



Massachusetts Cannabis Control Commission

Independent Testing Laboratory

General Information:

License Number: IL281355
Original Issued Date: 07/16/2021
Issued Date: 07/16/2021
Expiration Date: 07/16/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Smithers AMS LLC

Phone Number: 508-295-2550 Email Address: esteele@smithers.com

Business Address 1: 790 Main Street

Business Address 2:

Business City: Wareham

Business State: MA

Business Zip Code: 02571

Mailing Address 1: 790 Main Street

Mailing Address 2:

Mailing City: Wareham

Mailing State: MA

Mailing Zip Code: 02571

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 56 Percentage Of Control: 25

Role: Owner / Partner

Other Role: Owner of 55% Indirect Interest in Licensee; Member of Board of Managers of Licensee

First Name: J

Last Name: Hochschwender

Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: Percentage Of Control: 25

Role: Board Member Other Role: Member of Board of Managers of Licensee

First Name: Susan Last Name: Shepherd Suffix:

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: Percentage Of Control:

Role: Executive / Officer Other Role: Vice President of Environmental Risk Sciences for Parent Company

First Name: Ronald Last Name: Biever Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: Percentage Of Control:

Role: Executive / Officer Other Role: Director, Analytical & Microbiology Services for Parent Company

First Name: Eric Last Name: Steele Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 5

Percentage Of Ownership: Percentage Of Control: 25

Role: Board Member Other Role: Member of Board of Managers of Licensee

First Name: Michael Last Name: Menefee Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 6

Percentage Of Ownership: Percentage Of Control: 25

Role: Board Member Other Role: Member of Board of Managers of Licensee

First Name: Michael Last Name: Hollabaugh Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 7

Percentage Of Ownership: Percentage Of Control:

Role: Executive / Officer Other Role: Group President, Life Sciences

Date generated: 02/01/2022

First Name: Nathaniel Last Name: Leonard Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Decline to Answer
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 8

Percentage Of Ownership: Percentage Of Control:
Role: Other (specify) Other Role: Trustee of Indirect Owner Trusts
First Name: Stephen Last Name: Kresnye Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Decline to Answer
Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: Percentage of Ownership: 100
Entity Legal Name: The Smithers Group, Inc. Entity DBA: DBA
City: City:
Entity Description: The Smithers Group, Inc. provides a portfolio of contract research services through six divisions, serving the life science, transportation, consumer, packaging, materials, components and energy industries. Smithers has been in operation since 1925, headquartered in Akron, OH.
Foreign Subsidiary Narrative:
Entity Phone: 330-762-7441 Entity Email: tmenefee@smithers.com Entity Website: www.smithers.com
Entity Address 1: 121 South Main Street Entity Address 2: STE 300
Entity City: Akron Entity State: OH Entity Zip Code: 44308
Entity Mailing Address 1: 121 South Main Street Entity Mailing Address 2: STE 300
Entity Mailing City: Akron Entity Mailing State: OH Entity Mailing Zip Code:
44308
Relationship Description: Smithers AMS LLC (Licensee) is a wholly owned subsidiary of The Smithers Group, Inc. (Parent Company).

Entity with Direct or Indirect Authority 2

Percentage of Control: Percentage of Ownership: 33
Entity Legal Name: J. Michael Hoschschwender Irrevocable Trust dated 1/27/2010 Entity DBA: DBA
City: City:
Entity Description: Trust
Foreign Subsidiary Narrative:
Entity Phone: 216-622-8200 Entity Email: skresnye@calfee.com Entity Website:
Entity Address 1: 1405 East 6th Street Entity Address 2:
Entity City: Cleveland Entity State: OH Entity Zip Code: 44114
Entity Mailing Address 1: 1405 East 6th Street Entity Mailing Address 2:
Entity Mailing City: Cleveland Entity Mailing State: OH Entity Mailing Zip Code:
44114
Relationship Description: J. Michael Hoschschwender Irrevocable Trust dated 1/27/2010 is a trust that holds 33% of the issued and outstanding shares of The Smithers Group, Inc., which is the Parent Company to the Applicant, Smithers AMS LLC. Therefore, the J. Michael Hoschschwender Irrevocable Trust is a 33% indirect and passive owner of the Applicant, Smithers AMS LLC. The Trust has no

position of control. The Trustee, Stephen P. Kresnye, has submitted a Background Check Form and Disclosures.

Entity with Direct or Indirect Authority 3

Percentage of Control:	Percentage of Ownership: 11	
Entity Legal Name: J. Michael Hoschschwender Irrevocable Trust dated 12/23/2019	Entity DBA:	DBA City:
Entity Description: Trust		
Foreign Subsidiary Narrative:		
Entity Phone: 216-622-8200	Entity Email: skresnye@calfee.com	Entity Website:
Entity Address 1: 1405 East 6th Street		Entity Address 2:
Entity City: Cleveland	Entity State: OH	Entity Zip Code: 44114
Entity Mailing Address 1: 1405 East 6th Street		Entity Mailing Address 2:
Entity Mailing City: Cleveland	Entity Mailing State: OH	Entity Mailing Zip Code: 44114

Relationship Description: J. Michael Hoschschwender Irrevocable Trust dated 12/23/2019 is a trust that holds 11% of the issued and outstanding shares of The Smithers Group, Inc., which is the Parent Company to the Applicant, Smithers AMS LLC. Therefore, the J. Michael Hoschschwender Irrevocable Trust is a 11% indirect and passive owner of the Applicant, Smithers AMS LLC. The Trust has no position of control. The Trustee, Stephen P. Kresnye, has submitted a Background Check Form and Disclosures.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: The Smithers Group, Inc.	Entity DBA:
Email: tmeneffee@smithers.com	Phone: 330-762-7441
Address 1: 121 South Main Street	Address 2: STE 300
City: Akron	State: OH
	Zip Code: 44308
Types of Capital: Monetary/Equity	Other Type of Capital: Total Value of Capital Provided: \$1500000
Capital Attestation: Yes	Percentage of Initial Capital: 100

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 790 Main Street	
Establishment Address 2:	
Establishment City: Wareham	Establishment Zip Code: 02571
Approximate square footage of the Establishment: 1625	How many abutters does this property have?: 33
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes	

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Compliance with Zoning.pdf	pdf	6033b8bc15696807a44463fd	02/22/2021
Certification of Host Community Agreement	Host Community Agreement Certification Form.pdf	pdf	6037aaa66ec5ac07fcc0166	02/25/2021
Community Outreach Meeting Documentation	Community Outreach Meeting Attestation Form.pdf	pdf	6038fe6bd7adff35b5a4d07e	02/26/2021
Community Outreach Meeting Documentation	Attachment A.pdf	pdf	6038fe748d09dc35cbc0af8c	02/26/2021
Community Outreach Meeting Documentation	Attachment B.pdf	pdf	6038fe7a01124c35d209fbab	02/26/2021
Community Outreach Meeting Documentation	Attachment C_Part 1_Redacted.pdf	pdf	60390215d7adff35b5a4d089	02/26/2021
Community Outreach Meeting Documentation	Attachment C_Part 2_Redacted.pdf	pdf	6039021c93441135c0c309a3	02/26/2021

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	RFI Revised Smithers AMS - Positive Impact Plan.pdf	pdf	6054e0e04967a0078ae9661b	03/19/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer

Other Role:

First Name: Eric

Last Name: Steele Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Board Member

Other Role:

First Name: Susan

Last Name: Shepherd Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Owner / Partner

Other Role: Member of Board of Managers of Applicant

First Name: John

Last Name: Hochschwender Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 4

Role: Executive / Officer Other Role:
First Name: Michael Last Name: Hollabaugh Suffix:
RMD Association: Not associated with an RMD
Background Question: yes

Individual Background Information 5

Role: Board Member Other Role:
First Name: Michael Last Name: Menefee Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 6

Role: Executive / Officer Other Role:
First Name: Nathaniel Last Name: Leonard Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 7

Role: Other (specify) Other Role: Trustee of Indirect Owner Trusts
First Name: Stephen Last Name: Kresnye Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 8

Role: Executive / Officer Other Role:
First Name: Ronald Last Name: Biever Suffix:
RMD Association: Not associated with an RMD
Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company Other Role:
Entity Legal Name: The Smithers Group, Inc. Entity DBA:
Entity Description: The Smithers Group, Inc.
Phone: 330-762-7441 Email: tmenefee@smithers.com
Primary Business Address 1: 121 South Main Street Primary Business Address 2: STE 300
Primary Business City: Akron Primary Business State: OH Principal Business Zip Code: 44308
Additional Information:

Entity Background Check Information 2

Role: Other (specify) Other Role: Indirect Owners
Entity Legal Name: J. Michael Hoschschwender Irrevocable Trust Entity DBA:
dated 1/27/2010
Entity Description: Indirect Owner of Applicant
Phone: 216-622-8200 Email: skresnye@calfee.com
Primary Business Address 1: 1405 East 6th Street Primary Business Address 2:

Primary Business City: Cleveland Primary Business State: OH Principal Business Zip Code: 44114

Additional Information: J. Michael Hoschschwender Irrevocable Trust dated 1/27/2010 is a trust that holds 33% of the issued and outstanding shares of The Smithers Group, Inc., which is the Parent Company to the Applicant, Smithers AMS LLC. Therefore, the J. Michael Hoschschwender Irrevocable Trust dated 1/27/2010 is an 33% indirect and passive owner of the Applicant, Smithers AMS LLC. The trust has no position of control. The Trustee, Stephen P. Kresnye, has submitted a Background Check Form and Disclosures.

Entity Background Check Information 3

Role: Other (specify) Other Role: Indirect Owner
Entity Legal Name: J. Michael Hoschschwender Irrevocable Trust Entity DBA:
dated 12/23/2019

Entity Description: Indirect Owner of Applicant

Phone: 216-622-8200 Email: skresnye@calfee.com

Primary Business Address 1: 1405 East 6th Street Primary Business Address 2:

Primary Business City: Cleveland Primary Business State: OH Principal Business Zip Code: 44114

Additional Information: J. Michael Hoschschwender Irrevocable Trust dated 12/23/2019 is a trust that holds 11% of the issued and outstanding shares of The Smithers Group, Inc., which is the Parent Company to the Applicant, Smithers AMS LLC. Therefore, the J. Michael Hoschschwender Irrevocable Trust dated 1/27/2010 is an 11% indirect and passive owner of the Applicant, Smithers AMS LLC. The trust has no position of control. The Trustee, Stephen P. Kresnye, has submitted a Background Check Form and Disclosures.

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Filed MA Qualification - Smithers AMS LLC v 1 (4835-2196-3215).pdf	pdf	5fa461995b823307b79b63f3	11/05/2020
Bylaws	AMS Declaration - Amended and Restated Declaration of LLC - Smithers AMS LLC v 1 (4842-1783-9570) JMH Signed.pdf	pdf	5fc7c264dd0ccd077448dc69	12/02/2020
Department of Revenue - Certificate of Good standing	MA Certificate of Good Standing.pdf	pdf	6034fb3f5aed110812e495e9	02/23/2021
Secretary of Commonwealth - Certificate of Good Standing	DUA Letter.pdf	pdf	60394ce6d7adff35b5a4d2df	02/26/2021
Secretary of Commonwealth - Certificate of Good Standing	MA SOC Certificate of Good Standing.PDF	pdf	6052611e79e02335ddb631d5	03/17/2021
Articles of Organization	Certificate of Legal Existence.PDF	pdf	605a1edd7e61bd07773aaf2e	03/23/2021

No documents uploaded

Massachusetts Business Identification Number: 001466027

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan for Obtaining Liability Insurance.pdf	pdf	6033b9505aed110812e491c8	02/22/2021
Business Plan	Smithers Cannabis Testing Lab_Business Plan.pdf	pdf	60356e1e4bc57307f1ff377d	02/23/2021
Proposed Timeline	Proposed Timeline for Commencement of Operations.pdf	pdf	60356e2ce8348307b312c665	02/23/2021

LABORATORY CERTIFICATION

Certifying Body: A2LA ISO 17025 Accreditation Certificate Number: TBD

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Dispensing procedures	Dispensing Procedures.pdf	pdf	60268f0c10e86b36bb896af3	02/12/2021
Separating recreational from medical operations, if applicable	Separating Recreational from Medical Operations.pdf	pdf	602d74121681d1368fdb609f	02/17/2021
Maintaining of financial records	Maintenance of Financial Records.pdf	pdf	6033b78915696807a44463f5	02/22/2021
Prevention of diversion	Prevention of Diversion.pdf	pdf	6033b7b6b892bc07d32a5711	02/22/2021
Record Keeping procedures	Record Keeping.pdf	pdf	6033b7ce58692907c581a88c	02/22/2021
Restricting Access to age 21 and older	Restricting Access to 21+.pdf	pdf	6033b7de4bc57307f1ff302c	02/22/2021
Storage of marijuana	Storage.pdf	pdf	6033b7eb4ec46c07be83bac9	02/22/2021
Quality control and testing	Quality Control and Testing Procedures.pdf	pdf	60356d9f15696807a4446b4a	02/23/2021
Energy Compliance Plan	Energy Compliance Plan.pdf	pdf	60356e80b892bc07d32a5e51	02/23/2021
Inventory procedures	Inventory.pdf	pdf	60379f295aed110812e49eee	02/25/2021
Personnel policies including background checks	Personnel Polices.pdf	pdf	60379fa8c9a47307e6f70018	02/25/2021
Qualifications and training	Qualifications and Training Plan.pdf	pdf	6037a00db892bc07d32a6436	02/25/2021
Transportation of marijuana	Transportation.pdf	pdf	6037a1fa5aed110812e49ef6	02/25/2021
Security plan	RFI Revised Smithers AMS - Security Plan.pdf	pdf	6054e1c715bf0e07a4ba5c62	03/19/2021
Diversity plan	RFI Revised Smithers AMS - Diversity Plan.pdf	pdf	6058f6b3d90419077cc32f69	03/22/2021

ATTESTATIONS

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

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

Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

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

I Agree

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

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

Policy:	Compliance with Zoning
Effective Date:	1 Mar 2021
Author:	Eric Steele

1. Purpose and Scope

This policy outlines the procedures that Smithers AMS LLC (“Smithers”) will use to ensure that its Independent Testing Laboratory (“Laboratory”) remains compliant with local zoning ordinances and bylaws in the Town of Wareham (“Town”).

2. Policy

Smithers will remain compliant at all times with the local zoning requirements set forth in the Wareham, MA Zoning Bylaw, more specifically, Zoning Bylaw Section 392 governing Marijuana Establishments. Smithers’ proposed Laboratory location at 790 Main Street in Wareham is located in the MR-30 zoning district. Smithers has received a determination from the Town that as a pre-existing non-conforming laboratory use in the MR-30 zoning district, its use as a Laboratory is permitted.

Smithers’ proposed Laboratory is located within five hundred (500) feet of a public school, which requires it to obtain an amendment to the Zoning Bylaw at Town Meeting as authorized by 935 CMR 500.110(3). Smithers request for this zoning relief is supported by the Town’s Planning Board and Board of Selectmen and is on the Warrant for the Town’s next general Town Meeting. For the avoidance of doubt, Smithers will comply with all of the criteria set forth in the Town’s Zoning Bylaw.

Smithers will work cooperatively with various municipal departments, boards, and officials to ensure that its facility remains compliant with all laws, regulations, rules, and codes with respect to design, construction, operation and security. In accordance with 935 CMR 500.101, Smithers has convened a properly noticed Community Outreach Meeting on August 4, 2020 to inform and gather feedback from the community related to its proposed Laboratory. Smithers has also retained counsel to assist with ongoing compliance with local zoning and regulatory compliance.

