



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP282030
Original Issued Date: 08/11/2021
Issued Date: 09/14/2023
Expiration Date: 09/18/2024

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Trifecta Farms Corp

Phone Number: 508-943-7800 Email Address: nick@lakeshorelegalsolutions.com

Business Address 1: 142 New Holland Road

Business Address 2:

Business City: Brimfield

Business State: MA

Business Zip Code: 01010

Mailing Address 1: 58 Agard Road

Mailing Address 2:

Mailing City: Brimfield

Mailing State: MA

Mailing Zip Code: 01010

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: 55

Percentage Of Control: 55

Role: Owner / Partner

Other Role:

First Name: Michael

Last Name: Poirier

Suffix:

User Defined Gender:

Specify Race or Ethnicity:

Percentage Of Ownership: 35

Role: Owner / Partner

First Name: Cody

Suffix:

User Defined Gender:

Specify Race or Ethnicity:

Percentage Of Ownership: 10

Role: Owner / Partner

First Name: Evan

Suffix:

User Defined Gender:

Specify Race or Ethnicity:

No records found

No records found

Individual Contributing Capital 1

Last Name: Poirier

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of the Capital Provided: \$150000

Percentage of Initial Capital: 100

Capital Attestation: Yes

No records found

No records found

Individual 1

Last Name: Poirier

Marijuana Establishment Name: Trifecta Farms Corp

Business Type: Marijuana Cultivator

Marijuana Establishment City: Brimfield

Marijuana Establishment State: MA

First Name: Cody

Last Name: Langlitz

Suffix:

Marijuana Establishment Name: Trifecta Farms Corp

Business Type: Marijuana Cultivator

Marijuana Establishment City: Brimfield

Marijuana Establishment State: MA

Individual 3

First Name: Evan	Last Name: Charkin	Suffix:
Marijuana Establishment Name: Trifecta Farms Corp	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Brimfield	Marijuana Establishment State: MA	

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 142 New Holland Road
Establishment Address 2:
Establishment City: Brimfield
Establishment Zip Code: 01010
Approximate square footage of the Establishment: 10000
How many abutters does this property have?: 19
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
Community Outreach Meeting Documentation	attestation.pdf	pdf	602584076902113684c6efa1	02/11/2021
Certification of Host Community Agreement	Lake Shore Legal_20210211_141841.pdf	pdf	602585bc84d16335f02249cd	02/11/2021
Plan to Remain Compliant with Local Zoning	zoning.pdf	pdf	602585ed6d809f35defbbc5c	02/11/2021

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.: \$10000

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Positive Impact.pdf	pdf	6025862f604cbb361670f772	02/11/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

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

Individual Background Information 2

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

Individual Background Information 3

Role:
First Name: Evan
RMD Association: Not associated with an RMD
Background Question: no

Other Role:
Last Name: Chakrin **Suffix:**

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	sos_cert.pdf	pdf	602588a572b5633675943f3a	02/11/2021
Department of Revenue - Certificate of Good standing	dor_cert.pdf	pdf	602588ad4cfbf7366ef3e6e6	02/11/2021
Department of Revenue - Certificate of Good standing	dua_signed.pdf	pdf	602588b76902113684c6efbb	02/11/2021
Bylaws	bylaws.pdf	pdf	602588cfd44ed235c8c473ae	02/11/2021
Articles of Organization	articles.pdf	pdf	602588d684d16335f02249f2	02/11/2021

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	23070301240 (002).pdf	pdf	64be58bccabc8700071eb378	07/24/2023
Department of Unemployment Assistance - Certificate of Good standing	dua232.pdf	pdf	64bee6accabc8700071ff3d1	07/24/2023
Department of Revenue - Certificate of Good standing	dor2023.pdf	pdf	64c78cce22035f0008f671e2	07/31/2023

Massachusetts Business Identification Number: 001469491

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	plan.pdf	pdf	602588ee1c95e43696cce4ce	02/11/2021
Plan for Liability Insurance	obtain_liability.pdf	pdf	6025893110e86b36bb8968fe	02/11/2021
Proposed Timeline	time23.pdf	pdf	64bee6bce317fe0008ecddb	07/24/2023

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Sample of unique identifying marks used for branding	LOGO.pdf	pdf	60258c4d6902113684c6efd9	02/11/2021
Restricting Access to age 21 and older	restrict.pdf	pdf	60258cc6604cbb361670f7b5	02/11/2021
Security plan	security.pdf	pdf	60258d016902113684c6efdd	02/11/2021

Prevention of diversion	diversion.pdf	pdf	60258d0c4e95aa35cfc2368b	02/11/2021
Storage of marijuana	storage.pdf	pdf	60258d1cd44ed235c8c473c7	02/11/2021
Transportation of marijuana	transportation.pdf	pdf	60258d29fade7a35e9f2f3f9	02/11/2021
Inventory procedures	inventory.pdf	pdf	60258d3165c0d035fcc4d6cb	02/11/2021
Quality control and testing	quality.pdf	pdf	60258d43eabbc336a11f73a9	02/11/2021
Dispensing procedures	dispensing.pdf	pdf	60258d4f238c3036b0f85ed4	02/11/2021
Personnel policies including background checks	personnel.pdf	pdf	60258d6110e86b36bb89691a	02/11/2021
Record Keeping procedures	recordkeeping.pdf	pdf	60258d776d809f35defbbbc95	02/11/2021
Maintaining of financial records	financial_records.pdf	pdf	60258d8284d16335f0224a23	02/11/2021
Diversity plan	diversity.pdf	pdf	60258d8c65c0d035fcc4d6cf	02/11/2021
Qualifications and training	Qualifications.pdf	pdf	60258d974dba6f360b67f887	02/11/2021
Energy Compliance Plan	energy.pdf	pdf	60258da44e95aa35cfc23691	02/11/2021
Safety Plan for Manufacturing	safety.pdf	pdf	60258e126902113684c6efe7	02/11/2021
Sample of unique identifying marks used for branding	branding.pdf	pdf	60258e824dba6f360b67f88d	02/11/2021
Plan to Obtain Marijuana	obtainproduct.pdf	pdf	60258ebe238c3036b0f85eda	02/11/2021
Method used to produce products	method2.pdf	pdf	603664cfcb9c807dbbd7ed8	02/24/2021
Types of products Manufactured.	manufac_produc7.pdf	pdf	606e02eacefab844e67130a9	04/07/2021

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 Agree

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Applicant is not yet operational. Applicant will begin advertising for expungement services upon filing of PPLI with the CCC.

COMPLIANCE WITH DIVERSITY PLAN
Diversity Progress or Success 1

Description of Progress or Success: Applicant has yet to hire any staff; hiring will begin once construction is completed in 2023.

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS
Item 1

Label Picture:

Document Category	Document Name	Type	ID	Upload Date
	time.pdf	pdf	62852138eb816b00085eb681	05/18/2022

Name of Item: None Item Type: Concentrate

Item Description: No Items are yet being manufactured.

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

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 12/10/2020
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



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

a. Date of publication: 11/19/20

b. Name of publication: Journal Register

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: 11/19/20

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

a. Date notice(s) mailed: 11/20/20

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

Name of applicant:

Trifecta Farms Corp

Name of applicant's authorized representative:

Michael Poirier

Signature of applicant's authorized representative:



Attachment A

Senate Ways and Means Releases FY 2021 Budget Recommendations

BOSTON — The Senate Committee on Ways and Means recently announced a \$45.985 billion budget for Fiscal Year 2021.

The Committee's budget is a responsible and balanced plan that ensures fiscal stability and recommends targeted investments to protect access to core essential services, address urgent needs, and support efforts to build an equitable recovery for the Commonwealth in response to the COVID-19 pandemic.

"As I have often said, Massachusetts is a Commonwealth — which means that we take care of each other — and that's what this budget does," stated Senate President Karen E. Spilka (D-Ashland).

"I am immensely proud of Chair Rodriguez, his team, Vice Chair Friedman and Assistant Vice Chair Lewis and the entire Senate Committee on Ways and Means for the budget they have released today under very difficult circumstances. This budget utilizes a judicious use of reserves and targeted revenue initiatives while making notable investments in the areas of life most impacted by our current crisis to help us build towards an equitable recovery," Spilka said.

"As a member of the Ways and Means Committee, I am pleased with the investments we were able to make in this budget during what is a very difficult year by all accounts," said Senator Anne M. Goh (D-Spencer). "This is a positive step towards improving lives and livelihoods, and gives much needed support to those who have been waiting for funding level allocations to plan for the coming year."

The Committee's budget recommends a total of \$45.985 billion in spending, a 5.5% increase over the Fiscal Year 2020 (FY20). General Appropriations Act. This spending recommendation is based

on a revised tax revenue estimate of \$27.592 billion, which provides for \$3.538 billion less in available revenue than the original consensus revenue estimate of \$31.131 billion, as originally agreed upon in January. To close this anticipated revenue shortfall, the FY21 budget includes \$1.5 billion from the Stabilization Fund, ensuring a majority of the Stabilization Fund balance remains for future years, \$1.38 billion in available federal support, and more than \$400 million in new revenue initiatives. It also avoids drastic budget cuts while leaving the Commonwealth in a sound fiscal position moving forward.

The Committee's budget protects Massachusetts students and educational institutions by preserving the Senate's stated priority investments, despite an unprecedented fiscal cliff. Continuing the Senate's long-standing support of targeted investments in education, this budget makes harmless Chapter 70 funding in a manner consistent with the agreement reached between the Senate, House and Administration in July by providing \$5.283 billion, an increase of \$107.6 million over FY20.

This additional level of investment will allow all school districts to maintain foundation spending levels while accounting for enrollment and inflation changes. The budget also includes \$345 million for the Special Education (SPED) Circuit breaker, reimbursing school districts for the cost of educating students with disabilities, at the statutorily required 75% reimbursement rate. In addition to ensuring stability for the state's K-12 population, the Committee's budget takes steps to

invest in childcare providers and higher education institutions — both of which are of critical importance to the state's economy and recovery in midst of the COVID-19 pandemic.

Education investments include:

- \$5.283 billion for Chapter 70 education funding
- \$345 million for the Special Education Circuit Breaker
- \$115 million to reimburse public school districts for costs incurred when students leave to attend charter schools
- \$82.2 million to reimburse school districts for regional school transportation costs
- \$360.4 million for the University of Massachusetts, \$308 million for the lifetime community colleges, and \$285.5 million for the nine state universities
- \$40 million for a new reserve to cover parent fees for families receiving subsidized childcare for the remainder of FY 21
- \$25 million for a new Early Education and Care Workforce and COVID-19 Supports Reserve to provide classroom stabilization grants, incentive pay for providers, and support for increased operational costs due to COVID-19
- \$15 million for grants to the Head Start program to maintain access to early education services for low-income families
- \$5 million for the Commonwealth Preschool Partnership Initiative

to expand access to preschool in underserved areas

- \$2 million for grants offered through the Massachusetts Inclusive Concurrent Enrollment Initiative to support high school students with intellectual disabilities ages 18-22 with access to higher education opportunities
- \$1.5 million for rural school aid assistance
- \$1.5 million for the Clives Education Trust Fund

This proposal solidifies Massachusetts' leadership in affordable health care and preserves access to essential services for our most vulnerable residents. The budget funds MassHealth at a total of \$18.577 billion to maintain critical access to affordable health care coverage for over 1.9 million people, ensuring that comprehensive care for our most vulnerable residents, seniors and low-income residents is protected in the middle of a public health crisis. The Committee's budget also includes targeted investments to maintain and expand access to mental health services while highlighting the importance of strengthening public health infrastructure at the local, state and regional level to combat the effects of the COVID-19 pandemic.

