by shareholders.** The affirmative vote of a majority of all the shares eligible to vote on a matter shall be sufficient for the approval of the matter, notwithstanding any greater vote on the matter otherwise required by any provision of Chapter 156D of the General Laws of Massachusetts.

(e) **Minimum number of directors.** The board of directors may consist of one or more individuals, notwithstanding the number of shareholders.

ARTICLE VII

The effective date of organization of the corporation is the date 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:

ARTICLE VIII

The information contained in this article is not a permanent part of the articles of organization.

a. The street address of the initial registered office of the corporation in the commonwealth:
465 Hopping Brook Road, Holliston, MA 01746

b. The name of its initial registered agent at its registered office:
Teddy Scott

c. The names and 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):

President: Teddy Scott

Treasurer: Teddy Scott

Secretary: Teddy Scott

Director(s): Teddy Scott

d. The fiscal year end of the corporation:
December 31

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

f. The street address of the principal office of the corporation:
1010 Lake Street, Floor 2, Oak Park, IL 60301

g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

465 Hopping Brook Road, Holliston, MA 01746 , which is
(number, street, city or town, state, zip code)

- ☑ its principal office;
- ☐ an office of its transfer agent;
- ☐ an office of its secretary/assistant secretary;
- ☑ its registered office.

Signed by: Michelle M. Stamos ,
(signature of authorized individual)

- ☐ Chairman of the board of directors,
- ☑ President,
- ☐ Other officer,
- ☐ Court-appointed fiduciary,

on this 22nd day of February, 2018

COMMONWEALTH OF MASSACHUSETTS

SECRETARY OF THE COMMONWEALTH
2018 MAR 12 AM 11:44
CORPORATIONS DIVISION

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

Articles of Entity Conversion of a Domestic Non-Profit with a Pending Provisional or Final Certification to Dispense Medical Use Marijuana to a Domestic Business Corporation

(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

I hereby certify that upon examination of these articles of conversion, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said articles; and the filing fee in the amount of $ 475 having been paid, said articles are deemed to have been filed with me this 12 day of March, 2018, at 11:44 a.m./p.m.
time

Effective date: _____
(must be within 90 days of date submitted)

WILLIAM FRANCIS GALVIN
Secretary of the Commonwealth

SB
Examiner

DB
Name approval

C

M

Filing fee: Minimum $250 2668

TO BE FILLED IN BY CORPORATION
Contact Information:

Andrea F. Nuciforo, Jr.

One International Place, Suite 1400

Boston, MA 02110

Telephone: (617) 535-7720

Email: anuciforo@nuciforo.com

Upon filing, a copy of this filing will be available at www.sec.state.ma.us/cor. If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

130716 8

BYLAWS
PHARMACANNIS MASSACHUSETTS, INC.

Article I: Offices

Section 1. Principal Office. The principal office of the Corporation shall be 1010 Lake Street, 2nd Floor, Oak Park, Illinois, 60301.

Section 2. Other Offices. The Board of Directors may establish branch or subordinate offices at any time and at any place.

Article II: Purpose

To make cannabis products available to qualified patients and their personal caregivers in a safe, healthy, and clean environment that complies with the laws of The Commonwealth of Massachusetts and the directives of the Massachusetts Department of Public Health and the Massachusetts Cannabis Control Comission. Additionally, the purpose includes providing palliative and other services to qualified patients, as well as educational materials regarding the potential benefits and dangers associated with the use of medical marijuana. As permitted by law, the Corporation may engage in any and all activities in furtherance of, related to, or incidental to these purposes.

Article III: Shareholders

Section 1. Annual Meeting. A meeting will be held annually for the purpose of electing members of the Board of Directors (the "Directors") of the Corporation and for transacting such other business as may come before the meeting. The annual meeting will be held on a date and time designated by the Board of Directors.

Section 2. Special Meetings. Special meetings of the Shareholders may be called at any time by the Board of Directors, by the President, or by Shareholders entitled to cast in total not less than 50 percent of the votes at that meeting. If a special meeting becomes called by anyone other than the Board of Directors, the person calling the meeting will make a written request to the Corporation specifying the time and date of the meeting and the general nature of the business proposed to be transacted.

Section 3. Place of Meeting. Shareholders' meetings will be held at any place within or outside the Commonwealth of Massachusetts at a place to be determined at the Board of Directors discretion. If no designation of the location gets made for any annual or special meeting of the Shareholders, the meetings shall be held at the corporation's principal place of business.

Section 4. Notice. Written notice of any Shareholder meeting will be given not less than 10 days before the date of the meeting to each Shareholder entitled to vote at that meeting. The notice shall state the place, date, and hour of the meeting. If, for a special meeting, the notice shall state the purpose of the meeting. A mailed notice is effective when deposited in the United States mail with postage prepaid and the proper address of the Shareholder as appearing on the records of the corporation.

Section 5. Quorum and Required Vote. A majority of the outstanding voting shares, whether represented in person or by proxy, shall constitute a quorum entitled to take action at a meeting of

Shareholders. Without a quorum, a majority of the represented Shareholders may adjourn the meeting to another time without further notice.

Section 6. Consent of Shareholders in Lieu of Meeting. Any action to be taken at any annual or special meeting of Shareholders may be taken without a meeting, without prior notice, and without a vote, if a signed consent in writing, setting forth the action so taken, gets presented by the holders of outstanding shares having not less than the minimum number of shares that would be necessary to authorize or pass such an action were a meeting otherwise called and all votes cast.

Article IV: Directors

Section 1. Powers. The Board of Directors will manage the business and affairs of the Corporation by or under the Board.

Section 2. Number and Tenure. The Board will consist of one or more Directors, all of whom shall be natural persons who shall be elected for a term of three years. Each Director shall hold office until a successor becomes elected and qualified. Directors do not need to be Shareholders. Any Director may resign at any time upon notice given in writing to the Corporation. The authorized number of Directors will be one (1) until changed by a duly adopted amendment to the Bylaws adopted by the vote or written consent of a majority of the outstanding Shareholders.

Section 3. Vacancies. A vacancy in the Board of Directors will exist if a Director resigns, dies, or becomes removed by the Shareholders; or when a court of appropriate jurisdiction declares the Director of unsound mind or enters a felony conviction against a Director; or when the authorized number of Directors increases.

Section 4. Regular Meetings. By resolution, the Board may give the time and place, either within or outside the Commonwealth of Massachusetts, for the holding of regular Board meetings without any notice other than that of the resolution.

