



# Massachusetts Cannabis Control Commission

## Public Record Request

### Marijuana Retailer

#### General Information:

License Number: MR281793

Original Issued Date: 03/29/2019

Issued Date: 03/05/2020

Expiration Date: 03/29/2021

Payment Received: \$5000      Payment Required: \$10000

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Green Biz LLC

Phone Number: 515-460-8350      Email Address: jack@colonialcannabisco.com

Business Address 1: 34 Bridge St

Business Address 2:

Business City: Northampton      Business State: MA

Business Zip Code: 01060

Mailing Address 1: 34 Bridge St

Mailing Address 2:

Mailing City: Northampton      Mailing State: MA

Mailing Zip Code: 01060

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

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

### PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

### RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Date generated: 09/28/2020

#### Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100      Percentage Of Control: 100

Role: Owner / Partner      Other Role:

First Name: Hai Qing      Last Name: Huang      Suffix:

Gender: Male      User Defined Gender:

What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)

Specify Race or Ethnicity:

#### Person with Direct or Indirect Authority 2

Percentage Of Ownership:      Percentage Of Control:

Role: Manager      Other Role:

First Name: Jack      Last Name: Carney      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

No records found

#### CLOSE ASSOCIATES AND MEMBERS

No records found

#### CAPITAL RESOURCES - INDIVIDUALS

##### Individual Contributing Capital 1

First Name: Wen Bing      Last Name: Huang      Suffix:

Types of Capital: Monetary/Equity      Other Type of Capital:      Total Value of the Capital Provided: \$100000      Percentage of Initial Capital: 100

Capital Attestation: Yes

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

##### Business Interest in Other State 1

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

Owner First Name: BOLUN      Owner Last Name: Huang      Owner Suffix:

Entity Legal Name: E & E Investment Group LLC      Entity DBA:

Entity Description: Investment Group

Entity Phone: 248-705-0988      Entity Email: nwgardensupply@gmail.com      Entity Website:

Entity Address 1: 9100 E Marginal Way S      Entity Address 2:

Entity City: Tukwila      Entity State: WA      Entity Zip Code: 98108      Entity Country: USA

Entity Mailing Address 1: 9100 E Marginal Way S      Entity Mailing Address 2:

Entity Mailing City: Tukwila      Entity Mailing State: WA      Entity Mailing Zip Code: 98108      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: Hai      Owner Last Name: Huang      Owner Suffix:

Entity Legal Name: POS TECH LLC		Entity DBA:	
Entity Description: Point of Sale Technologies			
Entity Phone: 248-705-0988	Entity Email: nwgardensupply@gmail.com	Entity Website:	
Entity Address 1: 9100 E Marginal Way S		Entity Address 2:	
Entity City: Tukwila	Entity State: WA	Entity Zip Code: 98108	Entity Country: USA
Entity Mailing Address 1: 9100 E Marginal Way S		Entity Mailing Address 2:	
Entity Mailing City: Tukwila	Entity Mailing State: WA	Entity Mailing Zip Code: 98108	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: Hai Qing	Owner Last Name: Huang	Owner Suffix:	
Entity Legal Name: NW GARDEN SUPPLY LLC		Entity DBA:	
Entity Description: Wholesale and Retail Sales			
Entity Phone: 248-705-0988	Entity Email: nwgardensupply@gmail.com	Entity Website:	
Entity Address 1: 13400 Interurban Ave S		Entity Address 2:	
Entity City: Tukwila	Entity State: WA	Entity Zip Code: 98168	Entity Country: USA
Entity Mailing Address 1: 13400 Interurban Ave S		Entity Mailing Address 2:	
Entity Mailing City: Tukwila	Entity Mailing State: WA	Entity Mailing Zip Code: 98168	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: Bo Lun	Owner Last Name: Huang	Owner Suffix:	
Entity Legal Name: Green Rush Investment LLC		Entity DBA:	
Entity Description: Marijuana Retail			
Entity Phone: 248-705-0988	Entity Email: H2487050988@GMAIL.COM	Entity Website:	
Entity Address 1: 1123 SE SLEATER KINNEY RD		Entity Address 2:	
Entity City: Lacey	Entity State: WA	Entity Zip Code: 98503	Entity Country: USA
Entity Mailing Address 1: 1123 SE SLEATER KINNEY RD		Entity Mailing Address 2:	
Entity Mailing City: Lacey	Entity Mailing State: WA	Entity Mailing Zip Code: 98503	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: Hai Qing	Owner Last Name: Huang	Owner Suffix:	
Entity Legal Name: GREEN RUSH PRODUCTION LLC		Entity DBA:	
Entity Description: Manufacturing			
Entity Phone: 248-705-0988	Entity Email: H2487050988@GMAIL.COM	Entity Website:	
Entity Address 1: 13400 INTERURBAN AVE S		Entity Address 2:	
Entity City: Tukwila	Entity State: WA	Entity Zip Code: 98168	Entity Country: USA
Entity Mailing Address 1: 13400 INTERURBAN AVE S		Entity Mailing Address 2:	
Entity Mailing City: Tukwila	Entity Mailing State: WA	Entity Mailing Zip Code: 98168	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: Bo Lun      Owner Last Name: Huang      Owner Suffix:  
Entity Legal Name: NEW ERA GROUP INC      Entity DBA:  
Entity Description: Investments and Data Information Technologies  
Entity Phone: 248-705-0988      Entity Email: H2487050988@GMAIL.COM      Entity Website:  
Entity Address 1: 6790 28th Ave S      Entity Address 2:  
Entity City: Seattle      Entity State: WA      Entity Zip Code: 98108      Entity Country: USA  
Entity Mailing Address 1: 6790 28th Ave S      Entity Mailing Address 2:  
Entity Mailing City: Seattle      Entity Mailing State: WA      Entity Mailing Zip Code: 98108      Entity Mailing Country: USA

#### Business Interest in Other State 7

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

Owner First Name: Bolun      Owner Last Name: Huang      Owner Suffix:  
Entity Legal Name: GREEN RUSH BO LLC      Entity DBA:  
Entity Description: Retail and Cultivation  
Entity Phone: 248-705-0988      Entity Email: H2487050988@GMAIL.COM      Entity Website:  
Entity Address 1: 12903 NE AIRPORT WAY      Entity Address 2:  
Entity City: 97230      Entity State: OR      Entity Zip Code: 97230      Entity Country: USA  
Entity Mailing Address 1: 12903 NE AIRPORT WAY      Entity Mailing Address 2:  
Entity Mailing City: 97230      Entity Mailing State: OR      Entity Mailing Zip Code: 97230      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: Bolun      Owner Last Name: Huang      Owner Suffix:  
Entity Legal Name: VITAL ENVIRONMENTAL BIOTECH LLC      Entity DBA:  
Entity Description: Manufacturing  
Entity Phone: 425-931-5532      Entity Email: H2487050988@GMAIL.COM      Entity Website:  
Entity Address 1: 6790 28th Ave S      Entity Address 2:  
Entity City: Seattle      Entity State: WA      Entity Zip Code: 98108      Entity Country: USA  
Entity Mailing Address 1: 6790 28th Ave S      Entity Mailing Address 2:  
Entity Mailing City: Seattle      Entity Mailing State: WA      Entity Mailing Zip Code: 98108      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: Hai Qing      Owner Last Name: Huang      Owner Suffix:  
Entity Legal Name: Hydro 4 Less LLC      Entity DBA:  
Entity Description: Garden Wholesales  
Entity Phone: 248-705-0988      Entity Email: hydro4lessportland@gmail.com      Entity Website:  
Entity Address 1: 12903 NE AIRPORT WAY      Entity Address 2:  
Entity City: Portland      Entity State: OR      Entity Zip Code: 97230      Entity Country: USA  
Entity Mailing Address 1: 12903 NE AIRPORT WAY      Entity Mailing Address 2:  
Entity Mailing City: Portland      Entity Mailing State: OR      Entity Mailing Zip Code: 97230      Entity Mailing Country: USA