Health investments include:

- \$500.3 million for Adult Support Services, including assisted outpatient programming and com-

prehensive care coordination among health care providers

- \$163.6 million for a range of substance abuse treatment and intervention services
- \$94.5 million for children's mental health services
- \$45.2 million for domestic violence prevention services
- \$35.1 million for early intervention services, to ensure supports are accessible and available to infants and young toddlers with developmental delays and disabilities
- \$20 million for funding to support expanded access to mental health services, including \$10M for the Behavioral Health Outreach, Access and Support Trust Fund and \$10M for a new inpatient mental health acute care beds grant program to expand access to critical mental health services
- \$17.5 million for Family Resource Centers to meet increased demand for services
- \$10 million for grants to support local boards of health to combat COVID-19
- \$2.5 million for a new matching funds grant program to assist communities making public health-oriented adjustments to their public safety systems, including targeted reforms such as jail diversion programs, de-escalation training and professionalization, and behavioral health staffing and supports
- \$1.7 million for the State Action for Public Health Excellence (SAPHE) program to support a more

effective local and regional public health delivery system

- \$1 million for a COVID-19 Vaccine Distribution Plan program, focused on equitable vaccine distribution

In addition to these health care investments, the Committee's budget takes meaningful steps to expand access to care by including provisions concerning same day billing that prohibit insurers from denying coverage for mental health services and primary care services solely because they were delivered on the same day in the same facility. This important measure will remove a significant financial barrier to the integration of primary care and mental health. The Senate is committed to building an equitable recovery from the unprecedented COVID-19 public health crisis and its economic fallout. To that end, the Committee's budget invests in programs to educate, train, and prepare Massachusetts workers while addressing further economic impacts of the pandemic.

Opportunity investments include:

- \$46.4 million for a new Economic Planning and Response Program, including grants and loans to small businesses, small business technical assistance and capital improvement supports

BUDGET 1 page 2

Public Notices

Community Outreach

LEGAL NOTICE
Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for December 16, 2020 at 6:00 PM at the Town of Brimfield Town Hall Building located at 21 Main Street, Brimfield, Massachusetts 01010. The Community Outreach Meeting will be held in accordance with Social Distancing Guidelines. The proposed Marijuana Establishment will be an Adult-Use Marijuana Manufacturer and Adult-Use Marijuana Cultivator to be located at 142 Holland Road, Brimfield, Massachusetts 01010. There will be an opportunity for the public to ask questions.
11/19/2020

(SEAL)
THE COMMONWEALTH OF MASSACHUSETTS
LAND COURT
DEPARTMENT OF THE TRIAL COURT
20 SM 00706
ORDER OF NOTICE

To: Beirs, Devisees, and Legal Representatives of the Estate of Gloria T. Kay; Jan Kay; Barbara A. Kay a/k/a Barbara A. Boly and to all persons entitled to the benefit of the Servicemembers Civil Relief Act, 50 U.S.C. § 3901 (et seq).

Bank of New York Mellon Trust Company, N.A. as Trustee for Mortgage Assets Management Series I Trust claiming to have an interest in a Mortgage covering real property in Holland, numbered 51 East Brimfield Road, given by Gloria T. Kay to GSF Mortgage Corporation, dated July 6, 2006, and recorded in the Hampden County Registry of Deeds in Book 16081, Page 1 and now held by the Plaintiff by assignment, has filed with this court a complaint for determination of Defendant's Defendant's Servicemembers status.

If you now are, or recently have been, in the active military service of the United States of America, then you may be entitled to the benefits of the Servicemembers Civil Relief Act. If you object to a foreclosure of the above mentioned property on that basis, then you

or your attorney must file a written appearance and answer in this court at Three Pemberton Square, Boston, MA 02108 on or before December 14, 2020 or you may lose the opportunity to challenge the foreclosure on the ground of noncompliance with the Act.

Witness, Gordon H. Piper, Chief Justice of this Court on October 30, 2020.

Deborah J. Patterson
Recorder
11/19/2020

PUBLIC NOTICE

TOWN OF MONSON
Vertex Tower Assets, LLC (the "Applicant") has applied for a Special Permit from the Town of Monson Planning Board to construct a Wireless Communications Facility including a 100' tall monopole style tower at Lakeside Drive, Tax Assessors Parcel 33-24, on land owned by Peter D. Martin and Lori S. Martin. The Applicant will conduct a Visual Demonstration to illustrate the location and height of the proposed Facility by raising a balloon at and to the height of the proposed Facility. Said Visual Demonstration will be held SATURDAY DECEMBER 5, 2020 from 12:00 noon to 3:00 pm, weather and wind conditions permitting. In the event of inclement weather on December 5, 2020, the Visual Demonstration will be rescheduled until Sunday December 6, 2020, wind and weather conditions permitting. In the event of inclement weather on December 12, 2020 or Sunday December 13, 2020, wind and weather conditions permitting, if you have any questions concerning said Visual Demonstration, please contact the Town of Monson Planning Board, kbaker@monson-ma.gov OR Francis D. Parisi, Esq., Parisi Law Associates, P.C., (401) 437-8500, EMAIL: fparisi@plapc.com. Please check the Parisi Law Associates, P.C. website www.plapc.com after noon on the day before the scheduled date(s) to determine if the balloons will be up the following day.
11/19, 11/26/2020

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Attachment B

LEGAL NOTICE: Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for December 10, 2020 at 6:00 PM at the Town of Brimfield Town Hall Building located at 21 Main Street, Brimfield, Massachusetts 01010. The Community Outreach Meeting will be held in accordance with Social Distancing Guidelines. The proposed Marijuana Establishment will be an Adult-Use Marijuana Manufacturer and Adult-Use Marijuana Cultivator to be located at 142 Holland Road, Brimfield, Massachusetts 01010. There will be an opportunity for the public to ask questions.

Attachment C

November 20, 2020

RE: Notice of a Community Outreach Meeting for Trifecta Farms Corp.
Proposed Adult Use Cultivation and Manufacturing Facility
142 Holland Road, Brimfield MA 01010

Dear Sir/Madame:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for December 10, 2020 at 6:00 PM at the Brimfield Town Hall, 21 Main Street, Brimfield Massachusetts 01010. The proposed Marijuana Establishment will be an Adult-Use Marijuana Cultivation and Adult-Use Marijuana Manufacturing operation to be located at 142 Holland Road, Brimfield Massachusetts 01010. There will be an opportunity for the public to ask questions.

You are hereby receiving notice of this Community Outreach Meeting in accordance with the requirements of 935 CMR 500.000 based upon your proximity to the proposed establishment's location, 142 Holland Road, Brimfield MA 01010

All questions concerning this proposed establishment can be brought to the Community Outreach Meeting. Further information can be obtained by contacting Attorney Nicholas Adamopoulos at 508-943-7800.

Sincerely,

Nicholas Adamopoulos



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:

Trifecta Farms Corp

2. Name of applicant's authorized representative:

Michael Poirier

3. Signature of applicant's authorized representative:

4. Name of municipality:

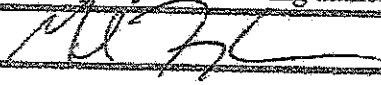
Town of Brimfield

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

Mike Doyle



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).*):

selectmen@brimfieldma.org

8. Host community agreement execution date:

2/1/21



PLAN TO REMAIN COMPLIANT WITH LOCAL BYLAWS

Trifecta Farms Corp. (“Trifecta Farms”) will remain compliant at all times with the Town of Dudley bylaws and regulations application to TRIFECTA FARMS’ Marijuana Establishment.

In accordance with Town of Brimfield’s Zoning By-Law Section 3.15.00, TRIFECTA FARMS’s proposed Marijuana Establishment is located at 142 New Holland Road, Brimfield Massachusetts in the Zoning District designated for Adult Use Marijuana cultivation and manufacturing

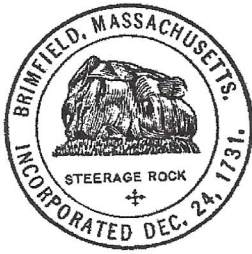
In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12

As required by Town of Brimfield’s Zoning By-Law, TRIFECTA FARMS will apply for a Special Permit and/or Site Plan Approval, as applicable, from the Town of Brimfield Planning Board. The Special Permit approval shall have a term limited to the duration of TRIFECTA FARMS’ ownership/control of the premises as a Marijuana Establishment and shall lapse/expire if: (1) TRIFECTA FARMS ceases to operate; and/or (2) TRIFECTA FARMS’s registration/license by the Commission expires or is terminated.

TRIFECTA FARMS will apply for a Building Permit and a Certificate of Occupancy from the Brimfield Building Department. TRIFECTA FARMS will also obtain a Marijuana Operating Permit annually from the Town of Brimfield Board of Health.

TRIFECTA FARMS will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Cultivator, and Manufacturer at TRIFECTA FARMS’s proposed location.

TRIFECTA FARMS has already attended several meetings with various municipal officials and boards to discuss TRIFECTA FARMS’s plans for a proposed Marijuana Establishment and has executed a Host Community Agreement with Town of Brimfield. TRIFECTA FARMS will continue to work cooperatively with various municipal departments, boards, and officials to ensure that TRIFECTA FARMS’s Marijuana Establishment remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.



Town of Brimfield
COMMONWEALTH OF MASSACHUSETTS
Office of the Select Board

July 21, 2023

Nicholas Adamopoulos
Lake Shore Legal, LLC
PO Box 1210
154 Thompson Road
Webster, MA 01570

RE: Trifecta Farms Corp's CCC License Renewal

Dear Mr. Adamopoulos:

It is our understanding that the Trifecta Farms Corp. license is currently up for renewal with the Massachusetts Cannabis Control Commission. As part of this renewal application, and pursuant to 935 CMR 500.103(4)(f), you are requesting from the Brimfield Select Board, records of any cost incurred by the Town of Brimfield, that are reasonably related to the operation of the Marijuana Establishment located at 142 New Holland Road, Brimfield, MA. 01010.

Pursuant to M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Please accept this correspondence as certifying that there have been no costs imposed on The Town of Brimfield by the operation of Trifecta Farms Corp., located at 142 New Holland Road, Brimfield, MA. 01010.

Additionally, the Host Community Agreement between the Town of Brimfield, Massachusetts, and Trifecta Farms Corp. remains in good standing.

Please contact this office should you require anything further relative to the above referenced.

Sincerely,

Theresa A. Cofske
Select Board Administrative Assistant/Chief Procurement Officer

From: [Select Board](#)
To: [Nicholas Adamopoulos](#)
Subject: RE: Trifecta Farm Corp
Date: Friday, July 21, 2023 12:43:35 PM
Attachments: [image002.png](#)
[image003.png](#)
[Trifecta Farms Corp - CCC License Renewal Brimfield Certification Letter 07212023.pdf](#)
Importance: High

Good Afternoon Nicholas:

Attached, please find the letter certifying there have been no additional costs to the Town of Brimfield, and further the HCA is in good standing.

Sincerely,

Theresa



Theresa A. Cofske
Administrative Assistant
to the Select Board

Town Hall Annex
23 Main Street
Brimfield, MA 01010
(413) 245-4100 x 1104
selectboard@brimfieldma.org

When writing or responding, please remember that the MASS Secretary of State's Office has determined that email is a public record and therefore subject to public access under the Mass Public Records Law. M.G.L.c.66§10.

*This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use the information. Also, please indicate to the sender that you have received this email in error, and delete the copy you received.
Please consider the environment before printing this e-mail.*

From: Nicholas Adamopoulos <Nick@lakeshorelegalsolutions.com>
Sent: Monday, July 17, 2023 7:45 PM
To: Select Board <SelectBoard@brimfieldma.org>
Cc: mjheavy@aol.com
Subject: Trifecta Farm Corp

Dear Sir/Madame

The annual renewal of Trifecta Farms Corp's CCC licenses is due shortly. Part of the submission to the CCC is a statement from the municipality stating the following:

Any documentation from the municipality demonstrating actual and/or anticipated costs associated with the establishment, if any

Acknowledgement that the HCA is still in good standing with the Town of Brimfield

Kindly respond to this email as soon as possible. If you have any questions certainly contact me.



