



## Massachusetts Cannabis Control Commission

### Marijuana Cultivator

#### General Information:

License Number: MC282243  
Original Issued Date: 11/22/2019  
Issued Date: 11/19/2020  
Expiration Date: 11/22/2021

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Four Daughters Compassionate Care, Inc.

Phone Number: 224-622-8770

Email Address: james@verano.holdings

Business Address 1: 1200 Providence Highway

Business Address 2:

Business City: Sharon

Business State: MA

Business Zip Code: 02067

Mailing Address 1: 415 N. Dearborn Street

Mailing Address 2: 4th Floor

Mailing City: Chicago

Mailing State: IL

Mailing Zip Code: 60654

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

### PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RPA201864

### RMD INFORMATION

Name of RMD: Four Daughters Compassionate Care, Inc.

Department of Public Health RMD Registration Number:

Operational and Registration Status: Obtained Provisional Certificate of Registration only

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

If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership:

Percentage Of Control:

Role: Executive / Officer

Other Role:

First Name: Brian

Last Name: Striar

Suffix:

Gender: Male                                      User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership:                      Percentage Of Control:

Role: Executive / Officer                      Other Role:

First Name: Darren                      Last Name: Weiss                      Suffix:

Gender: Male                                      User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership:                      Percentage Of Control:

Role: Director                                      Other Role:

First Name: Samuel                      Last Name: Dorf                      Suffix:

Gender: Male                                      User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership:                      Percentage Of Control:

Role: Executive / Officer                      Other Role:

First Name: George                      Last Name: Archos                      Suffix:

Gender: Male                                      User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100	Percentage of Ownership: 100		
Entity Legal Name: Verano Four Daughters Holdings, LLC	Entity DBA:	DBA	City:
Entity Description: Verano Four Daughters Holdings is a Delaware LLC			
Foreign Subsidiary Narrative:			
Entity Phone:	Entity Email:	Entity Website:	
Entity Address 1:		Entity Address 2:	
Entity City:	Entity State:	Entity Zip Code:	
Entity Mailing Address 1:		Entity Mailing Address 2:	
Entity Mailing City:	Entity Mailing State:	Entity Mailing Zip Code:	
Relationship Description: Verano Four Daughters Holdings owns 100% of Four Daughters Compassionate Care, Inc. This authority is exercised through its manager, Verano.			

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Date generated: 12/03/2020

No records found

## CAPITAL RESOURCES - ENTITIES

### Entity Contributing Capital 1

Entity Legal Name: Verano Holdings, LLC		Entity DBA:	
Email: darren@verano.holdings	Phone: 312-265-0730		
Address 1: 214 W. Ohio Street		Address 2:	
City: Chicago	State: IL	Zip Code: 60654	
Types of Capital: Monetary/Equity	Other Type of Capital:	Total Value of Capital Provided: \$9000000	Percentage of Initial Capital: 100
Capital Attestation: Yes			

## BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

### Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Verano Holdings,		Owner Last Name: LLC	
Owner Suffix:			
Entity Legal Name: Nature X, LLC		Entity DBA: Zen Leaf Vegas	
Entity Description: Medical and adult-use dispensary			
Entity Phone: 702-462-6706	Entity Email: info@zenleafvegas.com		Entity Website: zenleafvegas.com
Entity Address 1: 9120 W. Post Road, Suite 103		Entity Address 2:	
Entity City: Las Vegas	Entity State: NV	Entity Zip Code: 89148	Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

### Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Verano Holdings, LLC		Owner Last Name:	
Owner Suffix:			
Entity Legal Name: Ataraxia, LLC		Entity DBA: Ataraxia Grow & Labs	
Entity Description: Medical cultivation and manufacturing			
Entity Phone: 847-322-9002	Entity Email: garchos@ataraxiamm.com		Entity Website: ataraxiamm.com
Entity Address 1: 884 Industrial Blvd.		Entity Address 2:	
Entity City: Albion	Entity State: IL	Entity Zip Code: 62806	Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

### Business Interest in Other State 3

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Verano Holdings, LLC		Owner Last Name:	
Owner Suffix:			
Entity Legal Name: NH Medicinal Dispensaries, LLC		Entity DBA: The Clinic Effingham	
Entity Description: Medical and adult-use dispensary			
Entity Phone: 217-727-7715	Entity Email:		Entity Website: clinicillinois.com
Date generated: 12/03/2020			

Entity Address 1: 1011 Ford Avenue, Suite C

Entity Address 2:

Entity City: Effingham

Entity State: IL

Entity Zip Code: 62401

Entity Country: USA

Entity Mailing Address 1: 415 N. Dearbon Street, 4th Floor

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

## Business Interest in Other State 4

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

Owner First Name: Verano Holdings,

Owner Last Name:

Owner Suffix:

LLC

Entity Legal Name: Healthway Services of West Illinois

Entity DBA: Zen Leaf St. Charles

Entity Description: Medical and adult-use dispensary

Entity Phone: 630-377-7373

Entity Email:

info@zenleafil.com

Entity Website: zenleafil.com

Entity Address 1: 3714 Illinois Avenue

Entity Address 2:

Entity City: St. Charles

Entity State: IL

Entity Zip Code: 60174

Entity Country: USA

Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

## Business Interest in Other State 5

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

Owner First Name: Verano

Owner Last Name:

Owner Suffix:

Holdings, LLC

Entity Legal Name: Mother Grows Best, LLC

Entity DBA:

Entity Description: Medical cultivation and manufacturing

Entity Phone: 847-414-0373

Entity Email:

info@veranobrands.com

Entity Website: veranobrands.com

Entity Address 1: 1581 Steinway Blvd. SE

Entity Address 2:

Entity City: Canton

Entity State: OH

Entity Zip Code: 44707

Entity Country: USA

Entity Mailing Address 1: 415 N. Dearborn St., 4th Floor

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

## Business Interest in Other State 6

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

Owner First Name: Verano Holdings,

Owner Last Name:

Owner Suffix:

LLC

Entity Legal Name: Mother Knows Best, LLC

Entity DBA: Zen Leaf Canton

Entity Description: Medical dispensary

Entity Phone: 847-414-0373

Entity Email:

mkbccanton@gmail.com

Entity Website:

Entity Address 1: 1581 Steinway Blvd. SE

Entity Address 2:

Entity City: Canton

Entity State: OH

Entity Zip Code: 44707

Entity Country: USA

Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor

Entity Mailing Address 2:

Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA
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Business Interest in Other State 7

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Ohio Grown Therapies, LLC	Entity DBA:		
Entity Description: Medical dispensary			
Entity Phone: 847-414-0373	Entity Email: info@veranobrands.com	Entity Website:	
Entity Address 1: 1246 N. 21st	Entity Address 2:		
Entity City: Newark	Entity State: OH	Entity Zip Code: 43055	Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn, 4th Floor		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 8

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Canna Cuzzos	Entity DBA: Zen Leaf Waldorf		
Entity Description: Medical Dispensary			
Entity Phone: 833-936-5323	Entity Email: info@zenleafmd.com	Entity Website: zenleafmd.com	
Entity Address 1: 2290 Old Washington Road	Entity Address 2:		
Entity City: Waldorf	Entity State: MD	Entity Zip Code: 20601	Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 9

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Maryland Natural Treatment Solutions, LLC	Entity DBA: Oceanside Cannabis		
Entity Description: Medical dispensary			
Entity Phone: 833-936-5323	Entity Email: info@zenleafmd.com	Entity Website: zenleafmed.com	
Entity Address 1: 16 Magothy Beach Rd.	Entity Address 2:		
Entity City: Pasadena	Entity State: MD	Entity Zip Code: 22012	Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 10

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner			
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<b>Owner First Name:</b> Verano Holdings, LLC	<b>Owner Last Name:</b>	<b>Owner Suffix:</b>
<b>Entity Legal Name:</b> Mikran, LLC	<b>Entity DBA:</b> Zen Leaf Germantown	
<b>Entity Description:</b> Medical dispensary		
<b>Entity Phone:</b> 833-936-5323	<b>Entity Email:</b> info@zenleafmd.com	<b>Entity Website:</b> zenleafmd.com
<b>Entity Address 1:</b> 13007 Wisteria Drive		<b>Entity Address 2:</b>
<b>Entity City:</b> Germantown	<b>Entity State:</b> MD	<b>Entity Zip Code:</b> 20874 <b>Entity Country:</b> USA
<b>Entity Mailing Address 1:</b> 415 N. Dearborn Street, 4th Floor		<b>Entity Mailing Address 2:</b>
<b>Entity Mailing City:</b> Chicago	<b>Entity Mailing State:</b> IL	<b>Entity Mailing Zip Code:</b> 60654 <b>Entity Mailing Country:</b> USA

#### Business Interest in Other State 11

<b>Business Interest of an Owner or the Marijuana Establishment:</b> Business Interest of an Owner		
<b>Owner First Name:</b> Verano Holdings, LLC	<b>Owner Last Name:</b>	<b>Owner Suffix:</b>
<b>Entity Legal Name:</b> Lone Mountain Partners, LLC	<b>Entity DBA:</b>	
<b>Entity Description:</b> Medical and adult-use cultivation and manufacturing, and provisional adult-use dispensaries		
<b>Entity Phone:</b> 913-488-3938	<b>Entity Email:</b> info@veranonbrands.com	<b>Entity Website:</b> veranobrands.com
<b>Entity Address 1:</b> 2900 E. Lone Mountain Road		<b>Entity Address 2:</b>
<b>Entity City:</b> North Las Vegas	<b>Entity State:</b> NV	<b>Entity Zip Code:</b> 89081 <b>Entity Country:</b> USA
<b>Entity Mailing Address 1:</b> 415 N. Dearborn Street, 4th Floor		<b>Entity Mailing Address 2:</b>
<b>Entity Mailing City:</b> Chicago	<b>Entity Mailing State:</b> IL	<b>Entity Mailing Zip Code:</b> 60654 <b>Entity Mailing Country:</b> USA

#### Business Interest in Other State 12

<b>Business Interest of an Owner or the Marijuana Establishment:</b> Business Interest of an Owner		
<b>Owner First Name:</b> Verano Holdings, LLC	<b>Owner Last Name:</b>	<b>Owner Suffix:</b>
<b>Entity Legal Name:</b> Freestate Wellness, LLC	<b>Entity DBA:</b> Zen Leaf Jessup	
<b>Entity Description:</b> Medical cultivation and dispensary		
<b>Entity Phone:</b> 833-936-5323	<b>Entity Email:</b> info@zenleafmd.com	<b>Entity Website:</b> zenleafmd.com
<b>Entity Address 1:</b> 7221 Montevideo Road		<b>Entity Address 2:</b>
<b>Entity City:</b> Jessup	<b>Entity State:</b> MD	<b>Entity Zip Code:</b> 20794 <b>Entity Country:</b> USA
<b>Entity Mailing Address 1:</b> 415 N. Dearborn Street, 4th Floor		<b>Entity Mailing Address 2:</b>
<b>Entity Mailing City:</b> Chicago	<b>Entity Mailing State:</b> IL	<b>Entity Mailing Zip Code:</b> 60654 <b>Entity Mailing Country:</b> USA

#### Business Interest in Other State 13

<b>Business Interest of an Owner or the Marijuana Establishment:</b> Business Interest of an Owner		
<b>Owner First Name:</b> Verano Holdings, LLC	<b>Owner Last Name:</b>	<b>Owner Suffix:</b>
<b>Entity Legal Name:</b> Verano NJ, LLC	<b>Entity DBA:</b> Zen Leaf Elizabeth	
<b>Entity Description:</b> Medical Alternative Treatment Center		

Entity Phone: 833-936-5323	Entity Email: sammy@verano.holdings	Entity Website:
Entity Address 1: 117 Spring St.	Entity Address 2:	
Entity City: Elizabeth	Entity State: NJ	Entity Zip Code: 07201      Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor	Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654      Entity Mailing Country: USA

#### Business Interest in Other State 14

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

Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:
Entity Legal Name: GreenRX, LLC	Entity DBA: Have a Heart Cincy	
Entity Description: Medical dispensary		
Entity Phone: 513-440-6340	Entity Email: info@veranobrands.com	Entity Website:
Entity Address 1: 8420 Vine St.	Entity Address 2:	
Entity City: Cincinnati	Entity State: OH	Entity Zip Code: 45216      Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn St.	Entity Mailing Address 2: 4th Floor	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654      Entity Mailing Country: USA

#### Business Interest in Other State 15

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

Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:
Entity Legal Name: Noahs Ark, LLC	Entity DBA: Zen Leaf El Dorado	
Entity Description: Provisional medical dispensary		
Entity Phone: 312-265-0730	Entity Email: james@noahsarkdispensary.com	Entity Website:
Entity Address 1: 3213 N. West Ave.	Entity Address 2:	
Entity City: El Dorado	Entity State: AR	Entity Zip Code: 71730      Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn St.	Entity Mailing Address 2: 4th Floor	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654      Entity Mailing Country: USA

#### Business Interest in Other State 16

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

Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:
Entity Legal Name: Verano MO, LLC	Entity DBA:	
Entity Description: Provisional medical processing and dispensary		
Entity Phone: 312-265-0730	Entity Email: info@veranobrands.com	Entity Website:
Entity Address 1: N/A	Entity Address 2:	
Entity City: N/A	Entity State: MO	Entity Zip Code: N/A      Entity Country: USA

Entity Mailing Address 1: 415 N. Dearborn St.		Entity Mailing Address 2: 4th Floor	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 17

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

Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:
Entity Legal Name: Buchanan Development, LLC	Entity DBA: Zen Leaf Buchanan	
Entity Description: Medical and adult-use dispensary		
Entity Phone: 269-448-0390	Entity Email: zenleafbuchanan@gmail.com	Entity Website:
Entity Address 1: 259 E. Front St.	Entity Address 2:	
Entity City: Buchanan	Entity State: MI	Entity Zip Code: 49107      Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn St.	Entity Mailing Address 2: 4th Floor	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654      Entity Mailing Country: USA

Business Interest in Other State 18

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

Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:
Entity Legal Name: MME Evanston Retail, LLC	Entity DBA: MedMen Evanston	
Entity Description: Medical and adult-use dispensary		
Entity Phone: 224-278-9988	Entity Email: licensing@veranobrands.com	Entity Website:
Entity Address 1: 1804 Maple Avenue	Entity Address 2:	
Entity City: Evanston	Entity State: IL	Entity Zip Code: 60201      Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn St.	Entity Mailing Address 2: 4th Floor	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654      Entity Mailing Country: USA