Host Community Agreement Certification Form

Instructions

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

Certification

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

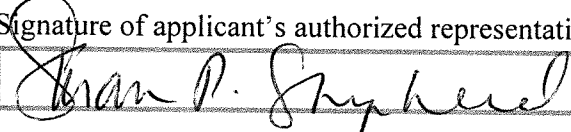
1. Name of applicant:

Smithers AMS LLC

2. Name of applicant's authorized representative:

Susan P. Shepherd

3. Signature of applicant's authorized representative:



4. Name of municipality:

Town of Wareham

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

Derek Sullivan



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



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

dsullivan@wareham.ma.us

8. Host community agreement execution date:

24 Feb 2021

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 25 Feb 2021
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

- a. Date of publication: 11 Feb 2021
- b. Name of publication: Wareham Week

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

- a. Date notice filed: 11 Feb 2021

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

- a. Date notice(s) mailed: 16 Feb 2021

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



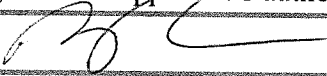
Name of applicant:

Smithers AMS LLC

Name of applicant's authorized representative:

Ronald C. Biever

Signature of applicant's authorized representative:



Opinion

Majestic parcel offers residents value beyond development

To the Editor:

I grew up on Hunter Avenue. I’m opposed to the casino project because I think it will ruin the otherwise pristine, quiet, and safe little corner of East Wareham that so many of us hold dear in our hearts, and because developing this high quality parcel of land would go against Massachusetts’ own plan to combat climate change.

Save for approximately 32 acres used as a sand mine, the parcel is undeveloped, and consists of approximately 243 acres of native Coastal Pine Barrens, a globally rare ecosystem.

The parcel sits on top of the EPA-designated sole-source Plymouth/Carver aquifer, which, according to the EPA, is the principal drinking water source for the entire region.

According to the Massachusetts DEP, the parcel also sits on top of an approved wellhead protection area, meaning the land on which the parcel sits has been determined to provide water to local public

supply wells.

The forest and sand that sit atop the parcel now help recharge the aquifer with drinking water and filter rainwater, helping maintain the quality of water for the region.

The 2018 Massachusetts Integrated State Hazard Mitigation and Climate Adaptation Plan, calls for “strategies that conserve and sustainably employ the natural resources of the Commonwealth to enhance climate adaptation, build resilience and mitigate climate change.”

I call on Wareham to preserve this parcel in perpetuity, to save our forests, save our ecosystems, protect our drinking water, and preserve our quality of life.

Katherine Harrelson

Editor’s note: To read Harrelson’s letter in full, go to www.WarehamWeekToday.com.

For more about the proposed Entertainment, Recreation and Hospitality District that could allow projects like the casino, see the story on Page 2.

In good faith

To the Editor:

The greatest love is shown when a person lays down his life for his friends. So many showed their love after the fire we endured.

In the village that I was raised in — Oakdale — the young people came out and showed their talent and love. They served fish and chips and seafood plates. Raffles were sold, and donations were given.

Everyone showed that they didn’t think about their own affairs, they thought of Tom and myself, Faith.

The many who attended felt the same way and came out to show their love and support.

God bless you all and always remember. When you bless someone in need, your cup of joy will overflow.

Thank you and always know Tom and myself will keep you in our prayers. Please keep your faith, hope, and love in all you do.

To “Oakdale’s Finest” — thank you all again and may God continue to bless you and your family.

Blessings,
Thomas Goodine
Faith Goodine

Food pantry is open to all in need

The Damien’s Place Family Food Pantry is open to any and all people who need food, regardless of where they live.

Executive Director Jackie Arsenault said that all people need to do to receive food is bring a piece of mail with their address on it the first time they come.

People are allowed to come to the pantry every two weeks.

The line moves quickly, and the pantry is now using beepers so people can wait in their car until it is their turn to come get food.

“Please don’t go hungry!” said Arsenault. “Many folks are needing help during these trying times and there is no shame in taking a little help - that is what we are here for, so come and see us and we will get you loaded up with good, nutritious food for you and your family!”

The pantry is located at 3065 Cranberry Highway in the building behind the Sherwin Williams Paint Store.

The pantry is open from 9 to 11:30 a.m. on Thursdays and Saturdays.

For more information, go to www.damiens-place.org.

Classifieds

To place a classified, please visit www.WarehamWeekToday.com

EMPLOYMENT

Year round farm stand Looking for happy, motivated team workers. Register, stocking, all around help. Apply in person. Mazzilli's 3134 Cranberry Hwy East Wareham 02538

REAL ESTATE FOR RENT

Office Space for Holistic Practitioners We are looking to rent your own or shared office space who would complement the successful modalities already located with the Wellness Center. Location, location, location. The Mattapoissett Wellness is located at 76 County Rd. (Route 6) Mattapoissett. Easy access off 195. Space pricing starts at \$525. Incentives available. 774-377-9692 jc@mattapoissettwellness.com

SERVICES

DUMP RUNS HOUSE, GARAGE AND CELLAR CLEANOUTS. BRUSH CUT AND HAULED AWAY. RESIDENTIAL TRASH PICK-UP AVAILABLE. CALL G.C. 508-295-5079

HANDYMAN AND MORE! Network of associates specializing in home improvements, cleanouts, dump runs, demolition, tree-removal, plumbing, and more. Insured. 24 hour answering service 508-676-3545

TOPNOTCH CLEANING Happy New Year! Let's

make way for 2021! Home • Office • Airbnb Cleaning & Errands Fully Insured Family Owned Call 508 863 2074 Email: topnotcherrandsandcleaning@gmail.com

AFFORDABLE HAULING - 508-776-9628 ATTENTION ALL CONTRACTORS/HOMEOWNERS! SINGLE ITEM TO COMPLETE HOME CLEAN-OUTS. 15/20 CUBIC YARD DUMPSTER TRAILERS AVAILABLE. FAST, FRIENDLY, FULL OR SELF-SERVE SAME-DAY SERVICE! SENIOR DISCOUNTS. PLEASE CALL MR. WASHINGTON 508 776 9638

Dave's Home Repair Carpentry & Home Repairs, Doors and Windows Installed, Roof Repairs, Gutter Cleaning, Yard Clean-ups, Interior/Exterior Painting, Pressure Washing. 508-295-5320, or 774-454-4437 Repairmandave@aol.com

Painting - Interior and Exterior 30 yrs local experience. References available. Call Ben Joyce for a free estimate 508-563-6563

2 EXPERIENCED CARPENTERS WILLING TO WORK WITH YOU. TELL US ABOUT YOUR PROJECT! GIVE US A CALL AT 508-397-5106 or JOHN AT 508-209-4263

LEGAL ADVERTISEMENTS

COMMUNITY OUTREACH MEETING

Notice is hereby given that a Community

Outreach Meeting, being held in conformity with the regulations of the Massachusetts Cannabis Control Commission, for a proposed Marijuana Independent Testing Laboratory is scheduled for February 25, 2021 at 6:30 PM. The proposed Independent Testing Laboratory is anticipated to be located at 790 Main Street Wareham, MA 02571. The meeting will occur remotely by:

Zoom:
<https://us02web.zoom.us/j/82047646492>
Meeting ID: 820 4764 6492
Mobile:
929-205-6099
Passcode: 82047646492#

There will be an opportunity for the public to ask questions.

**TOWN OF WAREHAM
BOARD OF SELECTMEN
54 Marion Road
Wareham, Massachusetts 02571
(508) 291-3100**

NOTICE OF PUBLIC HEARING

Notice is hereby given that DJP Corp. d/b/a The Jug Shop, Dipenkumar Patel, Manager, 221 Main Street, Wareham, MA has applied to the Board of Selectmen for Change of Location from

221 Main Street, Wareham to 2991 Cranberry Hwy, E. Wareham, of an existing Annual Retail Package Goods Store All Alcoholic Beverages License, under the provisions of Chapter 138 of the Massachusetts General Laws.

This building is one floor, 3,563 square feet with three total rooms, one entrance and two exits.

It is ordered: That a public hearing be held on said application within the Selectmen's Meeting on March 2, 2021 at approximately 7:15 p.m. via Zoom:

Join Zoom Meeting
<https://us02web.zoom.us/j/85712410789?pwd=bWV1Y241N1A1bTNDaW1UU1hiNOitUT09>
Meeting ID: 857 1241 0789
Passcode: 815383
One tap mobile
Dial by your location
+1 929 205 6099 US (New York)
1 312 626 6799 US (Chicago)

WAREHAM BOARD OF SELECTMEN
Peter W. Teitelbaum, Esq., Chairman
Judith Whiteside, Clerk
Alan H. Slavin
Patrick G. Tropeano
James M. Munise

WAREHAM TOWN CLERK
2021 FEB 11 PM 4:14

NOTICE OF COMMUNITY OUTREACH HEARING

Notice is hereby given that a Community Outreach Meeting, being held in conformity with the regulations of the Massachusetts Cannabis Control Commission, for a proposed Marijuana Independent Testing Laboratory is scheduled for February 25, 2021 at 6:30 PM. The proposed Independent Testing Laboratory is anticipated to be located at 790 Main Street Wareham, MA 02571. The meeting will occur remotely by:

Zoom:

<https://us02web.zoom.us/j/82047646492>

Meeting ID: 820 4764 6492

Mobile:

929-205-6099

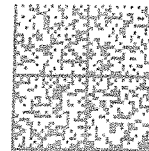
Passcode: 82047646492#

There will be an opportunity for the public to ask questions.

LEY
AG

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600

Attachment C - Part 1



U.S. POSTAGE >> PITNEY BOWES

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82-1012

10 Park Plaza Rm 3170
Boston, MA 02116

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1. Article Addressed to:
82-1012
Comm. Of Mass.
Exec. Office of Trans. & Const.
Multi-Model Rail Unit
10 Park Plaza Rm 3170
Boston, MA 02116



9590 9402 3961 8060 7943 11

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4746

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A. Signature

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☐ Agent

☐ Addressee

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C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
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3. Service Type

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- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
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- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

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Total Postage and Fees

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City, State, ZIP+4®

10 Park Plaza Rm 3170
Boston, MA 02116

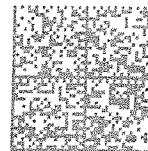
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155 Seaport Boulevard
Boston, MA 02210-2600



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ZIP 02210 \$ 006.96⁰
02 4W
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82-1005

Wareham, MA 02571

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

82-1005

Wareham, MA 02571



9590 9402 3961 8060 7943 28

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4739

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

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Total Postage and Fees

\$

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82-1005

Street and Apt. No., c

City, State, Zip+4®

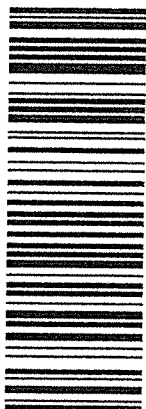
Wareham, MA 02571

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PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

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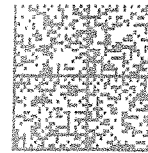


7017 2620 0000 0738 4739
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ZIP 02210 \$ 006.96⁰
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82-1002

Wareham, MA 02571

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

82-1002

Wareham, MA 02571



9590 9402 3961 8060 7934 20

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4722

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A. Signature

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☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
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3. Service Type

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- ☐ Certified Mail®
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- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
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- ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

82-1002

Street and Apt. No., c

City, State, ZIP+4®

Wareham, MA 02571

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OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

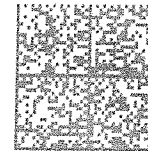
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81-1022/B

780 Mail St.
Wareham, MA 02571

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1022/B

780 Mail St.
Wareham, MA 02571



9590 9402 3961 8060 7934 37

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4715

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

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|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |

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- | | |
|--|----|
| Extra Services & Fees (check box, add fee as appropriate) | \$ |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$ |
| <input type="checkbox"/> Return Receipt (electronic) | \$ |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$ |
| <input type="checkbox"/> Adult Signature Required | \$ |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$ |

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\$ 81-1022/B

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780 Mail St.
Wareham, MA 02571

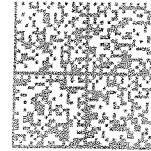
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81-1023

10 Park Plaza Rm 3170
Boston, MA 02116

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1. Article Addressed to:

81-1023

10 Park Plaza Rm 3170
Boston, MA 02116



9590 9402 3961 8060 7934 44

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4708

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

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- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

\$

81-1023

Total Postage and Fees

\$

Sent To

Street and

10 Park Plaza Rm 3170
City, State, ZIP+4®
Boston, MA 02116

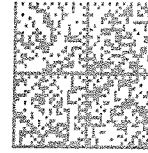
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Boston, MA 02210-2600



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ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

88-1013

795 Main Street
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

88-1013

795 Main Street
Wareham, MA 02571



9590 9402 3961 8060 7934 51

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4692

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from Item 1?** ☐ Yes
- If YES, enter delivery address below: ☐ No

3. Service Type

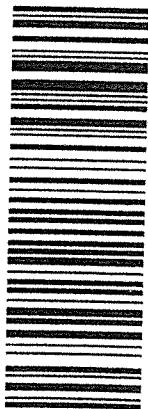
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
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- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

88-1013

Sent To

Street and Apt. No., or P.O. Box

795 Main Street

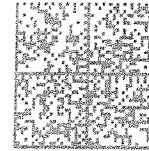
City, State, ZIP+4®

Wareham, MA 02571

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JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1006/D2

2696 Cran Hwy
Wareham, MA 02571

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1006/D2

2696 Cran Hwy
Wareham, MA 02571



9590 9402 3961 8060 7934 68

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4685

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
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Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$
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- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

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Total Postage and Fees

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81-1006/D2

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City, State, ZIP+4®

2696 Cran Hwy
Wareham, MA 02571

PS Form 3800, April 2015 PSN 7530-02-000-9053

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CERTIFIED MAIL®

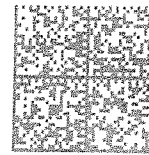


7017 2620 0000 0738 4685
7017 2620 0000 0738 4685

Postmark
Here

LEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1016

4 Fearing Hill Rd
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1016

4 Fearing Hill Rd
Wareham, MA 02571



9590 9402 3961 8060 7934 75

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4678

stricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☐ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

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Domestic Return Receipt

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

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

81-1016

Sent To

Street and Apt. No., c

City, State, ZIP+4®

4 Fearing Hill Rd
Wareham, MA 02571

PS Form 3800, April 2015 PSN 7530-02-000-0047

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS FOLD AT DOTTED LINE
CERTIFIED MAIL



7017 2620 0000 0738 4678
7017 2620 0000 0738 4678

LEY
JAG LLP
Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> FITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

86-1021
[REDACTED]
802 Mail St
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

86-1021
[REDACTED]
802 Mail St
Wareham, MA 02571



9590 9402 3961 8060 7934 82

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4661

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☐ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

stricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

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

For delivery information, visit our website at www.usps.com™.

OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

86-1021

Street and Apt. No.,

802 Mail St

City, State, ZIP+4®

Wareham, MA 02571

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

See Reverse for Instructions

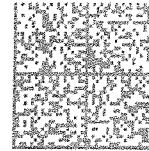
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL®



7017 2620 0000 0738 4661
7017 2620 0000 0738 4661

OLEY
DAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

88-1011/A

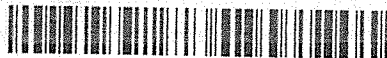
801 Mail St
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

88-1011/A
801 Mail St
Wareham, MA 02571



9590 9402 3961 8060 7934 99

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4654

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

☐ Restricted Delivery

Domestic Return Receipt

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

For delivery information, visit our website at www.usps.com.