NICHOLAS ADAMOPOULOS
LAKE SHORE LEGAL, LLC
PO Box 1210
154 THOMPSON ROAD
WEBSTER, MA 01570
TEL: 508-943-7800 EXT. 402
FAX: 508-948-0570
WWW.LAKESHORELEGALSOLUTIONS.COM (-> URLDEFENSE.COM)

With the prevalence of phishing schemes, please verify that any attachments and/or links are being sent from nick@lakeshorelegalsolutions.com and not from any third-party accounts prior to opening any such items.

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

Overview

Trifecta Farms Corp (“Trifecta”) is dedicated to serving and supporting populations falling within areas of disproportionate impact, which the Commission has identified as the following:

1. Past or present residents of the geographic “areas of disproportionate impact,” which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
2. Commission-designated Economic Empowerment Priority applicants;
3. Commission-designated Social Equity Program participants;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have drug convictions.

To support such populations, Trifecta has created the following Plan to Positively Impact Areas of Disproportionate Impact (the “Plan”) and has identified and created goals/programs to positively impact

Goals

In order for Trifecta to positively impact Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions, Trifecta has established the following goals:

1. Trifecta shall offer legal expungement services to individuals who have prior possession charges. Such services will be paid for by Trifecta. Trifecta shall strive to provide at a minimum of 12 expungement filings per year, or an average of one expungement filing per month.
2. Trifecta will give hiring consideration to at least 50% of individuals or their spouses or the direct descendants of such individuals who have obtained expungement services through Goal 1 of this program.

Programs

Trifecta has developed specific programs to effectuate its stated goals to positively impact Massachusetts residents who have past drug convictions and Massachusetts residents with parents or spouses who have drug convictions. Such programs will include the following:

1. Trifecta will at least quarterly advertise in the Register Journal, reaching Brimfield and its surrounding towns, that it is offering expungement services to Massachusetts residents with past drug convictions.

Measurements

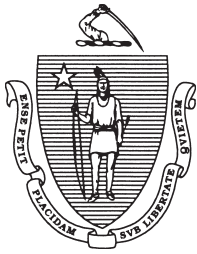
The President will administer the Plan and will be responsible for developing measurable outcomes to ensure Trifecta continues to meet its commitments. Such measurable outcomes, in accordance with Trifecta’s goals and programs described above, include:

- Annual filing of 12 expungement petitions with Massachusetts’ courts.
- Quarterly advertising in the Register Journal concerning expungement services
- Review of application filings from individuals who have obtained expungement services and review of applications from their spouses or children.

Beginning upon receipt of Trifecta's first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, Trifecta will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The President will review and evaluate Trifecta's measurable outcomes no less than quarterly to ensure that Trifecta is meeting its commitments. Trifecta is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

- Trifecta will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.
- Any actions taken, or programs instituted, by Trifecta will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



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

William Francis Galvin
Secretary of the
Commonwealth

Date: February 08, 2021

To Whom It May Concern :

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

TRIFECTA FARMS CORP.

is a domestic corporation organized on **November 10, 2020** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

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

Secretary of the Commonwealth

Certificate Number: 21020256220

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

Processed by: bod



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

mass.gov/dor

Letter ID: L1180405056
Notice Date: February 9, 2021
Case ID: 0-001-098-250



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



TRIFECTA FARMS CORP
58 AGARD RD
BRIMFIELD MA 01010-9760

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, TRIFECTA FARMS CORP 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!

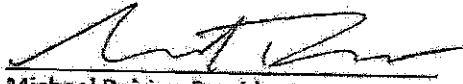
Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- 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

Certificate of Good Standing or Compliance from the Massachusetts Department of Unemployment
Assistance Attestation Form

I, Michael Poirier, the President of Trifecta Farms Corp certify that Trifecta Farms Corp does not currently have employees and is therefore unable to register with the Massachusetts Department of Unemployment Assistance to obtain a Certificate of Good Standing or Compliance.



Michael Poirier, President
Trifecta Farms Corp.

2/9/2021
Date

BYLAWS

OF

Trifecta Farms Corp.,
a Massachusetts Corporation

ARTICLE I

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

If no record date is fixed:

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

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

ARTICLE II

Board of Directors

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ARTICLE III

Executive and Other Committees

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

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

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

ARTICLE IV

Officers

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

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

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

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

ARTICLE V

Forms of Certificates; Loss and Transfer of Shares

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

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

ARTICLE VI

Records and Reports

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

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

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

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

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

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

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

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

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

ARTICLE VII

Miscellaneous

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

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

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

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

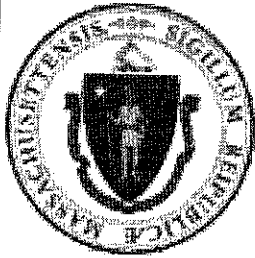
Section 7.5. Contracts. The Board of Directors may authorize any officer or officers, agent or agents, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances.

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

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

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

[Remainder Intentionally Left Blank.]



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

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

Identification Number: 001469491

ARTICLE I

The exact name of the corporation is:

TRIFECTA FARMS CORP.

ARTICLE II

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

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CWP	\$70.00000	10,000	\$700,000.00	10,000

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

ARTICLE IV

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

ARTICLE V

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

ARTICLE VI

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

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

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

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	MICHAEL POIRIER	58 AGARD ROAD BRIMFIELD, MA 01010 USA
TREASURER	MICHAEL POIRIER	58 AGARD ROAD BRIMFIELD, MA 01010 USA
SECRETARY	MICHAEL POIRIER	58 AGARD ROAD BRIMFIELD, MA 01010 USA
DIRECTOR	MICHAEL POIRIER	58 AGARD ROAD BRIMFIELD, MA 01010 USA

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

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

CULTIVATION - APPLYING FOR LICENCING WITH CANNIBUS

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

No. and Street: 58 AGARD ROAD
City or Town: BRIMFIELD State: MA Zip: 01010 Country: USA

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

No. and Street: 58 AGARD ROAD

City or Town:

BRIMFIELD

State: MA

Zip: 01010

Country: USA

which is

☒ its principal office

☐ an office of its secretary/assistant secretary

☐ an office of its transfer agent

☐ its registered office

Signed this 10 Day of November, 2020 at 7:05:37 AM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

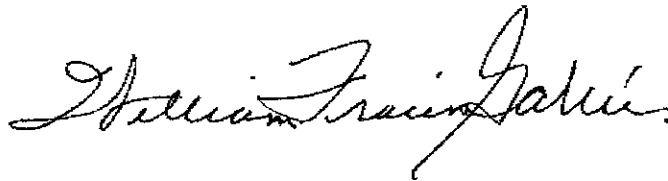
LEGALZOOM.COM, INC., A CALIFORNIA CORPORATION, CHEYENNE MOSELEY, ASSISTANT SECRETARY

THE COMMONWEALTH OF MASSACHUSETTS

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

deemed to have been filed with me on:

November 10, 2020 07:05 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

TRIFECTA FARMS CORP

BUSINESS PLAN

FEBRUARY 9, 2021

EXECUTIVE SUMMARY

Mission Statement and Message from the CEO

Trifecta Farms Corp (“Trifecta”) is an applicant for Marijuana Establishment Licenses in the Commonwealth that is committed to creating a safe and clean community environment and that provides consistent, high quality cannabis to consumers who are 21 years of age or older.

License Types

TRIFECTA FARMS is applying for the following Licenses from the Massachusetts Cannabis Control Commission (the “Commission”) to operate Marijuana Establishments in Massachusetts at 142 New Holland Road, Brimfield, Massachusetts

- Marijuana Cultivator
- Marijuana Manufacturer

What Drives Us

TRIFECTA FARMS’s goals include:

1. Providing customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting local communities in offsetting the cost of TRIFECTA FARMS’s operations within its communities;
3. Hiring employees and contractors from within the communities served;
4. Hiring employees and contractors from communities that have been disproportionately impacted by the war on drugs;
5. Having a diverse and socially representative pool of employees;
6. Empowering the next generation of entrepreneurs and leaders through hiring, training and teaching; and
7. Running an environmentally friendly Marijuana Establishment.

General

TRIFECTA FARMS has put together a team to implement the operations of the Marijuana Establishment and intends to create 15-20 full-time staff positions within the first three years of operation. No Person or Entity Having Direct or Indirect Control over TRIFECTA FARMS team is or will be a controlling person with over more than three licenses in a particular class of license.

Founders

TRIFECTA FARMS was founded in 2020 by Michael Poirier, Cody Langlitz, and Evan Chakrin.

COMPANY DESCRIPTION

Structure

TRIFECTA FARMS is a Massachusetts Corporation that is applying for Licenses from the Commission to operate Marijuana Establishments in the Commonwealth.

TRIFECTA FARMS will file, in a form and manner specified by the Commission, an application for licensure as a Marijuana Establishment consisting of three packets: An Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

Operations

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

TRIFECTA FARMS will tag and track all marijuana seeds, clones, plants, and marijuana products using Metrc and in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that has not first been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

TRIFECTA FARMS will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting

principles and maintained for at least 12 months or as specified and required by 935 CMR 500.000.

TRIFECTA FARMS 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 will be no higher than \$5,000 per occurrence. If adequate coverage is unavailable at a reasonable rate, TRIFECTA FARMS will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. TRIFECTA FARMS will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

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

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

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

Prior to commencing operations, TRIFECTA FARMS will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of TRIFECTA FARMS. If TRIFECTA FARMS is unable to secure a surety bond, it will place in escrow a sum of no less than \$5,000 or such other amount approved by the Commission, to be expended for coverage of liabilities. The escrow account will be replenished within ten business days of any expenditure required under 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* unless TRIFECTA FARMS has ceased operations. Documentation of the replenishment will be promptly sent to the Commission.

TRIFECTA FARMS and TRIFECTA FARMS agents will comply with all local rules, regulations, ordinances, and bylaws.

Security

TRIFECTA FARMS will contract with a professional security and alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

TRIFECTA FARMS's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs. A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Police Department. These surveillance cameras will remain operational even in the event of a power outage. The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only TRIFECTA FARMS's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity. All agents and visitors will be required to visibly display an ID badge, and TRIFECTA FARMS will maintain a current list of individuals with access. TRIFECTA FARMS will have security personnel on-site during business hours.

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

Benefits to Host Communities

TRIFECTA FARMS looks forward to working cooperatively with its host communities to ensure that TRIFECTA FARMS operates as a responsible, contributing member of those host communities. TRIFECTA FARMS has established a mutually beneficial relationship with its host communities in exchange for permitting TRIFECTA FARMS to site and operate.

TRIFECTA FARMS's host communities stand to benefit in various ways, including but not limited to the following:

- 1 **Jobs**: A Marijuana Establishment facility will add a number of full-time jobs, in addition to hiring qualified, local contractors and vendors.
- 2 **Monetary Benefits**: A Host Community Agreement with significant monetary donations will provide the host community with additional financial benefits beyond local property taxes.
- 3 **Access to Quality Product**: TRIFECTA FARMS will allow qualified consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants.
- 4 **Control**: In addition to the Commission, the Police Department and other municipal departments will have oversight over TRIFECTA FARMS's security systems and processes.
- 5 **Responsibility**: TRIFECTA FARMS is composed of experienced professionals who will be thoroughly background checked and scrutinized by the Commission.
- 6 **Economic Development**: TRIFECTA FARMS's operation of its facilities will help to revitalize its host communities and contribute to the overall economic development of the local community.
- 7 **Charity**: TRIFECTA FARMS is committed to contributing annually in charitable donations to public and local charities in the Town.

MARKET RESEARCH

Customers

TRIFECTA FARMS will only sell marijuana and marijuana products to other licensed Marijuana Establishments, customers ages 21 years and older that provide valid identification,

Competitors

A robust competitive landscape appears to be developing in the Massachusetts adult-use Cannabis market. While there have been over 700 applications submitted to the Commission in Massachusetts, none have been submitted in the Town of Brimfield where TRIFECTA FARMS plans to locate.