Business Interest in Other State 19

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

Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:
Entity Legal Name: Local Dispensaries, LLC	Entity DBA:	
Entity Description: Medical dispensaries		
Entity Phone: 312-265-0730	Entity Email: licensing@veranobrands.com	Entity Website:
Entity Address 1: 137 S. 17th St.	Entity Address 2:	
Entity City: Harrisburg	Entity State: PA	Entity Zip Code: 17104      Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn St.	Entity Mailing Address 2: 4th Floor	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654      Entity Mailing Country: USA

DISCLOSURE OF INDIVIDUAL INTERESTS



No records found

### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 1200 General Edwards Highway

Establishment Address 2:

Establishment City: Sharon

Establishment Zip Code: 02067

Approximate square footage of the Establishment: 25732

How many abutters does this property have?: 10

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

Cultivation Tier: Tier 04: 20,001 to 30,000 sq. ft

Cultivation Environment:

Indoor

### FEE QUESTIONS

Cultivation Tier: Tier 04: 20,001 to 30,000 sq. ft    Cultivation Environment: Indoor

### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host Community Agreement Certification Form.pdf	pdf	5d155a69c70e2b132b317be0	06/27/2019
Plan to Remain Compliant with Local Zoning	1. Plan to Remain Compliant - Four Daughters Sharon.pdf	pdf	5d155af91dae681319cecd42	06/27/2019
Community Outreach Meeting Documentation	4 Daughters Community Outreach Meeting Attestation Form signed by Brian Striar.pdf	pdf	5d2de0d0bc101905252e748b	07/16/2019

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.: \$3

### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Other	Four Daughters ELEVATE letter 4.18.19.pdf	pdf	5d155b2058ad7e1336c2a249	06/27/2019
Other	Four Daughters letter re EON donation .pdf	pdf	5d155b21bbb965134133e43e	06/27/2019
Plan for Positive Impact	Positive Impact Plan - Four Daughters Sharon.pdf	pdf	5d4b2910a442c833e606acb8	08/07/2019

### ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role:                                      Other Role:  
First Name: Brian                      Last Name: Striar    Suffix:  
RMD Association: RMD Manager  
Background Question: no

Individual Background Information 2

**Role:**  
**First Name:** George      **Other Role:**  
**Last Name:** Archos    **Suffix:**  
**RMD Association:** RMD Manager  
**Background Question:** yes

#### Individual Background Information 3

**Role:**  
**First Name:** Samuel      **Other Role:**  
**Last Name:** Dorf    **Suffix:**  
**RMD Association:** RMD Manager  
**Background Question:** yes

#### Individual Background Information 4

**Role:**  
**First Name:** Darren      **Other Role:**  
**Last Name:** Weiss    **Suffix:**  
**RMD Association:** RMD Manager  
**Background Question:** no

### ENTITY BACKGROUND CHECK INFORMATION

#### Entity Background Check Information 1

**Role:** Investor/Contributor      **Other Role:**  
**Entity Legal Name:** Verano Holdings, LLC      **Entity DBA:**  
**Entity Description:** Verano Holdings is a multi-state cannabis operator.  
**Phone:** 847-414-0373      **Email:** info@veranobrands.com  
**Primary Business Address 1:** 415 N. Dearborn      **Primary Business Address 2:** 4th Floor  
**Primary Business City:** Chicago      **Primary Business State:** IL    **Principal Business Zip Code:** 60654  
**Additional Information:**

#### Entity Background Check Information 2

**Role:** Parent Company      **Other Role:**  
**Entity Legal Name:** Verano Four Daughters Holdings, LLC      **Entity DBA:**  
**Entity Description:** Holding company  
**Phone:** 847-322-9202      **Email:** info@verano.holding  
**Primary Business Address 1:** 415 N. Dearborn St.      **Primary Business Address 2:** 4th Floor  
**Primary Business City:** Chicago      **Primary Business State:** IL    **Principal Business Zip Code:** 60654  
**Additional Information:**

### MASSACHUSETTS BUSINESS REGISTRATION

#### Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Four Daughters Articles of Entity Conversion.pdf	pdf	5d155c9b33099617d79479b4	06/27/2019
Bylaws	Four Daughters Bylaws.pdf	pdf	5d155c9c748dc71348c3affb	06/27/2019
Department of Revenue - Certificate of Good standing	Four Daughters Letter of Good Standing DOR.pdf	pdf	5d155c9eacc50017edd6501f	06/27/2019
Secretary of	Four Daughters Letter of Good Standing Secretary of	pdf	5d155c9f622b7c1357f73eb4	06/27/2019

Commonwealth - Certificate of Good Standing	Commonwealth.pdf			
Articles of Organization	Documentation to explain why individuals listed in Articles of Organization should NOT be considered close associate or persons having direct or indirect authority.pdf	pdf	5d2f2fcfa442c833e6067eec	07/17/2019

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	11A_Cert of Good Standing_Secretary of Commonwealth.pdf	pdf	5f6bf36e7e8b3807d9e5e368	09/23/2020
Department of Revenue - Certificate of Good standing	11B_Cert of Good Standing_Mass DOR.pdf	pdf	5f6bf3749193d007a21940d5	09/23/2020
Department of Unemployment Assistance - Certificate of Good standing	11C_Cert of Good Standing_Mass DUA.pdf	pdf	5f6bf379f3e55207cefa2d3d	09/23/2020
Department of Revenue - Certificate of Good standing	11B_(New)_Four Daughters_Certificate of Good Standing_10.05.2020.pdf	pdf	5f8dd2de682eef3980ba3c2d	10/19/2020

Massachusetts Business Identification Number: 001342887

Doing-Business-As Name:

DBA Registration City:

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Cultivation Center- Section 12 attachment.pdf	pdf	5f6bcefbac4d5e07c7f9c4e8	09/23/2020

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Policies and Procedures for cultivating.	21. Operational Plan for Cultivation - Four Daughters Sharon.pdf	pdf	5d155d29722cea17c12635d2	06/27/2019
Security plan	8. Four Daughters Security Plan for Cultivation.pdf	pdf	5d155d7958ad7e1336c2a253	06/27/2019
Prevention of diversion	9. Prevention of Diversion - Four Daughters Sharon.pdf	pdf	5d155d9633099617d79479b8	06/27/2019
Storage of marijuana	10. Storage - Four Daughters Sharon.pdf	pdf	5d155dcdacc50017edd65023	06/27/2019
Transportation of marijuana	11. Transportation- Four Daughters Sharon.pdf	pdf	5d155df0fe6a8617e209128c	06/27/2019
Inventory procedures	12. Inventory - Four Daughters Sharon.pdf	pdf	5d155e10624ce5135e928bf6	06/27/2019
Quality control and testing	13. Quality and Testing - Four Daughters Sharon.pdf	pdf	5d155e2f50e7af1803c21e8d	06/27/2019

Personnel policies including background checks	15. Personnel Policies - Four Daughters Sharon.pdf	pdf	5d155e48722cea17c12635d6	06/27/2019
Record Keeping procedures	16. Record Keeping - Four Daughters Sharon.pdf	pdf	5d156128c70e2b132b317beb	06/27/2019
Maintaining of financial records	17. Maintaining Financial Records - Four Daughters Sharon.pdf	pdf	5d15614841a4321320f2ad1e	06/27/2019
Diversity plan	FINAL- Diversity Plan - Four Daughters - 06-27-2019.pdf	pdf	5d15615858ad7e1336c2a25b	06/27/2019
Diversity plan	Four Daughters ELEVATE letter 4.18.19.pdf	pdf	5d15616a1dae681319cecd52	06/27/2019
Diversity plan	Four Daughters letter re EON donation .pdf	pdf	5d15616b50e7af1803c21e93	06/27/2019
Qualifications and training	19. Qualifications and Training - Four Daughters Sharon.pdf	pdf	5d156196c70e2b132b317bef	06/27/2019
Restricting Access to age 21 and older	Restricting Access to Age 21 and Older - Four Daughters Sharon Cultivation.pdf	pdf	5db7137c6b4e192b1d272f4f	10/28/2019

### ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

### ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

### COMPLIANCE WITH POSITIVE IMPACT PLAN

#### Progress or Success Goal 1

Description of Progress or Success: Donation made to ElevateNE.

#### Progress or Success Goal 2

Description of Progress or Success: Donation made to EON.

#### Progress or Success Goal 3

Description of Progress or Success: Diversity hiring breakdown.

## COMPLIANCE WITH DIVERSITY PLAN

### Diversity Progress or Success 1

Description of Progress or Success: Donation made to ElevateNE.

### Diversity Progress or Success 2

Description of Progress or Success: Donation made to EON.

### Diversity Progress or Success 3

Description of Progress or Success: Diversity hiring breakdown.

## HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 5:00 PM
Tuesday From: 8:00 AM	Tuesday To: 5:00 PM
Wednesday From: 8:00 AM	Wednesday To: 5:00 PM
Thursday From: 8:00 AM	Thursday To: 5:00 PM
Friday From: 8:00 AM	Friday To: 5:00 PM
Saturday From: 8:00 AM	Saturday To: 5:00 PM
Sunday From: 8:00 AM	Sunday To: 5:00 PM



## Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. 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(1).

Applicant Brian Strier

I, STANLEY ROSEN <sup>BS</sup> (insert name) certify as an authorized representative of FOUR DAUGHTERS COMMUNITY CARE INC (insert name of applicant) that the applicant has executed a host community agreement with SHARON (insert name of host community) pursuant to G.L.c. 94G § 3(d) on June 19, 2018 (insert date).

Stanley Rosen <sup>BS</sup>  
Signature of Authorized Representative of Applicant <sup>BS</sup>

### Host Community

I, Frederic E. Turkington, Jr. (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for the Town of Sharon (insert name of host community) to certify that the applicant and the Town of Sharon (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on June 19, 2018 (insert date).

Frederic E. Turkington, Jr.  
Signature of Contracting Authority or  
Authorized Representative of Host Community

## FOUR DAUGHTERS - CULTIVATION

### **PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING**

Four Daughters has thoroughly reviewed the marijuana establishment bylaws for the town of Sharon. The Corporation has discussed the project at length with Town officials and executed a Community Host Agreement on June 19, 2018.

Four Daughters thoroughly reviewed all local codes, ordinances and bylaws including §3600 of Sharon Zoning Bylaws as amended through May 2018, as they apply to the physical address of the marijuana establishment and in consultation with attorneys and advisors determined that the physical address is in compliance with local codes, ordinances and bylaws.

Four Daughters intends to engage a professional to monitor its compliance. Four Daughters will work with the appropriate authorities in Sharon in order to secure the necessary permits to begin operations at 1200 General Edwards Highway.

Four Daughters will ensure compliance with local codes, ordinances and bylaws for the physical address of the retail establishment through a comprehensive compliance program that will include, but not be limited to, instituting policies and procedures that comply with said regulations and continuously soliciting input from all local stakeholders, public safety and law enforcement authorities.



## Community Outreach Meeting Attestation Form

The applicant must complete each section of this form and initial each page before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant appear in italics. 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(1).

I, Brian Striwe, (insert name) attest as an authorized representative of Four Daughters Compassionate Care (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on Feb 4<sup>th</sup> 2019 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on Jan 25<sup>th</sup> 2019 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on Jan 25<sup>th</sup> 2019 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on Jan 25<sup>th</sup> 2019 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).



5. Information was presented at the community outreach meeting including:
  - a. The type(s) of Marijuana Establishment 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 Marijuana Establishment to prevent diversion to minors;
  - d. A plan by the Marijuana Establishment to positively impact the community; and
  - e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

**1200 GENERAL EDWARDS HGWY FOUR DAUGHTERS COMPASSIONATE**

1200 general edwards hwy

four daughters Compassionate care inc

Sharon Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, February 4th, 2019 at 2:00PM at 2-4 Merchant Street, Sharon, MA 02067.

The proposed Marijuana Cultivator and marijuana Products manufacturer are anticipated to be located at 1200 General Edwards Highway, US Rt.1

A proposed marijuana Retailer will be located at either 2 - 4 Merchant Street, Sharon, MA or 1200 General Edwards Highway, Sharon, MA

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

Note: This is the same presentation that was made on January 24.

13766444 1/25/19

Appeared in: **The Patriot Ledger** on Friday, 01/25/2019

Powered by [myPublicNotices.com](http://myPublicNotices.com)

## **FOUR DAUGHTERS COMPASSIONATE CARE INC**

### **SHARON COMMUNITY OUTREACH MEETING**

NOTICE IS HEREBY GIVEN THAT A COMMUNITY OUTREACH MEETING FOR A PROPOSED MARIJUANA ESTABLISHMENT IS SCHEDULED FOR MONDAY, FEBRUARY 4TH, 2019 AT 2:00PM AT 2-4 MERCHANT STREET, SHARON, MA 02067.

THE PROPOSED MARIJUANA CULTIVATOR AND MARIJUANA PRODUCTS MANUFACTURER ARE ANTICIPATED TO BE LOCATED AT 1200 GENERAL EDWARDS HIGHWAY, US Rt. 1

A PROPOSED MARIJUANA RETAILER WILL BE LOCATED AT EITHER 2 - 4 MERCHANT STREET, SHARON, MA OR 1200 GENERAL EDWARDS HIGHWAY, SHARON, MA

THERE WILL BE AN OPPORTUNITY FOR THE PUBLIC TO ASK QUESTIONS.

NOTE: THIS IS THE SAME PRESENTATION THAT WAS MADE ON JANUARY 24.

**From:** Lauren Barnes <[LBarnes@townofsharon.org](mailto:LBarnes@townofsharon.org)>  
**Sent:** Friday, January 25, 2019 10:35 AM  
**To:** Marlene Chused <[MChused@townofsharon.org](mailto:MChused@townofsharon.org)>; Seth Ruskin <[sruskin@msn.com](mailto:sruskin@msn.com)>; Gail Schustek <[GSchustek@townofsharon.org](mailto:GSchustek@townofsharon.org)>; Pat Pannone - Planning Board ([pasqualino.pannone@gmail.com](mailto:pasqualino.pannone@gmail.com)) <[pasqualino.pannone@gmail.com](mailto:pasqualino.pannone@gmail.com)>; Rachelle Levitts <[rlevitts@hotmail.com](mailto:rlevitts@hotmail.com)>  
**Cc:** Fred Turkington <[FTurkington@townofsharon.org](mailto:FTurkington@townofsharon.org)>  
**Subject:** FW: Meeting Notice Distribution  
**Importance:** High

Please see attached.