OFFICIAL USE

Certified Mail Fee

\$

- Extra Services & Fees (check box, add fee as appropriate)
- ☐ Return Receipt (hardcopy) \$
 - ☐ Return Receipt (electronic) \$
 - ☐ Certified Mail Restricted Delivery \$
 - ☐ Adult Signature Required \$
 - ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

88-1011/A

Street and Apt. No., or

801 Mail St

City, State, ZIP+4®

Wareham, MA 02571

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

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

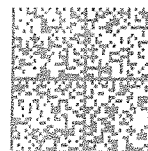
CERTIFIED MAIL®



7017 2620 0000 0738 4654
7017 2620 0000 0738 4654

LEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >>> PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1019

22 Fearing Hill Rd
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1019

22 Fearing Hill Rd
Wareham, MA 02571



9590 9402 3961 8060 7935 05

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4647

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL®



7017 2620 0000 0738 4647
7017 2620 0000 0738 4647

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

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

\$

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

- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

Street and Apt. No., or PO

City, State, ZIP+4®

City, State, ZIP+4®

City, State, ZIP+4®

City, State, ZIP+4®

City, State, ZIP+4®

City, State, ZIP+4®

City, State, ZIP+4®

81-1019

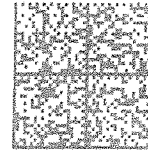
22 Fearing Hill Rd
Wareham, MA 02571

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

See Reverse for Instructions

ILEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE & PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1010

12 Fearing Hill Rd Off
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY												
<ul style="list-style-type: none">■ Complete items 1, 2, and 3.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.	<p>A. Signature X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>												
1. Article Addressed to: 81-1010 12 Fearing Hill Rd Off Wareham, MA 02571 9590 9402 3961 8060 7935 12	<p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>												
2. Article Number (Transfer from service label) 7017 2620 0000 0738 4630	<p>3. Service Type</p> <table border="0"><tr><td><input type="checkbox"/> Adult Signature</td><td><input type="checkbox"/> Priority Mail Express®</td></tr><tr><td><input type="checkbox"/> Adult Signature Restricted Delivery</td><td><input type="checkbox"/> Registered Mail™</td></tr><tr><td><input type="checkbox"/> Certified Mail®</td><td><input type="checkbox"/> Registered Mail Restricted Delivery</td></tr><tr><td><input type="checkbox"/> Certified Mail Restricted Delivery</td><td><input type="checkbox"/> Return Receipt for Merchandise</td></tr><tr><td><input type="checkbox"/> Collect on Delivery</td><td><input type="checkbox"/> Signature Confirmation™</td></tr><tr><td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td><td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td></tr></table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®												
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™												
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery												
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise												
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™												
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery												

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL®

7017 2620 0000 0738 4630
7017 2620 0000 0738 4630

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

For delivery information, visit our website at www.usps.com

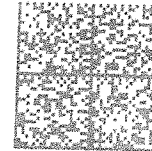
OFFICIAL USE

Certified Mail Fee \$	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and Fees \$	
Sent To 81-1010	
Street and Apt. No., or PO Box 12 Fearing Hill Rd Off	
City, State, ZIP+4® Wareham, MA 02571	

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

LEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES
ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

86-1019

3630 Peachtree Rd NE Ste 1500
Atlanta, GA 30326

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

86-1019

3630 Peachtree Rd NE Ste 1500
Atlanta, GA 30326



9590 9402 3961 8060 7935 29

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4623

Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

**U.S. Postal Service™
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Domestic Mail Only**

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee

\$

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

- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

86-1019

Sent To

Street and Apt.

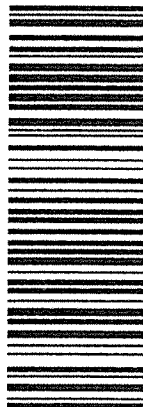
City, State, ZIP+4

3630 Peachtree Rd NE Ste 1500
Atlanta, GA 30326

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

See Reverse for Instructions

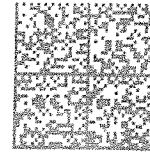
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.
CERTIFIED MAIL®



7017 2620 0000 0738 4623
7017 2620 0000 0738 4623

LEY
AG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

87-1001

10 Park Plaza Rm 3170
Boston, MA 02116

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
87-1001

10 Park Plaza Rm 3170
Boston, MA 02116



9590 9402 3961 8060 7935 36

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4616

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☐ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

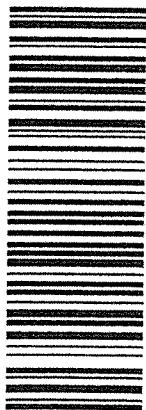
☐ Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS TO ADDITIONAL FEE

CERTIFIED MAIL®



7017 2620 0000 0738 4616
7017 2620 0000 0738 4616

**U.S. Postal Service™
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Domestic Mail Only**

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OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and

\$

Sent To

Street and Apt. No. 10 Park Plaza Rm 3170

City, State, ZIP+4® Boston, MA 02116

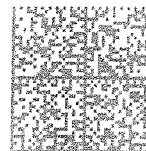
PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

Postmark
Here

LEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES



ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1007

20 Fearing Hill Rd
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1007

20 Fearing Hill Rd
Wareham, MA 02571



9590 9402 3961 8060 7935 43

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4609

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

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

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

\$

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

- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

81-1007

Street and Apt. No.,

20 Fearing Hill Rd

City, State, ZIP+4®

Wareham, MA 02571

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

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL®



7017 2620 0000 0738 4609
7017 2620 0000 0738 4609

LEY
DAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600

Attachment C - Part 2



U.S. POSTAGE >> PITNEY BOWES



ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

86-4

7 Fearing Hill Rd
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

86-4

7 Fearing Hill Rd
Wareham, MA 02571



9590 9402 3961 8060 7935 50

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4593

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

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

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

\$

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

- ☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

86-4

Sent To

Street and Apt. No.

City, State, ZIP+4®

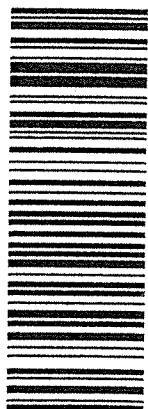
7 Fearing Hill Rd
Wareham, MA 02571

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

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

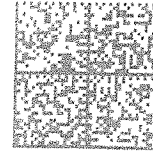
CERTIFIED MAIL



7017 2620 0000 0738 4593
7017 2620 0000 0738 4593

LEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

82-1001

Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

82-1001

Wareham, MA 02571



9590 9402 3961 8060 7935 67

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4586

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☐ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Restricted Delivery

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

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

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To 82-1001

Street and Apt. No.

City, State, ZIP+4

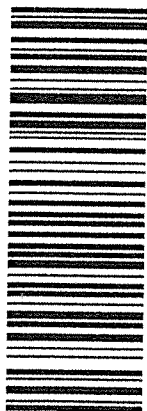
Wareham, MA 02571

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

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®

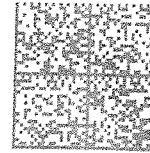


7017 2620 0000 0738 4586
7017 2620 0000 0738 4586

Postmark
Here

LEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

82-1000/A

PO Box 721
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

82-1000/A

PO Box 721
Wareham, MA 02571



9590 9402 3961 8060 7935 74

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4579

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



7017 2620 0000 0738 4579
7017 2620 0000 0738 4579

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

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

- \$ _____
- Extra Services & Fees (check box, add fee as appropriate)**
- ☐ Return Receipt (hardcopy) \$ _____
 - ☐ Return Receipt (electronic) \$ _____
 - ☐ Certified Mail Restricted Delivery \$ _____
 - ☐ Adult Signature Required \$ _____
 - ☐ Adult Signature Restricted Delivery \$ _____

Postage

\$ _____
Total Postage and Fees

\$ _____ **82-1000/A**

Sent To

Street and Apt. No.

City, State, ZIP+4®

PO Box 721
Wareham, MA 02571

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

See Reverse for Instructions

Postmark
Here

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DAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >>> PITNEY BOWES



ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

82-1004

Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

82-1004

Wareham, MA 02571

2. Article Number

(Transfer from service label)

7017 2620 0000 0738 4562

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL®



7017 2620 0000 0738 4562
7017 2620 0000 0738 4562

**U.S. Postal Service™
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For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

82-1004

Street and Apt. No.

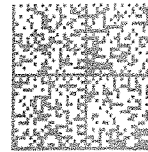
City, State, ZIP+4®

Wareham, MA 02571

Postmark
Here

ILEY
DAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> FITNEY BOWES



ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

82-1003

Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

82-1003

Wareham, MA 02571

2. Article Number

(Transfer from service label)

7017 2620 0000 0738 4555

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

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CERTIFIED MAIL® RECEIPT**
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

82-1003

Street and Apt. No.,

City, State, ZIP+4®

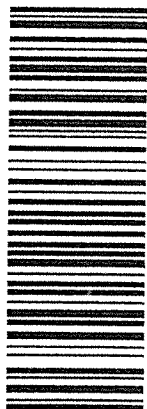
Wareham, MA 02571

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

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS FOLD IN DOTTED LINE

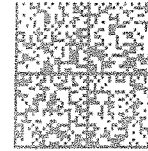
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7017 2620 0000 0738 4555
7017 2620 0000 0738 4555

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DAG LLP

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Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

87-1000/E2

247 Station Dr, Se 210
Westwood, MA 02090

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

87-1000/E2

247 Station Dr, Se 210
Westwood, MA 02090

2. Article Number

(Transfer from service label)

7017 2620 0000 0738 4548

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

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OFFICIAL USE

Certified Mail Fee

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$ 87-1000/E2

Total Postage and Fees

\$

Sent To

Street and Apt.

City, State, ZIP+4

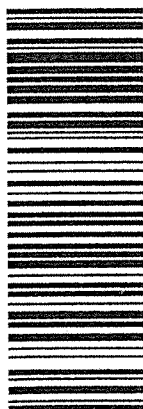
247 Station Dr, Se 210
Westwood, MA 02090

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

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

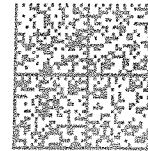
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7017 2620 0000 0738 4548
7017 2620 0000 0738 4548

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U.S. POSTAGE PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1005/B1

19 Station Street
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1005/B1

19 Station Street
Wareham, MA 02571

2. Article Number

(Transfer from service label)

7017 2620 0000 0738 4531

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail ☐ Express Mail

☐ Registered ☐ Return Receipt for Merchandise

☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL®



7017 2620 0000 0738 4531
7017 2620 0000 0738 4531

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OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

81-1005/B1

Sent To

Street and Apt.

City, State, ZIP+4

19 Station Street

Wareham, MA 02571

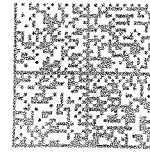
PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

Postmark
Here

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155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1017

907 Main Street
W. Wareham, MA 02576

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1017

907 Main Street
W. Wareham, MA 02576

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
(Transfer from service label)

7017 2620 0000 0738 4524

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL®



7017 2620 0000 0738 4524
7017 2620 0000 0738 4524

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Domestic Mail Only

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OFFICIAL USE

Certified Mail Fee

\$

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

- ☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

81-1017

Street and Apt. No.

907 Main Street

City, State, ZIP+4®

W. Wareham, MA 02576

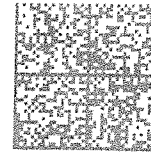
Postmark
Here

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

See Reverse for Instructions

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Boston, MA 02210-2600



U.S. POSTAGE PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

88-1014/A

799 Main St
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

88-1014/A

799 Main St
Wareham, MA 02571

2. Article Number

(Transfer from service label)

7017 2620 0000 0738 4517

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail ☐ Express Mail

☐ Registered ☐ Return Receipt for Merchandise

☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

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Domestic Mail Only**

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OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

88-1014/A

Sent To

Street and Apt. No.

City, State, ZIP+4®

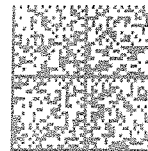
799 Main St

Wareham, MA 02571

Postmark
Here

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Boston, MA 02210-2600



U.S. POSTAGE >>> PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1015

8 Fearing Hill Rd
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1015

8 Fearing Hill Rd
Wareham, MA 02571

2. Article Number
(Transfer from service label)

7017 2620 0000 0738 4500

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

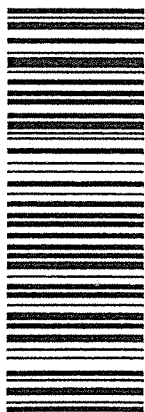
3. Service Type

☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



7017 2620 0000 0738 4500
7017 2620 0000 0738 4500

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OFFICIAL USE

Certified Mail Fee

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

☐ Return Receipt (hardcopy) \$ _____
☐ Return Receipt (electronic) \$ _____
☐ Certified Mail Restricted Delivery \$ _____
☐ Adult Signature Required \$ _____
☐ Adult Signature Restricted Delivery \$ _____

Postage

Total Postage and Fees

81-1015

Sent To

Street and Apt. No.

City, State, ZIP+4®

8 Fearing Hill Rd
Wareham, MA 02571

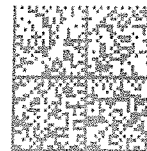
Postmark
Here

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See Reverse for Instructions

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AG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES



ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1014

10 Fearing Hill Rd
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1014

10 Fearing Hill Rd
Wareham, MA 02571

2. Article Number

(Transfer from service label)

7017 2620 0000 0738 4494

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

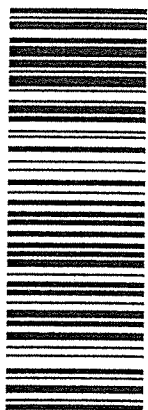
☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

CERTIFIED MAIL®



7017 2620 0000 0738 4494
7017 2620 0000 0738 4494

**U.S. Postal Service™
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OFFICIAL USE

Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

81-1014

Sent To

Street and Apt.

10 Fearing Hill Rd

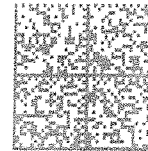
Wareham, MA 02571

City, State, ZIP+4®

Postmark
Here

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DAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

86-1020

802 Mail St
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

86-1020

802 Mail St
Wareham, MA 02571

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7017 2620 0000 0738 4487

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy)

\$

☐ Return Receipt (electronic)

\$

☐ Certified Mail Restricted Delivery

\$

☐ Adult Signature Required

\$

☐ Adult Signature Restricted Delivery

\$

Postage

\$

Total Postage and Fees

\$

Sent To

86-1020

Street and Apt. #

802 Mail St

City, State, ZIP+4

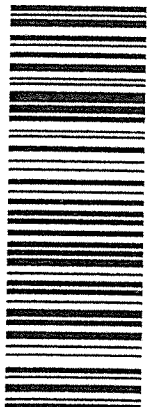
Wareham, MA 02571

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

See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

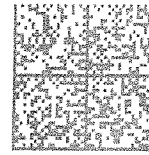
CERTIFIED MAIL



7017 2620 0000 0738 4487
7017 2620 0000 0738 4487

LEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE >> PITNEY BOWES



ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

87-1000/F

PO Box 721
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

87-1000/F

PO Box 721
Wareham, MA 02571

2. Article Number
(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

7017 2620 0000 0738 4470

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
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7017 2620 0000 0738 4470
7017 2620 0000 0738 4470

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Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$ 87-1000/F

Sent To

Street and Apt.

City, State, ZIP+4®

PO Box 721
Wareham, MA 02571

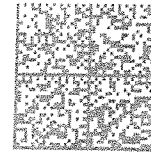
Postmark
Here

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

See Reverse for Instructions

LEY
JAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE PITNEY BOWES



ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1008

18 Fearing Hill Rd
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1008

18 Fearing Hill Rd
Wareham, MA 02571



9590 9402 3961 8060 8525 61

2. Article Number (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

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Certified Mail Fee

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

<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage

Total Postage and Fees

81-1008

Sent To

Street and Apt. No.