#### DISCLOSURE OF INDIVIDUAL INTERESTS

### Individual 1

First Name: Hai Qing	Last Name: Huang	Suffix:
Marijuana Establishment Name: Green Biz LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Northampton	Marijuana Establishment State: MA	

### Individual 2

First Name: Jack	Last Name: Carney	Suffix:
Marijuana Establishment Name: Green Biz LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Northampton	Marijuana Establishment State: MA	

### Individual 3

First Name: Wen Bing	Last Name: Huang	Suffix:
Marijuana Establishment Name: Green Biz LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Northampton	Marijuana Establishment State: MA	

### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 34 Bridge St	
Establishment Address 2:	
Establishment City: Northampton	Establishment Zip Code: 01060
Approximate square footage of the establishment: 1700	How many abutters does this property have?: 34
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes	

### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	HCA-Attestation-Signed.pdf	pdf	5ba91aede39a5e62fe051007	09/24/2018
Community Outreach Meeting Documentation	NorhamCommOutreachAttestation.pdf	pdf	5ba91b40c5b78d6cdece02f0	09/24/2018
Plan to Remain Compliant with Local Zoning	Northam Plan to Remain Compliant.pdf	pdf	5ba91e4a4cfbe26336424b77	09/24/2018

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$1

### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	34BridgeStPositiveImpactPlan.pdf	pdf	5c2e33616f99f37acbf30b85	01/03/2019

### ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

### INDIVIDUAL BACKGROUND INFORMATION

#### Individual Background Information 1

Role:	Other Role:
First Name: Hai Qing	Last Name: Huang    Suffix:

RMD Association: Not associated with an RMD

Background Question: no

#### Individual Background Information 2

Role:

Other Role:

First Name: Jack

Last Name: Carney Suffix:

RMD Association: Not associated with an RMD

Background Question: no

#### Individual Background Information 3

Role:

Other Role:

First Name: Wen Bing

Last Name: Huang Suffix:

RMD Association: Not associated with an RMD

Background Question: no

#### ENTITY BACKGROUND CHECK INFORMATION

No records found

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	GreenBizCertificateOfOrganization.pdf	pdf	5ba93a934cfbe26336424bec	09/24/2018
Department of Revenue - Certificate of Good standing	DORCertificateofGoodStandingGreenBiz.pdf	pdf	5ba93aa747325a63402894f3	09/24/2018
Secretary of Commonwealth - Certificate of Good Standing	CertificateofGoodStandingGreenBizLLC.pdf	pdf	5ba93ab44cfbe26336424bf0	09/24/2018
Bylaws	Green Biz LLC Bylaws.pdf	pdf	5ba93add9d77de63182270b1	09/24/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Unemployment Assistance - Certificate of Good standing	DeptUnemploymentGoodStanding.pdf	pdf	5e10d0dd541f65570b948803	01/04/2020
Department of Revenue - Certificate of Good standing	DeptRevLetterOfGoodStanding1.9.20.pdf	pdf	5e172c3c38abaf57497acd46	01/09/2020
Secretary of Commonwealth - Certificate of Good Standing	SecOfCommLetterOfGoodStanding1.15.20.pdf	pdf	5e1f46405e28f906d6c691a3	01/15/2020

Massachusetts Business Identification Number: 001319829

Doing-Business-As Name: Colonial Cannabis Company

DBA Registration City: Northampton

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	BusinessPlanNorthampton.pdf	pdf	5ba93b04f081906304afde1b	09/24/2018
Plan for Liability Insurance	PlanForLiabilityInsurance34BridgeSt.pdf	pdf	5e10d75c2f1a065311398084	01/04/2020
Proposed Timeline	Proposed Timeline for Operation.pdf	pdf	5e2209c14121de06bd3dd6aa	01/17/2020

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Restricting Access to age 21 and older	Restricting Access to 21+.pdf	pdf	5e10f1f2fab70557127f0f12	01/04/2020
Security plan	Security Plan.pdf	pdf	5e10f23538abaf57497ac151	01/04/2020
Prevention of diversion	Prevention of Diversion.pdf	pdf	5e10f2680aa7ba5339f6e021	01/04/2020
Storage of marijuana	Storage Of Marijuana.pdf	pdf	5e10f2915e2d54535a9c3636	01/04/2020
Transportation of marijuana	Transportation Plan.pdf	pdf	5e10f2c8cb8cc6573ebd29b2	01/04/2020
Inventory procedures	Inventory Management.pdf	pdf	5e10f3110557385733b42f8d	01/04/2020
Quality control and testing	Facilities Quality Control & Sanitation.pdf	pdf	5e10f3a6fab70557127f0f17	01/04/2020
Quality control and testing	Product Quality Control & Testing.pdf	pdf	5e10f3a7cb8cc6573ebd29b6	01/04/2020
Dispensing procedures	Dispensing Procedures.pdf	pdf	5e10f407fe65bd57507030f1	01/04/2020
Personnel policies including background checks	PersonnelPoliciesOperatingProcedures34Bridge.pdf	pdf	5e10f4292f1a0653113980ab	01/04/2020
Record Keeping procedures	Record Keeping Procedures.pdf	pdf	5e10f498cb8cc6573ebd29ba	01/04/2020
Maintaining of financial records	Maintenance of Financial Records.pdf	pdf	5e10f4c6b7ff09534ba022d3	01/04/2020
Qualifications and training	Qualifications & Agent Training.pdf	pdf	5e10f55a5e2d54535a9c363c	01/04/2020
Diversity plan	Diversity Plan 1.17.20.pdf	pdf	5e22239749a38606cba83ce6	01/17/2020

### MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

### 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:** As we have not yet commenced operations at our establishment, we have not begun making progress towards the goals of our positive impact plan. Once we commence operations we will begin implementing our programs and working towards our goals. We have uploaded our most up to date Positive Impact Plan below as well as a document detailing our current progress.

#### COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

**Description of Progress or Success:** As we have not yet commenced operations at our establishment, we have not begun making progress towards the goals of our diversity plan. Once we commence operations we will begin implementing our programs and working towards our goals. We have uploaded a document detailing our current progress.

#### HOURS OF OPERATION

Monday From: 10:00 AM	Monday To: 8:00 PM
Tuesday From: 10:00 AM	Tuesday To: 8:00 PM
Wednesday From: 10:00 AM	Wednesday To: 8:00 PM
Thursday From: 10:00 AM	Thursday To: 8:00 PM
Friday From: 10:00 AM	Friday To: 10:00 PM
Saturday From: 10:00 AM	Saturday To: 10:00 PM
Sunday From: 12:00 PM	Sunday To: 8:00 PM