For the ZBA and Planning Board chairs: please distribute to your members.

**From:** Stanley L. Rosen  
**Sent:** Friday, January 25, 2019 10:15 AM  
**To:** Fred Turkington <[FTurkington@townofsharon.org](mailto:FTurkington@townofsharon.org)>  
**Cc:** Lauren Barnes <[LBarnes@townofsharon.org](mailto:LBarnes@townofsharon.org)>  
**Subject:** Meeting Notice Distribution  
**Importance:** High

Hi Fred and Lauren,

Would you please distribute the attached Notice of a Community Outreach Meeting to  
Zoning Board of Appeals  
Planning Board  
Town Clerk

I also ask that you bcc me on the email, and that you do this today for the appropriate 'notice' period.

Thanks much, and have a great weekend.

--Stan

Stanley Rosen, RPH, MHA, FACHE, FACCP  
Massachusetts Registered Health Officer  
Co-Founder & Clinical Director  
Four Daughters Compassionate Care, Inc  
1200 General Edwards Highway (US Rt.1)  
Sharon, Massachusetts 02067  
mobile: 781.201.9444 | NPI:1376633834

Attachment C

## **FOUR DAUGHTERS COMPASSIONATE CARE INC**

### **SHARON COMMUNITY OUTREACH MEETING**

NOTICE IS HEREBY GIVEN THAT A COMMUNITY OUTREACH MEETING FOR A PROPOSED MARIJUANA ESTABLISHMENT IS SCHEDULED FOR MONDAY, FEBRUARY 4TH, 2019 AT 2:00PM AT 2-4 MERCHANT STREET, SHARON, MA 02067.

THE PROPOSED MARIJUANA CULTIVATOR AND MARIJUANA PRODUCTS MANUFACTURER ARE ANTICIPATED TO BE LOCATED AT 1200 GENERAL EDWARDS HIGHWAY, US Rt. 1

A PROPOSED MARIJUANA RETAILER WILL BE LOCATED AT EITHER 2 - 4 MERCHANT STREET, SHARON, MA OR 1200 GENERAL EDWARDS HIGHWAY, SHARON, MA

THERE WILL BE AN OPPORTUNITY FOR THE PUBLIC TO ASK QUESTIONS.

NOTE: THIS IS THE SAME PRESENTATION THAT WAS MADE ON JANUARY 24.



ELLEN W. ABELSON  
RICHARD B. GORDEN, M.A.A.  
ANNE M. CARNEY

# TOWN OF SHARON

OFFICE OF THE  
BOARD OF ASSESSORS  
90 SOUTH MAIN ST.  
SHARON, MASSACHUSETTS 02067

TEL. (781) 784-1500

January 10, 2019

RE: 2-4 Merchant St.  
Map 86 Lot 11 Block 3

TO WHOM IT MAY CONCERN:

I, Jeffery L. Funk, Administrative Assessor of the Town of Sharon, hereby certify that attached is a list of abutters in the Town of Sharon within 300' radius of the above mentioned location in the Town of Sharon. This list is compiled from the record of the Board of Assessors most recent tax assessment.

BOARD OF ASSESSORS

Jeffery L. Funk, M.A.A.

Enclosure

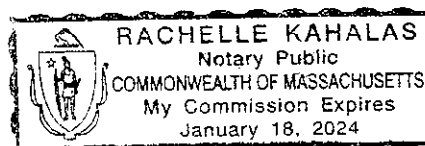
COMMONWEALTH OF MASSACHUSETTS

Norfolk,ss.

Date: *January 10, 2019*

Then personally appeared the above-named Jeffery L. Funk, and acknowledged the foregoing to be his free act and deed, before me

Notary Public  
My commission expires: *January 18, 2024*



MSPARCELID	MSLOCATION	MSOWNER	MSOWNERB	MSMADDA	MSMCITY	MSMSTATE	MSMZIP
86013000	9 MERCHANT ST	ACORN AT MEADOW BROOK LLC		70 ARDMORE RD	NEEDHAM	MA	02494
86004000	1205 GENERAL EDWARDS HWY	CHARLES RIVER APPAREL LLC		1205 GENERAL EDWARDS HWY	SHARON	MA	02067
86015000	1 MERCHANT ST	KING, DOUGLAS A TRUSTEE	KROKIDAS, MARCIA J TRUSTEE	115 MAIN ST SUITE 1D	NORTH EASTON	MA	02356
86011003	2-4 MERCHANT ST	A GIANNPOULOS, LLC		173 BELGRADE AVE	BOSTON	MA	02131
86011002	6-8 MERCHANT ST	FRANCHI MERCHANT STREET LLC	C/O A FRANCHI CONTRACTORS	190 NORTH MAIN ST	NATICK	MA	01760
86011001	10 MERCHANT ST	MURPHY, DONNELL W TR	MERCHANT ST RLTY TR	7 WEST STREET	WALPOLE	MA	02081
86014000	5 MERCHANT ST	5 MERCHANT ST LLC		5 MERCHANT ST	SHARON	MA	02067
86009000	1180 GENERAL EDWARDS HWY	MKR LLC	C/O BRODIE	10 BALLARD RD	LAWRENCE	MA	01843
86012000	15 MERCHANT ST	HURLBUT, EDWIN D & EVELYN TRS.	COLONIAL REALTY TRUST	15 MERCHANT ST	SHARON	MA	02067
86003001	1155 GENERAL EDWARDS HWY	MURPHY, JOHN & DONNELL TRS.	1155-1225 PROVIDENCE HGHW	7 WEST ST	WALPOLE	MA	02081
86010001	1200-1200 GENERAL EDWARDS HWY						
86010001	1200 GENERAL EDWARDS HWY	DOUGLAS A KING BUILDERS INC		115 MAIN ST SUITE 1D	NORTH EASTON	MA	02356

2-4 Merchant St.

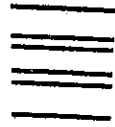


9590 9402 4219 8121 1996 36

United States  
Postal Service

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

Sender:  
Four Daughters Compassionate Care Inc  
Fifteen North Main Street, Box 12  
Sharon, Massachusetts 02067



CERTIFIED MAIL™  
Domestic Mail Only  
For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Certified Mail Fee \$  
Extra Services & Fees (check box, add fee as appropriate)  
☐ Return Receipt (hardcopy) \$  
☐ Return Receipt (electronic) \$  
☐ Certified Mail Restricted Delivery \$  
☐ Adult Signature Required \$  
☐ Adult Signature Restricted Delivery \$  
Postage \$  
Total Postage and Fees \$  
Sent 7  
Street  
City, State, ZIP+4®  
Postmark Here

Acorn at Meadow Brook LLC  
70 Ardmore Road  
Needham MA 02494

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

U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT  
Domestic Mail Only  
For delivery information, visit our website at [www.usps.com](http://www.usps.com)

OFFICIAL USE

Certified Mail Fee \$  
Extra Services & Fees (check box, add fee as appropriate)  
☐ Return Receipt (hardcopy) \$  
☐ Return Receipt (electronic) \$  
☐ Certified Mail Restricted Delivery \$  
☐ Adult Signature Required \$  
☐ Adult Signature Restricted Delivery \$  
Postage \$  
Total Postage and Fees \$  
Sent  
Street  
City, State, ZIP+4®  
Postmark Here

Charles River Apparel LLC  
1205 General Edwards Hwy  
Sharon MA 02067

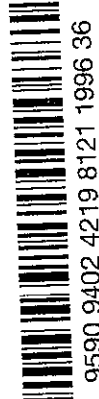
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions.

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Acorn at Meadow Brook LLC  
70 Ardmore Road  
Needham MA 02494



9590 9402 4219 8121 1996 36

2. Article Number (Transfer from service label)

017 2400 0000 2930 1736

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

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☐ Agent ☒ Addressee
- B. Received by (Printed Name) AS/12/19 Date of Delivery 12/19
- C. Is delivery address different from item 1? ☐ Yes ☐ No
- D. If YES, enter delivery address below:

3. Service Type
- ☐ Adult Signature
  - ☐ Adult Signature Restricted Delivery
  - ☐ Certified Mail®
  - ☐ Certified Mail Restricted Delivery
  - ☐ Collect on Delivery
  - ☐ Collect on Delivery Restricted Delivery
  - ☐ Insured Mail (over \$500)
  - ☐ Priority Mail Express®
  - ☐ Registered Mail™
  - ☐ Registered Mail Restricted Delivery
  - ☐ Return Receipt for Merchandise
  - ☐ Signature Confirmation™
  - ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt



USPS TRACKING#



9590 9402 4219 8121 1995 68

United States  
Postal Service

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

Sender:

Four Daughters Compassionate Care Inc  
Fifteen North Main Street, Box 12  
Sharon, Massachusetts 02067



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. 3-10

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

9590 9402 4219 8121 1995 68

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®  
OFFICIAL USE  
Certified Mail Fee  
Extra Services & Fees (check box, add fee as appropriate)  
☐ Return Receipt (hardcopy) \$  
☐ Return Receipt (electronic) \$  
☐ Certified Mail Restricted Delivery \$  
☐ Adult Signature Required \$  
☐ Adult Signature Restricted Delivery \$  
Postage \$  
Total Postage and Fees \$

Postmark  
Here

Sent Douglas A. King Builders, Inc  
Street 115 Main St. Suite 1D  
City North Easton MA 02356

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

U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT  
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For delivery information, visit our website at [www.usps.com](http://www.usps.com)®

OFFICIAL USE

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

Postmark  
Here

Sent A. Giannopoulos, LLC  
Street 173 Belgrade Ave  
City Boston MA 02131

Instructions

9590 9402 4219 8121 1995 68

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Douglas A. King Builders, Inc  
115 Main St. Suite 1D  
North Easton MA 02356



9590 9402 4219 8121 1995 68

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1668

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent  
B. Received by (Printed Name) ☐ Addressee  
C. Date of Delivery 09-17-2011  
D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type  
☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery  
☐ Insured Mail (over \$500)

Domestic Return Receipt

USPS TRACKING #



9590 9402 4219 8121 1995 82

United States  
Postal Service

Sender:  
Four Daughters Compassionate Care Inc  
Fifteen North Main Street, Box 12  
Sharon, Massachusetts 02067

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10



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OFFICIAL USE

Certified Mail Fee

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

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

Postage

Postmark  
Here

Total Postage and Fees

Sent to Franchi Merchant St. LLC  
Street c/o A Franchi Contractors  
190 North Main St.  
City, St. Natick MA 01760

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

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Franchi Merchant St. LLC  
c/o A Franchi Contractors  
190 North Main St.  
Natick MA 01760



9590 9402 4219 8121 1995 82

2. Article Number (Transfer from service label)

017 2400 0000 2930 1682

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ Agent  
☐ Address  
☐ Date of Delivery

B. Received by (Printed Name)

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

3. Service Type

☐ Adult Signature  
☐ Registered Mail™  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Signature Confirmation  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)

Domestic Return Receipt

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®

For delivery information, visit our website at [www.1800mycoca-cola.com](http://www.1800mycoca-cola.com)

OFFICIAL USE

15

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

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

Postage

3	Total Postage and Fees	
---	------------------------	--

Sent To Donnell W. Murphy, TR  
Street Merchant St. Rlty Trust  
City, St 7 West St.  
Walpole MA 02081

Postmark  
Here

PS Fo

**COMPLETE THIS SECTION ON DELIVERY**

1. Article Addressed to:

Donnell W. Murphy, TR  
Merchant St. Rlty Trust  
7 West St.  
Walpole MA 02081

A. Signature

X9. Holmes

B. Received by (Printed Name)

☐ Agent  
☐ Addressee

11/13/63. Date of Delivery

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

\_\_\_\_\_

9590 9402 4219 8121 1996 50

2 Article Number / Transfer from scanning label

7017 2400 0000 2930 1750

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

3. Service Type

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

Domestic Return Receipt

USPO TRACKING#

\_\_\_\_\_

9590 9402 4219 8121 1996 50

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

**United States  
Postal Service**

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

Sender:  
Four Daughters Compassionate Care Inc  
Fifteen North Main Street, Box 12  
Sharon, Massachusetts 02067

7017 2400 0000 2930 1712

# CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®

OFFICIAL USE

Certified Mail Fee

\$

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

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

Postage

\$

Total Postage and Fees

\$

Sent

5 Merchant St. LLC

Street

5 Merchant St.

City

Sharon MA 02067

Postmark  
Here

PS Form

Instruction

## SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

5 Merchant St. LLC  
5 Merchant St.  
Sharon MA 02067



9590 9402 4219 8121 1996 12

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1712

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

Domestic Return Re

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

*[Signature]*

☐ Agent

☒ Addre

B. Received by (Printed Name)

C. Date of Del

1/28

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

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation
- ☐ Signature Confirmation Restricted Delivery

USPS TRACKING#



9590 9402 4219 8121 1996 12

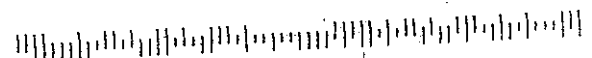
First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

United States  
Postal Service

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

Sender:  
Four Daughters Compassionate Care Inc  
Fifteen North Main Street, Box 12  
Sharon, Massachusetts 02067

67-120204



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

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

**OFFICIAL USE**

Certified Mail Fee

\$

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

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

Postmark  
Here

Postage

\$

Total Postage and Fees

\$

Sent to MKR, LLC

Street c/o Brodie

City, S 10 Ballard Road

Lawrence MA 01843

PS Form 3811, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

MKR, LLC  
c/o Brodie  
10 Ballard Road  
Lawrence MA 01843



9590 9402 4219 8121 1995 75

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1675

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

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X Angela Verdick

☐ Agent

☒ Addressee

B. Received by (Printed Name)

Angela Verdick

C. Date of Delivery

1-30-19

D. Is delivery address different from Item 1?  
If YES, enter delivery address below:

☐ Yes

☐ No

3. Service Type

☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)