City, State, ZIP+4®

18 Fearing Hill Rd
Wareham, MA 02571

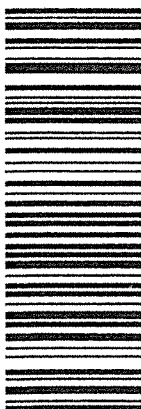
PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

7017 2620 0000 0738 4463

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

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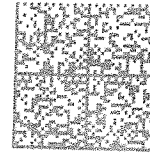
7017 2620 0000 0738 4463

7017 2620 0000 0738 4463

Postmark
Here

ILEY
DAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



U.S. POSTAGE PITNEY BOWES

ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1011

16 Fearing Hill Rd
Wareham, MA 02571

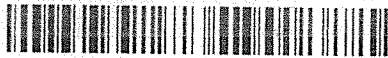
SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1011

16 Fearing Hill Rd
Wareham, MA 02571



9590 9402 3961 8060 8525 78

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4456

Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

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Certified Mail Fee

\$

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

- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

81-1011

Sent To

Street and Apt.

City, State, ZIP+4

16 Fearing Hill Rd
Wareham, MA 02571

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

See Reverse for Instructions

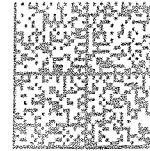
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
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7017 2620 0000 0738 4456
7017 2620 0000 0738 4456

LEY
AG LP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



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ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1006/E

PO Box 3

Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1006/E

PO Box 3

Wareham, MA 02571



9590 9402 3961 8060 8525 85

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4449

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

3. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

☐ Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

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

- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

81-1006/E

Street and Apt. No.,

PO Box 3

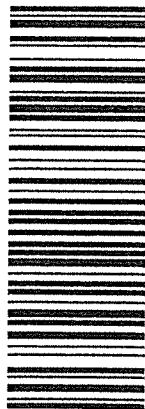
City, State, ZIP+4®

Wareham, MA 02571

Postmark
Here

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

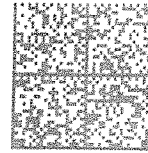
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7017 2620 0000 0738 4449

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DAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



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ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1006/D1

30 Fearing Hill Rd
Wareham, MA 02571

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

81-1006/D1

30 Fearing Hill Rd
Wareham, MA 02571



9590 9402 3961 8060 8525 92

2. Article Number (Transfer from service label)

7017 2620 0000 0738 4432

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1?** ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.

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7017 2620 0000 0738 4432

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

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☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

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Total Postage and Fees

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Sent To

Street and Apt. No.,

City, State, ZIP+4®

81-1006/D1

30 Fearing Hill Rd
Wareham, MA 02571

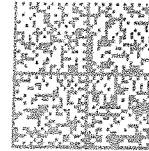
Postmark
Here

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

See Reverse for Instructions

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OAG LLP

Seaport West
155 Seaport Boulevard
Boston, MA 02210-2600



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ZIP 02210 \$ 006.96⁰
02 4W
0000355564 FEB 16 2021

81-1006/C

PO Box 48
Wareham, MA 02571

USPS TRACKING #



9590 9402 3961 8060 8526 08

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Jesse H. Alderman, Esquire
Foley Hoag LLP
155 Seaport Blvd
Boston, MA 02210

First-Class Mail
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USPS
Permit No. G-10

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS FOLD AT DOTTED LINE

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7017 2620 0000 0738 4425

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Certified Mail Fee

\$

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

☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

Street and Apt. No.

City, State, ZIP+4®

81-1006/C

PO Box 48

Wareham, MA 02571

Postmark
Here

Policy:	Plan to Positively Impact Areas of Disproportionate Impact
Effective Date:	1 Mar 2021
Author:	Eric Steele

Introduction

The Cannabis Control Commission (“Commission”) has identified certain communities in Massachusetts as areas of disproportionate impact. The Commission has identified the Town of Wareham (the “Town” or “Wareham”), the location of Smithers AMS LLC’s (“Smithers”) Independent Testing Laboratory (the “Laboratory”), as such a disproportionately impacted community. Smithers has developed tangible plans to uplift this community and, in particular, to hire employees from within this the disproportionately impacted community of Wareham, and to support and encourage Wareham youth interested in the study of Science, Technology, Engineering and Math (“STEM”) fields.

Positive Impact Goals

As a Laboratory staffed by professionals with advanced degrees in Math and Science disciplines, Smithers is perfectly suited to uplift Wareham by contributing to the education and intellectual curiosity of Wareham’s youth. In pursuit of that objective, Smithers employees will:

- Regularly participate in STEM programming in the Town.
- Support continuing education by establishing a scholarship program for Wareham students wishing to pursue the study of STEM subjects in college.

Not only does Smithers believe that these efforts will contribute to the collective knowledge and curiosity of Wareham’s youth, but it also hopes that these efforts will inspire Wareham youth to pursue a career in a STEM field or, perhaps, even laboratory sciences. Although the specific STEM curriculum will be developed jointly with our community partner organization, which is identified below, Smithers expects that the curriculum will include modules such as: 1) an introduction to the key elements of chemistry; 2) demonstrations of laboratory technology; and 3) fundamental mathematics for laboratory techniques.

Positive Impact Programs

Smithers expects to make a major contribution to youth education in the Town of Wareham. In furtherance of that ambition, Smithers will employ a twofold approach to uplifting Wareham and supporting the education of Wareham’s youth.

First, Smithers employees will regularly contribute both time and financial resources to STEM programming. As well-educated laboratory professionals, Smithers employees have a wealth of knowledge to diffuse to intellectually curious students in Wareham. Smithers will partner with the Wareham Public Schools’ 21st Century Community Learning Centers, known as the CARE program. Attached is evidence of the CARE program’s willingness to work with and accept donations from Smithers. The CARE program is operated out of several locations including Wareham Middle School, Decas Elementary, Minot Forest Elementary and Wareham High School. It consists of two, sixteen-week

Policy:	Plan to Positively Impact Areas of Disproportionate Impact
Effective Date:	1 Mar 2021
Author:	Eric Steele

after school sessions and a five-week summer program. Examples of classes include: Robotics, Marine Science, Environmental Art, Wood Shop, Hands in the Dirt, Stepping, SCRATCH, Fit Math, Origami and Drama.

The Wareham CARE program provides the perfect vehicle for Smithers' thoughtful and engaging professionals to teach Wareham students and to support and encourage their interest in STEM-related fields. In collaboration with CARE educators, Smithers employees will collectively volunteer for no less than 20 hours per year in support of or leading CARE programming on STEM topics. Smithers will also make annual donations to the CARE program for it to use in support of the STEM programming. Within its first year of operations in Wareham, Smithers will donate \$1,000 to the CARE program. Each year thereafter, Smithers will donate at least \$1,000 to the CARE program. For the avoidance of doubt, at no time will Smithers employees teach or engage any youth on the subject of marijuana or the specific business of the Laboratory. All programming organized by Smithers or attended by Smithers employees will be appropriately tailored to the age and maturity levels of the students in the particular program/class.

Second, Smithers will also establish a scholarship program for graduates of Wareham High School who are pursuing STEM-related degrees in college. Each year, Smithers will provide a \$1,000 scholarship to a deserving senior who will be pursuing either an Associate's or Bachelor's Degree in a STEM-related field at an institution of higher education. Smithers will develop an application for the annual scholarship, which will include an essay portion. In the essay portion, applicants will be asked to specifically describe their interest in one or more STEM-related fields and their future educational and professional aspirations. Smithers will also create an Application Review Board ("Board") comprised of the Vice President, Director, Human Resources, and the Director, Analytical & Microbiology Services, which Board will be tasked with reviewing all applications received and selecting a scholarship recipient. In many respects, this scholarship program will be the capstone of Smithers' Wareham STEM initiative.

Smithers is committed to hiring residents of Wareham whenever possible. Most of the positions within the Laboratory will require a bachelor's degree in either chemistry or biology and will likely require us to recruit both locally and outside of Wareham, however we will also need to fill non-degreed positions, where we should be able to identify Wareham residents (i.e., driver, clerical, etc.).

Positive Impact Measurement

Smithers will track its positive impact and youth education efforts. With respect to its contributions to CARE's STEM programming, Smithers will diligently record all employee volunteer hours and work closely with CARE to determine the number of Wareham students impacted over the course of the year. Smithers employees will, collectively, volunteer for at least 20 hours per year. Smithers will also track any equipment or other donations to CARE for use in STEM programming. These metrics will be recorded in a dedicated journal under the custody of the Director, Human Resources and will be made available to the Commission upon request.

Policy:	Plan to Positively Impact Areas of Disproportionate Impact
Effective Date:	1 Mar 2021
Author:	Eric Steele

With respect to the STEM scholarship program, Smithers will maintain all application materials and will provide them to the Commission upon request. Each year, Smithers will provide a \$1,000 scholarship to a deserving senior graduating from Wareham High School who will be pursuing either an Associate's or Bachelor's Degree in a STEM-related field at an institution of higher education. At least every three years, the Board, or a third-party contractor hired by the Board, will audit all application materials and responses in order to ensure that the process for awarding of the annual STEM scholarship has not be influenced by any biases. The Board, or its third party contractor, will then compile an audit report and present it to the Smithers executive management team for review.

Positive Impact Plan Acknowledgments

Smithers pledges to adhere to the requirements set forth in 935 CMR 500.105(4)(a) which provides the permitted advertising, branding, marketing and sponsorship practices for all Marijuana Establishments. Smithers likewise pledges not to employ any of the prohibited practices articulated in 935 CMR 500.105(4)(b). Finally, none of the actions taken or programs instituted by Smithers will violate the Commission's regulations with respect to limitations on ownership or control or any other applicable state laws.



Wareham Public Schools

Multi-Service Center
48 Marion Road
Wareham, MA 02571

Kimberly B. Shaver-Hood, Ed.D.
Superintendent of Schools

Phone: 508-291-3500
FAX: 508-291-3578
E-mail:
kshaver-hood@wareham.k12.ma.us

March 15, 2021

Dear Mr. Biever,

Wareham Public Schools 21st Century Community Learning Centers, known as the CARE program, supports additional learning time for students in grades K-12 before and/or after school and during the summer. The program provides creative and engaging academic enrichment opportunities that will help address college and workforce readiness and success. We are pleased to have the opportunity to work with Smithers AMS LLC to help further our mission through donations, volunteers, and support for our organization. We acknowledge and understand that Smithers AMS LLC is a Cannabis Establishment.

Sincerely,

Dr. Kimberly B. Shaver-Hood
Superintendent

F

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Room 1717, Boston, Massachusetts 02108-1512

**Foreign Limited Liability Company
Application for Registration
(General Laws Chapter 156C, Section 48)**

Federal Identification No.: _____

(1a) The exact name of the limited liability company:

Smithers AMS LLC

(1b) If different, the name under which it proposes to do business in the Commonwealth of Massachusetts:

(2) The jurisdiction where the limited liability company was organized:

Delaware

(3) The date of organization in that jurisdiction: August 12, 2020

(4) The general character of the business the limited liability company proposes to do in the Commonwealth:

Testing laboratory

(5) The business address of its principal office:

121 South Main Street, Suite 300, Akron, Ohio 44308

(6) The business address of its principal office in the Commonwealth, if any:

790 Main Street, Wareham, Massachusetts 02571

(7) The name and business address, if different from principal office location, of each manager:

n/a

- (8) The name and business address of each person authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property recorded with a registry of deeds or district office of the land court:

NAME	ADDRESS
J. Michael Hochschwender	121 South Main Street Suite 300 Akron, Ohio 44308

M. Terrell Menefee	121 South Main Street Suite 300 Akron, Ohio 44308
--------------------	---


- (9) The name and street address of the resident agent in the Commonwealth:

C T Corporation System	155 Federal Street, Suite 700, Boston, Massachusetts 02110
------------------------	---

- (10) The latest date of dissolution, if specified: _____

- (11) Additional matters:

Signed by (by at least one authorized signatory):  _____
J. Michael Hochschwender, Authorized Person

I, C T Corporation System, By:  _____ James M. Halpin
Assistant Secretary
resident agent of the above limited liability company, consent to my appointment as resident agent pursuant to G.L. c156C § 48
(or attach resident agent's consent hereto).

* Attach a certificate of existence or good standing issued by an officer or agency properly authorized in home state.

Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY "SMITHERS AMS LLC" IS DULY FORMED UNDER
THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A
LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF
THE TWENTIETH DAY OF OCTOBER, A.D. 2020.*

*AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN
ASSESSED TO DATE.*

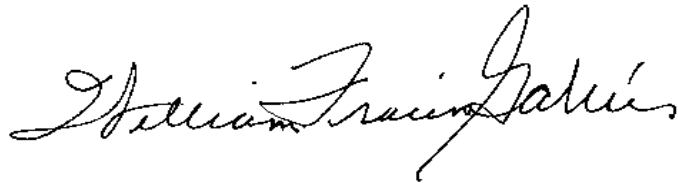



Jeffrey W. Bullock, Secretary of State

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:

October 20, 2020 02:53 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

SMITHERS AMS LLC

AMENDED AND RESTATED DECLARATION OF LIMITED LIABILITY COMPANY

THIS AMENDED AND RESTATED DECLARATION OF LIMITED LIABILITY COMPANY ("Declaration") is made effective as of Nov 30, 2020, by THE SMITHERS GROUP, INC., as the sole member (the "Member") of SMITHERS AMS LLC, a Delaware limited liability company (the "Company"). The Member hereby declares this Declaration (and any amendments hereto) to be the "Limited Liability Company Agreement" of the Company, as that term is used in the Delaware Act (as defined below).

RECITALS

A. The Company has previously been governed by that certain Declaration of Limited Liability Company, dated August 12, 2020 (the "Original Agreement").

B. The Member desires to amend and restate the Original Agreement in its entirety to provide for the affairs and conduct of the Company.

ARTICLE 1

Organization of the Company

Section 1.1 Organization. On August 12, 2020, an authorized person organized the Company by executing and filing a Certificate of Formation with the Secretary of State of Delaware in accordance with and pursuant to the laws of the Delaware Limited Liability Company Act, as amended from time to time (the "Delaware Act").

Section 1.2 Name. The name of the Company is Smithers AMS LLC.

Section 1.3 Principal Place of Business. The principal place of business of the Company shall be located at such address as shall be designated from time to time by the Board.

Section 1.4 Purposes. The purposes of the Company are to engage in any lawful act or activity for which a limited liability company may be formed under the Delaware Act, including making investments in, and loans to, other entities and third parties.

Section 1.5 Statutory Agent. The name and address of the agent for service of process shall be The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801. The Board may, from time to time, change the statutory agent without amending this Declaration.

Section 1.6 Term. The term of the Company commenced on the date of filing of the Certificate of Formation of the Company with the Secretary of State of Delaware and shall continue until terminated by operation of law or pursuant to the provisions hereof.

Section 1.7 No State Law Partnership; Liability to Third Parties. The Company has been established and is intended to operate as an entity separate from its Member, and the Member intends that the Company not be a partnership (including, without limitation, a limited partnership) or joint venture, and that no member be a partner or joint venturer of any other member, for any purposes other than federal and state tax purposes, and that this Declaration not be construed to suggest otherwise. Except as otherwise required by law, no member shall be liable for the debts, obligations or liabilities of the Company, including under a judgment decree or order of a court.

ARTICLE 2

Capital Contributions

The Member has a one hundred percent (100%) interest in the Company. The Member is not required to make any additional capital contributions to the Company.

ARTICLE 3

Profits and Losses; Distributions

Section 3.1 Accounting; Determination of Profits and Losses. The books of the Company shall be kept on such basis as determined by the Board in accordance with applicable law. The terms "Profits" and "Losses" as used in this Declaration shall mean the Company's "book" profits or losses (as the case may be), as determined in accordance with the provisions and principles of Sections 704(b) and 704(c) of the Internal Revenue Code of 1986, as amended (the "Code"), and the Treasury regulations promulgated thereunder (the "Regulations").