# **Business Plan**

**For:**

**Colonial Cannabis Company**

**Adult-Use Cannabis Retail**

**July 2018**

45 Bodwell St, Avon, MA 02322

(515) 460-8350

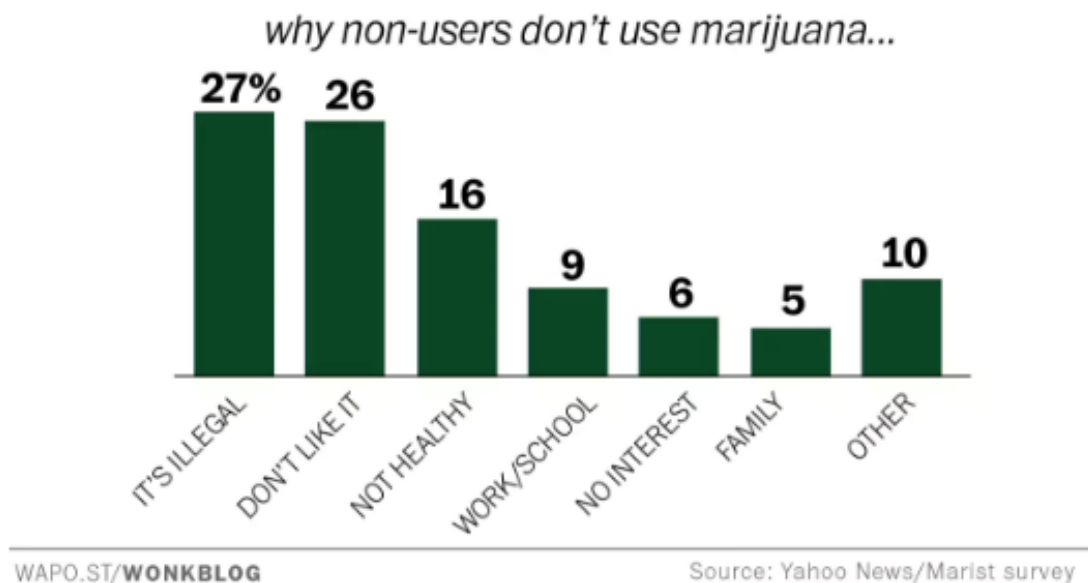
## Opportunity

With the emergence of legislation in Massachusetts to legalize and regulate the sale of cannabis, Green Biz LLC sees an opportunity to open businesses in an emerging market that topped **\$46.4 billion** in sales in 2016.

## Problem

In 2016, 87% of cannabis sales in the US can be credited to the black market, which amounts to **\$40 billion** of which is currently untapped by the legal markets.

Massachusetts has one of the highest per capita rates of cannabis users in the US with 15% of their residents stating they smoke or use cannabis in some form. That percentage can be expected to grow with legalization as 27% of Americans claim the reason they do not use cannabis being due to its legality.



## Solution

Legalization will open the doors in Massachusetts for our businesses to offer a service to consumers that they are already seeking through other means. This will also allow for the state to earn tax revenue from the sale of the product and allow consumers a sense of ease when purchasing product as its growth, testing, and sales

are being tightly regulated by an official state entity – in this case the *Cannabis Control Commission*.

## Target Market

With our location in Northampton, we will be dealing with a market of roughly 30,000 residents being made up of 35.5% 21-44 year olds and 30.2% ranging from 45-64. Both of these age ranges are our target age demographics and they amount to 65.2% of the market. Studies show that millennial account for the majority of cannabis users, but older generations follow closely behind.



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WAPO.ST/**WONKBLOG**

Source: Yahoo News/Marist survey

## Competition

In Northampton there is a successful medical dispensary called NETA that has been operating for over two years now. They have controlled the medical market in Northampton for the past two years, so they will become our main competition when we open our doors. Statistics from Washington State show that in a town of 37,000 people two stores across the street from each other were **able to sustain well over \$100,000 in revenue for the past 3 months**.

***White Rabbit Retail***, 15928 WA-99, Lynnwood, WA 98087

Month	Sales	Excise Tax
May-2018	\$198,737	\$73,533
Apr-2018	\$194,741	\$72,054
Mar-2018	\$211,754	\$78,349

***Puff N Chill Cannabis***, 15919 WA-99, Lynnwood, WA 98087

Month	Sales	Excise Tax
May-2018	\$149,851	\$55,445
Apr-2018	\$155,519	\$57,542
Mar-2018	\$168,463	\$62,331

## Our Advantages

With over twenty years of experience in the cannabis industry our team brings know-how from all areas of the industry. The signatory, Hai Qing Huang, has owned and operated a horticulture supply business that distributes growing products to

Washington State producer/processors and growers in Oregon and California (and now Massachusetts) for over five years. Through this business, he has become accustomed to grow space design, logistics, financing, sales, purchasing, inventory management, and much more – all relating to the cannabis industry. The managing member, Jack Carney, has assisted Mr. Huang for the past five years and has lead multiple projects dealing with data collection technologies, mobile applications, point of sale technologies, marketing and advertising, hiring, payroll, tax reporting, license acquisition, and much more – all relating to the cannabis industry. These two, along with their team and business connections, are some of the only professionals that have been operating in this industry from its origins as a legal and regulated industry in the US.

## **Northampton Retail Location**

The location of the Northampton retail location is 34 Bridge St, Northampton, MA 01060. The location consists of roughly 1778 square feet of space, of which roughly 1000 square feet will be accessible to customers. The remaining space will be utilized for back office and inventory as well as employee only accessible space. There is ample onsite parking and it is one of the only places in the downtown area that offers free parking. The lot is never full, so customers can rest assured they will be able to find available parking within close proximity to our front door.

## Milestones & Metrics

### Milestones Table

Milestone	Due Date	Details
Obtain provisional license	November 01, 2018	Our primary goal at this time is to obtain a provisional license from the CCC, hopefully by November 1st of this year.
Hiring Procedures Begin	December 10, 2018	We will begin advertising available positions and will start interviewing interested and qualified applicants.
Complete all local licensing	December 21, 2018	Our intention is to complete all local licensing before the end year holiday season so we can open for sales in early 2019.
Complete interior buildout	December 31, 2018	We intend to complete the entirety of the interior buildout by the end of the year.
Open for business	January 14, 2019	Our hope is to have everything in order to open for sales in the middle of January, 2019.

## Ownership & Structure

Green Biz LLC is a registered limited liability company in Massachusetts. Hai Qing Huang is the signatory and sole proprietor and Jack Carney is the sole managing member. Jack Carney will oversee all of the operations while residing in Massachusetts.

## Company History

Hai Qing Huang owns multiple businesses operating in the cannabis industry in Washington State, Oregon, and Massachusetts. Mr. Huang's horticulture supply company has distribution warehouses in Seattle, WA, Avon, MA, and Portland, OR. Through these distribution centers, he has also created several product lines from nutrients, to hydroponic tables and irrigation attachments, and all-in-one lighting systems partnering with a well respected international brand, "Eye-Hortilux". He also maintains 2 licenses for retail cannabis stores in Washington State – 1 of them is currently open at 1123 Sleater Kinney Rd SE, Lacey, WA 98503 and the other is a license and location that is awaiting approval from the states regulating authority as

a moratorium just expired allowing the store to open. Finally, Mr Huang is also partnered on 2 cannabis producer businesses in Washington State.

## Advisors

Our business has sought legal consultation while wading through the licensing and property acquiring procedures. We are working with McNulty and O'Malley Attorneys at Law to consult with while dealing with different licensing procedures in different cities across Massachusetts. We are also advised by Yuhong Li of YLI Law Firm in Seattle, WA to review commercial leases and brokerage deals.

## Financial Forecast

Over the first year of sales we are predicting a **\$1.2 million** revenue and in year 2 we are expecting a **\$1.6 million** revenue. We expect that the first few months will be slow, but we will enter into the \$100,000 monthly revenue range by month 4. These numbers can be supported by the following graphs below showing 2 different cities with two stores each to represent growth of stores in cities with a similar sized population.