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

Domestic Return Receipt



9590 9402 4219 8121 1995 75

United States  
Postal Service



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

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

Sender:  
Four Daughters Compassionate Care Inc  
Fifteen North Main Street, Box 12  
Sharon, Massachusetts 02067

# U.S. Postal Service™ CERTIFIED MAIL® RECEIPT

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For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

OFFICIAL USE

Certified Mail Fee

\$

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

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

Postage

\$

Total Postage and Fees

\$

Sent to Edwin and Evelyn Hurlbut, Trs.  
 Street: Colonial Realty Trust  
 15 Merchant St.  
 City, St: Sharon MA 02067

Postmark  
Here

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

See Reverse for Instructions

## SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Edwin and Evelyn Hurlbut, Trs.  
 Colonial Realty Trust  
 15 Merchant St.  
 Sharon MA 02067



9590 9402 4219 8121 1996 43

2. Article Number (Manufacturer's)

017 2400 0000 2930 1743

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

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Edwin and Evelyn Hurlbut*  
 B. Received by (Printed Name)

- ☐ Agent  
☒ Addressee

C. Date of Delivery  
 1/28/19

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

3. Service Type

- ☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)  
☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Return Receipt for Merchandise  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt



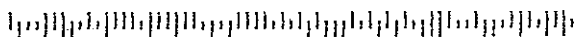
9590 9402 4219 8121 1996 43

United States  
Postal Service

Sender:  
 Four Daughters Compassionate Care Inc  
 Fifteen North Main Street, Box 12  
 Sharon, Massachusetts 02067

First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

57-124815



7017 2400 0000 2930 1705

**U.S. Postal Service**  
**CERTIFIED MAIL® RECEIPT**  
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OFFICIAL USE

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

Postmark  
Here

To John and Donnell Murphy, Trs.  
 155-1225 Providence Hwy  
 7 West St.  
 Walpole MA 02081

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

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

John and Donnell Murphy, Trs.  
 155-1225 Providence Hwy  
 7 West St.  
 Walpole MA 02081



9590 9402 4219 8121 1996 05

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1705

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

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *J. Holubek*

- ☐ Agent  
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

Domestic Return Receipt

USPS TRACKING#



9590 9402 4219 8121 1996 05

United States  
Postal Service

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

Sender:  
 Four Daughters Compassionate Care Inc  
 Fifteen North Main Street, Box 12  
 Sharon, Massachusetts 02067

First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

**CERTIFIED MAIL® RECEIPT**

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OFFICIAL USE

Certified Mail Fee

\$

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

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

Postmark  
Here

Postage

\$

Total Postage and Fees

\$

Sen. Douglas A. King, Trustee  
Sire Marcia J Krokidas Trustee  
City, 115 Main St. Suite ID  
North Easton MA 02356

PS

See for instructions

**SENDER: COMPLETE THIS SECTION**

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

## 1. Article Addressed to:

Douglas A. King, Trustee  
Marcia J Krokidas Trustee  
115 Main St. Suite ID  
North Easton MA 02356



9590 9402 4219 8121 1996 67

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

117 2400 0000 2930 1767

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Paul E. Carter*

- ☐ Agent  
☐ Addressee

B. Received by (Printed Name)

Jacky Crockett

C. Date of Delivery

1/28/19

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

## 3. Service Type

- ☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Return Receipt for Merchandise  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

USPS TRACKING™



02 4219 8121 1996 67

S  
ce

Sender:  
Four Daughters Compassionate Care Inc  
Fifteen North Main Street, Box 12  
Sharon, Massachusetts 02067

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. 6-10



# U.S. Postal Service CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

OFFICIAL USE

Certified Mail Fee \$2.75  
Extra Services & Fees (check box, add fee as appropriate)  
☐ Return Receipt (hardcopy) \$0.00  
☐ Return Receipt (electronic) \$0.00  
☐ Certified Mail Restricted Delivery \$0.00  
☐ Adult Signature Required \$0.00  
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.00

Total \$2.75

Donnell W and Douglas J Murphy  
of the Sharon Park South Rity Trust  
7 West St.  
Walpole MA 02081

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

Postmark  
Sharon  
MA

01/25/2019

## SENDER: COMPLETE THIS SECTION

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

### 1. Article Addressed to:

Donnell W and Douglas J Murphy  
of the Sharon Park South Rity Trust  
7 West St.  
Walpole MA 02081



9590 9402 4219 8121 1994 21

017 2400 0000 2930 1774

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

## COMPLETE THIS SECTION ON DELIVERY

### A. Signature

*[Signature]*

☐ Agent

☐ Addressee

### B. Received by (Printed Name)

Date of Delivery

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

### 3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

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

Domestic Return Receipt

## USPS TRACKING #



02 4219 8121 1994 21

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

IS  
CX

Sender:  
Four Daughters Compassionate Care Inc  
Fifteen North Main Street, Box 12  
Sharon, Massachusetts 02067



Town of Sharon  
c/o Fred Turkington, Town Administrator  
90 South Main Street  
Sharon, MA 02067

Re: Host Community Agreement Costs and Impacts:  
Four Daughters Compassionate Care, Inc dba Zen Leaf Sharon

Mr. Turkington,

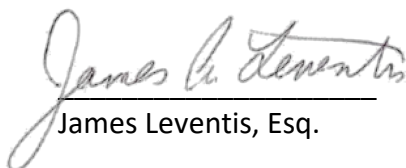
Please allow this letter to serve as a request per our Host Community Agreement (“HCA”) with the Town of Sharon, dated June 19, 2018, to conduct an Annual Review of the community impacts outlined in the HCA. Pursuant to Section 1(d) of the HCA, the Annual Review is to be conducted within 60 days of the anniversary of the Opening Date which was August 26, 2020. The review would be conducted prior to and completed by June 26, 2021.

However, the Massachusetts Cannabis Control Commission requires that Four Daughters requests from the Town of Sharon any records of any cost to the town related to the operation of the establishment. These expenditures can include “actual and anticipated costs.” If you would at your earliest convenience, please provide us with any costs accrued by the Town of Sharon related to the operation of the Zen Leaf Sharon Marijuana Retailer between August 26, 2020 to the present.

Should you have any questions, please contact me at: [james@verano.holdings](mailto:james@verano.holdings) or at 224-622-8770.

Thank you for your assistance in this matter.

Sincerely,

  
James Leventis, Esq.



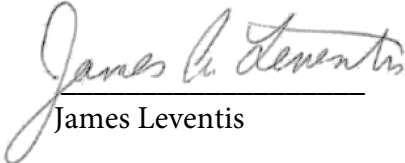
Cannabis Control Commission  
c/o Licensing  
Union Station  
2 Washington Square  
Worcester, MA 01604

Re: Zen Leaf Sharon – Host Community Records

To Whom It May Concern,

Four Daughters Compassionate Care, Inc. is attesting to the fact that we submitted a request to the Town of Sharon, the Host Community for Zen Leaf Sharon, requesting a report of the “actual and anticipated costs” associated with the operation of the dispensary between August 26, 2020 (the opening date) to the present.

At this time, we have not received a response and are submitting this letter demonstrating our compliance with this license renewal requirement.

  
James Leventis

### **Positive Impact Plan**

In an effort to promote and encourage full participation in the regulated cannabis industry by individuals from communities disproportionately harmed by marijuana prohibition and enforcement and to support one of the Commission's priorities of having an ongoing positive impact on communities, the Company has created the following Positive Impact Plan.

Four Daughters' Positive Impact Plan is an effort to respond to evidence which demonstrates that certain populations, particularly Blacks and Latinos, have been disproportionately impacted by high rates of arrest and incarceration for marijuana and other drug crimes as a result of state and federal drug policy. Criminalization has had long-term ill effects, not only on the individuals arrested and incarcerated, but on their families and communities.

The Commission has identified certain areas that were disproportionately harmed in the past by marijuana prohibition and enforcement as evidenced by their having historically high rates of arrest, conviction and incarceration related to marijuana crimes. Our Positive Impact Plan is focused on the following groups:

1. Past or present residents of Brockton, Mansfield, Taunton and Walpole who have drug convictions and/or have parents or spouses who have drug convictions
2. Past or present residents of communities disproportionately harmed by marijuana prohibition and enforcement
3. Massachusetts residents who have past drug convictions; and
4. Massachusetts residents with parents or spouses who have drug convictions.

The goal of our Positive Impact Plan is to promote practices that seek to repair the negative impacts of disproportionate enforcement of laws upon certain communities and populations. This goal has two components, both having a positive impact on all members of the impacted communities while also helping to reduce barriers to entry into the cannabis industry for people in Brockton, Mansfield, Taunton and Walpole.

Our Positive Impact Plan will create and implement the following programs:

1. Funding expungements for residents with cannabis-related felonies. The Company will identify an attorney to volunteer their time to help residents with completing the necessary expungement paperwork. The Company will work to expunge at least 10 felony records a year, hoping to expunge the record of at least one felon per month.
2. The Company has committed to donating funds to organizations specifically committed to improving the disproportionately impacted areas including Brockton, Mansfield, Taunton, and Walpole specifically:
  - a. Providing a donation (\$5,000) to Equitable Opportunities Now (EON) ([www.masseon.com](http://www.masseon.com)), an organization created to educate and inform people of color on how to become active participants in the Massachusetts legal cannabis market, specifically supporting a path to economic empowerment for people with past marijuana convictions and returning citizens. The Company has performed

its due diligence to obtain a letter from EON stating they are willing to receive the donation the Company intends to provide them. They will use these resources to conduct programming and job trainings, workshops and seminars on different facets of the industry, as well as networking and business events to support equity entrepreneurs in the cannabis space.

b. Providing a donation in the form of a Business Membership (Tier One: \$5,000) to Elevate NE (<https://www.elevatene.org/>) whose mission is to help improve disproportionately impacted areas (including Brockton, Mansfield, Taunton and Walpole). The Company has performed its due diligence to obtain a letter from Elevate NE stating they are willing to receive the donation the Company intends to provide them. Elevate NE will use these resources to offer more educational events around Massachusetts and more scholarship opportunities for the underrepresented communities they support. The additional funding will help them bring more experts in from other states and create more opportunities for them to lobby and support local community involvement.

3. Providing internships or apprenticeships with our company to young adults (over 21) from Brockton, Mansfield, Taunton and Walpole with parents who have cannabis convictions. Our Company will recruit candidates from local trade schools, colleges and universities for year-long paid internships. The purpose of this internship is to teach students about the cannabis industry and to work with them on developing policies and practices to better support and hire persons with cannabis offenses and give them an opportunity to work in the industry.
4. The Company will participate in at least two job fairs per year at area community colleges or host a job fair at their retail location at least once a year.
5. The Company will participate in community “clean-up” initiatives in the areas of disproportionate impact: Brockton, Mansfield, Taunton and/or Walpole.
6. The Company will dedicate 10% of shelf space to Economic Empowerment applicants or Social Equity participants.
7. To the extent allowable by law and excluding senior management, the Company will give hiring preference to individuals from Brockton, Mansfield, Taunton and Walpole. The intended ways to reach those communities for hiring is via local publications, area job fairs and community outreach centers that cater to job seekers in these communities.

The Company will use the following qualitative and quantitative measurement metrics in measuring the results of its programs. Upon renewal, we will demonstrate that the identified program/s in the plan led to measurable success of our goals. Our metrics have an identified data source and method for tracking the data.

The metrics we will utilize include:

1. Number of employees hired, retained or promoted that come from disproportionate impacted areas (Brockton, Mansfield, Taunton and Walpole) - the goal would be to hire at least 2 employees from the disproportionate impact areas of Brockton, Mansfield, Taunton or Walpole.
2. Number and subject matter of trainings offered and performed and to whom - the goal would be to offer two training programs per year.
3. Specific financial data and/or employee hours showing donations to or investments in to specific causes - the goal would be to support at least two organizations per year.
4. Number of businesses that obtained training or assistance from the programs - the goal would be to provide training or assistance to at least 3 businesses in the disproportionate impact areas of Brockton, Mansfield, Taunton or Walpole.
5. Number and types of jobs created in the adult-use cannabis industry utilizing individuals from Brockton, Mansfield, Taunton or Walpole - the goal would be to create at least 2 positions utilizing individuals from Brockton, Mansfield, Taunton or Walpole.

The Company will be able to demonstrate the success of its programs by:

1. Showing, via personnel records, the actual hiring for employment those who are members of the targeted groups.
2. Showing a record of attendance by members of the targeted groups at seminars, continuing education seminars, and other programs.
3. Producing documentation that criminal records of individuals in the targeted groups have had their records expunged.
4. Producing a record of support group participation and partnership with programs and agencies that will provide assistance to the targeted groups.
5. Maintain a database of local business that the Company has partnered with and update this on a quarterly basis.

In addition, the Company will have the Director of Community Engagement [or designated employee] attend quarterly meetings with local non-profits in an effort to remain informed about the challenges facing area felons and persons with cannabis-related criminal offenses so that the Company can play an ongoing role in helping to alleviate barriers.

Four Daughters will adhere to the requirements set for 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 Four Daughters will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

D

# The Commonwealth of Massachusetts

William Francis Galvin

Secretary of the Commonwealth

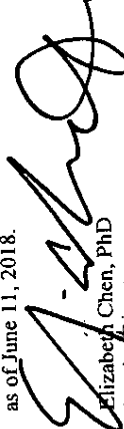
One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

**Articles of Entity Conversion of a  
Domestic Non-Profit with a Pending Provisional  
or Final Certification to Dispense Medical Use Marijuana  
to a Domestic Business Corporation**  
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

FORM MUST

Four Daughters Compassionate Care, Inc. is a registrant  
with the Department of Public Health  
in accordance with 105 CMR 725.100(C)  
as of June 11, 2018.

  
Elizabeth Chen, PhD  
Interim Director  
Bureau of Health Care Safety and Quality  
Massachusetts Department of Public Health

(1) Exact name of the non-profit: Four Daughters Compassionate Care Inc. 001179620

(2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01:

Four Daughters Compassionate Care Inc.

(3) The plan of entity conversion was duly approved in accordance with the law.

The Plan of Entity Conversion was approved by a unanimous Consent of Sole Member and Board of Directors on June 7, 2018.

(4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

## ARTICLE I

The exact name of the corporation upon conversion is:

Four Daughters Compassionate Care Inc.

## ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:\*

N/A

### ARTICLE III

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

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
			200,000	\$0.0001

### ARTICLE IV

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

There is a single class and series of common stock with no relative preferences within the class. The minimum consideration is the par value of \$0.0001 per share.

### ARTICLE V

The restrictions, if any, imposed by the articles or organization upon the transfer of shares of any class or series of stock are:

N/A

### ARTICLE VI

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

Please see attached continuation sheets 6A, 6B and 6C.

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



Continuation Sheet 6A

Special Provisions

ONE: All corporate powers of the Corporation shall be exercised by the Board of Directors except as otherwise provided by law. The Board of Directors may consist of one or more individuals notwithstanding the number of shareholders. In furtherance and not in limitation of the powers conferred by statute, the Board of Directors is expressly authorized to make, amend or repeal the By-Laws of the Corporation in whole or in part, except with respect to any provision thereof which by law or the By-Laws requires action by the shareholders, and subject to the power of the shareholders to amend or repeal any By-Law adopted by the Board of Directors.

TWO: Meetings of the shareholders of the Corporation may be held anywhere within the United States.

THREE: The Corporation may be a partner in any business enterprise which it would have power to conduct by itself.

FOUR: In the absence of fraud, no contract or other transaction of the Corporation shall be affected or invalidated by the fact that any of the directors of the Corporation are in any way interested in or connected with any other party to such contract or transaction or are themselves parties to such contract or transaction, provided that the interest in any such contract or transaction of any such director shall at the time be fully disclosed or otherwise known to the Board of Directors. Any director of the Corporation may be counted in determining the existence of a quorum at any meeting of the Board of Directors which shall authorize such contract or transaction and may vote and act upon any matter, contract or transaction between the Corporation and any other person without regard to the fact that he is also a shareholder, director or officer of, or has any interest in, such other person with the same force and effect as if he were not such shareholder, director or officer or not so interested. Any contract or other transaction of the Corporation or of the Board of Directors or of any committee thereof which shall be ratified by a majority of the holders of the issued and outstanding stock entitled to vote at any annual meeting or any special meeting called for that purpose shall be as valid and as binding as though ratified by every shareholder of the Corporation; provided, however, that any failure of the shareholders to approve or ratify such contract or other transaction, when and if submitted, shall not be deemed in any way to render the same invalid or deprive the directors and officers of their right to proceed with such contract or other transaction.

Continuation Sheet 6B

FIVE: The Corporation shall, to the extent legally permissible, indemnify each person (and his heirs, executors, administrators, or other legal representatives) who is, or shall have been, a director or officer of the Corporation or any person who is serving, or shall have served, at the request of the Corporation as a director or officer of another corporation, against all liabilities and expenses (including judgments, fines, penalties and attorneys' fees and all amounts paid in compromise or settlement) reasonably incurred by any such director, officer or person in connection with, or arising out of, any action, suit or proceeding in which any such director, officer or person may be a party defendant or with which he may be threatened or otherwise involved, directly or indirectly, by reason of his being or having been a director or officer of the Corporation or such other corporation, except in relation to matters as to which any such director, officer or person shall be finally adjudged, other than by consent, in such action, suit or proceeding not to have acted in good faith in the reasonable belief that his action was in the best interests of the corporation; provided, however, that indemnity shall not be made with respect to such amounts paid in compromise or settlement, unless:

(a) such compromise or settlement shall have been approved as in the best interests of the corporation, after notice that it involves such indemnification by:

- (i) The Board of Directors by a majority of a quorum consisting of directors who were not parties to such action, suit or proceeding, or by
- (ii) The shareholders of the Corporation by a majority vote of a quorum consisting of shareholders who were not parties to such action, suit or proceeding, or

(b) in the absence of action by disinterested directors or shareholders as above provided, there has been obtained at the request of a majority of the Board of Directors then in office a written opinion of independent legal counsel to the effect that the director or officer to be indemnified appears to have acted in good faith in the reasonable belief that his action was in the best interests of the Corporation.

Continuation Sheet 6C

Upon request therefor by any director, officer, or person enumerated in the preceding paragraph of this Article, the Corporation may from time to time, if authorized by the Board of Directors, prior to final adjudication or compromise or settlement of the matter or matters as to which indemnification is claimed, advance to such director, officer or person all expenses incurred by him to date of such request. Any advance made pursuant to this provision shall be made on the condition that the director, officer or person receiving such advance shall repay to the Corporation any amounts so advanced if, upon the termination of the matter or matters as to which such advances were made, such director, officer or person shall not be entitled to indemnification under the preceding paragraph of this Article.

The foregoing right to indemnification shall not be exclusive of any other rights to which any such director, officer or person is entitled under any agreement, vote of shareholders, statute, or as a matter of law, or otherwise.

The provisions of this Article are separable, and if any provision or portion hereof shall for any reason be held inapplicable, illegal or ineffective, this shall not prevent any other provision or portion hereof from applying, and shall not affect any right of indemnification existing otherwise than under this Article.

SIX: No director shall be personally liable to the Corporation or its shareholders for monetary damages for breach of fiduciary duty as a director notwithstanding any provision of law imposing such liability; provided, however, that such limitation on liability will not eliminate or limit the liability of a director (i) for any breach of the director's duty of loyalty to the Corporation or its shareholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (iii) under sections 6.41 or 8.32 of Chapter 156D of the Massachusetts General Laws, or (iv) for any transaction from which the director derived an improper personal benefit. If the Massachusetts Business Corporation Law is amended after the effective date of these Articles of Organization, to authorize corporate action further eliminating or limiting the personal liability of directors, then the liability of a director of the Corporation shall be eliminated or limited to the fullest extent permitted by the Massachusetts Business Corporation Law, as so amended.

SEVEN: All shares of Common Stock or Non-Voting Common Stock issued by the Corporation shall, to the extent permitted by the Internal Revenue Code, be deemed issued pursuant to a Plan to Issue Section 1244 Stock.

#### ARTICLE VII

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

#### ARTICLE VIII

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth:  
584 Mountain Street, Sharon, MA 02067
- b. The name of its initial registered agent at its registered office:  
Brian Striar
- c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: Brian Striar

Treasurer: Soozen Tribuna

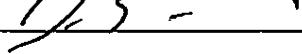
Secretary: Stephanie Striar

Director(s): Ronald D. Greco, Stanley Rosen, Brian Striar, Arthur Blumenthal

- d. The fiscal year end of the corporation:  
12/31
- e. A brief description of the type of business in which the corporation intends to engage:  
To operate a licensed Medical Marijuana establishment.
- f. The street address of the principal office of the corporation:  
584 Mountain Street, Sharon, MA 02067
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

584 Mountain Street, Sharon, MA 02067, which is  
(number, street, city or town, state, zip code)

- ☐ its principal office;
- ☐ an office of its transfer agent;
- ☐ an office of its secretary/assistant secretary;
- ☒ its registered office.

Signed by:   
(signature of authorized individual)

- ☐ Chairman of the board of directors,
- ☒ President,
- ☐ Other officer,
- ☐ Court-appointed fiduciary,

on this 7th day of June, 2018

COMMONWEALTH OF MASSACHUSETTS

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

28670

**Articles of Entity Conversion of a  
Domestic Non-Profit with a Pending Provisional or  
Final Certification to Dispense Medical Use Marijuana  
to a Domestic Business Corporation**  
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

I hereby certify that upon examination of these articles of conversion, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said articles; and the filing fee in the amount of \$475 having been paid, said articles are deemed to have been filed with me this 23 day of May, 2018, at \_\_\_\_\_ a.m./p.m.  
time

Effective date: \_\_\_\_\_  
(must be within 90 days of date submitted)



WILLIAM FRANCIS GALVIN  
Secretary of the Commonwealth

  
Examiner  
Name approval

Filing fee: Minimum \$250

TO BE FILLED IN BY CORPORATION  
Contact Information:

C

M

Andrew D. Myers, Esq.

Davis, Malm & D'Agostine, P.C.

One Boston Place, 37th Floor, Boston, MA 02108

Telephone: 617-367-2500

Email: [amyers@davismalm.com](mailto:amyers@davismalm.com)

Upon filing, a copy of this filing will be available at [www.sec.state.ma.us/cor](http://www.sec.state.ma.us/cor). If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

SECRETARY OF THE  
COMMONWEALTH  
2018 AUG 23 PM 2:35  
CORPORATIONS DIVISION

1316152

**SECOND AMENDED AND RESTATED BYLAWS  
OF  
FOUR DAUGHTERS COMPASSIONATE CARE, INC.  
(a corporation organized under M.G.L. Ch. 156D)**

**ARTICLE I. OFFICES**

**Section 1.1. Registered Office and Agent.** The registered office and registered agent of the Corporation shall be as set forth in the Corporation's Articles of Organization or subsequent filing with the Secretary of the Commonwealth. The Board of Directors or President of the Corporation may at any time change the registered office or the registered agent by making the appropriate filing with the Secretary of the Commonwealth.

**Section 1.2. Principal Office.** The principal office of the Corporation shall be within or without the Commonwealth of Massachusetts as set forth in the Corporation's Articles of Organization or subsequent filing with the Secretary of the Commonwealth.

**Section 1.3. Other Offices.** The Corporation may also have other offices at any places, within or without the Commonwealth of Massachusetts, as the Board of Directors may designate, or as the business of the Corporation may require or as may be desirable.

**Section 1.4. Books and Records.** Any records maintained by the Corporation in the regular course of its business, including its share ledger, books of account and minute books, may be maintained on any information storage device or method; provided that the records so kept can be converted into clearly legible paper form within a reasonable time. The Corporation shall convert any records so kept upon the written request of any person entitled to inspect such records pursuant to applicable law.

**ARTICLE II. SHAREHOLDERS**

**Section 2.1. Place of Meeting.** Meetings of the shareholders shall be held either at the principal office of the Corporation or at any other place designated by the Board of Directors, either within or without the Commonwealth of Massachusetts, as shall be designated in the notice of the meeting or executed waiver of notice. The Board of Directors may, in its discretion, determine that the meeting may be held solely by means of remote communication as set out in Section 2.02 below.

**Section 2.2. Meetings of Shareholders by Remote Communication.** If authorized by the Board of Directors, and subject to any guidelines and procedures adopted by the Board of Directors, shareholders not physically present at a meeting of shareholders may participate in a meeting of shareholders by means of remote communication, and such shareholders may be considered present in person and may vote at a meeting of shareholders, whether held at a designated place or solely by means of remote communication, subject to the conditions imposed by applicable law.

At a meeting in which shareholders can participate by means of remote communication, the Corporation shall implement reasonable measures to:

- a. Verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxy holder;
- b. Allow shareholders and proxy holders participating by remote communication to either read or hear the proceedings as they take place and to participate in the meeting and vote on matters submitted to the shareholders; and
- c. Maintain a record of the vote or other action taken by shareholders at the meeting by means of remote communication.

**Section 2.3. Annual Meeting.** An annual meeting of shareholders, for the purpose of electing directors and transacting any other business as may be brought before the meeting, shall be held on the third Tuesday in April, or such other date before May 31 as approved by the Board of Directors.

Failure to hold the annual meeting at the designated time shall not affect the validity of any action taken by the Corporation. If the Board of Directors fails to call the annual meeting, any shareholder may make demand in writing to any officer of the Corporation that an annual meeting be held.

**Section 2.4. Special Shareholders' Meetings.** Special meetings of the shareholders may be called:

- a. by the Board of Directors;
- b. by the President;
- c. by Chairman of the Board of Directors; or
- d. upon the demand of the holders of at least twenty-five percent (25%) of all the votes entitled to be cast on any issue proposed to be considered at the proposed special meeting.

In order for the shareholders to demand a special meeting, the shareholders of the required percentage of shares must sign, date, and deliver to the Corporation's Secretary one or more written demands for the meeting, describing the purposes for which the meeting is to be held.

Only business within the purposes described in the Corporation's meeting notice may be conducted at a special meeting of the shareholders.

**Section 2.5. Fixing the Record Date.** For the purpose of determining shareholders entitled to notice of or to vote at any meeting of shareholders or any adjournment thereof, the record date shall be the date specified by the Board of Directors in the notice of the meeting. If no date is specified by the Board of Directors, the record date shall be the close of business on

the day before the notice of the meeting is mailed to shareholders. If no notice is sent, the record date shall be the date set by the law applying to the type of action to be taken for which a record date must be set.

In the case of action by written consent of the shareholders without a meeting, the record date shall be (a) the date fixed by the board of directors or (b) the date that the first shareholder signs the written consent if no date has been fixed by the board.

A record date fixed under this Section may not be more than seventy (70) days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the Board of Directors fixes a new record date.

**Section 2.6. Notice of Shareholders' Meeting.** Written or printed notice stating the place, day and hour of the meeting, the means of any remote communication by which shareholders may be considered present and may vote at the meeting (if applicable), and, in case of a special meeting, the purpose or purposes for which the meeting is called, shall be given not less than seven (7) days nor more than sixty (60) days before the date of the meeting. Notice shall only be required to be made to shareholders entitled to vote at the meeting unless the purpose of the meeting is for the transaction of business for which notice to all shareholders is required by law.

Notice shall be given to a by personal delivery, by electronic transmission if consented to by a shareholder, or by mail, by or at the direction of the President, the Secretary, or the officer or person calling the meeting. If mailed, the notice shall be deemed to be given when deposited in the United States mail addressed to the shareholder at the shareholder's address as it appears on the share transfer records of the Corporation, with postage thereon prepaid.

Any person entitled to notice of a meeting may sign a written waiver of notice either before or after the time of the meeting. The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person attends for the specific purpose of objecting to the lawfulness of the convening of the meeting.

**Section 2.7. Voting Lists.** The officer or agent having charge of the share transfer records for shares of the Corporation shall prepare an alphabetical list of all shareholders entitled to notice of the meeting, arranged by voting group and by class and series of share, with the address of and the number of shares held by each shareholder. The list shall be available for inspection by any shareholder beginning two (2) business days after notice of the meeting is given at the principal place of business of the Corporation or if the meeting will be held at another location, at a place in the city where the meeting will be held, which shall be identified in the meeting notice.