Section 5. Special Meetings. Special meetings of the Board of Directors may be called for any purpose at any time by the Chairman of the Board, the President, or a majority of Directors.

Section 6. Quorum. A majority of the authorized number of Directors will be considered a quorum to transact business.

Section 7. Notice of Meetings. Any regular meeting of the Board may be held without notice of the date, time, and place of the meeting. Any special meeting of the Board may be preceded by at least a two (2)-day notice of the date, time, and place of the meeting. The Board may give this notice personally, by mail, facsimile, electronic mail, or by any other method allowed by law. Notice is effective at the earliest of: (a) receipt; (b) delivery to the proper address or telephone number as shown in the Corporation's records; or (c) five (5) days after its deposit in the United States mail, with postage prepaid and the correct address noted.

Section 8. Waiver of Notice. Notice of a meeting need not be given to any Director who signs a written waiver delivered to the Corporation for inclusion in the minutes or for filing with the corporate records.

Section 9. Action by Directors Without A Meeting. Any action required or permitted to be taken at a meeting of the Board may be taken without a meeting if all members of the Board consent to it in writing.

Section 10. Presence through Communications Equipment. Unless otherwise provided by law or by the articles of organization, Directors may participate in any meeting of the board of Directors by means of a conference telephone or similar electronic or communications equipment by mean of which all persons participating in the meeting can hear each other at the same time, and participation by such means shall constitute presence in person at a meeting.

Article V: Officers

Section 1. Officers. The Officers of the Corporation will consist of the President, the Treasurer, and the Secretary. Officers shall be elected for three years and shall hold office until their successors become elected and qualified. An appointee may hold one or more offices. Teddy Scott shall initially serve as President, Treasurer and Secretary.

Section 2. Removal and Resignation. Any Officer or agent appointed by the Board may be removed by the Board at any time with or without cause. Any Officer may resign at any time by giving written notice to the Corporation.

Section 3. Vacancies. The Board may fill a vacancy due to resignation, removal, disqualification, death, or otherwise.

Section 4. President. The President shall preside at all meetings of Shareholders and Directors, have the general management and supervision of the affairs of the Corporation, and shall perform all other duties as determined by the Board.

Section 5. Treasurer. The Treasurer shall have the custody of all moneys and securities of the corporation and shall keep accurate financial records for the Corporation.

Section 6. Secretary. The Secretary shall issue notices for all meetings except for notices for special meetings of the Shareholders and special meeting of the Directors; shall prepare the minutes of the meetings of the Shareholders and meetings of the Board; and shall keep a record of Shareholders at the principal office.

Article VI: Liability

Section 1. No Personal Liability. The directors and the officers of the Corporation shall not be personally liable for any debt, liability or obligation of the Corporation for or arising out of a breach of fiduciary duty as an officer or director notwithstanding any provision of law imposing such liability; provided, however, that the foregoing shall not eliminate or limit the liability of an officer or director to the extent that such liability is imposed by applicable law for acts or omissions not in good faith or which involve intentional misconduct, recklessness, or a knowing violation of the law.

Section 2. Corporate Obligations. All persons, corporations or other entities extending credit to, contracting with, or having any claim against, the Corporation, may look only to the funds and property of the Corporation for the payment of any such contract or claim, or for the payment of any debt,

damages, judgment or decree, or of any money that may otherwise become due or payable to them from the Corporation.

Section 3. Indemnification. The Corporation shall, to the extent legally permissible, indemnify any person serving or who has served at any time as a director, executive director, president, vice president, treasurer, assistant treasurer, clerk, assistant clerk or other officer of the Corporation, or at its request as a director or officer of any organization, or at its request in any capacity with respect to any employee benefit plan, and may indemnify an employee or other agent who has so served, against all liabilities and expenses, including, without limitation, amounts paid in satisfaction of judgments, in compromise or as fines and penalties, and counsel fees, reasonably incurred by him in connection with the defense or disposition of any action, suit or other proceeding, whether civil or criminal, in which he may be involved or with which he may be threatened, while in office or thereafter, by reason of his being or having been such a director or officer, except with respect to any matter as to which he shall have been adjudicated in any proceeding not to have acted in good faith; provided, however, that as to any matter disposed of by a compromise payment by such person, pursuant to a consent decree or otherwise, no indemnification either for said payment or for any other expenses shall be provided unless such compromise and indemnification shall be approved by a majority vote of the Board.

Article VII: Amendments

These Bylaws may be adopted, altered, amended or repealed, in whole or in part, by a two-thirds (2/3) vote of a majority of the directors then in office.

Article VIII: Powers

Section 1. Statement of Powers. By and through the Board, the Corporation shall have the power to do any and all lawful acts which may be necessary or convenient to affect the purpose for which the Corporation is organized, and to assist other organizations or persons whose activities further accomplish, foster or attain such purposes. The Corporation shall have the power to lease, sell, mortgage, transfer, in such manner and on such terms as they may deem advisable, all property, real or personal; to acquire, by purchase or otherwise, and retain for whatever period they shall think proper, all kinds of real and personal property and every kind of investment, including cash, securities and other property; to execute agreements and contract in furtherance of the business of the Corporation; to settle, compromise or pay any claims, including taxes, in accordance with law; to secure, hold and maintain municipal and state licenses and permits; to collect rents and other proceeds from real estate not specifically devised and to pay all carrying charges thereon and make such repairs thereto as they deem proper without the necessity of obtaining leave of any court.

Section 2. Investments. The Corporation shall have the right to retain all or any part of any securities or property acquired by it in whatever manner, and to invest and reinvest any funds held by it, according to the judgment of the Directors, without being restricted to the class of investments, provided, however, that no action shall be taken by or on behalf of the Corporation if such action is a prohibited transaction under Massachusetts law.

Section 3. Loans. No moneys shall be borrowed on behalf of the Corporation and no evidences of such indebtedness shall be issued in its name unless authorized by a resolution of the Board of Directors. Such authority may be general or confined to specific instances.

Section 4. Deposits. All funds of the Corporation, not otherwise employed, shall be deposited from time to time to the credit of the Corporation in such banks, investment firms or other depositories as the Board of Directors shall select.

Section 5. Audits. Within three (3) months after the close of the Corporation's fiscal year, the Corporation will prepare reviewed financial statements in accordance with generally accepted accounting principles (GAAP) and make these statements available to all Shareholders and, if required by law, to the Massachusetts Department of Public Health and the Massachusetts Cannabis Control Commission.