Competitive Advantage

TRIFECTA FARMS's competitive advantages over their competition include the following:

1. The co-founders of this business have vast experience in not only marketing but also in emerging markets such as cannabis. The experience the group brings will allow for TRIFECTA FARMS to have the knowledge and experience necessary to offer a high-end cannabis product and business to consumers in Massachusetts.
2. The location of TRIFECTA FARMS in the Town of Brimfield is very advantageous. With close access to the Route 20 and Route 90, consumer access to TRIFECTA FARMS will be very accessible. Additionally, the proposed property is located away from Main Streets in Brimfield which will allow TRIFECTA FARMS to be a good neighbor and greatly reduce any main street congestion in town.

TRIFECTA FARMS possesses several strengths that separate TRIFECTA FARMS from the competition.

Regulations

TRIFECTA FARMS is a Massachusetts domestic corporation. TRIFECTA FARMS will maintain the company in good standing with the Massachusetts Secretary of the Commonwealth, the Department of Revenue, and the Department of Unemployment Assistance. TRIFECTA FARMS will apply for all state and local permits and approvals required to build out and operate the facility.

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

Products & Services

1. A comprehensive list of products to be cultivated and manufactured by TRIFECTA FARMS will be provided to the Commission prior to final licensure.

Pricing Structure

TRIFECTA FARMS's pricing structure will vary based on market conditions. TRIFECTA FARMS plans to provide products of superior quality and will price accordingly.

MARKETING & SALES

Growth Strategy

TRIFECTA FARMS's plan to grow the company includes:

1. Strong and consistent branding;
2. Intelligent, targeted, and compliant marketing programs;and
3. A caring and thoughtful staff made of consummate professionals.

TRIFECTA FARMS plans to seek additional, appropriate locations in the surrounding area to expand business and reach an increased number of customers in the future.

Communication

TRIFECTA FARMS will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the public health, welfare, or safety of the general public, or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising, and branding created for viewing by the public will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will include a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the face of the advertisement.

All marketing, advertising, and branding produced by or on behalf of TRIFECTA FARMS will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination,

and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

TRIFECTA FARMS will seek events where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. At these events, TRIFECTA FARMS will market its products and services to reach a wide range of qualified consumers.

TRIFECTA FARMS will communicate with customers through:

1. A company run website;
2. A company blog;
3. Popular cannabis discovery networks such as WeeTrifecta Farmsps and Leafly;
4. Popular social media platforms such as Instagram, Facebook, Twitter, and SnapChat; and
5. Opt-in direct communications.

Sales

TRIFECTA FARMS will sell its products and services by engaging customers with knowledgeable personnel.

TRIFECTA FARMS Holdings (MA), LLC will utilize a wholesale model as part of its sales strategy. The root of such strategy is supplying the MA market with the highest-grade premium cannabis.

Packaging for marijuana products sold or displayed for consumers in multiple servings will allow a consumer to easily perform the division into single servings and include the following

statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica, or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.” TRIFECTA FARMS will not sell multiple serving beverages and each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. In no instance will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

Logo

TRIFECTA FARMS is developing a logo to be used in labeling, signage, and other materials such as letterhead and distributed materials.

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

An image of the logo will be provided to the CCC for their approval before final licensing.

FINAL REMARKS

TRIFECTA FARMS has the experience and know-how to safely and efficiently provide high quality, consistent, laboratory-tested cannabis and derivatives. TRIFECTA FARMS hopes to bring its high-quality standards to adult-use consumers to provide them with a safe and clean community environment. TRIFECTA FARMS’s security systems and comprehensive security measures will also help ensure a safe and secure environment that will help deter and prevent diversion.

Plan for Obtaining Liability Insurance

Trifecta Farms Corp (“Trifecta”) plans to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence & \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. Trifecta will consider additional coverage based on availability & cost-benefit analysis. If adequate coverage is unavailable at a reasonable rate, Trifecta will place in escrow at least \$250,000 to be expended for liabilities coverage. Any withdrawal from such escrow replenished within 10 business days. Trifecta will keep reports documenting compliance with 935 CMR 500.105(10).

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), TRIFECTA FARM CORP.'s ("TRIFECTA") facility will only be accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a TRIFECTA agent will immediately inspect the person's proof of identification and determine the person's age, in accordance with 935 CMR 500.140(2).

In the event TRIFECTA discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). TRIFECTA will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), TRIFECTA will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21. TRIFECTA 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 sponsorship of 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. TRIFECTA will not manufacture or sell any edible products that resemble a realistic or fictional human, animal or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b).

In accordance with 935 CMR 500.105(4)(a)(5), any marketing, advertising and branding materials for public viewing will include a warning stating, **"For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana. Please Consume Responsibly."** Pursuant to 935 CMR 500.105(6)(b), TRIFECTA packaging for any marijuana or marijuana products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors. TRIFECTA's website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

QUALITY CONTROL AND TESTING

Quality Control

Trifecta Farms Corp. ("TRIFECTA FARMS") will comply with the following sanitary requirements:

1. Any TRIFECTA FARMS agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any TRIFECTA FARMS agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
 1. Maintaining adequate personal cleanliness; and
 2. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. TRIFECTA FARMS's hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in TRIFECTA FARMS's production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. TRIFECTA FARMS's facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. TRIFECTA FARMS will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. TRIFECTA FARMS's floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. TRIFECTA FARMS's facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. TRIFECTA FARMS's buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. TRIFECTA FARMS will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. TRIFECTA FARMS acknowledges and understands that the Commission may require TRIFECTA FARMS to demonstrate the intended and actual use of any toxic items found on TRIFECTA FARMS's premises;

11. TRIFECTA FARMS will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet TRIFECTA FARMS's needs;
12. TRIFECTA FARMS's plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. TRIFECTA FARMS will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. TRIFECTA FARMS will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. TRIFECTA FARMS will store, and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

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

TRIFECTA FARMS will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by TRIFECTA FARMS to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Testing

TRIFECTA FARMS will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Any Independent Testing Laboratory relied upon by TRIFECTA FARMS for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR

500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Testing of TRIFECTA FARMS's marijuana products will be performed by an Independent Testing Laboratory 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 Medical Marijuana Products and Marijuana-infused Products*. Testing of TRIFECTA FARMS's environmental media will be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

TRIFECTA FARMS's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. TRIFECTA FARMS acknowledges and understands that the Commission may require additional testing.

TRIFECTA FARMS's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both TRIFECTA FARMS and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

TRIFECTA FARMS will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. TRIFECTA FARMS acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

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

directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%). Any marijuana or marijuana products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

Trifecta Farms Corp (“Trifecta”) will securely maintain personnel records, including registration status and background check records. Trifecta will keep, at a minimum, the following personnel records:

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

Agent Personnel Records

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent’s affiliation with Trifecta and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training; and
- Results of initial background investigation, including CORI reports.

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

After-Hours Contacts

Michael Poirier
413-262-6886

Cody Landlitz

774-289-2068

Business Hours (Subject to Approval by the Special Permit Granting Authority)

	Manufacturing/Cultivation	
	FROM:	TO:
Monday	8:00 AM	8:00 PM
Tuesday	8:00 AM	8:00 PM
Wednesday	8:00 AM	8:00 PM
Thursday	8:00 AM	8:00 PM
Friday	8:00 AM	8:00 PM
Saturday	8:00 AM	8:00 PM
Sunday	8:00 AM	8:00 PM

Agent Background Checks

- In addition to completing the Commission’s agent registration process, all agents hired to work for Trifecta will undergo a detailed background investigation prior to being granted access to a Trifecta facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for Trifecta pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, Trifecta will consider:
 - a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
 - b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
 - c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Trifecta 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, Trifecta will consider the following factors:

- i. Time since the offense or incident;
 - ii. Age of the subject at the time of the offense or incident;
 - iii. Nature and specific circumstances of the offense or incident;
 - iv. Sentence imposed and length, if any, of incarceration, if criminal;
 - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - vi. Relationship of offense or incident to nature of work to be performed;
 - vii. Number of offenses or incidents;
 - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
 - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
 - x. Any other relevant information, including information submitted by the subject.
- 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.
- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
 - Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
 - References provided by the agent will be verified at the time of hire.
 - As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Trifecta or the Commission.

Personnel Policies and Training

As outlined in Trifecta's Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All Trifecta agents are required to complete training as detailed in Trifecta's Qualifications and Training plan which includes but is not limited to

Trifecta's strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor

Training Program, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

Trifecta will have a policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported the Police Department and to the Commission;
- Engaged in unsafe practices with regard to Trifecta operations, which will be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

RECORDKEEPING PROCEDURES

General Overview

Trifecta Farms Corp (Trifecta) has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of Trifecta documents. Records will be stored at Trifecta in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

Recordkeeping

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

- **Corporate Records**

Corporate Records are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:

- Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
- Third-Party Laboratory Contracts
- Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
- Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Variances
 - Site Plan Approvals
 - As-Built Drawings
- Corporate Governance:
 - Annual Report
 - Secretary of Commonwealth Filings

- **Business Records**

Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;

- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Trifecta.
- Personnel Records

At a minimum, Personnel Records will include:

 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Trifecta and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with [M.G.L c. 6 § 172, 935 CMR 500.029: Registration of Independent Testing Laboratory Agents], 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
 - Trifecta will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
 - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
 - Trifecta will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

- Sales Records for Marijuana Retailer
 - Trifecta will maintain records that it has performed a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate the sales data and produce such records on request to the Commission.
- Incident Reporting Records
 - Within ten (10) calendar days, Trifecta will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident .
 - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Trifecta for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Trifecta s jurisdiction on request.
- Visitor Records
 - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
 - When marijuana or marijuana products are disposed of, Trifecta will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Trifecta agents present during the disposal or other handling, with their signatures. Trifecta will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
 - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
 - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
 - Recordings shall not be destroyed or altered and shall be retained as long as necessary if Trifecta is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
 - Trifecta will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.

- Vehicle Records (as applicable)
 - Records that any and all of Trifecta's vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
 - Trifecta shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
 - In the event Trifecta closes, all records will be kept for at least two (2) years at Trifecta's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Trifecta will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

Policies and Procedures related to Trifecta's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:

 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of Trifecta's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
 - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
 - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
 - A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
 - Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
 - Alcohol, smoke, and drug-free workplace policies;
 - A plan describing how confidential information will be maintained;
 - Policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
 - Engaged in unsafe practices with regard to Trifecta operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all board of directors, members, and executives of Trifecta, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Trifecta's website.
- Policies and procedures for the handling of cash on Trifecta premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
 - Trifecta shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or

town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

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

MAINTAINING OF FINANCIAL RECORDS

Trifecta Farms Corp (“Trifecta”) operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission’s Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Trifecta.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Prohibiting the use of software or other methods to manipulate or alter sales data;
 - Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - If Trifecta determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
 - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500;
- Additional written business records will be kept, including, but not limited to, records of:

- Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- License Renewal Records
 - Trifecta shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl.

DIVERSITY **PLAN**

Overview

Trifecta Farms Corp (“Trifecta”) is dedicated to promoting equity in its operations for diverse populations, which the Commission has identified as the following:

1. Minorities;
2. Women;
3. Veterans;
4. People with disabilities; and
5. People identifying as LGBTQ+

To support such populations, Trifecta has created the following Diversity Plan (the “Plan”) and has identified and created goals/programs to promote equity in Trifecta’s operations.