### *White Rabbit Retail*, Lynnwood, WA



Store Name: White Rabbit Retail

Location: Lynnwood, WA

Lynnwood Population: 37,000

Open Date: June, 2015

First 4 Month Sales:

1. \$59,178
2. \$108,791
3. \$147,181
4. \$177,702

***Puff N Chill Cannabis***, Lynnwood, WA



Store Name: Puff N Chill Cannabis

Location: Lynnwood, WA

Lynnwood Population: 37,000

Open Date: April, 2015

First 4 Months Sales:

1. \$11,826
2. \$79,996
3. \$127,783
4. \$151,368



***Destination Hwy 420***, Bremerton, WA



Store Name: Destination Hwy 420

Location: Bremerton, WA

Population: 37,729

Open Date: August, 2015

First 4 Months Sales:

1. \$15,291
2. \$113,462
3. \$173,467
4. \$164,842

***Hwy 420***, Bremerton, WA



Store Name: Hwy 420

Location: Bremerton, WA

Population: 37,729

Open Date: October, 2014

First 4 Months Sales:

1. \$40,445
2. \$78,619
3. \$123,506
4. \$120,340

## **Estimated Traffic**

Monthly sales: \$100,000

Daily sales: \$3,330

Avg transaction amount: \$30

Daily customers: 111

Customers per hour: 11

Time in store: 8-10 minutes

## **Product Variation**

There are various types of cannabis products. You can anticipate the following product categories in our store:

- Flower – dried buds of the cannabis plant. These products range from low to moderate THC levels.
- Concentrates – Solvent based product that is a result of an extraction process of cannabis buds and other plant materials. These are your high THC products.
- Vape Cartridges – Concentrates of various solvent types filled into cartridges that can be used with vaporizer pens. This is very similar to the already popular tobacco vaporizers.
- Edibles – Edible products that have been infused with THC or CBD (2 cannabinoids, THC being psycho-active while CBD is not). \*There will be regulation on these products that the product manufacturers will be required to follow in regards to the product's "look" and its potential appeal to those under 21. The most common forms of edibles will be brownies, cookies, soft drinks, and hard/soft candies, chocolates, caramels, etc.

- Topicals – These are lotions that are usually CBD dominant that can be used to apply to sore muscles for quick and natural relief. Limited to no psycho-active effects.

## **Preventing Diversion to Minors**

On a daily basis, it will be our employee's goal to follow our protocol in relation to diversion to minors. We will enact a no-tolerance policy as a violation in relation to this policy will be ground for immediate dismissal.

- Clear signage of +21 age limit. No confusion.
- Immediate ID check upon entry of premises.
- ID check at entry completed using ID reading software – available on iPad.
- Black light to check holograms on ID
- Secondary ID check at time of purchase.
- State consequences for breach of law.

## **Security Summary**

We plan to implement the following required security measures.

- Sufficiently lit building perimeter
- Secure Points of Entry with alarm and lock system
- Limited access areas – badge required
- Secured area for all security equipment and monitors
- 500ft Buffer from schools
- Employee Badges
- Certified alarm system and backup with ability to notify employees and local law enforcement inside state required notice period
- No blind spot security camera layout
- Yearly Audits – State Requirement

\*The state has a very detailed security protocol that licensees are required to follow. Due to these regulations, retail stores should be sufficiently secured and monitored so long they stay compliant with state regulation.

## Projected Profit and Loss

	2019	2020	2021
<b>Revenue</b>	<b>\$1,065,000</b>	<b>\$1,600,000</b>	<b>\$2,100,000</b>
<b>Direct Costs</b>	<b>\$362,100</b>	<b>\$544,000</b>	<b>\$714,000</b>
Gross Margin	\$702,900	\$1,056,000	\$1,386,000
<b>Gross Margin %</b>	<b>66%</b>	<b>66%</b>	<b>66%</b>
<b>Operating Expenses</b>			
Phone & Internet	\$3,600	\$3,600	\$3,600
Security	\$2,400	\$2,400	\$2,400
Business Insurance	\$6,000	\$6,000	\$6,000
Utility Total	\$2,400	\$2,400	\$2,400
Payroll	\$166,518		
Payroll 2		\$285,465	
Payroll Year 3			\$380,621
Rent	\$51,480	\$51,480	\$51,480
Point of Sale Software	\$2,640	\$2,640	\$2,640
Marketing	\$53,250	\$80,000	\$105,000
<b>Total Operating Expenses</b>	<b>\$288,288</b>	<b>\$433,985</b>	<b>\$554,141</b>
<b>Operating Income</b>	<b>\$414,612</b>	<b>\$622,015</b>	<b>\$831,859</b>
Interest Incurred			
Depreciation and Amortization			
Income Taxes	\$0	\$0	\$0
<b>Total Expenses</b>	<b>\$650,388</b>	<b>\$977,985</b>	<b>\$1,268,141</b>
<b>Net Profit</b>	<b>\$414,612</b>	<b>\$622,015</b>	<b>\$831,859</b>
<b>Net Profit / Sales</b>	<b>39%</b>	<b>39%</b>	<b>40%</b>

## **Liability Insurance**

We have obtained a General Liability Insurance policy through Cannasure Insurance Services. The policy has limits of \$1,000,000 each occurrence, \$2,000,000 general aggregate, and a deductible of \$2,500 per claim.

We have obtained a Product Liability Insurance policy through Cannasure Insurance Services. The policy has limits of \$1,000,000 per occurrence, \$2,000,000 general aggregate, and a deductible of \$2,500 per claim.

**Both policies are current and active.**

## 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).

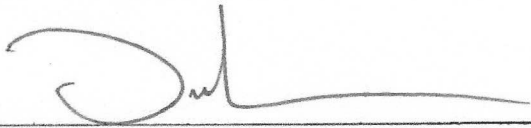
### Applicant

I, Jack Carney, (insert name) certify as an authorized representative of Green Biz LLC (insert name of applicant) that the applicant has executed a host community agreement with Northampton (insert name of host community) pursuant to G.L.c. 94G § 3(d) on 5/31/18 (insert date).

  
Signature of Authorized Representative of Applicant

### Host Community

I, DAVID J. NARKEWICZ, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for CITY OF NORTHAMPTON (insert name of host community) to certify that the applicant and CITY OF NORTHAMPTON (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on MAY, 31 2018 (insert date).

  
Signature of Contracting Authority or  
Authorized Representative of Host Community

## 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, Jack Carney, (insert name) attest as an authorized representative of Green Biz LLC (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 5/15/2018 (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 5/08/2018 (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 5/07/2018 (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 5/07/2018 (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.



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## COPY REQUIREMENTS

While the newspaper does not monitor individual ads or guarantee the offering in these pages, we will not knowingly run deceptive ads. All ads are run at the discretion of the publisher. If you believe any ad to be misleading or unfair, please let us know. Advertising subject to rate card provisions.



**TAG**  
**SALE**

**Items under  
\$500  
run for  
*FREE!***

Not accepted by phone.

**VISIT**  
**MAIN OFFICE**  
115 Conz St.  
Northampton  
8am-5pm

## ADJUSTMENTS

Please check your ad the first day it appears. If you find an error, call us immediately at 586-1700. We cannot be responsible for more than 2 days of incorrect insertions or for more than the cost of that part of the ad rendered valueless by the error.