Section 6. Insurance. The Corporation may purchase and maintain insurance (including but not limited to insurance for legal expenses and costs incurred in connection with defending any claim, proceeding or lawsuit) on behalf of any person who is or was a director, officer, employee, fiduciary or agent of the Corporation or who, while serving in this role, is or was serving at the request of the Corporation as a director, officer, partner, trustee, employee, fiduciary or agent of any other foreign or domestic Corporation, partnership, joint venture, trust, employee benefit plan, or other enterprise, against any liability asserted against him or incurred by him in any such capacity, or arising out of his status as such. In addition, the Corporation shall maintain liability insurance coverage in compliance with 105 CMR 725.105(Q), or any other provision of Massachusetts law or regulation.

Article IX: Anti-Trust Policy

The Corporation shall comply fully with all federal and state antitrust laws which prohibit companies from working together to restrict competition. The Corporation and its directors and officers are informed about antitrust laws and recognize possible antitrust issues or questions. While competitors in the Massachusetts medical marijuana industry may collaborate, such competitors may not unlawfully restrict competition within the industry. The Corporation shall not engage in any anti-competitive activities. Furthermore, to ensure against inadvertent violations of applicable antitrust laws and except to ensure that prices are affordable for the Corporation's patients, and to prevent diversion for non-medical purposes, directors, officers and employees shall not discuss with competitors:

1. Pricing strategies for medical marijuana or related products and services;
2. Establishment of market monopolies for products or services;
3. Refusal to deal with a company because of pricing or distribution practices for medical marijuana or related products or services;
4. Strategies or plans to give business or remove business from a specific company.

Furthermore, directors, officers, and employees shall not engage in any actions or understandings arising in the context of the Corporation's activities which appear to be anti-competitive in purpose or inconsistent with this policy.

Article X: Severability

The invalidity or unenforceability of any provisions of these Bylaws shall not affect the validity or enforceability of any other provision of these Bylaws, which shall remain in full force and effect.

Article XI: Dissolution

Dissolution of the Corporation will comply with Massachusetts law. The Directors may authorize a petition for the dissolution of the Corporation. A two-thirds vote will be required for such dissolution. Articles of Dissolution will be filed with the Massachusetts Secretary of State. All outstanding annual reports will be filed with the Secretary of State. A letter to the Massachusetts Department of Revenue on the Corporation's letterhead will be sent stating that the Corporation is dissolving. All outstanding business will be completed. All outstanding debts will be paid, and all assets transferred or liquidated in accordance with law. Any remaining funds in the Corporation will be distributed as per the direction of the directors at the meeting authorizing the dissolution.

In the event that the dissolution also requires one or more marijuana establishment locations to close, cease conducting business or dissolve, the board of directors shall vote to take the following actions: (i) written notice to the Massachusetts Department of Public Health and the Massachusetts Cannabis Control Commission; (ii) written notice to patients and caregivers via mail, or in-person if the opportunity arises to notify the patient or caregiver arises prior to the closing of the doors of the Corporation's place of business; (iii) any remaining cannabis product will be destroyed at the close of business, and disposed of in a manner consistent with 105 CMR 725.000 et seq. and with the policies and procedures of the RMD.

As set forth above, these Bylaws have been adopted by a vote of the Board as per Article VII and affirmed by the President of the Corporation on this 2nd day of April 2018.

Teddy Scott
President

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

Date: June 05, 2019

To Whom It May Concern :

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

PHARMACANNIS MASSACHUSETTS INC.

is a domestic corporation organized on **March 12, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.

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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 19060088790

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

Processed by:

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

mass.gov/dor

Letter ID: L1422863744
Notice Date: May 17, 2019
Case ID: 0-000-694-153

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

000043

BRIGHTON HEALTH ADVOCATES
112 MAIN ST
WAREHAM MA 02571-2171

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, BRIGHTON HEALTH ADVOCATES 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

Executive Summary

PharmaCannis Massachusetts, Inc., a Massachusetts corporation, is a wholly-owned subsidiary of PharmaCann LLC ("PharmaCann" or the "Company"). PharmaCann was founded in 2014 by a group of mission-driven individuals who saw a need to bring a science-based, professional approach to a marijuana industry that was quickly becoming recognized as a viable alternative for patients suffering from debilitating conditions.

Since its founding, PharmaCann has grown to over 250 employees operating 14 marijuana facilities (3 grow/process facilities; 11 dispensaries) and serving thousands of patients and customers in highly regulated states. PharmaCann has grown organically around a core of objective, data-driven professionals with a range of expertise including chemical engineering, pharmaceutical research, healthcare, horticulture, retail operations management, logistics, information technology, accounting, finance, regulatory compliance, and law. PharmaCann does not rely on consultants or non-employee advisors. PharmaCann is led by a management team experienced with a demonstrated capability to execute, and in a relatively short period of time, PharmaCann has grown to be one of the country's leading marijuana organizations.

Products: PharmaCann's facilities will offer and produce whole flower marijuana, marijuana-infused products such as tinctures, salves, edible options and cooking mediums, as well as ancillary accessory and storage products.

Services: Vision: PharmaCann's vision is to become the highest-quality and safest marijuana grower, processor, and dispensary in the country.

Mission: Establish the gold standard for growing, processing, and dispensing and the industry standard transparent operating model while maintaining the needs of customers with safe, high-quality products.

Company Ownership and Management Structure

PharmaCannis Massachusetts, Inc. is a Massachusetts corporation and a wholly-owned subsidiary of PharmaCann, which as the parent company provides the highest level of compliance, transparency and accountability to regulators, accountants, and financial institutions. PharmaCann is managed by a Board of Managers, including the Company's CEO/Founder, Teddy Scott, who is the senior corporate officer in charge of managing the Company. Reporting to the CEO is a leadership team consisting of the Chief Operating Officer/Chief Financial Officer, the Chief Human Resources Officer, the Chief Strategy Officer and the General Counsel. The leadership team meets on a bi-weekly basis to ensure that PharmaCann's

multi-state operations are aligned with corporate strategy. Reporting to the leadership team is an operational team of 12 functional and production leaders across the firm, including the Director of Process Engineering, the Manager of Quality, the Director of Cultivation, the Lead Pharmacist, the Director of Research and Development, the Director of IT Infrastructure, in addition to geographic-specific directors.