Section 3.2 Allocation of Profits and Losses. The Profits and Losses of the Company, and each item of income, gain, deduction or loss included therein, shall be allocated to and borne by the Member.

Section 3.3 Tax Reporting. It is the intention of the Member that the Company be disregarded for federal income tax purposes (so long as the Company has only one member), and accordingly all items of income, gain, loss, expense, deduction, and credit shall, for federal tax purposes, be reported directly by the Member.

Section 3.4 Distributions. Distributions shall be made to the Member at the times and in the aggregate amounts determined by the Board.

ARTICLE 4

Management

Section 4.1 Board of Managers. Except for situations in which the approval or consent of the Member is required by this Declaration or by nonwaivable provisions of the Delaware Act or other applicable law, all of the powers and authority of the Company shall be exercised exclusively by or under the direction of a Board of Managers (the "Board"). Each individual serving on the Board is referred to in this Declaration as a "Manager" and shall be a "manager" of the Company within the meaning of the Delaware Act. The Board shall act as a body and, any

other provision of this Declaration and any provision of the Delaware Act notwithstanding, no individual Manager shall, as a Manager, in the name of or on behalf of the Company, have the authority to or purport to execute or deliver any contract, instrument or document, perform any other act, engage in any transaction, commit or bind the Company to any act, contract, instrument or document, or incur any debt, except with the written approval of the Board or in accordance with policies adopted by the Board, or if such Manager has been appointed as an Officer of the Company, pursuant to such Manager's authority as such Officer. A Manager may resign at any time from the Board. Any or all of the Managers may be removed at any time from the Board, with or without cause, by the Member. The Member may designate additional Managers if desired, but the initial number of Managers shall be set at four (4). The initial Managers shall be:

J. Michael Hochschwender
Susan P. Shepherd
Michael P. Hollabaugh
M. Terrell Menefee

Section 4.2 Meetings of the Board. Any Manager may call a meeting of the Board upon two (2) days' notice in writing to all other Managers (which may be by facsimile), which notice shall specify the date, time and purpose or purposes of the meeting. Meetings of the Board shall be held at the Company's principal place of business, unless the Managers agree to meet at another location. Managers shall have the right to attend any meeting of the Board by means of conference telephone or other method of communication by which each Manager can hear all other Managers in attendance. A majority of all Managers shall constitute a quorum of the Board for the transaction of business at a meeting.

Section 4.3 Waiver of Notice. Notice of any meeting of the Board may be waived by a Manager by a waiver of the notice in writing, signed by the Manager entitled to the notice, whether before, at or after the time stated for the meeting. Attendance of a Manager at any meeting, whether in person or by telephone as provided above, shall constitute waiver of notice of such meeting, except where a Manager attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened and does so at the outset. Any waiver of notice of a meeting by a Manager hereunder shall be equivalent to the giving of such notice.

Section 4.4 Decisions of the Board. Except for any matter with respect to which any provision of this Declaration requires the approval of a greater proportion of the Managers, the vote of a majority of the Managers in attendance at a duly called meeting of the Board at which a quorum is present shall be the act of the Board.

Section 4.5 Actions of the Board Without a Meeting. Any action which is required or permitted to be taken at any meeting of the Board may be taken without a meeting, without prior notice and without a vote, if a consent or consents in writing, setting forth the action so taken, shall be signed by all of the Managers and shall be delivered to the Company at its principal place of business or to an Officer or agent of the Company having custody of the book in which proceedings of meetings of the Board are recorded.

Section 4.6 Officers. The Board shall have the power to appoint and remove individuals, including any Manager, as officers of the Company (each, in such capacity, an "Officer," and collectively, the "Officers") with such titles, if any, as the Board deems appropriate and to delegate to such Officers any of the powers granted to the Board under this Declaration (other than powers arising under this Section 4.6), including the power to execute and deliver documents on behalf of the Company, as the Board may determine. The Officers so appointed may include individuals holding titles such as chief executive officer, president, vice president, chief financial officer, treasurer, secretary, controller or other titles. Unless the authority of the Officer in question is limited in the document appointing such Officer or is otherwise specified by the Board, any Officer so appointed shall have the same authority to act for the Company as the corresponding officer of a Delaware corporation for profit would have to act for such corporation in the absence of a specific delegation of authority by the board of directors thereof. The Board in its sole discretion may by resolution ratify any act previously taken by an Officer acting on behalf of the Company. Each Officer shall hold office at the pleasure of the Board and may be removed at any time from any office or offices held by him or her, with or without cause, by and in the discretion of the Board. The Company may employ, engage and discharge such employees and independent contractors to effectuate its purposes, for such compensation and upon such other terms and conditions, as may be determined from time to time by the Board or any Officer so authorized by the Board, provided that no such employee or independent contractor shall be deemed an Officer unless expressly so designated by the Board. Subject to the foregoing, the officers of the Company shall be as follows:

J. Michael Hochschwender	-	Chairman and Chief Executive Officer
Susan P. Shepherd	-	President
Michael P. Hollabaugh	-	Treasurer
M. Terrell Menefee	-	Secretary

Section 4.7 Actions Requiring the Approval of the Member. Notwithstanding anything to the contrary contained in this Declaration and except as set forth in Article 6 and Article 7 of this Declaration, any action with respect to the following matters shall require approval by the Member:

- (A) the increase or decrease in the number of Managers;
- (B) the amendment of this Declaration; and
- (C) any merger or consolidation of the Company with any other entity.

Section 4.8 Actions of the Member. Decisions and actions of the Member, to be effective, shall be required to be made or approved by a written instrument executed by the Member.

Section 4.9 Tax Matters. If the Company is required to file any tax return, form, statement, or other document separate from the Member, the Member shall prepare and file such return, form, statement, or other document as appropriate under applicable law

ARTICLE 5

Limitation of Liability; Indemnification

Section 5.1 Proof of Failure to Satisfy Standard of Conduct. The Member or any Manager or officer of the Company shall not be deemed to have violated any standard of conduct under this Article 5 unless such violation is proved, by clear and convincing evidence, in an action brought against such person. The termination of any action, suit or proceeding by judgment, order, settlement or upon a plea of *nolo contendere* or its equivalent shall not of itself constitute proof or create a presumption that the appropriate standard of conduct has been violated.

Section 5.2 Liability to the Company. No Member, Manager or officer shall be liable to the Company in damages for any action that such Member, Manager or officer takes or fails to take in such capacity, unless it is proved, by clear and convincing evidence, in a court of competent jurisdiction that such action or failure to act was undertaken with deliberate intent to cause injury to the Company or with reckless disregard for the best interests of the Company.

Section 5.3 Liability to Others. The obligations and liabilities of the Company are solely the obligations and liabilities of the Company, and no Member, Manager or officer of the Company shall be liable therefor solely by reason of being a Member, Manager or an officer of the Company. No failure of the Company to observe any formality or requirement relating to the exercise of its powers or the management of its business or affairs under this Declaration shall be grounds for imposing liability on the Member or any Manager or officer for any liability of the Company to any third party.

Section 5.4 Indemnification. The Company shall indemnify the Member and any Manager or officer to the fullest extent provided by, or permissible under the Delaware Act. The Company is hereby authorized to take any and all further action to effectuate any indemnification of the Member and any Manager or officer which any Delaware limited liability company may have power to take with respect to the indemnification of its members, managers or officers, by any vote of the members, by any agreement, or otherwise. This Section 5.4 shall be interpreted in all respects to expand such power to indemnify to the maximum extent permissible to any Delaware limited liability company with regard to the particular facts of each case, and not in any way to limit any statutory or other power to indemnify, or any right of any individual to indemnification. Expenses, including attorneys' fees, incurred by the Member or any Manager or officer in defending any proceeding shall be paid by the Company, in advance of the final disposition of such proceeding, upon receipt of an undertaking by or on behalf of the Member or any Manager or officer, as applicable, to repay such amount, if it shall ultimately be determined that it is not entitled to be indemnified by the Company as authorized in this Section 5.4. No repeal, amendment or modification of this Section 5.4 shall affect any rights or obligations then existing hereunder with respect to any state of facts then or theretofore existing or any action, suit or proceeding theretofore or thereafter brought or threatened based in whole or in part upon any such

state of facts. This Section 5.4 is intended for the benefit of the Company, the Member and each Manager and officer.

Section 5.5 Indemnification of Other Persons. Employees of the Company shall be indemnified by the Company only if and to the extent approved by the Board or specifically required by applicable law.

Section 5.6 Survival. The provisions of this Article 5 shall survive any termination of this Declaration.

ARTICLE 6

Transfers of Interests

Section 6.1 Right to Transfer. The Member shall be entitled, in its sole and absolute discretion at any time and from time to time, to sell, mortgage, hypothecate, transfer, pledge, assign, donate, create a security interest in or lien on, encumber, give, place in trust (voting or other) or otherwise dispose of all or any portion of its units of limited liability company interests in the Company, including the Member's (A) interest in the Profits, Losses, allocations of other items and distributions from the Company, (B) rights with respect to the management and administration of the Company, (C) access to or rights to demand or require any information or account of the Company or its affairs, and (D) rights to inspect the books and records of the Company (collectively, the "Member's Interest").

Section 6.2 Status of Third Party Transferee. No transferee, including any transferee by operation of law or court order, of all or any portion of the Member's Interest shall, without the prior written consent of the Board, which consent may be withheld by the Board in its sole and absolute discretion, acquire the status of a substituted or additional member of the Company under the Delaware Act or under this Declaration, but shall have solely the status, rights and privileges of an assignee. In the event a substitute or additional member is admitted to the Company in accordance with this Section 6.2, such substitute or additional member shall be responsible for the payment of all fees and expenses associated with the transfer and such substitution or admission as the Board may require.

ARTICLE 7

Termination, Liquidation and Winding Up

Section 7.1 Termination and Winding Up. The Company shall terminate upon the election of the Board in writing to terminate the Company. At such time, the Company shall cease to carry on its business, except insofar as may be necessary for the winding up of its affairs, but its separate existence shall continue until a Certificate of Cancellation has been filed with the Secretary of State of Delaware or until a decree dissolving the Company has been entered by a court of competent jurisdiction. The filing of a Certificate of Cancellation shall not affect the limited liability of the Member.

Section 7.2 Method of Distribution Upon Winding Up. Upon termination of the Company pursuant to Section 7.1 hereof, the assets of the Company and the proceeds of any liquidation shall be applied and distributed in the following manner and order of priority:

(A) to the payment and discharge of all of the Company's liabilities and the expenses of liquidation and dissolution;

(B) to the setting up of any reserves reasonably necessary for any contingent or unforeseen liabilities or obligations of the Company;

(C) to the payment and discharge of any loans and advances made by the Member to the Company; and

(D) to the Member.

Section 7.3 Orderly Liquidation. A reasonable time shall be allowed for the orderly liquidation of the assets of the Company and the discharge of liabilities to creditors so as to enable the Board to minimize the normal losses attendant upon a liquidation.

ARTICLE 8

Miscellaneous

Section 8.1 Governing Law. The Company and this Declaration shall be governed by and construed in accordance with the laws of the State of Delaware and applicable to contracts made and to be wholly performed in Delaware.

Section 8.2 Entire Agreement. This Declaration contains the entire understanding and declaration of the Member with respect to the subject matter hereof.

Section 8.3 Severability. If any provision of this Declaration, or the application thereof to any person or circumstance shall, for any reason and to any extent, be invalid or unenforceable, the remainder of this Declaration and the application of such provision to other persons or circumstances shall not be affected thereby but rather shall be enforced to the fullest extent permitted by law.

Section 8.4 Amendment. This Declaration may be amended only in a writing signed by the Member.

Section 8.5 Successors and Assigns. This Declaration shall be binding upon and inure to the benefit of the Company and the Member.

IN WITNESS WHEREOF, the Member has executed this Amended and Restated Declaration of Limited Liability Company effective as of the date first written above.

SOLE MEMBER:

THE SMITHERS GROUP, INC.

By: 

Name: J. Michael Hochschwender

Title: President and Chief Executive Officer



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

mass.gov/dor

Letter ID: L1001860416
Notice Date: February 22, 2021
Case ID: 0-001-102-706



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



SMITHERS AMS LLC
790 MAIN ST
WAREHAM MA 02571-1037

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 9:00 a.m. to 4:00 p.m..

Visit us online!

Visit mass.gov/dor 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

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

26 February 2021

Dear Commissioners,

This letter is to inform you that at the time of submitting our application for an Independent Testing Laboratory license, Smithers AMS LLC does not have any employees on its staff, and is therefore unable to obtain a Certificate of Good Standing from the Department of Unemployment Assistance.

Sincerely,



Ronald C. Biever
Vice President
Smithers AMS LLC



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

William Francis Galvin
Secretary of the
Commonwealth

March 11, 2021

TO WHOM IT MAY CONCERN:

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

SMITHERS AMS LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **October 20, 2020**.

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation or withdrawal; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 72 for revocation of said Limited Liability Company's authority to transact business in the Commonwealth; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **NONE**

I further certify that the name of persons authorized to act with respect to real property instruments listed in the most recent filings are: **J. MICHAEL HOCHSCHWENDER, M. TERRELL MENEFE**



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

William Francis Galvin

Secretary of the Commonwealth



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

William Francis Galvin
Secretary of the
Commonwealth

Date: March 19, 2021

To Whom It May Concern :

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

SMITHERS AMS LLC

in accordance with the provisions of Massachusetts General Laws, Chapter 156C, on
October 20, 2020.

I further certify that, so far as appears of record, said registration has not been cancelled,
withdrawn, or revoked.



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

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

Secretary of the Commonwealth

Certificate Number: 21030525730

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

Processed by: NMa

Policy:	Plan for Obtaining Liability Insurance
Effective Date:	1 Mar 2021
Author:	Eric Steele

Smithers AMS LLC (“Smithers”) will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

Prior to commencing operations, Smithers will provide proof of having obtained a surety bond or escrow account in an amount equal to its licensure fee payable to the Marijuana Regulation Fund to ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 544 or 935 CMR 500.000 or cessation of operations.

Attached hereto is a Confirmation from Smithers’ insurer acknowledging these requirements.



Jonathan, King

Marsh USA Inc.
200 Public Square
Suite 1000
Cleveland, OH 44114
+1 216 937 1700
www.marsh.com

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

November 17, 2020

Subject: Smithers AMS LLC - Insurance Applications

Dear Board of Commissioners:

Be it known that we represent the captioned Smithers AMS LLC and are processing applications for insurance coverage for General Liability to be in compliance with or exceed 935 CMR (10) Liability Coverage required to Marijuana Establishments. The location of operations will be at 790 Main Street, Wareham, MA, 02571.

935 CMR (10). Liability Coverage required for Marijuana Establishments (10) Liability Insurance Coverage or Maintenance of Escrow.

(a) A Marijuana Establishment shall obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

Please feel free to contact us with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan King', written over a light blue horizontal line.

Jonathan King
Senior Account Executive
Marsh USA Inc

Smithers AMS LLC
Independent Testing Laboratory
Wareham, MA

Business Plan

Executive Summary

Smithers AMS LLC (“Smithers”) will be located in Wareham, MA and co-located with Smithers ERS LLC (“ERS”). ERS has conducted business at its Wareham, MA facility continuously since 1969, servicing the pharmaceutical, agrochemical and industrial chemical industries. Specifically, ERS conducts biological and analytical-based environmental testing services to aid its customers in the development and registration of chemicals. The laboratory testing required to be conducted by the Massachusetts marijuana industry closely aligns with the core analytical offerings of ERS; thus, Smithers plans to open an Independent Testing Laboratory (“ITL”) to service the medical and adult-use marijuana industry in Massachusetts at its Wareham facility, located at 790 Main Street.