Goals

In order for Trifecta to promote equity for the above-listed groups in its operations, Trifecta has established the following goal:

- Trifecta recognizes the importance of maintaining a varied and diverse workforce. To promote its goal of maintaining equity in its operations, Trifecta will strive to maintain a diverse workforce composed of at a minimum 50% individuals from the above referenced groups.
- This will be accomplished by hiring a staff of at least :
 - 10% Minorities;
 - 30% Women; and,
 - 10% Veterans

Programs

Trifecta has developed specific programs to effectuate its stated goals to promote diversity and equity in its operations, which will include the following:

- To accomplish its goal of maintaining a diverse workforce, Trifecta will utilize job postings in the Journal Register. These publications reach individuals located in towns surrounding Trifecta’s operation in Brimfield. Based upon the diverse population makeup of these towns, such postings will effectuate the targeting of individuals from the above referenced diverse populations. Such publications will occur quarterly or when a vacancy becomes available, whichever occurs first.

Measurements

The Director of Human Resources will administer the Plan and will be responsible for developing measurable outcomes to ensure Trifecta continues to meet its commitments. Such measurable outcomes, in accordance with Trifecta’s goals and programs described above, include:

- Human Resources will be responsible for quarterly reviewing the composition of employees and to maintain a current list of the total number of employees who have

identified as a member of one of the diverse populations. Human Resources will quarterly update the President with the composition figures and will highlight whether the 40% goal is currently being satisfied.

Beginning upon receipt of Trifecta's first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, Trifecta will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Director of Human Resources will review and evaluate Trifecta's measurable outcomes no less than annually to ensure that Trifecta is meeting its commitments. Trifecta is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

- Trifecta will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

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

QUALIFICATIONS AND TRAINING

Trifecta Farms Corp (“Trifecta”) will ensure that all employees hired to work at a Trifecta facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

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

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

Training

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

All of Trifecta’s current Owners, managers, and employees that are involved in the handling and sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission to provide the annual minimum of three (3) hours of required training to marijuana establishment agents to be designated a “Responsible Vendor”. Once Trifecta is designated a “Responsible Vendor”, all new employees involved in the handling and sale of marijuana will successfully complete a Responsible Vendor Training Program within 90 days of the date they are hired. After the initial successful completion of a Response Vendor Training Program, each Owner, manager, and employee involved in the handling and sale of marijuana will successfully complete the program once every year thereafter to maintain designation as a “Responsible Vendor”.

Trifecta will also encourage administrative employees who do not handle or sell marijuana to take the “Responsible Vendor” program on a voluntary basis to help ensure compliance. Trifecta’s records of Responsible Vendor Training Program compliance will be maintained for at least four years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

As part of the Responsible Vendor Training Program, Trifecta’s agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not

limited to the following:

1. Marijuana's effect on the human body, including:
 - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
 - The amount of time to feel impairment;
 - Visible signs of impairment; and
 - Recognizing signs of impairment
2. Diversion prevention and prevention of sales to minors, including best practices;
3. Compliance with all tracking requirements;
4. Acceptable forms of identification, including:
 - How to check identification;
 - Spotting false identification;
 - Patient registration cards formerly and validly issued by the DPH or currently and validly issued by the Commission; and
 - Common mistakes made in verification
5. Other key state laws and rules affecting Owners, managers, and employees, including:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability;
 - License sanctions;
 - Waste disposal;
 - Health and safety standards;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitted hours of sale;
 - Conduct of establishment;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records;
 - Privacy issues; and

Prohibited purchases and practices.

**ENERGY
EFFICIENCY**

In accordance with the regulations of the Cannabis Control Commission Trifecta Farms Corp's ("Trifecta") facility shall utilize numerous avenues to promote energy efficiency and conservation

To ensure energy efficiency and conservation Trifecta shall implement the following within its retail store:

1. The use of energy efficiency and energy savings light bulbs and lighting features to reduce the amount of energy light usage within the retail establishment;
2. The use of motion activated lighting in areas that are not high frequency walking areas outside the areas accessible by the general public. Such motion activated lighting features shall be done in accordance with the input of the security plan of Trifecta to ensure proper security of the facility;
3. Trifecta shall on an annual basis have the premises reviewed by the MassSave program so that any areas of the business that could lead to a reduction in energy cost can be identified and a plan put in place to address those areas.
4. Proper education to employees and employee tasks to ensure that all lighting sources are turned off at the end of the business day to ensure that there is no excess energy use during the non-business hours of the store.

TRIFECTA FARMS CORP (Trifecta) Safety Plan

TRIFECTA has developed operating policies and procedures (outlined below) for its Safety Plan concerning the manufacturing of products of product in compliance with 105 CMR 590.000 and 935 CMR 500.101(1). TRIFECTA will ensure that its upper management and employees adhere to all state and town guidelines, regulations, and laws pertaining to proper sanitation and safety measures. Further, TRIFECTA will comply with all requirements that the Town of Dudley's Board of Health requires concerning the manufacturing of adult use cannabis products on site.

TRIFECTA's Safety Plan will work closely with TRIFECTA's Quality Control Processes and Procedures include the following items which are further outlined herein:

- Handling Procedures,
- Facility Sanitation Standard Operating Procedures (SOPs);
- Facility Design and Layout,
- Facility Sanitation and Inspections,
- Equipment Selection and Maintenance,
- Regular Facility Maintenance,
- Worker Sanitation, and Plant Handling Safety.

TRIFECTA's Safety Plan will also ensure that its Testing Plans include the following.

- Periodic independent testing as deemed appropriate with third party vendor (e.g. MCR Labs) to ensure that quality control policies and procedures are properly working to keep TRIFECTA's facility in compliance with laws, rules, and regulations.

Marijuana and Product Handling

TRIFECTA will instill a culture dedicated to sanitation, safety, and quality assurance in the pursuit of producing the highest quality marijuana. TRIFECTA will require all employees who come into direct contact with marijuana ("cultivation employees") to be trained in food handling techniques and be subject to the same requirements as any commercial kitchen staff [935 CMR 500.105(3)(b)1. and 935CMR 500.130(2)(a)]. Specifically, implicated employees will be mandated to satisfy the requirements for food handlers specified in 105 CMR 300.000:

Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements, which lists diseases dangerous to the public health as designated by the Department of Public Health ("the Department") and establishes reporting, surveillance, isolation and quarantine requirements. In addition, TRIFECTA will provide all cultivation employees with company uniforms and a locker. Employees will be required to change at the beginning and end of each shift to minimize the risk of contamination as quality control requires effective production control.

The Quality Assurance Manager ("QAM") will be responsible for ensuring that TRIFECTA is maintaining facility quality control compliance and providing safe, high-quality product that meets market needs. Quality control protocols ensure that the highest standard management practices are continuously in effect and that the teams in the cultivation facility communicate effectively in maintaining said practices. TRIFECTA will enforce quality centric Supervisory Operating Procedures ("SOPs") through reoccurring and randomly performed quality control inspections throughout the facility. Every cultivation team member will be trained on their unique quality control responsibilities and will be expected to uphold TRIFECTA's strict quality control standards in every aspect of their position. Inspections by state and local licensing and enforcement

authorities will also ensure TRIFECTA is meeting the highest quality control standards [935 CMR 500.105(2)(b)7.e.x. and 500.300]. The QAM is responsible for ensuring facility adherence and compliance with all applicable local, state, and federal laws, rules, and regulations. The QAM performs Quality Control/Quality Assurance through all levels of the operation to ensure consistent, safe, quality and timely product for sale and delivery to other Marijuana Establishments. The QAM reports up to the General Manager and manages individual responsibilities in accordance with the company's policies and applicable laws. This position communicates compliance violations through the General Manager to the staff and maintains accurate records of all compliance checklists, production logs, visitor logs, employees, processes, vendors, shipping and receiving manifests. The QAM will consistently attend local and state regulatory meetings to stay abreast of changes in laws, rules, and regulations. The QAM will host and lead in discussions with local and state audit representatives during scheduled and unscheduled inspections to answer questions and provide support where needed. In addition, the QAM ensures the operational licenses and permits are kept current and renewed [935 CMR 500.103(4)].

No later than 60 calendar days prior to the expiration date, the QAM will submit a completed renewal application to the Commission in a form and manner determined by the Commission, as well as the required fee [935 CMR 500.103(4)(a)]. The QAM will submit as a component of the renewal application a report or other information demonstrating TRIFECTA's compliance with the quality assurance plans required under 935CMR 500.101(1) and (2). At the time of renewal, TRIFECTA will make available an accounting of the financial benefits accruing to the municipality as a result of the host community agreement with TRIFECTA for the Commission to make available on its website [935 CMR 500.103(4)(d)]. The QAM works in conjunction with the Inventory Control Manager and cultivation/harvest staff to ensure proper sample collection and testing in accordance with all applicable regulatory requirements and works with third party testing labs on shipment, manifest and reporting of samples, data derived, and proper reporting of findings [935 CMR 500.160].

The QAM candidate will have experience in quality systems in manufacturing or laboratory operations, controls, change management processes, regulatory, validation, leadership, influencing, and negotiation are preferable. The QAM will have a solid understanding of the equipment, manufacturing processes, maintenance and quality standards required to keep the facility functioning at full capacity. Plants are reviewed through continual quality control process throughout the life cycle. Through proper plant handling, contamination prevention, pest management, environmental controls, and staff training, TRIFECTA will create a proactive approach to quality control and reduce the potential for outbreaks or crop loss. The cultivation team will tend the crops allowing for sustained visual scrutiny of each individual plant. The cultivation team will perform quality control checks as they are cloning, topping, pruning, making rounds and generally working with the plants. Marijuana plant health can be vulnerable to hundreds of different pests and microbial threats or outbreaks that can be devastating to the crop. In mitigating such threats, the cultivation team will continuously check, recheck and immediately address any issues that may arise. The Harvest Team will be responsible for performing visual quality control checks as they remove waste stems and leaves from harvested plants.

As the harvested marijuana is dried and cured, final quality control checks are performed by the team and the QAM; should an issue be detected post-harvest, the potentially contaminated product will be physically segregated and tagged in the seed-to-sale tracking system as being on hold. The Cultivation Manager and QAM will decide if the contamination is clear and present, what the contamination is, and if the product

requires destruction. The cultivation team will be prompted to inspect the specific room the plant was harvested from and determine if any other plants in that room are contaminated. If so, the room will be quarantined and sanitized. Contaminated items will be quarantined and destroyed according to the TRIFECTA's Waste Disposal Management SOPs.

Facility Sanitation Standard Operating Procedures ("SOP")

TRIFECTA has developed facility sanitation standard operating procedures ("SOP") based on Massachusetts' regulatory guidelines in accordance with current good manufacturing

practices (cGMP) and sanitation principles to maintain an aseptic environment that ensures the safety and integrity of the marijuana plants being cultivated within and, ultimately, dispensed to the public [935 CMR 500.105(3)(c)]. The Facilities Manager and Cultivation Manager will be responsible for the proper implementation and maintenance of TRIFECTA's Sanitation Plan under the oversight of the General Manager ("GM"). Cleaning and sanitation are a substantial part of TRIFECTA's Integrated Pest Management (IPM) protocols for prevention of both plant and non-plant pests. Pest prevention standards require zero infestation and conformity with the mandatory pest management program, permitted mitigation techniques, and record keeping. TRIFECTA will maintain good sanitary conditions to limit the potential for contaminants and pest outbreaks that may lead to contamination or adulteration of growing or harvested marijuana. Sanitation and product handling audits may be carried out by inspectors from within the company, from an independent organization, or the Commission (at any time). Audits are based on criteria to ensure the highest standard of compliance with a specific emphasis on product handling. Cleaning activities in limited access areas will follow TRIFECTA's security protocol, including the supervision of staff at all times by an authorized manager under constant video surveillance. TRIFECTA's facility sanitation SOPs include daily and weekly sanitation responsibilities for every position in the facility, including pest prevention, worker sanitation practices, and the proper removal of litter and waste [935CMR500. 105(3)(b)8.]. Various sanitation SOPs will detail processes for safely handling marijuana plants through every phase of growth and production. TRIFECTA's SOPs also include an inspection and maintenance schedule to ensure equipment, floors, counters, walls, and ceilings are maintained and in excellent repair.