PharmaCann's Executive Director of Massachusetts, Shelley Stormo, oversees the Company's current operations in Massachusetts. The Company is currently operating a co-located medical and adult use dispensary in Wareham, MA, the fourth adult use dispensary to open in the Commonwealth. Additionally, the Company is operating (and constructing) a grow/process facility in Holliston. PharmaCann's operations in Massachusetts have maintained full compliance with state and local regulatory directives.

Financial Plan

PharmaCann believes ample access to capital and prudent financial management are necessary to provide an uninterrupted supply of marijuana in safe and compliant facilities. While PharmaCann fully intends to build and maintain a financially and operationally sound grow/process facility in Massachusetts that will thrive on its own, PharmaCann is also able to rely on its substantial cash flow generating operations, its significant cash balance ($22.4 million as of 12/31/18) and the ample sources of additional capital it maintains.

Funding from Internal Operations: In addition to its balance sheet assets, PharmaCann will utilize funds generated internally from its rapidly expanding operations as a source of capital. PharmaCann expects revenues generated from its existing operations to contribute positively to its overall cash position.

Fundraising History: The success of PharmaCann to date can be attributed not only to its strategy and operational excellence, but also to its ability to quickly raise significant amounts of capital. PharmaCann has already raised $160.5 million in capital through a variety of sources, as set forth below. All of the sources of capital available to PharmaCann are currently available, and will remain available, to PharmaCann in order to fund any construction and/or operating expenses in Massachusetts.

	$ MM's
Priced equity round I (9/2014)	$20.4
Priced equity round II (5/2015)	$5.0

Priced equity round III (7/2015)	$15.3
Convertible note I (9/2016)	$23.8
Sale / leaseback transaction (12/2016)	$30.0
Convertible note II (11/2017)	$20.0
Priced equity round IV (as of 12/13/2017)	$15.5
Priced equity round V (as of 6/2018)	$30.5
Total capital /cash raised as of 12/31/2018	**$160.5**

Quality Control and Testing Procedures

In accordance with 935 CMR 500.140(9), Pharmacannis Massachusetts, Inc. ("Pharmacannis") will not sell or market any marijuana product (including marijuana) that has not been tested by an Independent Testing Laboratory first, except as allowed under 935 CMR 500.000. Testing of 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 2016 by the DPH in compliance with 500.160(1). In accordance with 935 CMR 500.160(2), PharmaCannis will have a written policy responding to laboratory results that indicate contamination levels are above the acceptable limits established by DPH protocols identified in 935 CMR 500.160(1). The written policy will require that notification be provided to DPH and the notification communication will be in compliance with the requirements set forth under 935 CMR 500.160(2).

Company will process the leaves and flowers of the female marijuana plant only, which will be: (a) well cured and generally free of seeds and stems; (b) free of dirt, sand, debris, and other foreign matter; (c) free of contamination by mold, rot, other fungus, and bacterial diseases; (d) prepared and handled on food-grade stainless steel tables; and (e) packaged in a secure area, as required by 935 CMR 500.105(3)(a).

Company's cultivation facility will have sufficient space for the placement of equipment and storage of materials as necessary for the maintenance of sanitary operations, as required by 935 CMR 500.105(3)(b)(4). The buildings, fixtures, and other physical facilities will be maintained in a sanitary condition and floors, walls, and ceilings will be constructed in a manner that allows them to be adequately kept clean and maintained in good repair as required by required by 935 CMR 500.105(3)(b)(8) and 935 CMR 500.105(3)(b)(6). Company will provide employees with adequate and readily accessible toilet facilities that will be maintained in a sanitary condition and good repair as required by 935 CMR 500.105(3)(b)(13). All contact surfaces in the dispensary, including utensils and equipment, will be maintained in a clean and sanitary condition in compliance with 935 CMR 500.105(3)(b)(9).

Company's water supply will be sufficient for the dispesnary's operations and any private water source (if applicable) will be capable of providing a safe, potable, and adequate supply of water to meet Company's needs, as required by 935 CMR 500.105(3)(b)(11). In accordance with 935 CMR 500.105(3)(b)(12), the plumbing system for the dispensary will be of adequate size, design and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the dispensary. Plumbing will properly convey sewage and liquid disposable waste from the dispensary. There will be no cross-connections between the potable and waste water lines.

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Quality Control and Testing Procedures

As required under as required under 935 CMR 500.105(3)(b)(5), litter and waste will be properly removed, disposed of to minimize the development of odor and minimize the potential for the waste attracting and harboring.Company will process marijuana in a safe a sanitary manner. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12). In compliance with 35 CMR 500.105(3)(b)(10) and 935 CMR 500.105(3)(b)(14), toxic items will be identified, held and stored in a manner that protects against contamination of marijuana and all products that can support the rapid growth of undesirable microorganisms are held in a manner that prevents the growth of such microorganisms. Company will store and transport finished products under conditions that will protect them against physical, chemical and microbial contamination, deterioration as required under 935 CMR 500.105(3)(b)(15).

The hand washing facilities within the dispensary will be adequate and convenient with running water at suitable temperatures and will conform to the requirements as required by 935 CMR 500.105(3)(b)(3). In addition, Pharmacannis will provide effective hand cleaning and sanitizing preparations, sanitary towel service or suitable drying devices to ensure employees maintain good sanitary practices. Agents working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including personal cleanliness and thorough hand-washing before starting work and at any other time when hands may have become soiled or contaminated as required by 935 500.105(3)(b)(2). Company will prepared, stored and handled all edible products in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standard for Food Establishment as required by 935 CMR 500.105(3)(c). In accordance with 935 CMR 500.105(3)(b)(1), Pharmacannis agents whose job responsibilities/duties includes contact with marijuana or nonedible marijuana products are subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements.

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Personnel Policies

General

In accordance with 935 CMR 500.101(1)(c) and 935 CMR 500.101(2)(e), Pharmacannis Massachusetts, Inc. ("Pharmacannis" or "Company") has developed personnel policies to serve as the foundation for the Human Resources team and managers to oversee all employee related matters. Pharmacannis values its employees and believes that each one contributes directly to the Company's success. Pharmacannis promotes a culture where management and employees value the integrity of the company and the industry while also being wholly compliant with state cannabis regulations and applicable federal, state and local laws.