The list shall also be produced and kept open at the time and place of the meeting and shall be subject to the inspection of any shareholder during the whole time of the meeting. If any shareholders are participating in the meeting by means of remote communication, the list must be open to examination by the shareholders for the duration of the meeting on a reasonably accessible electronic network, and the information required to access the list must be provided to shareholders in the meeting notice. The Corporation shall take reasonable steps to ensure that the information is available only to shareholders of the Corporation.



**Section 2.8. Quorum of Shareholders.** A quorum shall be present for action on any matter at a shareholder meeting if a majority of the votes entitled to be cast on the matter by a voting group is represented at the meeting in person or by proxy. A voting group includes all shares of one or more classes or series that are entitled, by law or the Articles of Organization, to vote and to be counted together collectively on a matter at a meeting of shareholders.

Once a quorum for a voting group has been established at a meeting, the shareholders in that voting group represented in person or by proxy at the meeting are deemed present for quorum purposes for the remainder of the meeting and for any adjournment unless:

- a. The shareholder attends the meeting solely to object to defective notice or the conduct of the meeting on other grounds and does not vote the shares or take any other action at the meeting.
- b. The meeting is adjourned and a new record date is set for the adjourned meeting.

The shareholders in a voting group represented in person or by proxy at a meeting of shareholders, even if not comprising a quorum, may adjourn the meeting as to the voting group until a time and place as may be determined by a vote of the holders of a majority of the shares of the voting group represented in person or by proxy at that meeting. If the meeting is adjourned for more than 120 days after the date fixed for the original meeting, a new record date must be fixed by the Board of Directors; notice of the meeting must be given to the shareholders who are members of the voting group as of the new record date, and a new quorum for the meeting must be established.

**Section 2.9. Conduct of Meetings.** The Board of Directors of the Corporation may adopt by resolution rules and regulations for the conduct of meetings of the shareholders, as it deems appropriate. At every meeting of the shareholders, the Chairman of the Board of Directors, or in his or her absence or inability to act, a director or officer designated by the Board of Directors, shall act as the presiding officer of the meeting. The Secretary or, in his or her absence or inability to act, the person whom the chair of the meeting shall appoint secretary of the meeting, shall act as secretary of the meeting and keep the minutes thereof.

The presiding officer shall determine the order of business and, in the absence of a rule adopted by the Board of Directors, shall establish rules for the conduct of the meeting. The presiding officer shall announce the close of the polls for each matter voted upon at the meeting, after which no ballots, proxies, votes, changes or revocations will be accepted. Polls for all matters before the meeting will be deemed to be closed upon final adjournment of the meeting.

**Section 2.10. Voting of Shares.** Each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote at a meeting of shareholders, except to the extent that the Articles of Organization provides for more or less than one vote per share or limits or denies voting rights to the holders of the shares of any class or series.

If a quorum of a voting group exists, favorable action on a matter, other than the election of Directors, will be approved by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, unless a greater or lesser number of votes is required by law or a greater vote is required by the Articles of Organization, these Bylaws or a

resolution of the Board of Directors requiring receipt of a greater affirmative vote of the shareholders, including more separate voting groups.

Directors are elected by a plurality of the votes cast by the shares entitled to vote in the election at a meeting at which a quorum is present.

**OR**

No ballot shall be required for the election of directors unless requested by a shareholder present or represented at the meeting and entitled to vote in the election.

**Section 2.11. Voting by Proxy or Nominee.** Shares of the Corporation's stock owned by the Corporation itself or by another corporation or entity, the majority of the voting stock or interest of which is owned or controlled by the Corporation, shall not be voted, directly or indirectly, at any meeting, and shall not be counted in determining the total number of outstanding shares at any given time. Nothing in this section shall be construed as limiting the right of the Corporation or any domestic or foreign corporation or other entity to vote shares, held or controlled by it in a fiduciary capacity, or with respect to which it otherwise exercises voting power in a fiduciary capacity.

A shareholder may vote either in person or by proxy executed in writing by the shareholder or his or her attorney-in-fact. An appointment of a proxy is effective when received by the Secretary or other officer or agent authorized by the Corporation to tabulate votes. No proxy shall be valid after eleven (11) months from the date of its execution unless otherwise provided in the proxy. A proxy shall be revocable unless the proxy form conspicuously states that the proxy is irrevocable and the proxy is coupled with an interest as defined in the Massachusetts Business Corporations Act. An appointment made irrevocable is revoked when the interest with which it is coupled is extinguished. The death or incapacity of the shareholder appointing a proxy shall not affect the right of the Corporation to accept the proxy's authority unless notice of the death or incapacity is received by the Secretary or other officer or agent authorized to tabulate votes before the proxy exercises his or her authority under the appointment.

Shares owned by another corporation, domestic or foreign, may be voted by any officer, agent, or proxy as the bylaws of that corporation may authorize or, in the absence of authorization, as the Board of Directors of that corporation may determine.

An administrator, executor, guardian, or conservator may vote shares held in that fiduciary capacity if the shares forming a part of an estate are in the possession and forming a part of the estate being served by the fiduciary, either in person or by proxy, without a transfer of the shares into the fiduciary's name. A trustee may vote shares standing held in trustee's name, either in person or by proxy, but no trustee shall be entitled to vote shares held by him or her without a transfer of the shares into his or her name as trustee.

A receiver may vote shares standing in the name of a receiver and may vote shares held by or under the control of a receiver without the transfer thereof into the receiver's name if authority so to do be contained in an appropriate order of the court by which the receiver was appointed.

A shareholder whose shares are pledged shall be entitled to vote the shares until the shares have been transferred into the name of the pledgee, and thereafter the pledgee shall be entitled to vote the shares transferred, subject to any agreements containing restrictions on the hypothecation, assignment, pledge, or voluntary or involuntary transfer of shares.

The Board of Directors may establish a procedure by which the beneficial owner of shares that are registered in the name of a nominee may be recognized by the Corporation as the shareholder to the extent provided by the procedure. The procedure may set forth the types of nominees to which it applies, the rights or privileges that the Corporation recognizes in a beneficial owner, the manner in which the procedure is selected by the nominee, a requirement for the certification by the nominee of the beneficial owner, the information to be provided when the procedure is selected, the period for which selection of the procedure is effective, and other aspects of the rights and duties created.

**Section 2.12. Written Consent of Shareholders Without a Meeting.** Any action required or permitted to be taken at any annual or special meeting of shareholders may be taken without a meeting, if a consent or consents in writing, setting forth the action so taken, shall have been signed by shareholders not having less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders, and are delivered to the Corporation for inclusion with the records of meetings within sixty (60) days of the earliest dated consent delivered to the Corporation.

If the action to be taken pursuant to the consent of voting shareholders without a meeting is one for which notice to all shareholders would be required by law if the action were to be taken at a meeting, then the Corporation shall give notice, in the manner specified by Section 2.6, at least seven (7) days before the action is taken, to all nonvoting shareholders that would be entitled to vote on such action at a meeting of shareholders.

### **ARTICLE III. DIRECTORS**

**Section 3.1. Powers.** All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, the Board of Directors, except such powers expressly conferred upon or reserved to the shareholders, and subject to any limitations set forth by law, by the Articles of Organization or by these Bylaws.

**Section 3.2. Number of Directors.** The Board of Directors may consist of one (1) director notwithstanding the number of shareholders of the Corporation with the number fixed from time to time by resolution adopted by the Board of Directors or the shareholders. No decrease in the number of directors shall have the effect of decreasing the number of directors below the minimum number of individuals permitted by law, nor shall have the effect of shortening the term of any incumbent director.

The number of directors shall be [NUMBER] provided that the number may be increased or decreased from time to time by an amendment to these Bylaws or resolution adopted by the Board of Directors or by the shareholders. No decrease in the number of directors shall have the

effect of decreasing the number of directors below the minimum number of individuals permitted by law, nor shall have the effect of shortening the term of any incumbent director.

**Section 3.3. Term of Office.** At the first annual meeting of shareholders and at each annual meeting thereafter, the holders of shares entitled to vote in the election of directors shall elect directors to hold office until the next succeeding annual meeting. Despite the expiration of a director's term, he or she shall continue to serve until his or her successor is elected and qualified or until there is a decrease in the number of directors.

**Section 3.4. Vacancies.** Vacancies and newly created directorships, whether resulting from an increase in the size of the board of directors, from the death, resignation, disqualification or removal of a director or otherwise, may be filled by the affirmative vote of a majority of the remaining directors then in office, even though less than a quorum of the Board of Directors. A director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

**Section 3.5. Removal.** Directors may be removed from office at any time with or without cause by the shareholders entitled to elect them or for cause by vote of a majority of the directors then in office. A director may be removed by shareholders or directors only at a meeting called for that purpose, for which the notice must state that the purpose, or one of the purposes, of the meeting is removal of the director or directors.

**Section 3.6. Resignation.** A director may resign by providing notice in writing to the Corporation. The resignation shall be effective upon the later of the date of receipt of the notice of resignation or the effective date specified in the notice. Acceptance of the resignation shall not be required to make the resignation effective.

**Section 3.7. Meeting of Directors.** A regular meeting of the newly-elected Board of Directors shall be held without other notice immediately following each annual meeting of shareholders, at which the board shall elect officers and transact any other business as shall come before the meeting. The board may designate a time and place for additional regular meetings, within or outside Massachusetts, by resolution, without notice other than the resolution.

Special meetings of the Board of Directors may be called by the President, by the Chairman of the Board, if any, by the Secretary, by any two directors, or by one director in the event that there is only one director.

**Section 3.8. Participation by Remote Communication.** The Board of Directors may permit any or all directors to participate in any meeting by, or conduct the meeting through the use of, any means of communication by which all directors participating may simultaneously hear each other during the meeting. A director participating in a meeting by this means is considered to be present in person at the meeting.

**Section 3.9. Notice of Directors' Meetings.** All special meetings of the Board of Directors shall be held upon not less than two (2) days' notice stating the date, place and time of the meeting given to each director or not less than two (2) hours' notice in the event of an emergency.

Notice may be given to each personally, by telephone or voice mail, by mail, by electronic transmission if consented to by the director, or by messenger or delivery service.

A written waiver of the required notice signed by a director entitled to the notice, before or after the meeting, is the equivalent of giving notice to the director who signs the waiver. A director's attendance at any meeting shall constitute a waiver of notice of the meeting, except where the director attends a meeting for the express purpose of objecting to the transaction of any business on the grounds that the meeting is not lawfully called or convened.

**Section 3.10. Quorum and Action of Directors.** A majority of the number of directors shall constitute a quorum for the transaction of business. The act of the majority of the directors present at a meeting at which a quorum is present at the time of the act shall be the act of the Board of Directors, unless the act of a greater number is required by law, the Articles of Organization, or these Bylaws. The directors at a meeting for which a quorum is not present may adjourn the meeting until a time and place as may be determined by a vote of the directors present at that meeting.

**Section 3.11. Compensation.** Directors shall not receive any stated salary for their services, but by resolution of the Board of Directors a fixed sum and expenses of attendance, if any, may be allowed for attendance at any meeting of the Board of Directors or committee thereof. A director shall not be precluded from serving the Corporation in any other capacity and receiving compensation for services in that capacity.

**Section 3.12. Action by Directors Without a Meeting.** Any action required or permitted to be taken at a meeting of the Board of Directors or any committee thereof may be taken without a meeting if all members of the Board of Directors or committee consent in writing or by electronic transmission and the writings or electronic transmissions are filed with the minutes of the proceedings of the Board of Directors.

**Section 3.13. Committees of the Board of Directors.** The Board of Directors, by resolution adopted by a majority, may designate one or more directors to constitute one or more committees, to exercise the authority of the Board of Directors to the extent provided in the resolution of the Board of Directors and allowed under the law of the Commonwealth.

A committee of the Board of Directors does not have the authority to:

- a. Authorize distributions;
- b. Approve or propose to shareholders action that this chapter requires be approved by shareholders, including an amendment to the Articles of Organization;
- c. Change the number of the Board of Directors, remove directors from office or fill vacancies on the Board of Directors, or
- d. Adopt, amend, or repeal the Bylaws of the Corporation.

The designation of a committee of the Board of Directors and the delegation thereto of authority shall not operate to relieve the Board of Directors, or any member thereof, of any responsibility imposed by law.

#### **ARTICLE IV. OFFICERS**

**Section 4.1. Positions and Appointment.** The officers of the Corporation shall be appointed by the Board of Directors and shall be a President, a Treasurer, a Secretary, and any other officers, including assistant officers and agents, as may be deemed necessary by the Board of Directors. Any two or more offices may be held by the same person.

Each officer shall serve until a successor is appointed and qualified, or until the death, resignation, or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board of Directors. Appointment of an officer or agent shall not of itself create contract rights.

**Section 4.2. Removal.** Any officer appointed or elected by the Board of Directors may be removed with or without cause by the affirmative vote of the majority of the Board of Directors at any regular or special meeting. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

**Section 4.3. President.** The President shall be the chief executive officer of the Corporation, and subject to the direction of the Board of Directors, shall have active, general supervision and executive management over the business and affairs of the Corporation. The President shall preside at all meetings of all directors, shall see that all orders and resolutions of the Board of Directors are carried out, and shall perform any other duties as the Board of Directors may assign.

**Section 4.4. Vice-Presidents.** Each Vice President, in order of their rank as designated by the Board of Directors, shall perform the duties and exercise the powers of the President in the absence or disability of the President, and shall perform other duties as the Board of Directors or President shall assign.

**Section 4.5. The Secretary and Assistant Secretaries.** The Secretary shall attend all meetings of the Board of Directors and all meetings of the shareholders and shall record all votes and the minutes of all proceedings and shall perform like duties for the standing committees when required. The Secretary shall give or cause to be given notice of all meetings of the shareholders and all meetings of the Board of Directors and shall perform other duties as may be prescribed by the Board of Directors or the President. The Secretary shall be the custodian of the records and of the seal of the Corporation, and shall affix the seal to all documents and attest to it, when duly authorized by the Board of Directors.

The Assistant Secretaries shall, in order of their rank as designated by the Board of Directors, in the absence or disability of the Secretary, perform the duties and exercise the powers of the Secretary, and they shall perform other duties as the Board of Directors or the Secretary shall assign.

In the absence of the Secretary or an Assistant Secretary, the minutes of all meetings of the board and shareholders shall be recorded by the person designated by the President or by the Board of Directors.