## ONLINE

Your classified ad will appear automatically on our website **GAZETTENET.COM** at no extra charge. *JobNetwork ads will appear for an additional fee.*

**ADS**  
3 lines 3 days  
\$27.93

Call by Wednesday at 1pm

[illegible]

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Gazette**

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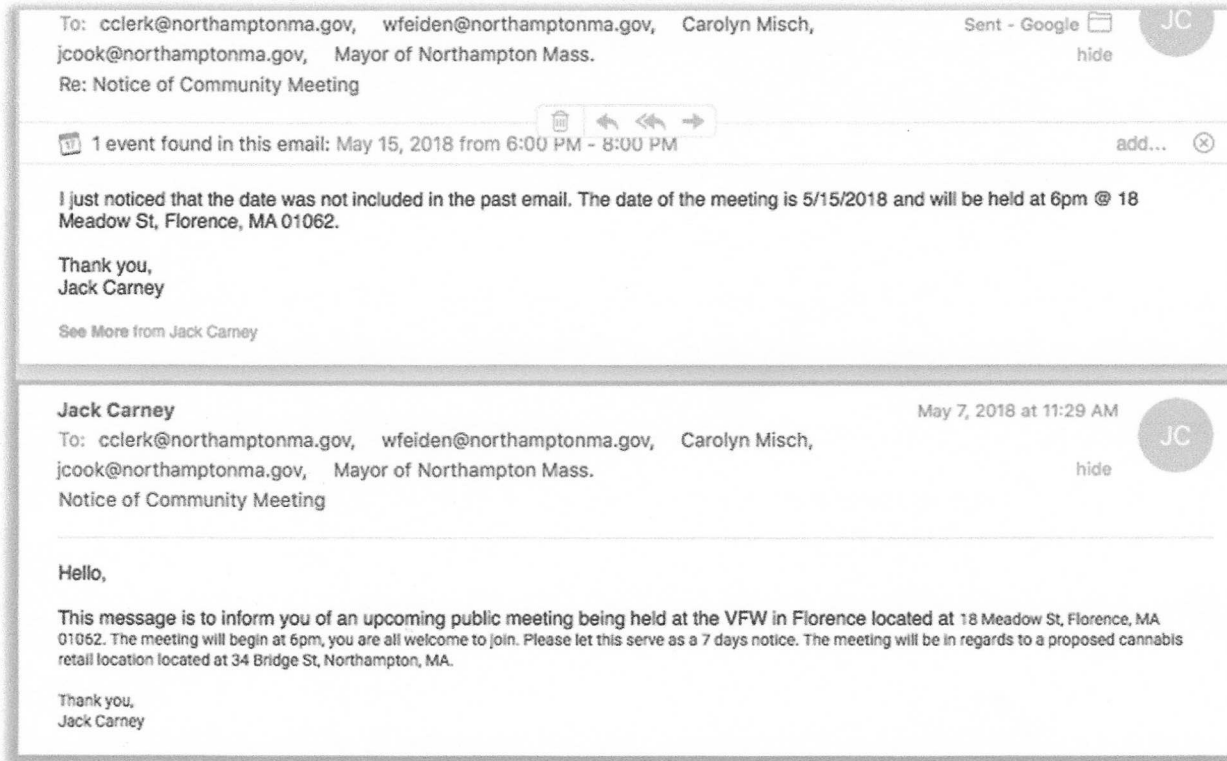
parties are entitled to petition the Court to institute formal proceedings and to obtain orders terminating or restricting the powers of Personal Representative appointed under informal procedures. A copy of the Petition and Will, if any, can be obtained from the Petitioner.

34-00205 May 8

**THE \$9 AD.** Selling an item between \$501 and \$1000? We will publish your ad for 1 week for just \$9.00. For the *Real Estate Gazette* call for only \$9. Call *Gazette Classifieds* at 586-1700

Attachment  
B

## Documentation of Notifying City Departments of Community Meeting



This email was sent to the recipients listed above. These recipients occupy the City Clerks Office, Planning Board, Contracting Authority, and Licensing.

To Whom It May Concern:

This letter is to notify you of an upcoming community meeting that will be held on 5/15 at 6pm at 18 Meadow St, Florence, MA 01062. The topic of the meeting will be to discuss a proposed cannabis retail location at 34 Bridge St, Northampton, MA 01060. Please feel free to attend and receive more information on the proposal as well ask any questions you may have.

Thank you,

Jack Carney

## **Plan to Remain Compliant** **With Local Zoning**

We have worked closely with the City of Northampton's Mayor's Office, Planning Department, and Building Department throughout the process leading up to the completion of this application. We have every intention of continuing this positive relationship with the community and have even met with additional entities in the city that were not required for this application (Police Chief and etc). We will renew our zoning permit as required by the city and will cooperate to our best ability to adjust to any changes that are made in regards to the city's zoning procedures while we continue to do business in Northampton.



## The Commonwealth of Massachusetts William Francis Galvin

Minimum Fee: \$500.00

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

### Certificate of Organization

(General Laws, Chapter )

Identification Number: 0013198291. The exact name of the limited liability company is: GREEN BIZ LLC

## 2a. Location of its principal office:

No. and Street: 45 BODWELL ST  
City or Town: AVON State: MA Zip: 02322 Country: USA

## 2b. Street address of the office in the Commonwealth at which the records will be maintained:

No. and Street: 45 BODWELL ST  
City or Town: AVON State: MA Zip: 02322 Country: USA

## 3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:

GREEN BIZ LLC WILL PRIMARILY BE A RETAIL AND COMMERCIAL/INDUSTRIAL PRODUCTION COMPANY.

## 4. The latest date of dissolution, if specified:

## 5. Name and address of the Resident Agent:

Name: JOEY CHIU  
No. and Street: 1 THOMPSON ST  
City or Town: QUINCY State: MA Zip: 02169 Country: USA

I, JOEY CHIU resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

## 6. The name and business address of each manager, if any:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	JACK G CARNEY	13400 INTERURBAN AVE S TUKWILA, WA 98168 USA

## 7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	HAI QING HUANG	13400 INTERURBAN AVE S

**8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:**

<b>Title</b>	<b>Individual Name</b> First, Middle, Last, Suffix	<b>Address</b> (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	HAI QING HUANG	13400 INTERURBAN AVE S TUKWILA, WA 98168 USA

**9. Additional matters:**

**SIGNED UNDER THE PENALTIES OF PERJURY, this 27 Day of March, 2018,**  
**HAI QING HUANG**

*(The certificate must be signed by the person forming the LLC.)*

THE COMMONWEALTH OF MASSACHUSETTS

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

March 27, 2018 02:45 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, prominent "G" at the end.

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

## **Green Biz LLC Operation Agreement/Bylaws**

Green Biz LLC is a limited liability company registered to do business in the Commonwealth of Massachusetts with a registered office located at 45 Bodwell St, Avon, MA 02322.

### *Principles of Green Biz LLC*

Signatory: Hai Qing Huang

Address: 13400 Interurban Ave S, Tukwila, WA 98168

Phone: 248-565-6966

Managing Member: Jack Carney

Address: 13400 Interurban Ave S, Tukwila, WA 98168

Phone: 515-460-8350

### *Term and Purpose:*

Green Biz LLC was formed for the purpose of applying for licenses and opening business establishments in Massachusetts dealing in the cannabis industry.

### *Member Roles:*

Hai Qing Huang: Signatory and CEO of LLC with 100% control of the LLC.

Jack Carney: Management of businesses that are licensed under the LLC.

### *Distribution of Profit and Loss:*

Hai Qing Huang maintains 100% control of the LLC and will distribute funds amongst members of the LLC as he sees fit.





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

mass.gov/dor

Letter ID: L1321739392  
Notice Date: May 29, 2018  
Case ID: 0-000-298-586



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



JACK CARNEY  
GREEN BIZ LLC  
45 BODWELL ST  
AVON MA 02322-1112

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

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

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

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

### *What if I have questions?*

If you have questions, call us at (617) 887-6367 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

May 25, 2018

TO WHOM IT MAY CONCERN:

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

**GREEN BIZ LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **March 27, 2018.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation or withdrawal; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **JACK G CARNEY**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **JACK G CARNEY, HAI QING HUANG**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **HAI QING HUANG**



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

*William Francis Galvin*

Secretary of the Commonwealth



# COLONIAL CANNABIS COMPANY

“NOT THOMAS JEFFERSON’S HEMP.” | EST. 2019 | NORTHAMPTON, MA

## Dispensing Procedures

### Sale Limit

Each customer will not be allowed to purchase more than one ounce of marijuana or five grams of marijuana concentrate per transaction.