Business Description and Services Offered

The Massachusetts Cannabis Control Commission (“CCC”) requires that each batch of medical and adult-use marijuana related product (e.g., flower, edibles, concentrates, tinctures, etc.) be tested by an ITL prior to sale to the public. In accordance with 935 CMR 500.050(7)(b), no Executive or Member of the Smithers ITL will be a person or entity with direct or indirect control of any other Marijuana Establishment, except as otherwise noted in 935 CMR 500.200. The ITL will offer ISO 17025 accredited testing services to the cultivators and producers located in the state of Massachusetts to determine that their products meet the safety requirements as set forth in 935 CMR 500.000 and 935 CMR 501.000 prior to release for public consumption. The testing services to be offered are listed below:

- Potency or cannabinoid profile
- Concentration of residues of pesticides and plant growth regulators
- Microbiological contaminants and mycotoxins
- Heavy metal contaminants
- Concentration of residual solvents
- Terpene profile
- Vitamin E Acetate Screening

These tests will be offered as individual tests, or as compliance packages meeting the specific CCC requirements for each type of product.

Market Overview

Due to the federal status of marijuana as a Schedule I drug substance, marijuana must be tested within the same state that it is grown or produced. Because of this, Smithers’ focus will be on the Massachusetts industry only. The medical and adult use marijuana testing market size in Massachusetts in 2019 was estimated at ~\$26M (Smithers research), being supported by three licensed laboratories. The Massachusetts marijuana market is vertically integrated meaning that cultivators tend to also be producers and dispensers, with ITLs being the exception. The cultivators are required to test flowers and trimmings and producers are required to test marijuana infused products (“MIPs”). As of January 14, 2021, there were 44 licensed cultivators and 38 licensed producers in operation within Massachusetts. Today, Massachusetts has a greater demand than supply of marijuana. Thus, we believe that as the supply increases there will be greater testing demand until a saturation of the market on the demand side. Furthermore, there are an additional 148 cultivators and 102 product manufacturers that

have received provisional or final licensure and are anticipated to be fully operational within the next 6-12 months. This additional supply to the market will further drive the demand for laboratory testing capacity.

Competition

As of January 14, 2021, there were 3 ITLs operational in the state of Massachusetts, 4 ITLs that have been provisionally licensed, 1 ITL holding a final license, and an additional 5 ITLs that have submitted applications to the CCC. None of these 13 potential competitors is located in the southeastern quadrant of the state, requiring cultivators and producers in this region to test their samples at laboratories in other areas of the state. The locality of a testing lab to the cultivator or producer can reduce the overall cost of testing by negating the need to drive samples up to 130 miles to the nearest lab, or the need to hire a third-party delivery service.

Management Structure

The President of ERS is responsible for global operations of the ERS business. The Vice President of North American Operations reports to the President of ERS and is responsible for operations in North America. The proposed Smithers ITL will be led by a Director who will report directly to the VP of North American Operations and will be responsible for the day-to-day management and oversight of the ITL, as well as adherence to all Town and State regulations governing the business.

Organizational Design

The ITL will operate by employing bachelor's degree level chemists and biologists under the leadership of the Director and Laboratory Manager. Staff members will be cross trained to conduct multiple assay types to afford the Laboratory Manager the greatest flexibility in meeting the demand needs of our customers. In addition to the scientific staff, the ITL will employ sample pickup drivers and administrative functions as the business grows. Smithers will ensure that any staff member who transports, tests or handles marijuana or MIPs will be registered as a Laboratory Agent in accordance with 935 CMR 500.029.

Financial Plan and Timeline

Smithers will submit its ITL application to the CCC in February 2021 and will submit its application for ISO 17025 accreditation by the end of April 2021. Based on these application submission dates, Smithers estimates obtaining ISO 17025 accreditation by mid-June and receiving Commence Operations orders from the CCC by the end of July.

The projected financials for the ITL are presented in the table below.

	Year 1	Year 2	Year 3
Revenue	\$1,240,441	\$2,170,219	\$3,098,779
Cost of Goods Sold	\$581,041	\$789,551	\$982,749
Operating Expenses	\$665,193	\$864,499	\$1,093,447
EBITDA	(\$5,793)	\$516,169	\$1,022,583

Policy:	Separating Recreational from Medical Operations
Effective Date:	1 Mar 2021
Author:	Eric Steele

Not Applicable

Smithers AMS LLC is an Independent Testing Laboratory, and this procedure is not applicable.

Policy:	Maintaining Financial Records
Effective Date:	1 Mar 2021
Author:	Eric Steele

1. Purpose and Scope

This policy outlines the procedures that Smithers AMS LLC (“Smithers”) will use to ensure all financial records are maintained in compliance with 935 CMR 500 *et. seq.* at Smithers’ Independent Testing Laboratory (the “Laboratory”). These policies and procedures work together with and incorporate Smithers’ Recordkeeping Procedures Plan.

2. Policy

Smithers’ operating policies and procedures and robust recordkeeping procedures (see Smithers’ companion Recordkeeping Procedures for greater detail) will ensure that its financial records are accurate and maintained in compliance with the Commission’s regulations at 935 CMR 500 *et. seq.* Smithers financial records maintenance plan includes policies and procedures requiring that:

- A. Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- B. All recordkeeping requirements under 935 CMR 500.105(9) are followed, including keeping written business records available for inspection, and in accordance with Generally Accepted Accounting Principles (“GAAP”), which will include manual or, if possible, electronic records of: 1) statements assets and liabilities; 2) monetary transactions; 3) books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; 4) the quantity, form, and cost of laboratory testing services sold to licensed marijuana establishments; and 5) salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any individual.
- C. Additional written business records will be kept, including, but not limited to, records of: 1) compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16); 2) fees paid under 935 CMR 500.005 or any other section of the Commission’s regulations; and 3) fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission’s regulations.
- D. Smithers will not utilize software or other methods to manipulate or alter sales data and will conduct monthly audits of its equipment and sales data to confirm that no such malware has been deployed. If Smithers uncovers any sales data manipulation, it shall immediately disclose that information to the Commission, cooperate with the

Policy:	Maintaining Financial Records
Effective Date:	1 Mar 2021
Author:	Eric Steele

Commission in any investigation regarding manipulation or alteration of sales data, and take any other such action as directed by the Commission.

- E. Smithers shall maintain records that it has completed the required monthly audits and make such records available to the Commission upon request.
- F. Finally, to the extent it could be applicable to a Laboratory, Smithers shall institute separate accounting practices for marijuana and non-marijuana sales and comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.

Policy:	Record Keeping
Effective Date:	1 Mar 2021
Author:	Eric Steele

1. Purpose and Scope

This policy outlines the procedures that Smithers AMS LLC (“Smithers”) will use to ensure all record keeping is conducted in compliance with 935 CMR 500.030 at Smithers’ Independent Testing Laboratory in Wareham, Massachusetts (the “Laboratory”). These policies and procedures work together with and incorporate Smithers’ Maintenance of Financial Records Plan and Personnel Plan.

2. Policy

Smithers has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Smithers intends to maintain all records, to the extent feasible, in electronic form. If physical records are used, they will be stored at the Laboratory in a locked cabinet designated for record retention. All written and electronic records will be available for inspection by the Commission upon request in accordance with 935 CMR 500.300(1).

All records will be maintained in accordance with Generally-Accepted Accounting Principles (“GAAP”). In order to ensure that Smithers’ recordkeeping practices remain compliant with the specific requirements of 935 CMR 500.030, our executive management team review of Corporate Records, Business Records, and Personnel Records for completeness, accuracy, and timeliness of such documents will occur as part of Smithers’ quarter-end closing procedures. Smithers will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations and herein below. In addition, Smithers will update its internal operating procedures on regular basis, as needed and under the supervision of the executive management team in order to ensure the safe and compliant keeping of records. Smithers’ internal operating procedures will provide for the safe and compliant keeping and maintenance of the following records:

- A. Corporate Records: are defined as those records that require, at a minimum, annual reviews, updates, and renewals. These records include:
 - 1. Insurance Coverage Records (including: Product Liability Policies; General Liability Policies, Umbrella Policies, Workers Compensation Policies and Employer Professional Liability Policies);
 - 2. Third-Party Contracts;
 - 3. Commission Required Registrations (including: Annual Agent Registration(s) and Annual Marijuana Establishment Registration);
 - 4. Local Compliance Documents (including: Certificate of Occupancy, Special Permits, Variances, Site Plan Approvals and As-Built Drawings); and

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5. Corporate Governance Filings (including: Annual Reports and Secretary of State Filings).
- B. Business Records: as are required by 935 CMR 500.105(9)(e). Smithers will keep these records in electronic form, if possible, so that Smithers can efficiently produce the records for inspection by the Commission. Smithers' business records include: 1) statements of assets and liabilities; 2) monetary transactions; 3) books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers; 4) the quantity, form, and cost of marijuana testing services sold to licensed marijuana establishments; and 5) salary and wages paid to each agent, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with Smithers, including members, if any.
 - C. Personnel Records: will include at least: 1) job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions; 2) a staffing plan that will demonstrate accessible business hours and safe testing conditions; 3) personnel policies and procedures; 4) all background check reports obtained in accordance with 935 CMR 500.030; and, finally, 5) a personnel file for each marijuana establishment agent. Smithers will maintain such personnel files for at least twelve (12) months after termination of the employee's (also called Independent Testing Laboratory agent or agent) affiliation with Smithers. Smithers' personnel files will include for each Independent Testing Laboratory agent, at a minimum, the following:
 1. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 2. Documentation of verification of references;
 3. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision of the agent;
 4. 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;
 5. Documentation of periodic performance evaluations;
 6. A record of any disciplinary action taken; and
 7. Notice of completed responsible vendor and eight-hour related duty training.
 - D. Agent Training Records: Smithers will maintain documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed

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statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s). Smithers will maintain records of responsible vendor trainings of agents for at least four (4) years.

E. Written Operating Policies and Procedures: policies and procedures related to Smithers' operations will be updated by the executive management team on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Written operating policies and procedures will include the following:

1. Security measures in compliance with 935 CMR 500.110;
2. Agent security policies, including personal safety and crime prevention techniques;
3. A description of Smithers' hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000;
4. Storage of marijuana in compliance with 935 CMR 500.105(11);
5. Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
6. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
7. A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
8. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
9. Alcohol, smoke, and drug-free workplace policies;
10. A plan describing how confidential information will be maintained;
11. Policy for the immediate dismissal of any agent who has: 1) diverted marijuana (which diversions will be reported the Wareham Police Department and to the Commission); 2) engaged in unsafe practices with regard to marijuana testing operations, which will be reported to the Commission; or 3) 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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12. A list of all Smithers executives and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m)'s requirement may be fulfilled by placing this information on the Smithers website;
 13. Policies and procedures for the handling of any cash on Smithers' premises including but not limited to storage, collection frequency and transport to financial institution(s);
 14. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old;
 15. Policies and procedures for energy efficiency and conservation that will include: 1) identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities; 2) consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable; 3) strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and 4) engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- F. Handling and Testing of Marijuana Records: Smithers will maintain the results of all testing for a minimum of one (1) year.
- G. Inventory Records: the record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory in accordance with 935 CMR 500.105(8)(d).
- H. Seed-to-Sale Tracking Records: Smithers will use a Commission-approved seed-to-sale tracking system, most likely *METRC*, to maintain real-time inventory. *METRC* inventory reporting meets the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of all marijuana testing samples and all damaged, defective, expired, or contaminated marijuana testing samples awaiting disposal. Smithers' tracking software will enable Smithers to tag and track all marijuana testing samples in compliance with the seed-to-sale methodology in a form and manner approved by the Commission.
- I. Waste Disposal Records: when marijuana testing samples are disposed of, Smithers will create and maintain a written record of the date, the type and quantity disposed of or

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handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Smithers agents present during the disposal or handling, with their signatures in compliance with 935 CMR 500.105(12). Smithers will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

- J. Incident Reporting Records: within ten (10) calendar days, Smithers will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the Wareham Police Department and Commission were notified within twenty-four (24) hours of discovering the breach, and any other relevant information. Reports and supporting documents, including photos and surveillance video related to a reportable incident, will be maintained by Smithers for no less than one (1) year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.
- K. Visitor Records: a visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- L. Security Records: Smithers will maintain a current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request. Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the Commission upon request and that are retained for at least ninety (90) calendar days.
- M. Transportation Records: To the extent applicable, Smithers will retain all transportation manifests (which, in each instance, will be created in accordance with 935 CMR 500.105(13)(f)) for a minimum of one (1) year and make them available to the Commission upon request.
- N. Closure: In the event that the Laboratory closes, all records will be kept for at least two (2) years at Smithers' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Smithers will communicate with the Commission during the closure process and accommodate any additional requests that the Commission or other Commonwealth agencies may have.

Policy:	Restricting Access to Individuals 21 or Older
Effective Date:	1 Mar 2021
Author:	Eric Steele

1. Purpose and Scope

This policy outlines how Smithers AMS LLC (“Smithers”) will restrict access to individuals 21 or older to remain in compliance with 935 CMR 500.000 et. seq. at its Wareham, Massachusetts Independent Testing Laboratory (“Laboratory”). These policies and procedures work together with and incorporate Smithers’ Security Plan.

2. Policy

Access to the Laboratory shall be strictly limited to individuals age 21 or older who possess a valid, non-expired, government-issued photo identification verifying their age. In accordance with 935 CMR 500.050(5), all Laboratory employees (also called “Independent Testing Laboratory Agents” or “agents”) shall be age 21 or older.

Smithers will require all visitors to present government-issued photo identification to verify their age. Upon entry into the premises of the Laboratory by any individual, a trained Smithers agent will immediately inspect the individual’s proof of identification and determine the individual’s age, in accordance with 935 CMR 500.140(2).

In the event that Smithers discovers that any of its agents intentionally or negligently allowed a person under the age of 21 to enter its facility, the agent will be terminated and the Commission will be notified in accordance with 935 CMR 500.105(1).

Specifically, the Laboratory located at 790 Main Street, Wareham, Massachusetts will allow the following individuals access to the facility.

1. Independent Testing Laboratory Agents (including board members, directors, employees, executives, managers, or volunteers)
 - a. Must have a valid Independent Testing Laboratory Agent Registration Card issued by the Commission.
2. Visitors (including outside vendors and contractors)
 - a. Prior to being allowed access to our facility or any Limited Access Area, the visitor must produce a Government issued Identification Card to a trained Smithers security agent and have their age verified to be 21 years of age or older. If there is any question as to the visitor’s age, or if the visitor cannot produce a Government Issued Identification Card, they will not be granted access.
 - b. After the age of the visitor is verified, they will be given a Visitor Identification Badge. The Badge must be displayed on the person(s) at all times;

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- c. Visitors will be escorted at all times by an Independent Testing Laboratory Agent authorized to enter the limited access area; and
 - d. Visitors will be logged in and out of our facility and must return the Visitor Identification Badge upon exit. The visitor log will be available for inspection by the Commission at all times.
- 3. The Commission, Emergency Responders and Law Enforcement.
 - a. The following individuals shall have immediate access to the Laboratory:
 - i. Representatives of the Commission conducting responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000.
 - ii. Representatives of other state agencies of the Commonwealth.
 - iii. Emergency responders while responding to an emergency.
 - iv. Law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.
 - b. Individuals described in i-iv above will be granted immediate access to our Marijuana Establishment.
- 4. Smithers will not engage in any advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data.

Policy:	Quality Control and Testing Procedures
Effective Date:	1 Mar 2021
Author:	Eric Steele

1. Purpose and Scope

This policy outlines the procedures that Smithers AMS LLC (“Smithers”) will implement to achieve the requirements of 935 CMR 500.160 and ISO 17025:2017.