Pharmacannis is an open door, equal opportunity employer and will make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable laws. All individuals hired by Pharmacannis must be authorized to work in the US, which is verified by e-Verify. All employment at Pharmacannis is at will and employees are paid bi-weekly on Fridays. All non-exempt employees are required to use a timekeeping system to record hours worked. Pharmacannis complies with the salary basis requirements of the Fair Labor Standard Act (FLSA) and does not make improper deductions from the salaries of exempt employees. Company strives to create and maintain a work environment in which people are treated with dignity, decency and respect. Company will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, Pharmacannis will seek to prevent, correct and discipline behavior that violates this policy. All employees go through a monthly touch base with their manager to discuss, plan and review performance. All employees have access to and are encouraged to read the Pharmacannis Employee Handbook.

Pharmacannis is committed to fulfilling its obligations under the Americans With Disabilities Act and all other applicable state and federal statutes governing the workplace and its employees. It is the policy of Company to hire, train, promote, compensate, and administer all employment practices without regard to medical condition or disability unrelated to the ability to perform a job with or without reasonable accommodation. Discrimination against job applicants or employees because they are disabled is prohibited and will not be tolerated. Every good faith effort will be taken by Company to fulfill the objectives of this policy.

Company's policies include a staffing plan and corresponding staffing records in compliance with 935 CMR 500.105(1)(h). All Pharmacannis employees must acknowledge and adhere to the Company's alcohol, smoke, and drug-free workplace policies.

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Personnel Policies

Training

Pharmacannis employees will register as marijuana establishment agents and will be required to undergo and pass both a federal and state background check prior to beginning work in the cultivation facility as required by 935 CMR 500.030(1). All agents will complete training prior to performing job functions.Training will be tailored to the roles and responsibilities of the job function of each agent, and at a minimum will include a Responsible Vendor Program in compliance with 935 CMR 500.105(2)(b). At a minimum, Pharmacannis staff will receive eight hours of on-going training annually.

In accordance with 935 CMR 500.105(2)(b), all current owners, managers and employees of Pharmacannis that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, will have attended and successfully completed a responsible vendor program to be designated a “responsible vendor.” Once a licensee is designated a “responsible vendor,” all new employees involved in the handling and sale of marijuana for adult use must successfully complete a responsible vendor program within 90 days of hire. This program will then be completed annually and those not selling or handling marijuana may voluntarily participate. Records of responsible vendor training program compliance will be maintained for four years and made available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Personnel Records

Pursuant to 935 CMR 500.105(9)(d), the Chief Human Resources Officer will maintain and make available to the Commission upon request the following personnel records job descriptions for each employee and volunteer positions, as well as organizational charts consistent with the job descriptions and a personnel record for each marijuana establishment agent, which will be maintained for at least 12 months after termination of the individual’s affiliation with Pharmacannis and must include, at a minimum, the following: (a) all materials submitted to the Commission pursuant to 935 CMR 500.030(2); (b) documentation of verification of references; (c) job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision; (d) documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters; (e) documentation of periodic performance evaluations; (e) a record of any disciplinary action taken; and (f) notice of completed responsible vendor and eight-hour related duty training.

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Personnel Policies

In accordance with 935 CMR 500105(9)(d)(3-5), Company will also keep maintain the following personnel records staffing plan that will demonstrate accessible business hours and safe cultivation conditions, personnel policies and procedures; and all background check reports obtained in accordance with 935 CMR 500.030.

Employee Dismissal

The Chief Human Resources Officer will implement a policy pursuant to 935 CMR 500.105(1)(l) for the immediate dismissal of any marijuana establishment agent who has: (i) diverted marijuana, which will be reported to law enforcement officials and the Commission; (ii) engaged in unsafe practices with regard to the operation of the cultivation center, which will be reported to the Commission; or (iii) been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

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Maintaining of Financial Records

Pharmacannis Massachusetts, Inc. ("Pharmacannis" or "Company") financial records will be maintained in accordance with generally accepted accounting principles and these records will be available for inspection by the Commission, upon request. In accordance with 935 CMR 500.105(9)(e), business records 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, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Company, including members of the non-profit corporation (if any).

Company will not utilize software or other methods that could be used to alter or manipulate sales data, as required by 935 CMR 500.140(6)(c). In accordance with 935 CMR 500.140(6)(d), monthly analysis of Company's sales equipment and data software will be conducted to ensure that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Records of performed monthly analysis will be maintained by Pharmacannis and available to the Commission upon request. If Company determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data. Company will: (i) immediately disclose the information to the Commission; (ii) cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and (iii) take such other action directed by the Commission to comply with 935 CMR 500.105.

Financial records shall be kept for a minimum of three years from the date of the filed tax return, in accordance with 830 CMR 62C.25.1(7) and 935 CMR 500.140(6)(e). Pharmacannis will maintain all records following the closure of the Marijuana Establishment for at least two years in a form and location acceptable to the Commission. The records will be maintained at the expense of Pharmacannis.

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Qualification and Intended Training for Agents

General

Pursuant to 935 CMR 500.105(2)(a), Pharmacannis Massachusetts, Inc. ("Pharmacannis" or "Company") will ensure that all agents complete training prior to performing job functions. Training will be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum will include the Responsible Vendor Program as required by 935 CMR 500.105(2)(b). At a minimum, staff will receive eight hours of on-going training annually. Once onboarded as a Pharmacannis employee, all cultivation agents will participate in an employee orientation prior to beginning work with the Company, which will include a summary overview of all the required training modules.

All current owners, managers and employees of Pharmacannis that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure (as applicable) will successfully complete a Responsible Vendor Program, and once designated a "responsible vendor" all new employees involved in the handling and sale of marijuana for adult use will be required to complete a Responsible Vendor Program within 90 days of hire as required by 935 CMR 500.105(2)(a) and 935 CMR 500.105(2)(b)(1-2). In accordance with 935 CMR 500.105(2)(b)(4), this program will then be completed annually and those not selling or handling marijuana may voluntarily participate in the program. Records of responsible vendor training program compliance will be maintained for four (4) years and made available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours as required by 935 CMR 500.105(2)(b)(5).