TRIFECTA will develop SOPs customized to the specific cultivation facility based upon best practices. Sanitation procedures will address the unique aspects of sanitizing, inspecting, and maintaining equipment and surfaces that come into contact with marijuana. Sanitation forms and logs will detail the steps taken by staff to prevent contamination, clutter, infestation from insects, rodents, birds, or other pests, microbial or pathogenic outbreaks.

Facility Inspections

The opening manager will perform a daily walkthrough of the entire facility to look for potential safety and sanitation hazards. These inspections will include looking for burned out bulbs, damaged equipment, evidence of pests, and lack of cleanliness. Any concerns will be immediately corrected or scheduled to be corrected. TRIFECTA's integrated pest management plan includes weekly exterior facility inspections conducted by the Facilities Manager to identify potential habitats and food sources, gaps in doors or windows, inadequate screening, mowing, or other maintenance needed to prevent attracting rodents, insects and other pests. Pursuant to 935 CMR 500.300, the Commission or its agents may inspect TRIFECTA's facility and affiliated vehicles (if applicable) at any time without prior notice to determine and enforce compliance with St.

3026, c. 334, as amended by St. 2017, c 55 and 935 CMR 500.300. Accordingly, all areas of the TRIFECTA's facility including agents, activities, and all records may be subject to inspection. TRIFECTA's acceptance of a license constitutes consent [935 CMR 500.300(1)].

The QAM will maintain and update a comprehensive compliance binder (or software) to keep the facility current with applicable laws and regulations. The QAM will then educate all personnel including owners and management on regulatory changes and compliance.

Facility Design

The cultivation facility will be designed to reduce the risk of contamination using special construction materials, equipment selection, and environmental controls. Building materials used for internal surfaces, such as walls, floors and work surfaces, will be conducive to sanitation and maintenance.

TRIFECTA's facility design will ensure that:

- Interior/exterior room surfaces (walls, floors, and ceilings) are constructed of aluminum, fiberglass reinforced paneling (e.g., Perma-Therm or equivalent) and other antimicrobial materials that are resistant to high-moisture, impacts, and fire, and that are durable, smooth, free from cracks and holes, and won't shed particulate matter.
- Organic-surface materials (e.g., wood) for framing and walls will be limited to mitigate the risk of harboring pests and other pathogens, and to prevent deterioration under high moisture conditions.
- Interior work surfaces, including mechanical gear, tables, racks and fixtures, will be manufactured of aluminum or stainless steel which that will be easy to clean and maintain free of contaminants.
- Fujitsu or Mitsubishi HVAC units (or similar suitable substitutes) will be used for all grow areas including vegetative, flowering, dry and cure rooms that will manage temperature. CO2 will be introduced and controlled to create an desired optimal atmosphere. Integrated emergency air ventilation will insure CO2 levels stay within safe ranges. Air scrubbers using carbon, UV, cold plasma and other equivalent air sanitation methods will be used to create an exceptionally clean environment. These scrubbers are also capable of providing filtration to further mitigate airborne pests and pathogens within the facility.
- Electrical conduit, HVAC filters, lighting fixtures, hoods, tables, fixtures and ventilation points will be easy to clean and maintain in accordance with their manufacture recommended schedules.

Water will be sourced from municipal or if needed private suppliers capable of providing safe, potable, and adequate volumes of water to meet the facility's needs. [935 CMR 500.105(3)(b)11.] Plumbing will be of adequate size and design and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility and will properly convey sewage and disposable liquid-waste from the facility. Drains will be sized adequately and will have appropriate traps. There will be no cross-connections between the potable and wastewater lines [935 CMR 500.105(3)(b)12.]. Readily accessible restrooms will be maintained for visitors and employees in a sanitary condition and in good repair [935 CMR 500.105 (3)(b)13.].

Facility Layout

Defining clear production areas and delineating limited-access areas is important to keeping the facility clean, secure, and running efficiently in compliance with all applicable laws. Rows will be kept clear of obstructions for ease of egress in case of emergency. Adequate safety lighting will be installed in all areas where marijuana is stored and where utensils or equipment are cleaned [935 CMR 500.105(3)(b)7.]. Sufficient space will be included for the placement of equipment and storage of materials to maintain sanitary, free-flowing conditions for marijuana cultivation [935 CMR 500.105(3)(b)4.]. The Facilities Manager and the Cultivation Team will ensure that spills and any debris are quickly cleaned to prevent slipping, injury, or dropping plants while in transport. Clutter will be removed from all access ways and corridors to prevent accidents.

Equipment Selection and Maintenance

All equipment will be maintained and sanitized in each operating unit at appropriate intervals to prevent malfunctions or contamination that would alter the safety, identity, strength, quality or purity of the finished marijuana [935 CMR 500.105(3)(b)(9)]. TRIPECTA will maintain an Equipment Log for each piece of equipment. The Equipment Log will document equipment related events such as validation and qualification work, inspection results, calibrations, equipment cleaning, preventive maintenance and repairs, and unexpected events. Logs will contain the dates, times and employee ID number(s) for each recorded event. A master list of instruments and specific requirements will be kept in an Equipment Log binder, maintained onsite in hard copy form and backed up electronically. Equipment will be inspected and maintained regularly per the manufacturer's instructions and schedule, including calibration of scales to ensure accuracy. Visual inspections will be conducted prior to and at the completion of any cultivation activities and maintenance, including cleaning and sanitizing. An overall equipment inspection schedule will be completed monthly by the Facilities Manager in addition to the daily checks by cultivation agents.

Equipment selection will be based on the following priorities:

- User-friendly;
- Easy to repair and maintain;
- Designed and installed in an area where it can be easily cleaned;
- Not reactive, additive or absorptive; and
- Calibrated at defined intervals.

Regular Facility Maintenance

Cultivation agents will conduct daily inspections prior to commencing work and will maintain sanitary conditions throughout their shift, keeping surfaces free of debris and dust including any dead or unusable plant parts from the cultivation and storage areas [935 CMR 500.105(11)]. All equipment, floors, and counters will be sanitized daily. Work surfaces and any equipment that comes into contact with marijuana will also be cleaned after each use and between different harvest batches. The facility will use food-grade quality shelving, equipment, counters and surfaces (including floors, walls, and ceilings) so designed and of such material and workmanship as to be capable of being adequately cleaned and will not react adversely with any

solvent being used [935 CMR 500.105(3)(a)4.; 500.105(3)(b)6. and 500.105(3)(b)9.]. All cleaning activities will be documented by cultivation agents on cleaning logs as they are completed. Cultivation rooms will receive a thorough cleaning of all fixtures, lights, racks, walls, and ceilings and will be sterilized after each harvest to protect against contamination. Staff will also receive guidance on the use of sticky mats, hydrogen peroxide/isopropyl alcohol, dust traps, daily HVAC inspections, and ultraviolet light when entering and leaving cultivation rooms. The storage and transport of marijuana will be conducted under conditions that protect against physical, chemical, and microbial contamination as well as against deterioration of any container or its contents [935 CMR 500.105(3)(b)14-15.].

The cultivation facility will have a dedicated, locked room or closet for storage of toxic cleaning compounds, sanitizing agents, solvents, and chemicals. Flammable liquids will be stored in approved Flammable Liquid Cabinets. Employees will only use cleaning solutions registered with the United States Environmental Protection Agency (EPA) for use around vegetables, fruit, or medicinal plants in accordance with the instructions printed on the label [935 CMR 500.105(3)(b)9.]. Refillable spray bottles used for cleaners or other fluids will be clearly labeled to indicate their contents to prevent misuse or accidental ingestion. Stored sanitizing and cleaning solutions, solvents and pesticide chemicals will be physically segregated from cultivation rooms to prevent contamination of marijuana [935 CMR 500.105(3)(b)10.]. Containers will be stored with labels facing out and good First In First Out (FIFO) protocols in place. Hard copies of the Safety Data Sheets (SDS) for all hazardous chemicals to which employees may be exposed will be readily available in each chemical storage area in a designated SDS binder. Employees will be required to read the SDS for every chemical they use. All solid waste (every day refuse such as paper, cardboard, and other common materials) will be kept in solid waste receptacles located at various sites throughout the facility. These waste receptacles will remain covered and emptied daily to minimize odors and reduce the potential for attracting pests by creating harborage or breeding grounds [935 CMR 500.105(3)(b)5.]. Any operating systems for waste disposal will be maintained pursuant to 935 CMR 500.105(12).

Worker Sanitation

Marijuana plants must be handled and stored in a manner that prevents the growth of pathogenic microorganisms or the formation of toxins. Every employee whose job entails contact with marijuana, including cultivation, production, and packaging, will conform to FDA GMPs for food handlers in accordance with 21 CFR 110.10 and 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements* [935 CMR 500.105(3)(b)1.]. In addition to receiving in-house training on sanitation SOPs, TRIFECTA will require employees to complete a ServSafe® certification program from a certified instructor within the first 30 days of employment. ServSafe is a nationally recognized food safety training program that is mandated in several states for all employees engaged in the production of food items. The ServSafe program blends the latest FDA Food Code, food safety research and years of food sanitation training experience. TRIFECTA'S employees and managers will learn to implement essential product handling practices and work in a culture that promotes product safety.

The ServSafe program can be customized for professionals in the marijuana industry and includes the following topics, which relate to the cultivation and handling of marijuana:

- Maintaining adequate personal cleanliness. [935 CMR 500.105(3)(b)2.a.]
- When and how to wash hands, including washing hands after meals, using the restroom, smoking cigarettes, using smokeless tobacco, touching bare human skin, or any other activity which may have soiled them. [935 CMR 500.105(3)(b)2.b.]
- Proper use of single-use sanitary items, such as disposable sanitary gloves, hairnets, mouth covers, and how often to change said single-use items. Gloves will be made of an impermeable material for use in handling plant components, maintained in an intact, clean, and sanitary condition.
- Sanitization, including the proper use of sanitizer in a 3-compartment sink, sanitizing contact surfaces, and sanitization of utensils.
- The proper storage of ingredients, including keeping storage areas free of cleaners or other potential contaminants in close proximity to prep areas.
- Keeping prep areas free of employee food or beverages.
- Proper waste management practices, including the use of covered waste receptacles, daily removal of waste, and proper disposal methods. Employees will not eat food, chew gum, drink beverages, or use tobacco products in cultivation or packaging areas, or where plant components, packaging components, or any contact surfaces are exposed or washed.

Employees will also take other precautions necessary to protect plant components, packaging, marijuana, or contact surfaces from toxins, microorganism, or other extraneous materials including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin. All employees will wear company-issued, disinfected uniforms (e.g. scrubs) in a manner that protects against the contamination of plant components, packaging, marijuana, or any contact surface. This will include the use of appropriate hairnets, caps, ear covers, or other effective hair restraints. Employees will remove all unsecured jewelry and other objects that might fall into marijuana, equipment, or packaging, and remove hand jewelry that cannot be adequately cleaned during periods in which these components are manipulated by hand. If hand jewelry cannot be removed, it must be covered by material that effectively protects against contamination. Workers will wash their hands prior to starting work, prior to engaging in cultivation activities, and any time they contact a potential contaminant. The cultivation facility will be designed to provide easy access to sanitizing stations with cleaning agents. Adequate hand washing stations that supply nontoxic sanitizing cleaners and a sanitary towel service or suitable hand drying devices will be in convenient, clearly marked locations throughout the building [935 CMR500.105(3)(b)3.]. The water temperature at these stations will be at least 100°F, but will not exceed 110°F.

Additionally, any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for whom there is a reasonable possibility of contact with marijuana will be excluded from any operations which may be expected to result in such contamination until the condition is corrected.