2. Policy

No marijuana product, including Marijuana, may be sold or otherwise marketed for medical or adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Smithers will test marijuana and marijuana products in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission including, but not limited to, the Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations. Testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the Commission.

Smithers will test marijuana and marijuana products for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant growth regulators, and the presence of Pesticides. The Commission may require additional testing. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations issued by the Commission.

Smithers shall have a written policy for notification of laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1). Any such policy shall include:

1. notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the Production Batch.
2. notifying the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission.

Smithers shall maintain the results of all testing for no less than one year.

All transportation of Marijuana to and from Smithers shall comply with 935 CMR 500.105(13).

All storage of marijuana at Smithers will comply with 935 CMR 500.105(11). In particular, Smithers will identify, hold and store any toxic items in a manner that protects against contamination of marijuana.

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All excess Marijuana shall be disposed of in compliance with 935 CMR 500.105(12), either by the Smithers returning excess Marijuana to the source Marijuana Establishment for disposal or by the disposing of it directly.

With respect to the features of Smithers' Independent Testing Laboratory ("ITL"):

1. There will be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.
2. Hand-washing facilities will be located wherever good sanitary practices require employees to wash and sanitize their hands.
3. Floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair.
4. All contact surfaces, will be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination.
5. Water supply will be sufficient for necessary operations.
6. Plumbing will be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the ITL.
7. Smithers will provide its employees with adequate, readily accessible toilet facilities.

Smithers will perform the following assays in accordance with the Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations:

- Cannabinoid profile (HPLC-UV)
- Pesticides and Plant Growth Regulators (LC-MS/MS and GC-MS/MS)
- Heavy Metals (ICP-MS)
- Residual Solvents (HS-GC-MS)
- Terpene Profile (GC-MS)
- Vitamin E Acetate (HPLC-UV)
- Mycotoxins (LC-MS/MS)
- Microbiological Contaminants (PCR/MCA and MPN)

Each instrument has its own unique routine maintenance procedures, which when followed, allow the instrument to generate consistent, accurate data. The routine maintenance procedures for each instrument will be outlined within instrument specific procedures and will tracked within the Laboratory Information Management Systems ("LIMS").

To maintain quality control within each analytical sample set, sample responses will be compared to external calibration curves, with calibration check samples interspersed throughout the sample set as dictated by Smithers procedures. In addition, samples spiked with analytes of interest at known concentrations (Quality Control or QC samples) will be prepared and run within each sample set to verify that the sample processing and analytical method are performing as expected. Data from these QC

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samples will be control charted, allowing Laboratory Management the ability to understand the lab's accuracy and precision statistics for each assay type. When dictated by individual validated methods, internal standards are added to each sample to correct variations from sample run to sample run.

Microbiological testing for bacteria, yeast and mold requires a different QC approach than the chromatography or mass spectrometry analytical methods. In each testing run on the qPCR, up to 96 different samples are tested at one time. Since each run also tests for multiple different biological contaminants, multiple QC controls can be run simultaneously with the unknown samples. These samples are run in plates that contain 96 wells. For each run, a plate will contain one bacterial positive control, one bacterial negative control, one cannabis positive control, one negative cannabis control, and internal standards in all sample wells. These controls normalize the response from interactions with background materials that could affect the instrumentation.

1. The agent responsible for receiving samples will conduct a visual inspection of each sample. During the inspection of plant material, the agent will ensure the material is only the leaves and flowers of the female cannabis plant. Additionally, they will ensure the material is well cured and free of seeds and stems, free of dirt, debris, and foreign matter. They also check for the presence of mold, fungus, and bacteria contamination.
2. All agents handling marijuana are required to wear appropriate personal protective equipment ("PPE"). While in the laboratory area, agents will wear a lab coat and safety glasses, at a minimum. When handling marijuana, agents are also required to wear nitrile gloves. Additional PPE is required for specific activities including handling of cryogenic material, strong acids, and biological material. Additionally, housekeeping procedures ensure clean and disease-free working environments required for food handling workers outlined in 105 CMR 300.00.
3. All agents directly handling marijuana materials shall conform to personal sanitary practices so as not to inadvertently contaminate samples. This includes but is not limited to maintaining reasonable bodily cleanliness (which shall include regular handwashing) and wearing clean clothes in good condition with no rips or tears. Agents with hair longer than shoulder length must pull hair back and away from the face. At all times, closed-toe shoes shall be worn inside the lab area. No loose or flowing clothing shall be worn in the lab.
4. All agents will be responsible for maintaining a clean work environment to minimize the opportunity for sample contamination. In addition, any agent whose job includes contact with marijuana will comply with the requirements for food handlers specified in 105 CMR 300.000.
5. All items used in the lab including solvents, reagents, samples, etc. are handled in accordance to manufacturers' Safety Data Sheets ("SDS"). All SDS are kept in appropriately labeled binders in the lab area to be viewable by all laboratory agents and are kept electronically in the LIMS.
6. The company utilizes a LIMS to organize and manage sample inventory and data reporting. If a sample fails one compliance test, the sample is immediately retested from the source material. If the failure is repeated, the results are published to the company's customer portal, METRC reporting tool, and a notice is sent to the Commission. This occurs within the 72-hour window outlined in the reporting requirements of 935 CMR 500.160.

Policy:	Energy Compliance Plan
Effective Date:	1 Mar 2021
Author:	Eric Steele

Energy Compliance Plan

Smithers AMS LLC (“Smithers”) appreciates that consideration of energy efficiency and conservation should occur during the application process for marijuana establishment licensees and throughout the operational lives of its facilities. Smithers’ independent testing laboratory in Wareham will be located within a secure area within its Parent Company’s existing environmental testing laboratory facility. Accordingly, the laboratory will not utilize large amounts of energy or water in its operations. Nevertheless, Smithers will develop procedures to comply with all energy conservation regulations and guidance documents applicable to independent testing laboratories. In accordance with 935 CMR 500.105(1)(q), Smithers will implement policies and procedures for energy efficiency and conservation that shall include:

- A. Identification of potential energy use reduction opportunities (including, but not limited to, natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
- B. Consideration of opportunities for renewable energy generation including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
- C. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
- D. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants

Improvements to the independent testing laboratory at Smithers’ facility will include collaboration with energy professionals who will review facility and equipment needs and make recommendations for optimal facility equipment choices based on energy usage. In addition, to the extent the Commonwealth’s Executive Office of Energy and Environmental Affairs (“EOEEA”) promulgates any energy or water conservation regulations applicable to independent cannabis testing laboratories, Smithers will nimbly incorporate such regulations into its energy compliance procedures.

Although, Smithers will be producing nominal quantities of waste, to the extent that waste is produced on site, Smithers will comply with the Commission’s Guidance on Best Management Practices for Waste

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Management.¹ Likewise, although Smithers does not expect to utilize significant quantities of water, Smithers will nevertheless comply with the Commission's Guidance on Best Management Practices for Water Use.¹

For the avoidance of doubt, all of Smithers' energy and water conservation procedures will be fully compliant with h 935 CMR 500.101(1)(c)(10) and 500.105(15), to the extent applicable to marijuana independent testing laboratories.

¹ Available at: https://mass-cannabis-control.com/wp-content/uploads/200825_Energy_and_Environment_Compiled_Guidance.pdf.

Policy:	Personnel Policies
Effective Date:	1 Mar 2021
Author:	Eric Steele

1. Purpose and Scope

This policy outlines Personnel Policies of Smithers AMS LLC (“Smithers”) for its Wareham, MA Independent Testing Laboratory (“Laboratory”).

2. Policy

Introduction

Smithers will maintain personnel records as a separate category of records due to the sensitivity and importance of information concerning agents, including registration status and background check records. At a minimum, Smithers will maintain the following personnel records: 1) job descriptions for each employee (also referred to as Independent Testing Laboratory Agent or agent) and volunteer position, as well as organizational charts consistent with the job descriptions; 2) personnel records for each agent; 3) a staffing plan that will demonstrate accessible business hours and safe conditions; 4) personnel policies and procedures; and 5) all background check reports obtained in accordance with 935 CMR 500.029. Smithers anticipates that it will employ agents to fill the following job roles at the Laboratory:

- Laboratory Director
- Laboratory Manager or Senior Chemist
- Chemist
- Associate Chemist

Independent Testing Laboratory Agent Personnel Records

Personnel records for each Independent Testing Laboratory Agent (as defined in 935 CMR 500.002, 029) will be maintained for at least twelve (12) months after termination of the agent’s affiliation with Smithers and will include, at a minimum, the following: 1) all materials submitted to the Commission pursuant to 935 CMR 500.029(2); 2) documentation of verification of references; 3) the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision of the agent; 4) 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; 5) documentation of periodic performance evaluations; 6) records of any disciplinary actions taken; 7) notice of completed responsible vendor and eight-hour related duty training; 8) results of initial background investigation, including CORI reports; and 9) documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident. These personnel records will be kept in a secure location to maintain confidentiality and be accessible only to the agent’s manager or members of the executive management team.

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Independent Testing Laboratory Agent Background Checks

In addition to completing the Commission's agent registration process, all agents hired to work for Smithers will undergo a detailed background investigation prior to being granted access to Smithers' Laboratory or beginning work duties. Background checks will be conducted on all agents in their capacity as employees or volunteers for Smithers pursuant to 935 CMR 500.100 and will be used by the Director of Human Resources, who will assure such background checks are performed by a party registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.

For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.101(1), Smithers will consider: 1) all conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction; 2) all criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability; and 3) where applicable, all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.

Smithers will make employment suitability determinations in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Smithers will:

- A. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination;
- B. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Smithers will consider the following factors:
 - 1. Time since the offense or incident;
 - 2. Age of the subject at the time of the offense or incident;
 - 3. Nature and specific circumstances of the offense or incident;
 - 4. Sentence imposed and length, if any, of incarceration, if criminal;
 - 5. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - 6. Relationship of offense or incident to nature of work to be performed;
 - 7. Number of offenses or incidents;

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8. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
 9. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
 10. Any other relevant information, including information submitted by the subject; and
- C. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

Upon adverse determination for a particular applicant, Smithers will provide the applicant a copy of her/his background screening report and a pre-adverse determination letter providing the applicant with a copy of their right to dispute the contents of the report, who to contact to do so and the opportunity to provide a supplemental statement. After 10 business days, if the applicant does not dispute the contents of the report and no applicant-provided statement gives cause to alter the suitability determination, an adverse action letter will be issued providing the applicant information on the final determination made by Smithers along with any legal notices required. All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.

Smithers will cause its background screening to be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission. Any references provided by the agent will be verified at the time of hire. As deemed necessary, individuals to be hired for key Smithers positions with unique and sensitive access (e.g., members of the executive management team) will undergo additional screening, which may include interviews with prior employers and/or colleagues. As a condition of continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Registration Cards (as that term is defined in 935 CMR 500.002) annually and submit to other background screening as may be required by Smithers or the Commission.

Staffing Plan and Business Hours

Hiring and Recruitment

Smithers' Human Resource Director will engage the executive management team and supervisory staff on a regular basis to determine if vacancies are anticipated and whether specific positions need to be

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created in response to company needs. Smithers' hiring practices will include but are not limited to the following and apply to all types of working situations including hiring, firing, promotions, harassment, training, wages and benefits:

1. Equal Employment Opportunity Commission (EEOC) Compliance;
2. Smithers' Diversity Plan;
3. Smithers' Plan to Positively Impact Areas of Disproportionate Impact;
4. Background Checks and References;
5. Mandatory reporting of criminal convictions (and termination if necessary);
6. State and Federal Family Leave Act;
7. Workplace Safety Laws;
8. State and Federal Minimum Wage Requirements; and
9. Non-Disclosure and Non-Compete Agreements

Standards of Employee Conduct

Smithers' mission is to provide a professional workplace free from harassment and discrimination for employees. Smithers has a zero-tolerance policy on harassment or discrimination based on sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, gender expression, or any other trait or characteristic protected by any applicable federal, state, or local law or ordinance. Harassment or discrimination on the basis of any protected trait or characteristic contravenes Smithers' Productive Work Environment – Non-Harassment Policy. A broad range of behavior could constitute harassment and/or discrimination. In general, harassment is any verbal or physical conduct that: 1) has the purpose or effect of creating an intimidating, hostile, or offensive working environment; 2) has the purpose or effect of unreasonably interfering with an individual's work performance; or 3) adversely and unjustifiably affects an individual's employment opportunities.

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

Smithers also has a zero-tolerance policy against use of alcohol, tobacco and other smoking products (including, but not limited to, marijuana consumption), or drugs within its Wareham facility, however, tobacco products may be used in designated outdoor areas. All employees and volunteers (if any) will be made aware of this zero-tolerance policy, and Smithers will have in place policies and procedures to ensure company-wide compliance.

Violence and Weapons in the Workplace

Any and all acts of violence in the workplace will result in immediate dismissal of the employee, customer, or parties involved. The Wareham Police Department and other law enforcement authorities, as applicable, will be contacted immediately in the case of a violent event. Weapons are not permitted at Smithers' Laboratory by employees, customers, or any other parties. Agents (including employees)

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found carrying weapons at Smithers' Laboratory will be immediately terminated. Vendors or other visitors to the Laboratory found carrying weapons on the premises will be asked to leave and/or the police will be notified accordingly.

At-Will Employment

In the state of Massachusetts, employment is assumed to be at-will unless otherwise stated. At-will employment implies that employer and employee alike may terminate the work relationship at any given moment and for any legitimate purpose. Wrongful termination may be more difficult to prove in an at-will arrangement because of the freedom that each party has to end the employment.

Workplace Attire

The required attire for Laboratory agents varies based upon required duties. New hire training will define appropriate attire for each role and the Laboratory Director will be responsible for ensuring compliance with all requirements.

Staffing Plan Record Retention

Prior to commencing operations in Wareham, Smithers will implement a tailored staffing plan, which shall include job descriptions for each employee and volunteer position (if any) at the Laboratory, in addition to an organizational chart that is consistent with those job descriptions. For each employee or volunteer, Smithers will retain all staffing and personnel records described in 935 CMR 500.105(9) for at least 12 months after termination of the employee/volunteer's affiliation with Smithers.

Overview of Personnel Policies and Procedures

Standard Employment Practices

Smithers values and thrives off of the contributions of its management and staff positions. Smithers intends to be a market leader in workplace satisfaction by offering competitive wage and benefits packages and nurturing a corporate culture that values complete transparency, accountability and service to the Wareham community.

In accordance with 935 CMR 500.105(1)(r), Smithers has in place policies and procedures to promote workplace safety consistent with the standards set forth in the Occupational Safety and Health Act ("OSHA") of 1970. Smithers shall furnish to each of its employees employment and a place of employment, which are free from recognized hazards that are causing or likely to cause death or serious physical harm. In turn, Smithers shall comply with all applicable OSHA regulations.

Advancement

The organization will be structured in a relatively flat manner, with promotional opportunities. Participation in training and annual performance evaluations will be critical for any promotions or pay increases. Smithers pledges to be an equal opportunity employer and advancer of its employees. See Smithers' Diversity Plan for greater detail.

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Written Policies

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

Investigations

Smithers will develop policies and procedures to investigate any complaints or concerns identified or raised internally or externally in order to remain compliant with 935 CMR 500.000 *et seq.*

Designated Outside Counsel

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

Job Status

Job Classifications

Positions at Smithers are categorized by rank and by department. Smithers' executive management team oversees the overall success toward achieving the company's mission. Smithers' President is responsible for implementation of the mission and the management team is responsible for ensuring that all Laboratory employees are properly executing their functions and responsibilities. Job classification is comprised of three rank tiers: Executive Management, Management/Supervisors, and Non-Management Employee Staff.