Certification Training Program Standards

Pursuant to 935 CMR 500.105(2)(b)(6), no owner or employee of a responsible vendor program will have an interest in a Pharmacannis, program providers will submit their programs to the Commission every two years for approval as a responsible vendor program, the program will include at least two hours of instruction time and will be taught in a real-time, interactive classroom setting where the instructor is able to verify the identification of each individual attending the program and certify completion of the program by the individual identified, the program provider will maintain its training records at its principal place of business during the applicable year and for the following three years and make the records available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours, the program will provide written documentation of attendance and successful passage of a test on the knowledge of the required curriculum for each attendee, attendees who can speak and write English must successfully pass a written test with a score of 70% or better, attendees who cannot speak or write English may be offered a verbal test, provided that the same questions are given as are on the written test and the results of the verbal test are documented with a passing score of 70% or better, and program providers will solicit effectiveness evaluations from individuals who have completed their program.

Qualification and Intended Training for Agents

Certification Training Class Core Curriculum

Pursuant to 935 CMR 500.105(2)(b)(7), responsible vendor training will include a discussion concerning marijuana effect on the human body, diversion prevention and prevention of sales to minors, including best practices, compliance with tracking requirements, identifying acceptable forms of identification, key state laws and rules affecting owners, managers, and employees and any other areas of training determined by the Commission to be included in the responsible vendor training program. Training records will be maintained in the cultivation agent's employee personnel file and will be retrained for at least one year after the agent's termination.

Registration of Marijuana Establishment Agents

Pursuant to 935 CMR 500.030(1), Pharmacannis will apply for registration for all of its board members, directors, employees, executives, managers, and volunteers who are associated with the Company. The Commission will issue a registration card to each individual determined to be suitable for registration. All individuals must: (a) be 21 years of age or older; (b) not be convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and (c) be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

PharmaCannis Massachusetts, Inc.
Management and Operations Profile
Operating Policies and Procedure

Record Keeping Procedures

In accordance with 935 CMR 500.105(9)(a) records of Pharmacannis Massachusetts, Inc. ("Pharmacannis" or "Company") will be available for inspection by the Cannabis Control Commission ("Commission"), upon request. The records will be maintained in accordance with generally accepted accounting principles. Written records required and subject to inspection include, but are not limited to, any section of 935 CMR 500.00 and the following: (a) operating procedures as required by 935 CMR 500.105(1); (b) inventory records as required by 935 CMR 500.105(8); (c) seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e); and (d) personnel records as required by 935 CMR 500.105(9)(d), which is discussed in greater detail below.

Company will maintain personnel records for each employee for at least 12 months after the termination of the individual's affiliation with the Company pursuant to 935 CMR 500.105(9)(d). At a minimum, personnel records will include the following: (a) job descriptions for each employee and volunteer positions; (b) organizational charts consistent with job descriptions; (c) staffing plans; (d) notice of completion for 8-hour responsible vendor training; (e) materials submitted to the Commission as required by 935 CMR 500.030(2); (f) documentation of required training; (g) documentation of periodic performance evaluations and records of disciplinary actions; (h) background checks as required by 935 CMR 500.030; and (i) personnel policies and procedures.

PharmaCannis will maintain business records as required under 935 CMR 500.105(9)(e). Business records will include manual or computerized records of (a) assets and liabilities; (b) monetary operations; (c) books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, vouchers; (d) Sales records including the quantity, form, and cost of marijuana products; (e) salary paid to each employee; (f) stipend paid to each board member; and (g) any executive compensation, bonus, benefit, or item of value paid to any individual affiliated affiliated or including members of the nonprofit corporation (if any) with the Marijuana Establishment.

Waste records will be maintained pursuant to 935 CMR 500.105(9)(f) and as required under 935 CMR 500.105(12)(d). Pharmacannis will ensure that at least two (2) Marijuana Agents are present to witness and document how waste was disposed of or otherwise handled (recycled, composted, etc.) in accordance with 935 CMR 500.105(12)(d). Pharmacannis will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names and signatures of the two Marijuana Establishment Agents present during the disposal or other handling when marijuana products or waste is disposed or handled.

Pharmacannis will keep the records for at least three (3) years and the three year period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

In the event of a closure, Pharmacannis will maintain all records following the closure of the Marijuana Establishment for at least two years in a form and location acceptable to the Commission. The records will be maintained at the expense of Pharmacannis.

Restricting Access to Age 21 or Older

In accordance with 935 CMR 500.140(3), Pharmacannis Massachusetts, Inc. ("Pharmacannis" or "Company") a co-located adult use and medical use location will ensure that a PharmaCannis Agent immediately inspects an individual's proof of identification upon entry into the premise of PharmaCannis to determine if the individual seeking access to the facility is 21 years of age or older. A Pharmacannis agent will receive and examine from the individual one of the following authorized government issued ID cards: (a) Massachusetts issued driver's license; (b) Massachusetts issued ID card; (c) Out-of-state driver's license or Photo ID card; (d) Passport; or (e) U.S. Military ID. To verify the age of the individual the Agent will use an Age Verification Smart ID Scanner that will be supplied by Pharmacannis. If for any reason the identity of the customer or the validity of the ID is in question, the individual will not be granted access to the facility. Company will positively identify all individuals seeking access to the facility to limit access solely to individuals 21 years or age or older.

Pharmacannis will train all cultivation agents and Security Agents on the verification and identification of individuals. All Agents will enroll in and compete the Responsible Vendor Training Program when it is available. This curriculum will include: Diversion prevention and prevention of sales to minors; and Acceptable forms of identification, including how to check identification, spotting false identification, provisions for confiscating fraudulent identifications, and common mistakes made in verification.

Pharmacannis will have limited access areas identified with clear signage designating the access point for authorized personnel only, pursuant to 935 CMR 500.110(4). Pharmacannis employees will be required to wear their identification badges at all times while at the facility or engaged in transportation.

While at the facility or transporting marijuana for the facility all PharmaCannis Agents must carry their valid Agent Registration Card issued by the Commission. All Company Agents are verified to be 21 years of age or older prior to being issued a Marijuana Establishment Agent card. All outside vendors, contractors and visitors shall be required to wear visitor badges prior to entering limited access areas and shall be displayed at all times. Visitors shall be logged in and out and be escorted while at the Company facility. The visitor log will be available for inspection by the Commission at all times. All visitor badges will be returned to Company upon exit.