### Sale Refusal Rights

1. We shall refuse sale to anyone that cannot show a valid form of ID verifying they are above the age of 21
2. We shall refuse sale to anyone our marijuana agents believe is showing signs of intoxication
3. We shall refuse sale to anyone our marijuana agents believe would be a danger to the public if he/she would be able to purchase product
4. We shall not sell more than one ounce of marijuana or five grams of concentrate to a customer per transaction

### Unauthorized Sales (prohibited)

1. No products will be sold containing nicotine
2. No products will be sold containing alcohol
3. No products missing any required labels will be sold
4. No products with tampered packaging will be sold
5. No product that is in an unsealed package will be sold
6. No expired product will be sold
7. No product that has not been tested according to the regulations in 935 CMR will be sold

### Transaction Procedure

The following procedure will be followed for each transaction.

1. Check the customers ID and enter their birthday into the POS system to begin the transaction.
2. Ring up all items the customer would like to purchase. The POS system will differentiate the non-cannabis products from the cannabis products to calculate the correct tax amount.

3. Determine if all products are in child safe and tamper resistant package. If so, move to step 5, if not, move to step 4.
4. If one of the items is not in a child safe and tamper resistant package, it is to be placed in a child safe and tamper resistant exit package. Products that are already in child safe and tamper resistant packaging may also go inside of this exit bag. Place a "FAQ" notice in the bag before closing.
5. Place all products in a paper bag, place a "FAQ" notice in the bag, close the bag, and staple the receipt. Hand the bag, with receipt attached, to the customer.
6. If the customer paid with a card there will be an additional receipt from the credit/debit card-processing machine – give a copy to the customer.

### Recoding Sales

Our establishment will utilize the Green Bits POS software.

Green Bits POS will offer a suite of programs including but not limited to transaction processing, sales records, live inventory, inventory organizational tools, accounting software, employee time clock, and payroll.

Our software will have complete 24/7 technical support and auditing abilities to ensure the system is working correctly and no manipulation is occurring from an outside software or an internal error.

### System Auditing

On a monthly basis, one of our marijuana agents will work with a technical support representative from Green Bits POS to audit our POS to ensure that over the past month there have been no interior or exterior influence on the sales data that is being reported by the system. The audit will also ensure that the POS is in working order to continue as our main record-keeping asset. At the end of the audit, a report will be printed out and signed by our marijuana agent that was a part of the monthly POS audit. The report will be filed away and kept on hand in case the CCC requests it.

### Sales & Record Keeping

All sales and other records relating to the sale, transfer, purchase, and disposal of products & services at our location will be saved and filed away in a locked cabinet to ensure full disclosure in the event of an audit, as well as, maintenance of proper business organization tactics for efficiency & performance purposes.

## Non-Marijuana Product Sales

Non-marijuana related products will be processed during a transaction in a different manner than marijuana products due to tax rates and accounting procedures. The POS will have the capability to make sales that are non-marijuana related.

## Consumer Education

Our establishment will make available to our patrons several informative packets that help educate the public on the products they are consuming and the laws that regulate their sale, use, and possession. You will find the following informative pamphlets at our location at all times of operation.

### Safe Use & Awareness:

- The FDA has not approved cannabis products. Because of this, there may be unknown health risks and side effects associated with the use of cannabis products.
- Cannabis products should be kept out of the hands of children and anyone that is under the age of 21.
- Do not operate heavy machinery while under the influence of cannabis.
- Do not operate a vehicle while under the influence of cannabis – it is dangerous and prohibited by law.
- The sale of cannabis to another individual is illegal. Sales may only occur at licensed retail establishments.

### Products & Effects:

- A list of cannabis product types and the uses and potential effects of each type.
- Examples of product/strains that can be associated with a certain type of cannabis and what the expected effects can be.
- Descriptions of routes of administration for each product type and information on the positives and negatives of each route.
- Information on the suggested serving sizes relating to different administration techniques (routes) and the expected result from the suggested serving size. Also, suggestions relating to time frames for expecting the effects as well as suggestions as to when reapplication/re-administration can occur.
- Information on tolerance, dependence, and withdraw and how to best manage these.
- Substance abuse signs, symptoms, and contact information for individuals that believe they may have a substance abuse problem.

### Marijuana Facts & Statistics:

- Statistics from states that have legalized and regulated the sale of cannabis products.

- Study results relating to the effects and use of cannabis.
- Information on the specific regulations relating to cannabis use in Massachusetts.
- Examples of what is allowed and what is not allowed in Massachusetts relating to cannabis.
- Information regarding penalties for different types of infractions in Massachusetts relating to cannabis.

Personal Tracking Logs:

- Small pamphlets formatted in a grid with different categories per column allowing the patron to log the cannabis product they have recently consumed, its type, how much they consumed, how it was administered, what the experienced effects where, how long it lasted, a rating for their overall experience, and any notes.



# COLONIAL CANNABIS COMPANY

“NOT THOMAS JEFFERSON’S HEMP.” | EST. 2019 | NORTHAMPTON, MA

## Promotion of Diversity

Our establishment intends to promote a safe and accepting environment for our staff and the customers they serve. This can only be achieved by having no tolerance for those who cannot accept the differences in the people around them. Although every person has a right to due process, if discrimination is encountered in the workplace the person responsible for these acts will be terminated immediately.

When hiring we are looking for individuals with a good work ethic and an enthusiasm for giving exemplary customer service. The only acceptable time for an employees’ appearance to be evaluated is in how they present themselves as a representative of our establishment. This appearance is not in regard to the color of one’s skin, sexual orientation, political affiliation, or creed but how one acts and treats others.

*We will adhere to the requirements set forth in 935 CMR 500.105(4) relating to advertising, branding, marketing, and sponsorship practices.*

*We will not violate the commission’s regulations with respect to limitations on ownership or other applicable state laws.*

## Our Goals:

**Educate Hiring Staff** – We will educate our administrators and hiring staff on best practices for building an inclusive workforce. Extensive training will benefit the leadership staff through assistance with identifying unconscious bias, guidelines for self- monitoring, and integration of these lessons within their teams.

**Offer Job Opportunities to Wider Audience** - In order to ensure that job opportunities are available to a wider pool of people we will list our job openings on an internet publication that caters to a minority group. The goal is to expand our net past generic employment search-engines to people who would otherwise not know about a potential position in our retail establishment.

**Offer ‘No Expertise’ Positions** - Our establishment will also offer entry-level positions that do not require a high level of expertise to applicants that value customer service but may not have past retail or management related experience.

## Programs:

*The following programs have been designed to achieve the goals previously laid forth.*

**Educate Hiring Staff** - Administrators or managers involved with the hiring process will be enrolled in *Understanding Diversity & Inclusion*. This is an accredited course through Purdue University/Future Learn and is estimated to take three weeks at a pace of three hours a week. When the course is completed a Certificate of Achievement will be awarded by Purdue/Future Learn. This course will cover definitions of diversity, tools to manage diversity, bias & self-regulation, incremental processes, and bridging differences. Each week there is an assigned discussion and review with a cumulative review to finalize the course. There will be no participation in the hiring process unless course has been passed.

**Offer Job Opportunities to Wider Audience** - To allow for more awareness of the job opportunities offered by our company, we will work with a publication called *African-American Point of View* which has a readership of 30,000 in the greater Springfield & Hartford Areas. We will list job openings in their Employment Opportunities section to attract a more diverse pool of applicants for our hiring purposes.

**Offer 'No Expertise' Positions** – Our company would also like to provide opportunity for potential job applicants that may not have experience working in the retail industry. We will offer mentored entry-level positions that, if performed well, lead to opportunities for promotion.