**Section 4.6. The Treasurer and Assistant Treasurers.** The Treasurer shall be the principal financial officer of the Corporation, shall have the custody of the corporate funds and securities, shall keep full and accurate accounts of receipts and disbursements of the Corporation, shall deposit all moneys and other valuable effects in the name and to the credit of the Corporation in the depositories designated by the Board of Directors, and in general shall perform all the duties incident to the office of Treasurer and such other duties as from time to time may be assigned by the Board of Directors or by the President.

The Treasurer shall disburse the funds of the Corporation as may be ordered by the Board of Directors, taking proper vouchers for the disbursements. The Treasurer shall keep and maintain the Corporation's books of account and shall render to the President and the Board of Directors an account of all of his or her transactions as Treasurer and of the financial condition of the Corporation and exhibit the books, records and accounts to the President or the Board of Directors at any time.

If required by the Board of Directors, the Treasurer shall give the Corporation a bond in a sum and with a surety or sureties satisfactory to the Board of Directors for the faithful performance of the duties of the office and for the restoration to the Corporation, in case of death, resignation, retirement or removal from office, of all books, papers, vouchers, money and other property of whatever kind in the incumbent's possession or under the incumbent's control belonging to the Corporation.

The Assistant Treasurers in the order of their seniority shall, in the absence or disability of the Treasurer, perform the duties and exercise the powers of the Treasurer, and they shall perform other duties as the Board of Directors shall prescribe.

## **ARTICLE V. INDEMNIFICATION OF DIRECTORS AND OFFICERS**

The Corporation shall indemnify a director or officer who was wholly successful, on the merits or otherwise, in the defense of any proceeding to which he or she was a party because he or she was a director or officer of the Corporation against reasonable expenses incurred by him or her in connection with the proceeding.

The Corporation may, to the fullest extent permitted by law, indemnify each person who may serve or who has served at any time as a director or officer of the Corporation or of any of its subsidiaries, or who at the request of the Corporation may serve or at any time has served as a director, officer, administrator or trustee of, or in a similar capacity with, another organization or any employee benefit plan, against all expenses and liabilities, including counsel fees, reasonably incurred by or imposed upon such person in connection with any proceeding in which he may become involved by reason of his serving or having served in such capacity.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of a director, officer or other person entitled to indemnification hereunder.

The foregoing right of indemnification shall be in addition to and not exclusive of any other rights which such director or officer or other person may be entitled under the Articles of Organization, any agreement, or pursuant to any action taken by the directors or shareholders of the Corporation or otherwise.

## **ARTICLE VI. SHARE CERTIFICATES AND TRANSFERS**

**Section 6.1. Certificates Representing Shares.** If shares are represented by certificates, at a minimum each share certificate shall state upon the face thereof:

- a. The name of the Corporation and that it is organized under the laws of the Commonwealth.
- b. The name of the person to whom issued.
- c. The number and class of shares and the designation of the series, if any, which the certificate represents.

No share shall be issued until the consideration therefor, fixed as provided by law, has been fully paid.

**Section 6.2. Transfers of Shares.** Shares of the Corporation shall be transferable in the manner prescribed by law and in these Bylaws. Transfers of shares shall be made on the books of the Corporation only by the holder of record thereof, by such person's attorney lawfully constituted in writing and, in the case of certificated shares, upon the surrender of the certificate thereof, which shall be cancelled before a new certificate or uncertificated shares shall be issued. No transfer of shares shall be valid as against the Corporation for any purpose until it shall have been entered in the share records of the Corporation by an entry showing from and to whom transferred.

**Section 6.3. Registered Shareholders.** The Corporation may treat the holder of record of any shares issued by the Corporation as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth, or giving proxies with respect to those shares.

**Section 6.4. Lost Certificates.** The Board of Directors may direct a new certificate or certificates to be issued in place of any certificate or certificates theretofore issued by the Corporation alleged to have been lost or destroyed, upon the making of an affidavit of that fact by the person claiming the certificate to be lost. When authorizing the issue of a new certificate or certificates, the Board of Directors in its discretion and as a condition precedent to the issuance thereof, may require the owner of the lost or destroyed certificate or certificates or his or her legal representative to give the Corporation a bond with surety in a sum as it may direct as indemnity against any claim that may be made against the Corporation or other obligees with respect to the certificate alleged to have been lost or destroyed.

## **ARTICLE VII. MISCELLANEOUS**



**Section 7.1. Seal.** The Corporation may adopt a corporate seal in a form approved by the Board of Directors. The Corporation shall not be required to use the corporate seal and the lack of the corporate seal shall not affect an otherwise valid contract or other instrument executed by the Corporation.

**Section 7.2. Checks, Drafts, Etc.** All checks, drafts or other instruments for payment of money or notes of the Corporation shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the Board of Directors.

**Section 7.3. Fiscal Year.** The fiscal year of the Corporation shall be as determined by the Board of Directors.

**Section 7.4. Invalid Provisions.** If any one or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

## **ARTICLE VIII. AMENDMENT OF BYLAWS**

The power to make, amend, or repeal these Bylaws shall be in the shareholders.

The directors also may make, amend, or repeal these Bylaws in whole or in part, except with respect to any provision that by virtue of the law, the Articles of Organization or these Bylaws requires action by the shareholders.



Commonwealth of Massachusetts  
Department of Revenue  
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L2123988736  
Notice Date: April 10, 2018  
Case ID: 0-000-555-086



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



FOUR DAUGHTERS COMPASSIONATE CARE  
584 MOUNTAIN ST  
SHARON MA 02067-3022

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

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

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

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

### ***What if I have questions?***

If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

### ***Visit us online!***

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

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



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

William Francis Galvin  
Secretary of the  
Commonwealth

Date: February 08, 2019

To Whom It May Concern :

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

**FOUR DAUGHTERS COMPASSIONATE CARE INC.**

is a domestic corporation organized on **August 23, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

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

Secretary of the Commonwealth

Certificate Number: 19020115690

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

Processed by:

**Documentation to explain why individuals listed in Articles of Organization should NOT be considered close associates or persons having direct or indirect authority.**

Soozen Tribuna, Stephanie Striar, Ronald D. Greco, Stanley Rosen and Arthur Blumenthal have all resigned their positions as Directors. None of the individuals listed above are executives, managers, persons having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment. None of the individuals listed above are close associates or members of the applicant. None of the individuals listed above have contributed 10% or more of the initial capital to operate the Marijuana Establishment. None of these individuals hold a relevant managerial, operational or financial interest in the business of the applicant and, by virtue of that interest or power, is able to exercise a significant influence over the management, operations or finances of a Marijuana Establishment licensed under 935 CMR 500.000. The current Directors are reflected on the Secretary of the Commonwealth's website and were all disclosed in the Application of Intent, Background Check Management and Operations Profile Packets.

## FOUR DAUGHTERS - CULTIVATION

### **QUALITY CONTROL AND TESTING FOR CONTAMINANTS**

#### **Testing of Marijuana**

Four Daughters will not sell or otherwise market for adult use any marijuana product, including marijuana, that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Four Daughters will engage an Independent Testing Laboratory to test its marijuana products in compliance with the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH and to test its environmental media (e.g., soils, solid growing media, and water) in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the DPH.

Four Daughters will test for contaminants as specified and required by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

Four Daughters will notify the Commission within seventy-two (72) hours of receipt in writing of any laboratory testing results indicating that the marijuana or marijuana products contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) that contamination cannot be remediated, and must be disposed of. The notification from Four Daughters will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination. Four Daughters will ensure that notification comes from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly.

Four Daughters will maintain the results of all testing for no less than one year.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with Four Daughters's Transportation Policy and 935 CMR 500.105(13).

All excess marijuana will be disposed of in compliance with Bloominus Inc.'s Disposal Policy and 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly.

#### **Handling of Marijuana**

Four Daughters will handle and process in a safe and sanitary manner.

Four Daughters will process the leaves and flowers of the female marijuana plant only, which will be:

## FOUR DAUGHTERS - CULTIVATION

1. Well cured and generally free of seeds and stems;
2. Free of dirt, sand, debris, and other foreign matter;
3. Free of contamination by mold, rot, other fungus, and bacterial diseases;
4. Prepared and handled on food-grade stainless steel tables; and
5. Packaged in a secure area.

Four Daughters will comply with the following sanitary requirements:

1. Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging will comply with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
2. Any marijuana establishment agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
  - i. maintaining adequate personal cleanliness; and
  - ii. 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. Four Daughters will supply adequate and convenient hand-washing facilities furnished with running water at a suitable temperature. Hand-washing facilities will be located in the Marijuana Establishment in 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. Four Daughters will supply sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Litter and waste will be properly removed, 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. Floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Four Daughters will ensure that there will be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. 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;

## FOUR DAUGHTERS - CULTIVATION

11. Four Daughters's water supply will be sufficient for necessary operations. Any private water source will be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
12. Plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing will properly convey sewage and liquid disposable waste from the Marijuana Establishment. There will be no cross-connections between the potable and waste-water lines;
13. The Company will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Products that can support the rapid growth of undesirable microorganisms will be held in a manner that prevents the growth of these microorganisms; and
15. Storage and transportation of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
16. All 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).

Four Daughters will comply with sanitary requirements. All edible products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

## FOUR DAUGHTERS - CULTIVATION

### **PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS**

Four Daughters will implement personnel policies and procedures to ensure a safe, secure, and respectful work environment free from all forms of harassment, discrimination or hostility. All employees will have a background check prior to hiring.

Four Daughters will institute a policy for the immediate dismissal of any marijuana establishment agent who has:

1. Diverted marijuana, which will be reported to law enforcement officials and to the Commission;
2. Engaged in unsafe practices with regard to the operation of the Marijuana Establishment, which will be reported to the Commission; or
3. Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving the 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.

(1) Four Daughters will apply for registration for all of its board members, directors, employees, executives, managers, and volunteers. All such individuals will:

- (a) be 21 years of age or older;
- (b) not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
- (c) be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

(2) An application for registration of a marijuana establishment agent will include:

- (a) the full name, date of birth, and address of the individual;
- (b) all aliases used previously or currently in use by the individual, including maiden name, if any;
- (c) a copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
- (d) an attestation that the individual will not engage in the diversion of marijuana products;
- (e) written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
- (f) background information, including, as applicable:
  1. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of *nolo contendere*, or admission of sufficient facts;



## FOUR DAUGHTERS - CULTIVATION

2. a description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority relating to any professional or occupational or fraudulent practices;
  3. a description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
  4. a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority with regard to any professional license or registration held by the applicant;
- (g) a nonrefundable application fee paid by the Marijuana Establishment with which the marijuana establishment agent will be associated; and
- (h) any other information required by the Commission.
- (3) An executive of Four Daughters registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration, will submit to the Commission a Criminal Offender Record Information (CORI) report and any other background check information required by the Commission for each individual for whom the Marijuana Establishment seeks a marijuana establishment agent registration, obtained within 30 days prior to submission.
  - (4) Four Daughters will notify the Commission no more than one (1) business day after a marijuana establishment agent ceases to be associated with Four Daughters. The subject agent's registration will be immediately void when the agent is no longer associated with Four Daughters.
  - (5) Four Daughters will require that all agents renew their registration cards annually from the date of issue, subject to a determination by the Commission that the agent continues to be suitable for registration.
  - (6) After obtaining a registration card for a marijuana establishment agent, Four Daughters will notify the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five (5) business days of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.
  - (7) Four Daughters's agents will carry their registration card at all times while in possession of marijuana products, including at all times while at the Marijuana Establishment or while transporting marijuana products.
  - (8) Should any of Four Daughters's agents be affiliated with multiple Marijuana Establishments Four Daughters will ensure that such agents are registered as a marijuana establishment agent by each Marijuana Establishment and will be issued a registration card for each establishment.

Four Daughters will also maintain the following Personnel Records:

## FOUR DAUGHTERS - CULTIVATION

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each marijuana establishment agent. Such records will be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and will include, at a minimum, the following:
  - a. all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
  - b. documentation of verification of references;
  - c. the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
  - d. documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
  - e. documentation of periodic performance evaluations;
  - f. a record of any disciplinary action taken; and
  - g. notice of completed responsible vendor and eight-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with 935 CMR 500.030.

Four Daughters will implement written policies and procedures on the following, to include but not be limited to:

- Security measures
- Employee security policies, including personal safety and crime prevention techniques
- Emergency response protocols, including disaster plan, fire and other emergencies
- Quality control
- Workplace hazards
- Inventory management
- Customer education
- Safe and secure handling of products
- Product tracking system and software
- Record keeping
- Policies and procedures for handling and securing cash
- Alcohol, smoke, and drug-free workplace policies
- Policies to prevent diversion of marijuana to those under 21
- Hours of operation, job descriptions, and staffing plan
- Opening and closing procedures
- Prohibited practices
- Energy conservation methods
- Acceptable advertising practices
- Waste management

## FOUR DAUGHTERS - CULTIVATION

### **RECORD KEEPING PROCEDURES**

Four Daughters will keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records will be available for inspection by the Commission, upon request and will include, but not be limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

- (a) Written operating procedures as required by 935 CMR 500.105(1);
- (b) Inventory records as required by 935 CMR 500.105(8);
- (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
- (d) Personnel records, to include:
  - a. job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions
  - b. A personnel record for each marijuana establishment agent which will be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and will include, at a minimum, the following:
    - i. all materials submitted to the Commission pursuant to 935 CMR 500.030(2)
    - ii. documentation and verification of all references
    - iii. job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
    - iv. 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
    - v. documentation of periodic performance evaluations
    - vi. a record of any disciplinary action taken
    - vii. notice of completed responsible vendor and eight-hour related duty training
  - c. A staffing plan with accessible business hours
  - d. Personnel policies and procedures
  - e. All background check reports obtained in accordance with 935 CMR 500.030
- (e) Business records which will include manual or computerized records of assets and liabilities; and 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, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any; and
- (f) Waste disposal records as required under 935 CMR 500.105(12)

## FOUR DAUGHTERS - CULTIVATION

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

All records will be maintained in a safe and secure location and be maintained according to all Commission and local requirements.