The following individuals shall be granted immediate access to the facility: Representatives of the Commission in the course of responsibilities authorized by Chapter 334 of the Acts of 2016, as amended by Chapter 55 of the Acts of 2017 or 935 CMR 500.000; representatives of other

state agencies in the Commonwealth; emergency responders in the course of responding to an emergency; and law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

All Limited Access areas will be clearly described by the filing of a diagram of the registered premises, as determined by the Commission, reflecting, where applicable, entrances and exits, walls, partitions, vegetation, flowering, processing, production, storage, disposal and retail sales areas. Access to Limited Access areas will be restricted to employees, agents or volunteers specifically permitted by Company, agents of the Commission, state and local law enforcement and emergency personnel. All Company employees will visibly display an employee identification badge issued by Company at all times while Company's Marijuana Establishments or transporting marijuana.

PharmaCannis Massachusetts Inc.

Energy Efficiency and Conservation

PharmaCannis Massachusetts Inc. ("PharmaCann") designs its facilities locations to achieve full compliance with local energy codes and identifies opportunities for potential energy use reduction such as natural lighting and energy efficiency measures. PharmaCann utilizes LEED-based design principles whenever possible and considers renewable and energy efficient options for new facilities.

PharmaCann will monitor energy consumption and currently tracks energy and water usage at its cultivation facility from the data gathered by monthly utility invoices. PharmaCann's newest dispensing facility at 939 Boston Turnpike in Shrewsbury meets the standards of the 2015 IECC International Energy Conservation Code. Additionally, the dispensary was designed according to the guidelines recommended for LEED retail design and commercial design. Features to conserve energy and reduce energy use include indoor water use reduction, the use of enhanced energy efficiency with all appliances, energy efficient LED lighting fixtures, and thoughtful environmental quality control to reduce odors and provide comfort to our staff and community. PharmaCann will continue to evaluate potential energy use reduction opportunities and strategies to reduce electric demand, such as lighting schedules, active load management, and energy storage) at its dispensing and cultivation facilities in the Commonwealth. PharmaCann also will seek to utilize renewable energy sources and participate in energy efficiency programs when possible.

PharmaCannis Massachusetts Inc.
Holliston Manufacturing Facility

Diversity Plan

STATEMENT OF PURPOSE

PharmaCannis Massachusetts Inc. d/b/a Verilife ("PharmaCann") is committed to creating a diverse and equitable workforce as a licensed cannabis operator in the State of Massachusetts. Pursuant to 935 C.M.R. § 500.101(1)(c)8.k. and 935 C.M.R. § 501.101(1)(c)8.k., and in accordance with the guidance made available by the Massachusetts Cannabis Control Commission (the "Commission"), the purpose of this Diversity Plan is to promote equity among people of color, including Black, African-American, Hispanic, Latinx, and Indigenous people; women; veterans; persons with disabilities; and LGBTQ+ individuals (collectively, "Diverse Populations") in PharmaCann's licensed cannabis operations. Established at its inception, PharmaCann's core organizational mission is to improve people's lives through cannabis. As part of that mission, PharmaCann emphasizes diversity, equity, and inclusion throughout its employment regime and business contracting.

This emphasis is a means of fostering and maintaining a company culture of anti-discrimination, which provides a space where every person feels welcomed and possesses an equal opportunity to succeed, regardless of their race, sex, or sexual orientation. PharmaCann is dedicated to ensuring Diverse Populations are properly equipped to prosper in their desired work setting within the broader cannabis industry and shares the intent of the Massachusetts legislature and the Commission in legalizing and regulating cannabis with the inclusion of Diverse Populations in mind. This Diversity Plan's goals were intentionally designed toward supporting the participation of Diverse Populations in the Massachusetts cannabis industry, and this aim is achieved through the strategic execution of PharmaCann's diversity initiatives, the incremental progress of which will be measured throughout the annual licensure period, as outlined in greater detail below.

GOALS, STRATEGIES, AND MEASUREMENTS

Goal #1: Implement and Enhance Organizational Inclusivity Practices to Maintain a Diverse Massachusetts-Based Workforce.

Proposed Initiative/Strategy:

PharmaCann will seek out individuals from various backgrounds for employment within its Massachusetts-based workforce and ensure they are equipped for long-term success. Specifically,

PharmaCann sets achievable percentage goals for Diverse Populations with the aim of increasing the volume of individuals from these demographics working within the organization. PharmaCann's impact will be measured in the incremental progress of its diversity profile with the goal of increasing diversity by the following metrics (to the extent such employment opportunities become available through its operations):

- 45% Women
- 25% Persons of Color
- *2% Veterans
- *2% LGBTQ+
- *2% Persons with Disabilities

**With regards to LGBTQ+, veterans, and disabled individuals, PharmaCann does not currently mandate that prospective and current employees disclose this information. Instead, PharmaCann fosters an environment that welcomes individuals of all backgrounds, genders, races, sexual orientation, abilities, religion, and the like. To increase visibility and tracking, PharmaCann employs an education and awareness campaign for employees focused on state disclosure requirements, protections for all individuals, and the use of any voluntary reporting with respect to LGBTQ+, veteran status, and disabled status. By launching this education campaign amongst employees, PharmaCann hopes to be able to accurately track and report these demographics in future goal updates.*

This initiative was designed to increase Diverse Populations' participation in the Massachusetts cannabis industry through access to the gainful and dignified employment opportunities PharmaCann provides. By leveraging its Human Resources Department, PharmaCann is capable of measuring its hiring and retention practices and activities in a manner that actively includes individuals from Diverse Populations, particularly within the communities in which it operates and their surrounding vicinities.

PharmaCann's goal of creating an inclusive and respectful work environment also necessitates the provision of equitable benefits as part of being employed within the organization. Namely, this includes providing a comprehensive employee benefit package that avails to employee success, a job training program that emphasizes the importance of anti-discrimination and combating implicit biases in the workplace, and a goal-oriented task progress tracking mechanism that enables additional compensation and internal promotion of diverse individuals based on the merits of their labor.

PharmaCann is proud to offer comprehensive benefits to all of its full-time employees, including employer-paid health, vision, and dental benefits; retirement savings with a company matching

contribution; paid time off and holidays; product discounts; and performance-based merit wage/salary increases and bonuses, where applicable. As a part of these encompassing benefits offerings, PharmaCann also provides its full-time, Massachusetts-based employees with the following benefits, which were designed to be inclusive of Diverse Populations:

- Family and Medical Leave Act coverage for up to 12 weeks;
- Parental leave coverage for a birth, adoption, or placement of a child or children for up to 8 weeks;
- Reasonable accommodation medical leave coverage;
- Military leave coverage;
- Jury duty and witness leave coverage;
- Voting leave coverage to vote;
- Domestic violence and sexual assault leave coverage;
- Parental school involvement leave coverage for those with children in grades K-12; and
- Bereavement leave for an absence upon the death of an immediate family member.