These positions are:

- a. Front Desk/Security Agent Assistant – Assisting the Security Agent in checking IDs to confirm that everyone that enters the establishment is of age and has an authentic ID following our ID checking protocol. Also, assisting the Security Agent in carrying out any of the other tasks they may have.  
*\*This will be the primary entry level position.*
- b. Floor Agent Assistant – This would be a part-time position for extra help on the sales floor during high volume hours. This position would assist a Floor Agent in managing the show floor from entry to exit - assisting customers on the show floor as they enter and exit the facility during high traffic times.

### **Monitoring Results/Accountability:**

**Educate Hiring Staff** – All certificates of achievement for the completion of *Understanding Diversity & Inclusion* will be filed in each of the hiring staff's personnel files. Each year a certificate will be added when a refresher course is taken.

To evaluate how useful the course is in the workplace, twice a year the company will offer an anonymous work climate survey. The answers will be reviewed by the hiring staff and a plan of corrective action will be prepared and shared with the staff in regard to any negative feedback.



**Offer Job Opportunities to Wider Audience** – Records of all of jobs listed in *Af-Am Point of View* will be saved and filed. When applicants arrive for their in-person interviews they will be asked to fill out a questionnaire asking how they learned about the job opening. All questionnaires will be logged and filed; questionnaires of hired applicants will be logged and filed separately in order to track effectiveness of job listings in this publication.

**Offer ‘No Expertise’ Positions** – Each employee file will hold the original job description that was signed upon hire. During the employees’ time with us the managerial staff will hold monthly meetings with them to discuss their job tasks and experiences. This will allow for a one-on-one opportunity for the employee to seek any necessary clarification and also an opportunity for management to provide any job coaching. Notes will be reported from this meeting and included in the employees’ file for later review or request. When new positions open, the employees that currently hold these ‘no expertise’ positions will be of priority consideration for the open position. This allows them to learn at an entry-level and offers our establishment some consistency with employees that are familiar with our operating procedures and standards. Promotions will be detailed in the employees file, as listed above, so we can track their progress within our company.

*The timeframe relating to our tracking of these programs will be ongoing. The reports will be submitted to the employees’ file whenever change occurs. A detailed description of the employee’s time at our establishment will be kept starting from their knowledge of our opportunity, to their application, and throughout their potential employment. On a yearly basis, a full report will be created for each employee detailing a summary of all that is mentioned above and will be available upon request.*



# COLONIAL CANNABIS COMPANY

“NOT THOMAS JEFFERSON’S HEMP.” | EST. 2019 | NORTHAMPTON, MA

## Maintenance of Financial Records

Financial records will be kept in three separate areas:

1. Internal and External hard drives stored on site. All hard drives will be secured within the back office.
2. Third-party Human Resources Partner - in relation to payroll and other financial documents. Duplicates of these records may also be held on site and may be stored on a hard drive that is on site.
3. All printed financial documents will be kept in an appropriate file in the back office’s secured file cabinet that will be locked at all times.

Recorded Business Documents:

*The following documents will be recorded and available upon request from our establishment.*

1. All Assets & Liabilities
2. Monetary Transaction Ledgers
3. Books of Account, including but not limited to; ledgers, journals, supporting documents, agreements, checks, invoices, vouchers, etc
4. Sales records, including quantity sold, form, and cost
5. Salary and/or 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 our establishment

Additional Protocols:

1. No software or methods will be utilized to manipulate sales data or any data on our POS software.
2. Our POS provider, Green Bits, is SOC 1 & SOC 2 compliant which certifies their ability to securely manage and monitor our POS data to ensure no manipulation or corruption is occurring.

3. **CMR 500.140(6)(d)** *"A retailer shall 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. A Marijuana Retailer shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If a retailer 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:*

- a. It shall immediately disclose the information to the Commission*
- b. It shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data*
- c. Take such other action directed by the Commission to comply with 935 CMR 500.105"*

We will conduct randomly scheduled monthly audits on all sales equipment and related data systems (including Green Bits POS) to verify compliance with CMR 500.140(6)(c). This audit will be a multiple point check to ensure that the system is calibrated correctly for best performance and that all equipment used in relation to the POS system are working properly. Test sales will be rung into the system to ensure the system is reporting and calculating the transaction properly. These audit results will be maintained in both digital and physical copies, both of which will be made available to the Commission upon request. In the event that an audit finds sales equipment or sales data has been manipulated we will immediately disclose this information to the Commission, will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data, and will take such other action as directed by the Commission to fully comply with 935 CMR 500.105

4. **CMR 500.140(6)(c)** *"A retailer is prohibited from utilizing software or other methods to manipulate or alter sales data"* - We have retained Green Bits for point-of-sale software and hardware services. Green Bits is a validated software provider on the Metrc integrator list. Green Bits has received training and instructions for compliant handling of sales data. Green Bits has signed the Massachusetts API user agreement and demonstrated their ability to perform the functions specified in the following API areas:

*Packages, Sales Admin, Rooms, Strains, Items*

We will ensure sales data is safe from manipulation by controlling access to Green Bits software and hardware through the use of robust system-based permissions that ensures only compliant sales are reported to Metrc on a

daily basis. We will also conduct monthly audits on all sales equipment and related data systems, including Green Bits POS, which is mentioned above.

5. Relating to all product sold that warrants a tax, such data will be preserved and maintained in permanent books of account or records (digital or hard copy) to establish the amount of gross income, deductions, credits or other matters required to be shown by such person in any return of such tax or information. All data will be stored according to and in compliance with 830 CMR 62C.25.1.
6. Our POS system will be capable of storing all sales data for the period required by Massachusetts tax code. Data can also be exported from the POS onto external hard drives to ensure storage of all sales data for the amount of time required by Massachusetts law.
7. POS system records **all** transactions in a manner that will allow for verification of what was sold and whether the appropriate amount of tax was collected.
  - a. If at any point one of our agents notices a discrepancy in the totals the POS system calculates when ringing up a transaction, the agent will be instructed to inform a manager so the station can be shut down and the before mentioned audit procedure can be conducted on the POS terminal to ensure it is working properly prior to using the station again. If the audit results in discovery that the system is not working properly we will suspend sales until we are able to individually audit each POS station and ensure each are running properly. If none of the stations are working properly, the store may need to be closed until the problem is resolved. The store may remain open as long as one of the POS stations is able to pass the audit and continue operating. A report will be created and filed to be available upon request from the CCC. If the audit found an issue in the reporting ability or overall functionality of the POS system that could have effected the collection of data and accurate collection of data, the CCC will be notified immediately.
  - b. Our establishment will comply with any further investigation initiated by the CCC in response to the report of an error with our POS system and/or equipment.
8. Our POS system will allow for the ability to separate marijuana sales from non-marijuana sales so that the proper tax amount can be charged and received.



# COLONIAL CANNABIS COMPANY

“NOT THOMAS JEFFERSON’S HEMP.” | EST. 2019 | NORTHAMPTON, MA

## Personnel Policies & Operating Procedures

### Security Procedures

Check-in Procedure: Our main entry at the front of the building is where all patrons, non-patron visitors, and deliveries will enter through. We will follow the following protocol for each *type* of visitor.

**Patron:** Upon entry identification will be checked. Our marijuana agent stationed at the door will immediately request ID from the patron and initiate our 3-point check procedure. First the agent confirms the picture on the ID matches the individual that presents the ID. Then, the agent will confirm the ID is authentic by using an iPad software called VeriScan. Using the VeriScan program, the agent can scan the ID’s barcode with the iPad’s camera to confirm its authenticity and that the birthdate confirms the individual is 21 or older. The agent will then use a black-light flashlight to check for other authenticity markers. Once the ID is verified the patron will be permitted to enter the waiting line to be helped by one of our marijuana agents. If the ID is not authentic or does not belong to the individual who presented it, our agent will confiscate the ID and ask the individual to leave. Local law enforcement will be given the fake IDs that are confiscated and we will work with local law enforcement to identify individuals that attempt to use fake IDs/IDs that do not belong to them to enter our establishment.