Plant Handling Safety

While handling plants (including seeds, clones, mother plant genetics, vegetative and flowering plants), whether transplanting, moving from one room to another, topping, pruning, feeding, harvesting, trimming, drying, curing or storage, all employees will wear appropriate uniforms

and suitable personal protective equipment (“PPE”) such as nitrile gloves. Employees will be required to wear scrubs and hair nets in addition to clean clothes and shoes. Employees will be asked to keep their shoes at work to further prevent outside contamination. Access to contaminated areas will be strictly limited in the event of an outbreak.

Marijuana Testing Policies and Sample Collection Procedures

In addition to serving as the tracking mechanism for marijuana through the seed-to-sale tracking system, labels and tags will be designed to communicate everything that has occurred within each production batch to licensed partners. Comprehensive internal labeling standards and checklists will ensure labels properly display all required information needed by licensed partners. This information will include residual moisture content, plant weights, cultivation time, strain profile, cannabinoid profiles, terpene profiles, nutrients and other crop inputs such as pesticides, fertilizers, and metals. Collectively this information will aid the licensed partners in the creation of marijuana products at their facilities. As marijuana plants are harvested, trimmed, dried, and cured, they are aggregated into a harvest batch. After the QAM determines the batch has been properly cured by passing all internal quality control checks, the QAM will contact a licensed testing laboratory and arrange for transport of samples of each harvest batch for required testing [935 CMR 500.160]. TRIFECTA will collect representative samples of each marijuana production batch to provide to an analytical laboratory. Samples collected for a production batch will be representative of all the marijuana in the batch. According to the *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*, as amended in November 2016, a production Batch is a batch of finished plant material, cannabis resin, cannabis concentrate, or MIP made at the same time, using the same methods, equipment, and ingredients. To perform required testing, TRIFECTA will collect samples to be analyzed by an independent and appropriately certified laboratory. The amounts of sample required for cannabinoid or contaminant testing may vary by analytical method and laboratory- specific procedures. TRIFECTA will, therefore, confer with the selected laboratory to determine the minimum sample size required for evaluation. Samples from each production batch will be collected in a ready-to-use condition (i.e., ready for packaging or post-packaging). For other production batches, ready-to-use will be defined as ready for use as an intermediate or ingredient in making other products. After samples are collected, the entire production batch will be quarantined in a secure, cool, and dry location until the analytical results are returned by the laboratory.

TRIFECTA will collect duplicate samples to provide verification of sampling and laboratory procedures. Duplicates will be collected for at least 5 percent (1 per 20) of the samples collected for each marijuana product type. Duplicate samples will not be identified to the laboratory to provide blind-test quality controls. Duplicate samples will be used to evaluate any variance in the sampling and analysis procedures. To ensure authenticity, samples will be taken on the same day, be derived from the same batch, and will be documented on a test results tracking sheet.

TRIFECTA will collect samples in a manner that provides analytically sound and representative examples so that all TRIFECTA’s marijuana products are safe, effective, and accurately labeled. TRIFECTA will document every sampling event and provide this documentation to the Cannabis Control Commission upon request.

TRIFECTA will implement production batch tracking to ensure representative sample collection and analysis of tested batches. TRIFECTA will be able to demonstrate to inspectors that the production tracking, sampling, and analysis procedures are sufficient in obtaining representative samples.

TRIFECTA's Quality Assurance Manager (QAM) will take responsibility for preparing samples for testing. The QAM will assemble all the equipment and information needed before beginning each sampling process. Tools used to contact the samples will be clean and made of stainless- steel or other inert material to avoid potential contamination of the sample.

Appropriate sample containers will be made of suitable materials.

Items to assemble before sampling include, but are not limited to, the following

[MMJ_PR_3.0_020516 (6)]:

- Sample collection plan for each product type (compiled in coordination with the testing lab);
- Logbook or sample collection forms;
- Chain-of-custody ("COC") forms;
- Disposable gloves;
- Decontaminated tool(s), such as a spatula, knife, sampling spear, or pipette;
- Stainless steel bowl and implement to homogenize the product (e.g., by stirring, chopping, or grinding);
- Clean, decontaminated surface for sample processing;
- Sample containers appropriate for the analyses required;
- Container labels and pens with indelible ink;
- Supplies to thoroughly clean, decontaminated and dry sampling equipment between samples; and
- Appropriate coolers with ice to keep samples cool until refrigeration or shipment to the laboratory.

The QAM will create a new entry for each sampling event in a sample collection logbook or prepare sample collection forms for documentation of sample collection. Sample collection documentation will identify the sample collection date and start time, participating personnel, a general description of the product type and batch number sampled, a description of the sampling procedures used, and a record of batches that would potentially be impacted should analysis results indicate unacceptable contamination levels.

The QAM will identify or determine the cultivation batch number, production batch, and number of samples to be collected. The number of samples taken from each cultivation batch will be recorded in the sample collection logbook or forms. The QAM will record the sample cultivation and production batch identifiers ("ID") for each sample. The batch IDs will be included on sample labels. In addition to the batch ID, the QAM will create a unique sample ID for each sample. Sample identifiers will be unique for a given sample event. The QAM will record the batch and sample IDs in the sample collection logbook.

The QAM will prepare sample labels and affixing them to sample containers immediately before sampling. Information included on the label will include at a minimum the name of the person preparing the sample, the batch and sample IDs, and the date/time of collection. Additional information to be recorded in documentation, if not on the label, will include the sample

collector's name, product type, collection method, and other details about the product, such as Marijuana Infused Products (MIP's) type or production method.

The QAM will collect the planned samples from each cultivation or production batch one at a time, following these basic steps for each sample [MMJ_PR_3.0_020516 (6)]:

- Wear disposable gloves to mitigate potential for contamination of samples.
- Ensure that the sampling area is clean and decontaminated and lay out any tools and equipment needed.
- Collect the sample using appropriate tools. Do not touch the sample with your hands or allow the sample to touch anything that might cause cross contamination.
- If necessary, place the sample in the stainless-steel bowl or on a decontaminated cutting surface for homogenizing the sample using either a sample collection tool or a separate clean, decontaminated implement.
- Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.
- To avoid cross contamination of samples, any tools or equipment that comes in contact with the finished plant material or other marijuana products should be cleaned before collecting the next sample.
- All samples should be placed in clean, airtight sample containers that are large enough to hold the prescribed sample quantity with minimal headspace. Sample containers will be firmly closed and appropriately labeled.
- To preserve the chemical and biological composition of the samples, they should be refrigerated or maintained on ice until shipped to the analytical laboratory.
- Chain-of-custody paperwork should be completed immediately prior to shipment to the analytical laboratory.

The transport of any samples will conform to TRIFECTA's transportation SOPs and 935CMR500.105(13) [935 CMR 500.160(6)]. Laboratory testing information will confirm the product safety, cannabinoid profile, terpene profiles, and any additional Commission mandated testing results. All packaged marijuana at the facility will be stored under quarantine until the completion of required laboratory testing [935 CMR 500.160]. Each harvest batch will be easily distinguishable from other harvest batches until it is broken down into packages. No marijuana will be sold by TRIFECTA that is not capable of being tested by, or prior receiving a passing designation from, an Independent Testing Laboratory [935 CMR 500.105(8)(f); 500.120(6); 500.160(1); and 500.160(9)].

Test Results

Depending on the outcome of the analysis, TRIFECTA may need to take action to address unacceptable levels of contamination or to perform follow-up investigation. If an analysis fails to meet all applicable data quality objectives ("DQOs"), then the finished marijuana product or MIP cannot be dispensed. In this case, the production batch will be resampled for follow-up testing. A production batch may be retested once. TRIFECTA will retain records of the original analysis. If applicable DQOs are not met, the production batch cannot be dispensed to consumers or used in the production of MIPs.

If a batch of finished plant material fails to meet a metal or a bacteria/fungi/mycotoxin standard the finished plant material will not be distributed as finished marijuana. It may, instead, be used to derive finished marijuana products (e.g., resins, concentrates). Conversely, depending on the quality of the tested material, the batch may be destroyed and properly disposed of according to TRIPECTA's Waste Disposal SOPs.

If a batch of finished plant material fails to meet a pesticide residue or plant growth regulator limit it will not be distributed or used to derive other products. The batch may be retested once. If the batch fails the retest, it will likewise be destroyed. Upon the receipt of laboratory test results marijuana items will be inspected by the QAM prior to distribution and warehoused in an approved released-product storage area under appropriate environmental conditions consistent with its shelf life specifications and labeling. Once laboratory test results for a harvest batch are returned, they will be entered into the seed-to-sale tracking system by the QAM, where the harvest batch information and associated test results are then transferred to the harvest batch label. Laboratory results that indicate contaminant levels are above acceptable limits established in the Department of Public Health protocols identified in 935 CMR 500.160 will be promptly addressed. TRIPECTA will notify the Commission within 72-hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the affected production batch is warranted [935 CMR 500.160(2)]. Notification to the Commission will come from the Independent Testing Laboratory, separately and directly. TRIPECTA's notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination. TRIPECTA will maintain the results of all testing for no less than one year [935 CMR 500.160(3)]. The QAM will record the batch number for each sample taken, along with the date, the time, and the name and employee ID of the employee collecting the samples. For each harvest batch, TRIPECTA will also retain samples at the facility of sufficient volume for comparative purposes or any additional tests that may be required for one year past the harvest batch date. Once selected, the collected sample information will be recorded to ensure accurate counts within the seed-to-sale tracking system. Should the Independent Testing Laboratory return any excess marijuana from testing samples, it will be immediately designated for disposal in compliance with 935 CMR 500.105(12) [935 CMR 500.160(8)].

The testing laboratory will issue a report of results that includes potency, homogeneity, and contamination when all tests have been completed for a batch sample; this report will include cannabinoid potency (THC, THCA, CBD and CBDA), microbial contaminants, mycotoxins, moisture content, foreign matter contamination, heavy metals (arsenic, cadmium, lead and mercury), and pesticide and fertilizer residue. All application of pesticides will be performed in compliance with M.G.L. c. 132B and the regulations promulgated at 333 CMR 2.00 through 333 CMR 14.00. TRIPECTA understands that any testing results indicating noncompliance will be immediately reported to the Commission, who may refer the result to the Massachusetts Department of Agricultural Resources [935 CMR 500.120(5)].

The QAM will review the laboratory quality assurance test results to determine if the batch meets TRIPECTA's strict quality control standards. As laboratory testing results for the batch are received, such as cannabinoid profile, terpene profile, and any other information required by the Commission, they will be entered in the seed-to-sale tracking system. Upon approval, the associated harvest batch may proceed to packaging, where any marijuana labeling will include a statement and a seal certifying that the product has been tested for contaminants, that there were

no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15; [935 CMR 500.120(5)(a)6.]

Sampling and Analysis of Environmental Media

Pursuant to 935 CMR 500.160 (1), TRIFECTA will sample its grow medium according to the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries*.

Sampling and analysis requirements for growing media used in TRIFECTA's marijuana cultivation process include solid but non-soil growing media and water from public water supply ("PWS") (or non-PWS sources, such as private wells, as applicable).

TRIFECTA will ensure and be able to demonstrate to inspectors, that samples accurately represent facility cultivation conditions and that analysis results accurately determine potential contaminants in all media used. Sampling and analyses are subject to inspection, review, and independent confirmation by inspectors according to the Department's inspection guidelines and regulations.

Solid Growing Media

Solid growing media include all soils including soil amendments or other solid materials used as a substrate for cultivation. Massachusetts regulations state that soil for marijuana cultivation must meet the Agency for Toxic Substances and Disease Registry ("ATSDR") Environmental Media Evaluation Guidelines ("EMEG") for residential soil levels and limits any pesticide residues. EMEG values have been determined for several contaminants of concern. Pesticides not permitted for use in organic agriculture are also prohibited for use in the cultivation of marijuana according to the regulations under 935 CMR 500.160(1) and 105 CMR 725.105(B)(1)(d)].13. Additionally, soils and solid growing media will be sampled and analyzed prior to use at the facility for the cultivation of marijuana, and at least annually or within the quarter if amended.