With respect to tracking full-time employee performance for merit-based compensation benefits and potential promotion opportunities, PharmaCann leverages the periodic evaluations of employees' Most Important Tasks ("MITs"), which track a particular employee's performance and success in their role. The MITs evaluation process is a performance management tool conducted quarterly where the overall company goals cascade down from the company's senior leadership throughout the supervisory structure to each individual full-time employee. Employees then set relevant personal goals and MITs to support achieving these company objectives four times per year, and an employee's evaluations are conducted with their supervisor during an annual performance review.

This process enables PharmaCann to determine a viable pathway toward career progression and promotion based on an employee's accomplishments of their MITs with the goal of investing in internal human capital for managerial and executive opportunities. PharmaCann also offers short-term incentive plan and long-term incentive plan bonus payments to eligible employees relating to employee supervisory level and company performance. When these attainable goals are met, these employees can expect to receive additional pay on top of their regular wages/salaries.

In addition to the volume of benefits described above, PharmaCann will further provide comprehensive workforce training during onboarding and subsequently, as necessary to ensure its employees are properly equipped for employment in the cannabis industry. This comprehensive training was strategically developed in coordination with PharmaCann's Training & Development Department to provide prospective and current employees with cultural diversity and sensitivity trainings. As part of these onboarding training modules, PharmaCann requires training through Seed Talent, a third-party online platform that provides courses discussing protecting patient privacy under HIPAA, sexual harassment and bystander intervention, diversity and inclusion in the workplace, among a variety of other important topics.

PharmaCann's intent is to ensure all personnel understand the importance of anti-discrimination and the organization's zero-tolerance policy on discriminating against individuals based on a person's race, sex, sexual orientation, or other legally protected classification. PharmaCann requires 100% of its employee base to complete this training as a condition of employment. Additional educational resources will further include teaching modules on regulatory changes, updates to standard operating procedures, and working with the state-of-the-art equipment and business practices required in the regulated cannabis industry.

Measurements and Evaluation:

PharmaCann will evaluate the progress of its organizational diversity profile by recording the number of individuals who identify as belonging to a Diverse Population in Massachusetts as well as applicable corporate personnel who provide oversight and support to the organization's Massachusetts-based operations. To that end, PharmaCann will use a voluntary employee demographic survey to track and report certain demographic metrics of its employees. PharmaCann's Human Resources Department will record the data self-reported by employees on the survey, the results of which will be anonymized prior to reporting the information in a similar form to the table made available in the Commission's guidance. Specifically, PharmaCann will determine the following information and report it to the Commission upon an annual license renewal, to the extent feasible: demographic identifiers of its employees (*i.e.*, race, sex, sexual orientation, veteran status, disability status), the number of employees for each demographic, and their job title or position within the broader organizational structure.

PharmaCann will further measure the progress of its benefits offerings and employment trainings through an internal recording mechanism that tracks and reports the number of employees who enroll in certain benefits and complete all required training modules. To that end, PharmaCann's Human Resources Department is responsible for and will record the metrics of all Massachusetts-based employees' enrollment in the organization's benefits programs. Additionally, PharmaCann's Training & Development Department will further track and archive each employee's completion of all required trainings.

Goal #2: Enhance Opportunities and Engagement for Diverse Business Enterprises to Participate in the Massachusetts Cannabis Industry.

Proposed Initiative/Strategy:

PharmaCann supports Massachusetts's diversity goals through strategic partnerships with organizations and entities who seek an active role in strengthening Commission-identified areas disproportionately impacted by decades of uneven and disproportionate drug enforcement, particularly with respect to Diverse Populations. This includes partnering with diverse cannabis wholesalers as well as non-cannabis vendors, service providers, construction contractors, ancillary service providers, and other entities organized with the purpose of supporting the cannabis industry. These partnerships provide equity in Massachusetts's cannabis industry through the inclusion of diverse operators who operate a disadvantaged business enterprise ("DBE(s)"), including businesses owned and operated by people of color (MBEs), women (WBEs), veterans (VBEs), people with disabilities (DOBEs), and LGBTQ+ individuals (LGBTBEs).

Wholesalers, vendors, contractors, and ancillary service providers are an integral part of any compliant and efficient cannabis operation. As such, PharmaCann will be intentional in its engagement with and selection of qualified wholesalers, vendors, contractors, and providers to ensure a meaningful array of Diverse Populations and DBEs are able to substantially participate in the Massachusetts cannabis industry. In furtherance of this purpose, PharmaCann will proactively seek out business relationships with DBEs to the benefit of Diverse Populations who are either employed with or are provided a benefit from the goods or services furnished by the DBE. This will ensure that PharmaCann can measure the impact of its partnerships with DBEs throughout its cannabis supply chain in a manner that ensures Diverse Populations are not only included in the fruits of the cannabis industry's success but are financially successful in their own right. PharmaCann has a goal over the next 3 years to engage and contract with at least 10 of the aforementioned enterprises throughout the licensure period (to the extent commercially feasible). PharmaCann recognizes that this goal will require a scaled approach and will work cross-functionally across various sectors of the organization and broader industry to develop strategies, connections, and agreements (as such opportunities become available within its commercially reasonable control).

Measurements and Evaluation:

PharmaCann will quantify its engagement with Massachusetts-based DBEs to measure how many of its ancillary services and participants in its supply chain are owned or managed by DBEs and will determine which function they fulfill within PharmaCann's business practice and supply chain. PharmaCann's commercial teams are committed to ensuring diversity within their own internal structure but also toward the aims of Massachusetts's goal of increasing diverse participation across the cannabis industry's supply chain. Namely, this will be accomplished

through strategic business partnerships with cannabis wholesalers to enable a wider array of product selection, including those produced and branded by DBEs. Accordingly, these teams will seek out engagements with DBEs in Massachusetts through pop-up events and other community engagement activities and record any pertinent information obtained from this engagement, as needed for purposes of reporting its progress to the Commission at its annual license renewal.

REGULATORY ACKNOWLEDGMENTS

As required by the Commission, PharmaCann acknowledges and understands its obligations to the following:

1) PharmaCann is aware and will adhere to the requirements set forth in 935 C.M.R. § 500.105(4) and 935 C.M.R. § 501.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every cannabis Establishment and cannabis Treatment Center, respectively.

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