## FOUR DAUGHTERS - CULTIVATION

### **MAINTAINING OF FINANCIAL RECORDS**

Four Daughters will keep and maintain records of the Marijuana Establishment in accordance with generally accepted accounting principles. Such records will be available for inspection by the Commission, upon request and will include, but not be limited to, all financial records required in any section of 935 CMR 500.000, and business records, in accordance with 935 CMR 500.105(e), which will include manual or computerized records of:

1. Assets and liabilities;
2. Monetary transactions;
3. Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
4. Sales records including the quantity, form, and cost of marijuana products; and
5. Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.

Furthermore, Four Daughters will implement the following policies for Recording Sales:

- (a) Four Daughters will utilize a point-of-sale (“POS”) system approved by the Commission, in consultation with the Massachusetts Department of Revenue (“DOR”).
- (b) Four Daughters may also utilize a sales recording module approved by the DOR.
- (c) Four Daughters will not utilize any software or other methods to manipulate or alter sales data at any time or under any circumstances.
- (d) Four Daughters will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. Four Daughters will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If Four Daughters determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
  - i. it will immediately disclose the information to the Commission;
  - ii. it will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
  - iii. take such other action directed by the Commission to comply with 935 CMR 500.105.
- (e) Four Daughters will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
- (f) Four Daughters will adopt separate accounting practices at the POS for marijuana and marijuana product sales, and non-marijuana sales.
- (g) Four Daughters will allow the Commission and the DOR audit and examine the POS system used by a retailer in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000;

## FOUR DAUGHTERS - CULTIVATION

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

## **DIVERSITY PLAN**

Four Daughters Compassionate Care, Inc. (“Four Daughters”) is committed to promoting equity among minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations. The following is an outline of our goals for our Diversity Plan, the programs we will implement to achieve those goals and specific metrics that will be implemented to assess the progress and success of the programs.

The Four Daughter’s management team will determine the number of roles to be filled during our Phase 1 hiring process. All roles, titles, compensation packages and reporting structures will be outlined during this planning phase. Once all roles are outlined, the hiring team will determine what percentage of open roles are to be filled by candidates meeting our diversity requirements. Four Daughters subscribes to hiring and human resource practices that ensure diversity and opportunity in recruitment, hiring, training, promotion, and lateral movement. The Company will design and implement a clear Diversity and Inclusion Plan along with practical training modules. This will be done in partnership with a recognized minority- and/or woman-owned firm that is experienced in diversity and inclusion strategic planning so as to ensure adherence to our Plan. The Company will develop comprehensive Diversity Plan training before permit issuance and will immediately following permit issuance, begin implementing the plan and training all new hires within 90 days of permit issuance.

We plan to hire at least five (5) diverse candidates. We also intend to utilize a portion of total vendor budget to engage diverse companies, including designated Minority-owned Business Enterprises (MBE) and Women Business Enterprises (WBE). The Company’s management team will meet quarterly to discuss the Company’s diversity status, inclusion plans, overall recruitment efforts, and pursued and missed diversity opportunities. The Company will hire personnel for several positions, upon the issuance of a provisional license, and will immediately begin leveraging community contacts and partnerships to recruit from the most professional and diverse candidate pool possible.

Achievement of this goal can be facilitated by advertising open positions within the Company in diverse publications and tailoring these advertisements to individuals falling into the categories of - minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations. Some examples of these publications are: *Professional Diversity Network, Diversity Jobs, Beyond.com, Black Jobs, IMB Diversity, Hispanic Today, Hispanic Professional Latino Association, Vet Jobs, Recruit Military, Women for Hire, Military.com, Campus Pride, Out and Equal, Recruit Disability Jobs, and Ability Links.*

### **Internal Diversity Training**

The Company is committed to developing and fostering a safe working environment for all groups, including those marginalized by other industries or aspects of society. The Company recognizes that the foundation for a diverse workforce is education. To that end, the Company will conduct on-site annual diversity training once every quarter. This training will reinforce Company expectations and help prevent harassment or discrimination as well as encourage

employees to recommend employment opportunities to others in the specified demographics.

The Human Resources Director will develop and conduct all diversity trainings and meetings, offering mediation between employees involved in a related issue or concern, investigating all claims pertaining to an employee not complying with the diversity plan, maintaining an internal audit and reporting system that will track the effectiveness of this plan, and evaluating the plan bi-annually to ensure that it is current, effective and followed by all employees.

The Company will develop an inclusive work environment and high-performing, diverse teams. The management team will meet monthly to review and discuss employee performance, team morale, and attrition. By remaining sensitive to employee morale, examining attrition rates and performance metrics, the Company will be able to quantify performance and ensure that diversity on each team is maintained. By evenly distributing opportunities for success and growth across team members and by supporting employees through comprehensive training, the Company is confident that teams will remain diverse while performing at a high level. The Company is committed to creating an environment in which individuals treat each other with equality, dignity, and respect by implementing this goal through diversity initiatives, such as communicating its diversity role model behaviors, providing diversity training, and obtaining senior-level commitment to diversity.

### **Veterans in the Workforce**

The Company is committed to the participation of veterans in the workforce both internally and more generally in the industry. To that end, the Company will focus recruiting efforts at VFW and other veteran-focused organizations including those within the cannabis industry. Twice a year, the Company will sponsor general educational cannabis trainings at these organizations, as well as, more specific job training so that veterans are prepared for their roles in the industry. The Company will designate a veteran employee to create an internal support for veterans at the Company. This group will meet regularly and ensure that employees are getting the necessary professional development to advance within our organization.

### **Community Partnerships**

The Company will develop relationships with diverse community organizations including those that are diversity focused. The Company will identify potential partners within the cannabis community namely, Elevate NE (<https://www.elevatene.org/>) and Equitable Opportunities Now (<http://www.masseon.com/>). Through our Business Membership (Tier 1: \$5000 level) with Elevate NE the Company will partner with Elevate NE to host a workforce and community education program with Elevate NE which will connect individuals in the cannabis industry and showcase opportunities within the Company and the cannabis industry in general. In addition, with our financial contribution to EON, the organization will be able to put on additional trainings, workshops and seminars as well as networking and business events to support diverse entrepreneurs.

The Director of Community Engagement [or designated employee] will meet quarterly with upper management to discuss engagement efforts with community organizations, overall outreach outcomes, and pursued and missed opportunities. The Company is confident that we



can build upon and leverage our existing relationships to develop meaningful partnerships with other organizations.

### **Women in the Workforce**

Four Daughters holds as a core tenet a commitment to the equal participation of women at all levels of the cannabis industry, including all levels within our organization. Four Daughters will focus on the training, employment and promotion of women throughout the organization. Four Daughters will create a workforce that is diverse and provides exceptional employment opportunities for women. Twice a year, Four Daughters will host education and community panels focused on the role of women within the cannabis industry. Four Daughters will sponsor events with organizations such as Elevate NE (<https://www.elevatene.org/>) and Equitable Opportunities Now (<http://www.masseon.com/>). Through both the recruitment and education of women throughout the Commonwealth, we will lead by example in promoting equity of women throughout the organization.

The Company will develop and maintain clear written records measuring the company's progress towards reaching diversity goals. At each monthly and quarterly diversity-related meeting, written notes and records will be kept by the appropriate member of the management team. Each meeting, the previous meeting's notes and records will be reviewed and analyzed to quantify progress as the Company develops. The Company will immediately implement written record keeping regarding all diversity-related goals and progress and analyze records, month over month, to evaluate progress. The Company will assign a competent, detail-oriented member of management to keep written records and schedule analysis meetings to document and evaluate progress. Progress toward diversity goals will be evaluated beginning in the company's second quarter of operations.

The Company will be able to demonstrate the success of its diversity programs and achievement of its goals by producing personnel records that reflect the hiring and retention and promotion of diverse individuals. A record of participation by employees in diversity programs and seminars will be maintained. In addition, a listing of partnerships the Company has engaged in will be posted on the Company website and/or the communication method used to communicate with its employees and partners. Records of advertisements in publications and job posting notices will be maintained by the human resources department of the Company and can be produced to the Commission upon request.

Four Daughters will adhere to the requirements set forth in 935 CMR 500.105(4) which details the permitted and prohibited advertising, branding, marketing and sponsorship practices.

No action taken or program instituted by Four Daughters will violate the Commission's regulations with respect to limitations on ownership or control of other applicable state laws.



Cannabis Control Commission  
101 Federal St 13th floor  
Boston, MA 02110

April 18, 2019

Dear Cannabis Control Commission:

It is with great pleasure that we accept a business membership enrollment and any additional donations offered from Four Daughters as they prepare to open adult use cannabis retail stores in Massachusetts.

ELEVATE was created to support the Northeast US's growing cannabis industry and the corresponding need for workforce and community education, advocacy and networking, ELEVATE provides a variety of exceptional events and experiences that connect attendees and elevate the perception of what cannabis professionals are and can do.

And because cannabis businesses cannot succeed without inclusion of multiple perspectives, an educated community, and informed customer base, ELEVATE's mission is to empower underrepresented populations to work and lead in the cannabis industry, and to empower our communities to be educated customers and responsible consumers.

Currently in the process of becoming a registered 501(c)(3) nonprofit organization, all proceeds collected from ELEVATE event ticket and sponsorship sales are kept local and reinvested in the cannabis community.

We will use these resources and our relationship with Four Daughters to offer more educational events around Massachusetts and more scholarship opportunities for underrepresented communities we support. We have been able to offer nearly 2:1 ratio of paid students to scholarship recipients in the past two long form educational programs. Additional funding to our organization right now will help us bring more experts in from other states, more opportunities for us to lobby and support local community involvement.

We look forward to working with Four Daughters in 2019!

Thank you,

*ELEVATE Northeast Leadership Team*



**Equitable Opportunities NOW**  
4186 Washington Street, Roslindale, MA 02131

Cannabis Control Commission  
101 Federal St 13th floor  
Boston, MA 02110

June 26, 2019

Dear Cannabis Control Commission:

This letter is to confirm that The EON Foundation will be accepting from Four Daughters a \$5,000 donation to support programming planned for the community for the second half of 2019.

The EON Foundation is a registered 501(c)(3) nonprofit organization dedicated to increasing equity in the cannabis industry. One way that The EON Foundation pursues this goal is by supporting individuals from marginalized communities and those who have been disproportionately impacted by cannabis prohibition in their quest to work in the cannabis industry or become owners. The EON Foundation has in the past held trainings, workshops, and seminars on different facets of the industry, as well as networking and business events to support equity entrepreneurs in the space. The donation from Four Daughters will be used to conduct similar programming and job trainings in the upcoming months.

Sincerely,

The EON Foundation

## FOUR DAUGHTERS - CULTIVATION

### **EMPLOYEE QUALIFICATIONS AND TRAINING**

Four Daughters will ensure that all marijuana establishment agents complete training prior to performing job functions. Training will be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum will include a Responsible Vendor Program under 935 CMR 500.105(2)(b). It will be a policy of Four Daughters that all marijuana agents and staff will receive and participate in a minimum of eight (8) hours of on-going training annually.

Company Training Policies will be as follows:

1. On or after July 1, 2019, all current owners, managers and employees of a Four Daughters that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, will have attended and successfully completed a responsible vendor program to be designated a “responsible vendor.”
2. Once Four Daughters is designated a “responsible vendor,” all new employees involved in the handling and sale of marijuana for adult use will successfully complete a responsible vendor program within 90 days of hire.
3. It will be a policy of Four Daughters that after initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use will successfully complete the program once every year thereafter to maintain designation as a “responsible vendor.”
4. Administrative employees who do not handle or sell marijuana may take the “responsible vendor” program on a voluntary basis.
5. Four Daughters will 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 upon request during normal business hours.

Four Daughters will ensure that such responsible vendor training programs core curriculum include the following:

- (a) Discussion concerning marijuana’s effect on the human body. Training will include:
  - a. Marijuana’s physical effects based on type of marijuana product;
  - b. The amount of time to feel impairment;
  - c. Visible signs of impairment; and
  - d. Recognizing the signs of impairment.
- (b) Diversion prevention and prevention of sales to minors, including best practices;
- (c) Compliance with all tracking requirements; and
- (d) Acceptable forms of identification. Training will include:
  - a. How to check identification;
  - b. Spotting false identification;
  - c. Medical registration cards issued by the CNB;
  - d. Provisions for confiscating fraudulent identifications; and
  - e. Common mistakes made in verification.
- (e) Other key state laws and rules affecting owners, managers, and employees, which will include:

## FOUR DAUGHTERS - CULTIVATION

- a. Local and state licensing and enforcement;
  - b. Incident and notification requirements;
  - c. Administrative and criminal liability;
  - d. License sanctions and court sanctions;
  - e. Waste disposal;
  - f. Health and safety standards;
  - g. Patrons prohibited from bringing marijuana onto licensed premises;
  - h. Permitted hours of sale;
  - i. Conduct of establishment;
  - j. Permitting inspections by state and local licensing and enforcement authorities;
  - k. Licensee responsibilities for activities occurring within licensed premises;
  - l. Maintenance of records;
  - m. Privacy issues; and
  - n. Prohibited purchases and practices.
- (f) Any other areas of training determined by the Commission to be included in a responsible vendor training program.

## FOUR DAUGHTERS - CULTIVATION

### **RESTRICTING ACCESS TO AGE 21 AND OLDER**

Four Daughters will require that all Marijuana Establishment Agents and visitors are 21 years of age or older. Four Daughters will positively identify individuals seeking access to the premises of the Marijuana Establishment or those to whom marijuana or marijuana products are being transported to ensure that access is limited solely to individuals 21 years of age or older.

Upon entry into the premises, the Four Daughters agent will immediately inspect an individual's proof of identification and determine that the individual is 21 years of age or older. An individual will not be admitted to the premises unless Four Daughters has verified that the individual is 21 years of age or older by an individual's proof of identification.

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

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

Our proposed location is not within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades (1) through twelve (12), as described in 935 CMR 500.110(3).

### **NO MARKETING OR ADVERTISING TO UNDER 21**

Four Daughters will prohibit any of our marijuana establishment's advertising, marketing, and branding by any means (television, radio, internet, mobile applications, social media, other electronic communication, billboard or other outdoor advertising, or print publication) 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. None of our advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations will portray anyone younger than 21 years old, nor will any of our advertising, marketing, or branding include, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, which might be deemed to appeal to a person younger than 21 years old as per 935 CMR 500.105(4)(b)(2-4).