Work Schedules

Work schedules will be either part-time or full-time, depending on the specific position. Schedules will be set according to the needs of the Laboratory as determined by the applicable manager and the supervising executive manager. It is the manager's responsibility to develop and implement a work schedule that provides necessary duty and personnel coverage but does not exceed what is required for full implementation of operations.

Mandatory Meetings and Community Service Days

There will be a mandatory reoccurring company-wide meeting on a quarterly basis. All full-time employees will be notified of their required attendance. Smithers will also organize and encourage employee participation in community service activities in Wareham.

Breaks

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

Performance Reviews

Performance reviews will be conducted by an employee's direct supervisor. Reviews will be conducted at mid-year and annual intervals for all employees. A written review will be provided to, and signed by, the employee under review. Reviews must be retained in each employee's personnel file and treated as a personnel record in accordance with Smithers' Recordkeeping Policies. Performance reviews must take into account positive performance factors and areas requiring improvement. Scoring systems may be utilized to help reflect the employee's overall performance.

Leave Policies

Smithers' leave policies will comport with all state and federal law. All full-time employees will receive at least two 40-hour weeks of paid vacation per annum, pro-rated in the first year of employment. Smithers will determine which holidays will be observed and will make the annual holiday schedule available to employees no later than January 31 of the given year.

Smithers anticipates observing the following holidays:

- New Year's Day;
- Memorial Day;
- Independence Day;
- Labor Day;
- Thanksgiving;
- Day after Thanksgiving;
- Christmas Eve; and
- Christmas Day.

Disciplinary Policies

Purpose

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

Smithers reserves the right to combine or skip steps depending upon facts of each situation and the nature of the offense – each offense will be reviewed and remediated on a case-by-case basis. The level of disciplinary intervention may also vary. The procedure outlined below is intended to provide guidance to Smithers Human Resources Director and executive management team and not bind them in any given disciplinary scenario. Some of the factors that will be considered depend upon whether the offense is repeated despite coaching, counseling, and/or training; the employee's work record; and the impact the conduct and performance issues have on Smithers' organization.

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Procedure

Step 1: Counseling and Verbal Warning

Step 1 creates an opportunity for the immediate supervisor to schedule a meeting with an employee to bring attention to the existing performance, conduct, or attendance issue. The supervisor should discuss with the employee the nature of the problem or violation of company policies and procedures. The supervisor is expected to clearly outline expectations and steps the employee must take to improve performance or resolve the problem.

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

Step 2: Written Warning

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

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

Step 3: Recommendation for Termination of Employment

The last and most serious step in the progressive discipline procedure is a recommendation to terminate employment. Generally, Smithers will endeavor to exercise the progressive nature of this policy by first providing counseling and a verbal warning, a written warning and performance improvement plan before proceeding to a recommendation to terminate employment. However, Smithers reserves the right to combine and skip steps depending upon the circumstances and severity of each situation and the nature of the offense. Furthermore, employees may be terminated without prior notice or disciplinary action.

Management's recommendation to terminate employment must be approved by the Human Resources Director and the Vice President. Final approval may be required from the President or designee.

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

Performance and Conduct Issues Not Subject to Progressive Discipline

Behavior that is illegal is not subject to progressive discipline and may be reported to the Wareham Police Department or other law enforcement authorities. Gross violation of company policy is not subject to progressive discipline and are grounds for immediate termination.

Documentation

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

Separation of Employment

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

Types of Separation

1. Resignation

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

2. Retirement

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

3. Job Abandonment

An employee who fails to report to work or contact his or her supervisor for three (3) consecutive workdays will be considered to have abandoned the job without notice effective at the end of the employee's normal shift on the second day. The manager will notify the Human

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Resources Director at the expiration of the second workday and initiate the paperwork to terminate the employee. Employees who are separated due to job abandonment are ineligible to receive accrued benefits and are ineligible for rehire.

4. Termination

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

5. Reduction in Workforce

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

6. Release

Release is the end of temporary or seasonal employment. The Human Resources Director or their designee will inform the temporary or seasonal worker of their release according to the terms of the individual's temporary employment.

Exit Interview

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

Return of Property

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

Termination of Benefits

An employee separating from Smithers is eligible to receive benefits as long as the appropriate procedures are followed as stated above. The appropriate notice period must be given, and the employee must work the full period. Any accrued and unused vacation will be paid in the last pay check.

Health Insurance

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

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Rehire

Former employees who left in good standing and were classified as eligible for rehire may be considered for reemployment. An application must be submitted to the Human Resources Director, and the applicant must meet all minimum qualifications and requirements of the position, including any qualifying exam and current registration with the Commission, when required.

Managers must obtain approval from the Human Resources Director or designee prior to rehiring a former employee. Rehired employees begin benefits just as any other new employee. An applicant or employee who is terminated for violating policy or who resigned in lieu of termination from employment due to a policy violation will be ineligible for rehire.

Compensation

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

Selection Criteria

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

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Responsibilities

The executive management team will possess final approval authority over Smithers' compensation system.

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

Management Responsibility

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

Policy:	Qualifications and Training
Effective Date:	1 Mar 2021
Author:	Eric Steele

1. Purpose and Scope

This policy outlines the procedures that Smithers AMS LLC (“Smithers”) will use to ensure all Independent Testing Laboratory Agents possess qualifications and training in accordance with 935 CMR 500 et. seq. at Smithers’ Independent Testing Laboratory (the “Laboratory”). These policies and procedures work together with and incorporate Smithers’ Personnel Procedures Plan.

2. Policy

Smithers shall ensure that all Independent Testing Laboratory Agents undergo and maintain comprehensive training prior to performing job functions, and at regular intervals. Training shall be tailored to the roles and responsibilities of the job function of each Independent Testing Laboratory Agent (also called “employees” herein), and at a minimum shall include participation in a Responsible Vendor Program pursuant to 935 CMR 500.105(2)(b). Records of these trainings will be maintained for at least 4 years. Smithers will require that all marijuana establishment agents and staff receive and participate in, a minimum of, eight (8) hours of training annually. In addition, Smithers will ensure that all employees are trained on job specific duties prior to performing job functions.

Prohibition on Ownership, Control or Employment for Individuals Affiliated with a Marijuana Establishment

In accordance with 935 CMR 500.050(7)(b), no Smithers Owner (entities and individuals), Executive or Member will be a Person or Entity Having Direct or Indirect Control in an any other Marijuana Establishment, except as otherwise provided in 935 CMR 500.200. Smithers will verify this with executive management, other managers, and all owners and employees.

In accordance with 935 CMR 500.050(7)(c), no individual employee of Smithers may receive direct or indirect financial compensation from any Marijuana Establishment, except as otherwise provided in 935 CMR 500.200. Smithers will verify this prohibition with all employees, and if any employee is found to have violated this requirement, Smithers will immediately terminate the employee and report the incident to the Cannabis Control Commission (the “Commission”).

Company Training Programs

Smithers Training Policies shall be as follows:

- A. All marijuana establishment agents and staff will receive and participate in, a minimum of, eight (8) hours of training annually, including a minimum of 4 hours of responsible vendor training. 935 CMR 500.105(2)(a) and (b)(1). Any additional responsible vendor training hours shall not count to the 8-hour annual minimum.

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- B. All owners, managers and employees that are involved in the handling and testing of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall attend and successfully complete a responsible vendor training.
- C. All new employees involved in the handling and testing of marijuana for adult use shall successfully complete a responsible vendor program within 90 days of hiring.
- D. After initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and testing of marijuana for adult use shall successfully complete the program once each year thereafter in order to maintain designation as a responsible vendor.
- E. Administrative employees who do not handle or test marijuana may voluntarily participate in the responsible vendor program.
- F. Smithers shall maintain records of responsible vendor training program compliance for four (4) years and make them available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Responsible Vendor Program

In accordance with 935 CMR 500.105, Smithers's marijuana agents first take the Basic Core Curriculum. On completing the Basic Core Curriculum, an agent will be eligible to take the Advanced Core Curriculum. Smithers shall ensure that its Responsible Vendor Training Program's core curriculum includes the following minimum requirements and meets any other requirements of a Commission approved curriculum:

- A. Safety, Security and Rules and Regulations pertaining to the testing of marijuana including sanitary procedures;
- B. Discussion concerning marijuana's effect on the human body, with specific focus on:
 - 1. Marijuana's physical effects based on type of marijuana product;
 - 2. Duration of physical effects; and
 - 3. Recognizing the signs of impairment.
- C. Diversion prevention and prevention of sales to minors;
- D. Compliance with all inventory tracking requirements;
- E. Acceptable forms of identification, with specific focus on:

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1. Verifying identification;
 2. Spotting false identification;
 3. Confiscating fraudulent identifications;
 4. Common mistakes made in verification.
- F. Other state laws and regulations affecting owners, managers, and employees, which shall include:
1. Local and state licensing and enforcement;
 2. Incident and notification requirements;
 3. Administrative and criminal liability;
 4. License sanctions and court sanctions;
 5. Waste disposal;
 6. Health and safety standards;
 7. Conduct of establishment;
 8. Permitting inspections by state and local licensing and enforcement authorities;
 9. Licensee responsibilities for activities occurring within licensed premises;
 10. Maintenance of records;
 11. Privacy issues; and
 12. Prohibited practices.
- G. Any other areas of training determined by the Commission to be included in a responsible vendor training program.

Policy:	Diversity Plan
Effective Date:	1 Mar 2021
Author:	Eric Steele

Introduction

Smithers AMS LLC (“Smithers”) is committed to encouraging diverse viewpoints and promoting equity within its Wareham Independent Testing Laboratory (“Laboratory”) and hiring a workforce that is representative and as diverse as the surrounding community. Smithers will foster a diverse culture and pledges to promote equity among minorities, women, veterans, people with disabilities, and LGBTQ+ individuals (“Diverse Individuals”). Smithers is committed to promoting equity within the Laboratory, and at the outset of operations, at least 25% of the laboratory employees will be Diverse Individuals. This ratio will increase to 50% Diverse Individuals as the staff grows.

Diversity Goals

- Smithers will hire and maintain a diverse workforce through its diversity outreach and hiring efforts. At the outset of operations, at least 25% of the Laboratory employees will be Diverse Individuals.
- As the laboratory’s capacity and staff grows in the future, Smithers has an ambition to promote diversity amongst the staff. Until the full-time employee count at the Laboratory reaches 7 full-time employees, Smithers endeavors that at least 25% of those employees will be Diverse Individuals. For this initial 25% target, Smithers intends to employ a workforce comprised of:
 - 10-15% Women;
 - 5-10% Minorities;
 - 0-5% Veterans;
 - 0-5% People with disabilities; and
 - 0-5% People who identify as LGBTQ+.
- Once the staff is 8 or more full-time employees, the ratio of Diverse Individuals will increase, reaching at least 50% by the time there are 15 full-time employees. For this future (i.e., once Smithers employs 8 or more full-time employees) 50% target Smithers intends to employ a workforce comprised of:
 - 20-30% Women;
 - 10-20% Minorities;
 - 5-10% Veterans;
 - 5-10% People with disabilities; and
 - 5-10% People who identify as LGBTQ+.
- Smithers also intends to support diverse employees and create an environment where those employees can succeed and advance within the company.
- Smithers will, on an annual basis, make a donation to an organization in Southeastern Massachusetts that is dedicated to promoting equity or otherwise contributing to the success of Diverse Individuals in the region.

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Diversity Programs

Although Smithers does not intend to hire a large number of Laboratory professionals at the outset of operations in Wareham, at least 25% of the initial Laboratory staff will be Diverse Individuals. Thereafter, Smithers will employ a laboratory staff that is at least 25% comprised of Diverse Individuals, until the staff reaches 7 employees. Once the staff is 8 or more full-time employees, the ratio of Diverse Individuals will increase, reaching at least 50% by the time there are 15 full-time employees.

When the Laboratory has an open position, Smithers will publicize the position on platforms that are specifically designed to attract qualified, Diverse Individual candidates from Southeastern Massachusetts. Initially, Smithers will work with the MassHire Greater New Bedford Career Center (the "Center") to publicize any new job openings at the Laboratory. The Center serves as a hub of activity focused on connecting job seekers and employers, to meet the employment and career advancement needs of individuals and the workforce needs of businesses. The Center also provides high quality services in a professional and welcoming environment, including counseling, education, and technology to support job search, and labor market information and recruitment opportunities for businesses. Smithers will intentionally recruit from sources that will provide a diverse slate of candidates. Smithers will give hiring preference to Diverse Individuals if their qualifications are equivalent to non-Diverse Individuals, but in all cases will hire the most qualified candidate for the position.

In order to ensure and maintain a diverse staff of Laboratory professionals, Smithers will ensure that all employees, including diverse employees, receive clear information regarding opportunities for promotions (to the extent applicable to a diverse employee's job function or career ambitions), career counseling, and training to provide such employees with a strong platform for growth within the Laboratory and to decrease turnover among diverse employees.

Finally, each year, Smithers will make a \$1,000 donation to an organization in Southeastern Massachusetts that is dedicated promoting equity or otherwise contributing to the success of Diverse Individuals in the region. For its first donation, which will be made within six months of the Laboratory's opening, Smithers will provide funding to Community Connections in Wareham. Attached is evidence of Community Connections willingness to work with and accept donations from Smithers.

Diversity Measurement

From the commencement of operation of the Laboratory - at least 25% of the Laboratory's employees will be Diverse Individuals. Once the staff is 8 or more full-time employees, the ratio of Diverse Individuals will increase, reaching at least 50% by the time there are 15 full-time employees.

Smithers will also develop policies to regularly analyze the effectiveness of its diversity outreach and diverse employee advancement programs for creating a diverse and inclusive work environment. As part of that regular analysis, the Director of Human Resources, or their designee will annually audit all job applications received by the Laboratory to ensure that the company is attracting interest from

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Diverse Individuals. The Director, Human Resources, or their designee will also audit all new hiring decisions to ensure that the Laboratory's commitment to a "majority-diverse" workforce is reflected in its hiring decisions and employee profile. The following metrics will be recorded on an annual basis and will be made available to the Commission upon request:

- Total number of applications received, including a breakdown of diverse vs non-diverse individuals
- Total number of diverse individuals hired, also reported as a percentage of total employee count
- Total number of diverse individuals interviewed, also reported as a percentage of the total number of interviews

Finally, each year, Smithers will make a \$1,000 donation to an organization in Southeastern Massachusetts that is dedicated to promoting equity or otherwise contributing to the success of Diverse Individuals in the region. Smithers will keep diligent records of all donations and will make them available to the Cannabis Control Commission ("Commission") upon request.

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Diversity Plan Acknowledgments

Smithers pledges to adhere to the requirements set forth in 935 CMR 500.105(4)(a) which provides the permitted advertising, branding, marketing and sponsorship practices for all Marijuana Establishments. Smithers likewise pledges not to employ any of the prohibited practices articulated in 935 CMR 500.105(4)(b). Finally, none of the actions taken or programs instituted by Smithers will violate the Commission's regulations with respect to limitations on ownership or control or any other applicable state laws.



Community Connections Inc.

Opportunities for People with Disabilities

An Arc affiliate



March 22, 2021

Mr. Ronald C. Bieber,
c/o Smithers AMS LLC
790 Main Street
Wareham, MA 02571

Dear Mr. Bieber,

Community Connections Inc (CCI) with locations across Cape Cod and Southeastern Massachusetts, including Wareham, is an organization that is dedicated to providing life-enriching services that promote optimal independence for adults with disabilities.

We are pleased to have the opportunity to work with Smithers AMS LLC. Donations from Smithers AMS LLC will allow CCI to further its mission and support the people we serve. We acknowledge and understand that Smithers AMS LLC is a Cannabis Establishment.

Sincerely,

David Botting
CEO