Specifically:

- All source soils or solids will be sampled and analyzed prior to use in the cultivation and whenever new soils or solids are received from a different source.
- Solid materials such as clay, rock wool, and vermiculite or other non-soil enhancements will be sampled and analyzed prior to being used at the facility for cultivation of marijuana and whenever received from a different source.
- All cultivation soils used in beds or containers to actively cultivate marijuana will be sampled and analyzed annually.
- In cases where cultivation soils (or other solid growing media) are amended with additional solid materials (excluding water and nutrient fertilizers), sampling and analysis will take place in the quarter during which the soil was amended.

Water

Water used in marijuana cultivation generally requires analysis, however the frequency and sampling and analysis requirements are determined based on whether the water source is from a public water source ("PWS") already subjected to testing requirements and whether the cultivation

approach relies on hydroponics. Water derived from a PWS and used in soil or solid growing media cultivation of marijuana is exempted from sampling and analysis requirements.

Solid Growing Media

Sources of solid growing media including soils will be sampled and analyzed prior to use in the cultivation facility and upon any change in the source of solids. Once cleared for use in cultivation, the soils will be sampled and analyzed at least annually and within any quarter that the soils are amended. The spatial distribution of samples will be considered to ensure representativeness across the entire cultivation operation.

Minimum Sampling and Analysis Frequency for Source Soils and Solids:

- All source soils and solids will be sampled and analyzed prior to use in TRIFECTA's cultivation.
- All source soils and solids will be sampled and analyzed whenever TRIFECTA utilizes a new source material (e.g., different source soil location or different source solid manufacturer).
- All source soils and solids for initial use will be sampled at the rate of one (1) sample per cubic yard of solid media/soil.
- Source soils and solids passing initial testing requirements may be stockpiled for later use without requiring re-analysis unless the stockpile has been contaminated or altered while stored. Situations for re-analysis may include but are not limited to soils that have been amended, mixed with other source soils/solids, subject to pesticide application, used for other purposes, or inundated by flood waters.

Cultivation Soils or Solids

- All cultivation soils and solid materials will be analyzed at least annually during the calendar year of use. Solids tested initially as source soils or solids prior to use in cultivation do not require retesting until the following year (or quarter if amended as described below).

- If amended, the solid growing media/soil used in cultivation will be sampled and analyzed during the quarter in which it was amended. Soil amendment includes any material added to a soil, including other soils, to improve its physical properties, such as water retention, permeability, water infiltration, drainage, aeration and structure. Soil amendment does not include the addition of water or fertilizers added solely for nutrient purposes. Materials such as compost or manure that is added for both nutrients and to change the character of the soil and that are added in bulk are considered soil amendments for the purpose of this protocol. Application of soil amendments must be consistent with all requirements of 935 CMR 500.000.

- For cultivation that utilizes beds or other broad area cultivation, solid growing media/soil samples will be collected at the rate of 1 sample per discrete cultivation unit or at least 1 sample per 100 square feet of soil area for larger discrete cultivation units.

- For cultivation that utilizes individual plant containers (as opposed to beds or in-ground cultivation), solid growing media/soil samples will be collected from a minimum of 5-percent of the total number of growing containers.

- A diagram of the cultivation area, the sampling design, and the horizontal and vertical location of each sample will be created for each sampling event and maintained on file for review by inspection authorities.

- Solid growing media samples will be collected to be representative of the horizontal and vertical conditions of the growing configuration.
- When collected prior to distribution among beds or containers, source soil or solids samples will be taken to best represent the overall source soils (e.g., collected from different areas and depths of a stockpile).
- Cultivation soil and solid samples will be collected to represent the broad range of cultivation units, growth stages, and soil and solid types whether from beds or containers.

Quality Control (QC) Samples

Field duplicate samples will be collected at least annually and one (1) for every twenty (20) field samples of the solid samples collected to provide verification of field and laboratory procedures. Field duplicate samples will be collected and analyzed for each analytical method performed on the samples. Field duplicate samples will not be identified to the laboratory in order to provide blind quality controls. Blank samples are required to provide important information on potential positive bias on any positive results in field samples.

Sample Collection Procedures

TRIFECTA is responsible for performing sample collection for analysis that is compliant with regulations. All staff responsible for sample collection and sample handling must be trained in environmental sample collection. TRIFECTA will maintain all training records and provide them

to inspectors as required. Sample collection staff must understand the sample collection plan, operation of sampling equipment, and the importance of ensuring the representativeness and integrity of the samples, documentation, and chain-of-custody requirements.

Collecting Samples of Soil or Solid Growing Media

The sampling methods described are generally applicable to collection of soil and solid samples for cultivation methods anticipated to be used by TRIFECTA. Characteristics of certain solid matrices such as cohesionless sands or non-uniformly distributed soil amendments may require adaptation for the specific situation encountered. Generally, samples will be collected from stockpiles or other sources prior to use in the cultivation or from cultivation units such as beds or individual containers during ongoing cultivation. Solid growing media samples will be collected that are representative of the horizontal and vertical conditions of the configuration. Prior to sample collection TRIFECTA will assemble the equipment and information needed to begin.

Items to assemble before sampling include, but are not limited to, the following:

- Sample collection plan or diagram of locations to ensure representative sample collection
- Logbook or sample collection forms
- Chain-of-custody forms (COCs)
- Disposable gloves
- Decontaminated soil collection tool(s), such as a corer, spatula, or trowel
- Stainless steel bowl and implement to homogenize soil samples
- Clean, decontaminated plastic sheeting or other clean, non-porous surface for sample processing;
- Sample containers appropriate for the analyses required;
- Container labels and pen with indelible ink;

- Supplies to thoroughly clean, decontaminate and dry sampling equipment between samples; and
- Appropriate coolers with ice to keep samples cool until refrigeration or shipment to the laboratory.

Sample collection personnel will create a new entry for each sampling event in the sample collection logbook or prepare sample collection forms for documentation of sample collection. Sample collection documentation will identify the sample collection date and start time, participating personnel, a general description of the media and locations sampled, relevant environmental conditions, a description of the sampling procedures and equipment decontamination/cleaning used, and a record of plants or batches that would potentially be impacted should analysis results indicate unacceptable contamination.

Sample collection personnel will identify or determine the number and location of soil or other solid growing media grab samples to be collected. Sample locations from containers, beds, or other cultivation units will be recorded in the sample collection logbook or forms. The sample location identifier (“location ID”) for each sample is recorded so it can be used to identify the physical location of the cultivation unit. Location identifiers will be consistent across sampling events to allow tracking of repeated sample locations. The location IDs will be included on sample labels (unless the grab samples are used in a composite sample). In addition to the location ID, sample collection personnel will create a unique sample ID for each sample. Sample identifiers will be unique for a given sample event. Sample collection personnel will record the location and sample IDs in the sample collection logbook.

Sample collection personnel will use tools of stainless steel or other inert material to avoid potential contamination of the sample. Sample containers will likewise be made of suitable materials for the methods and analytes being analyzed. The sampler will avoid using insect repellents that may interfere with sample integrity. Sample collection personnel will prepare sample labels and affix them to sample containers immediately before sampling. At minimum, the information displayed on the label will include the location and sample ID and date/time of collection. Additional information that must be properly recorded, if not on the label, includes sample collector’s name, media type, collection method, whether the sample is a grab or composite sample, and soil or core depth (if applicable).

Sample Collection

Collect the planned samples from each sample location one at a time. Follow these basic steps for each sample:

- Don gloves to mitigate potential for contamination of samples
- Spread clean, decontaminated plastic sheeting or other nonporous surface near the sample location and lay out any tools and equipment needed.
- Clear the surface of the location if necessary excluding detritus, dead leaves, stones, pebbles, or other debris from the soil or other solid growing media with a clean trowel or similar tool.
- Collect the sample using an appropriate tool. Do not touch the sample with your hands or allow the sample to touch anything that might cause contamination.

- Place the sample in the stainless-steel bowl for homogenizing the sample using either the sample collection tool or separate clean, decontaminated implement.
- Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.
- To avoid cross contamination of samples, any tools or equipment that come in contact with the soil or growing media must be cleaned before moving to the next sampling location.
- All samples will be placed in clean, airtight sample containers that are large enough to hold the prescribed sample quantity with minimal headspace. Sample containers must be firmly closed and appropriately labeled.
- If grab samples are planned, place the homogenized sample into the appropriate container(s).
- If the sample is to be composited with other locations, repeat the above steps to collect the other individual samples to be placed into the stainless-steel bowl. Once the planned primary samples are collected, thoroughly homogenize the samples contained in the stainless-steel bowl and place the homogenized composite sample into the appropriate container(s).
- Excess soil collected but not shipped to the laboratory for testing will be returned to the cultivation area(s) where it was collected from (composite soils may be spread among the primary sample locations). It is not necessary to send the entire volume of the combined primary samples to the laboratory.
- Samples will be refrigerated or maintained on ice until shipped to the analytical laboratory.
- Chain-of-custody paperwork will be completed immediately prior to shipment.

Sample Handling

After samples are properly collected and labeled, they will be delivered for analysis as soon as possible. This section describes how TRIFECTA will handle, securely store, package, and ship the samples to the laboratory.

- Sample containers both empty and once containing samples will be stored in a contaminant-free environment to the degree possible. Sample containers will not be stored for more than one (1) year.
- Preservatives and pre-preserved sample containers may degrade after several months. Contact the laboratory to verify and record limits on sample container use.
- All samples will be collected and stored in containers of the appropriate materials based on the analysis method being performed.
- Until the samples are analyzed, they will be preserved to minimize chemical or physical changes according to the analytical method references.

Sample Storage.

- Samples will be refrigerated or maintained on ice (4 °C +/-2°C) until they are shipped to the analytical laboratory.
- Placing the samples in airtight containers with minimal headspace preserves samples by minimizing moisture loss and chemical exchange between the sample medium and air.

- In addition, protect the samples from excessive light exposure to minimize photochemical degradation. Samples can be protected from light by using an amber sample container, storing the samples in a closed box or other amber container, or in a dark storage location.
- To be considered valid, all samples must be analyzed prior to expiration of the technical holding time as defined in each analytical method. Note that the holding time for some biological components is very short; 24 to 48 hours from the time of collection,
- Note that all collected samples are considered under the custody of sample collection staff following collection and prior to shipment. Samples will be maintained either under the supervision of someone responsible for the integrity of the samples or locked to prevent mishandling.
- Chain of custody seals may be used by sample collection staff to ensure that samples are not tampered with following sample collection.

Packing and Shipping Samples

Many laboratories provide specific shipping or courier instructions to follow. In the absence of specific instructions from the laboratory, TRIFECTA will use the following instructions, which are based on U.S. EPA (2002) guidance.

- Package the samples for shipping in a clean area free of contamination.
- Make sure that sample containers are clean, lids are tight and will not leak and that all samples are properly labeled as described above. Covering labels with clear tape is recommended for protection in the event of a leak or damage to the package.
- Conduct an inventory of sample IDs against the chain-of-custody documentation form to make sure that all samples and containers are present.
- Seal sample containers in clear plastic bags with labels visible.
- If the samples need to be kept cold during transport, pack the samples in a clean waterproof metal or hard plastic ice chest or cooler with double-bagged ice or ice packs. Samples will be maintained at 4 °C +/-2°C at all times. Be sure that the samples are already cool when packaged for shipping.
- When samples are shipped in a cooler, line the cooler with plastic (e.g., large heavy-duty garbage bag) before packing. If the cooler has an external drain, make sure it is plugged.
- Include noncombustible absorbent packing materials to protect the samples from damage.
- Enclose chain-of-custody forms and any other necessary documentation in a sealed waterproof plastic bag. If applicable, include instructions or a shipping label for return of the cooler.
- Remove the old shipping labels, if any, and seal the cooler, or other container, with strapping tape.
- Use package tracking, if available from the shipper.