Once the initial ID inspection is completed in the front vestibule, the patron will enter the waiting area. Once an agent is available, they will answer any questions the patron may have and guide the patron through our available inventory. Once the patron selects what they would like to purchase, the agent will bring them to one of our cashiers to checkout. The patron’s ID will be checked by the cashier prior to initiating the transaction. Once the patron has completed their transaction, one of our floor agents will escort them to the exit.

**Non-Patron Visitor:** Non-patron visitors will be by appointment only. Our marijuana agent stationed at the door will immediately request ID from the individual and initiate our 3-point check procedure. Our agent will have a schedule of all expected visits for the day. If the individual does not have an appointment, the manager may come to the front to schedule for another time. If the agent confirms the individual has a scheduled meeting, the agent will initiate the ID check and check in procedure. First the agent confirms the picture on the

ID matches the individual that presents the ID. Then, the agent will confirm the ID is authentic by using an iPad software called VeriScan. Using the VeriScan program, the agent can scan the ID's barcode with the iPad's camera to confirm its authenticity and check that the birthdate confirms the individual is 21 or older. The agent will then use a black-light flashlight to check for other authenticity markers. Once the ID is confirmed to be authentic and they are of legal age, they will be directed through the entrance door and in to the partitioned waiting area to be greeted by a manager or shift lead. The manager will present them with a visitor badge and inform the visitor that it must be worn at all times during their visit. Prior to entering the limited access area, the visitor will be asked to fill out their information on a visitor log sheet. They will print their name, sign, record check-in time, reason for visiting, company info, date, and list the number of their visitor badge that is given to them. The visitor's ID badge will be required for the duration of their visit and must be clearly visible at all times. Once the patron is ready to exit, they will be escorted back to the ID checkpoint at the front of the facility, they will record their checkout time on the visitor log sheet, return their visitor badge, and then they will exit the premises. \*If the ID is not authentic or does not belong to the individual who presented it, our agent will confiscate the ID and ask the individual to leave. Local law enforcement will be given IDs that we confiscate from individuals and we will work with local law enforcement to identify individuals that attempt to use fake IDs/IDs that do not belong to them to enter our establishment.

**Delivery Visitor:** Each day, our establishment will have a list of incoming deliveries for that day. We will also have the manifests of the delivery orders printed and ready for the arrival of the delivery. The marijuana agent making the delivery will enter through the front of our establishment and will check-in at the ID checkpoint. They will check in similar to the procedure listed above. First the agent confirms the picture on the ID matches the individual that presents the ID. Then, the agent will confirm the ID is authentic by using an iPad software called VeriScan. Using the VeriScan program, the agent can scan the ID's barcode with the iPad's camera to confirm its authenticity and that the birthdate confirms the individual is 21 or older. The agent will then use a black-light flashlight to check for other authenticity markers. Once their ID is confirmed to be authentic and they are of legal age they will be directed through the entrance door and in to the partitioned waiting area to be greeted by a manager. The manager will ask the delivery visitor to display their marijuana agent registration card. Once the card is confirmed to be authentic and belong to the visiting driver the manager will present the visiting driver with a visitor badge and inform them that it must be worn at all times during the delivery process. Prior to accompaniment to the *limited-access area* where we will check in the delivery with the previously printed manifest, the visiting driver will be asked to sign in on the visitor log sheet. They will print their name, sign, record check-in time, reason for visiting, company info, date, and list the number of their visitor badge that is given to them. The visitor's ID badge will be required for the duration of their visit and must be clearly visible at all times.

Once their ID is confirmed to be authentic and they are of legal age, they will also be asked to display their marijuana agent registration card. Once the delivering agent is ready to exit, they will be escorted back to the ID checkpoint at the front of the facility, they will record their checkout time on the visitor log sheet, return their visitor badge, and then they will exit the premises. \*If the ID is not authentic or does not belong to the individual who presented it, our agent will confiscate the ID and ask the individual to leave. Local law enforcement will be given the fake IDs that we confiscate from individuals and we will work with local law enforcement to identify individuals that attempt to use fake IDs/IDs that do not belong to them to enter our establishment.

**Employees:** Employees will need to be checked in by their manager or shift lead to obtain their registered agent badge prior to entering the facility for their shift. They will also be checked out at the end of their shift and leave their badge prior to exiting the building. The registered agent badges will be secured in the back office until the employee returns for their next shift. If the agent is not scheduled and it is not an error (or other issue, ex. Last minute fill-in for an employee that called out the day of) the employee will need to sign in as a visitor to enter the facility.

**Limited Access Areas:** Outside of the customer accessible show floor, all other areas of the establishment will be considered a limited-access area and only marijuana agents wearing their badge or visitors that have signed in and received a visitors badge and are accompanied by one of our agents are permitted in this area. \*Off duty agents must follow visitor check in procedures when visiting the establishment outside of their scheduled hours.

**Loitering Prevention:** Our ID checkpoint will be occupied by one of our marijuana agents at all times during our operating hours. The security agent will be instructed and trained to keep a visual inspection of the exterior of the building and to inform a manager or shift lead if they suspect any suspicious, illegal, or inappropriate activity going on around our premises. In this event a manager or shift lead will be trained to inspect the situation and ask these individuals to exit the property. If the individuals refuse they will be informed that the authorities will be called and our marijuana agent will contact local authorities.

**Waste Disposal:** We will enforce the following procedures to store, secure, and manage our cannabis related waste.

- In the breakroom we will have a designated disposal area with a table for sorting/destroying product and a sink.
- Whenever we have cannabis related product that needs to be disposed of, we will bring the product from the designated cabinet in the secured inventory room to the disposal area. This process will

take place outside of business hours. The product will be weighed and the weight will be recorded. This will also take place while being video recorded with two agents present; both agents will be trained inventory agents.

- The weight of the cannabis will be recorded with two of our marijuana agents present. The product will then be ground up, sprayed with Seventh Generation Chlorine Free Bleach (environmentally safe, biodegradable, and will render the product unusable) and/or isopropyl alcohol and then placed into a container used only to store cannabis related waste – this container will be stored in the inventory room and the contents will be transferred to a locked trash bin on site to be picked up by a licensed waste removal provider. Concentrates will be mixed with the Seventh Generation Chlorine Free Bleach and/or isopropyl alcohol and then disposed of. Edibles will be ground up and sprayed with Seventh Generation Chlorine Free Bleach and/or isopropyl alcohol and then disposed of. Cartridges will be opened and sprayed with Seventh Generation Chlorine Free Bleach and/or isopropyl alcohol and then disposed of. Liquids will be poured down the drain of the sink in the disposal area and the packaging will be dipped in Seventh Generation Chlorine Free Bleach and/or isopropyl alcohol and recycled if able.
  - Above when product is referenced to be disposed of after it is rendered unusable, the unusable product will be disposed of into a bin that will be stored in the inventory room prior to being transferred to an onsite locked trash bin to be picked up by a licensed waste disposal provider.
- A disposal report will be filed in the back office along with all cannabis waste disposal reports to be maintained for at least three years.
- Any packaging that the product may have been placed in will be dipped in Seventh Generation Chlorine Free Bleach and/or isopropyl alcohol to neutralize any remaining cannabis material and then placed in a recycling bin/trash bin.
- Marijuana product that has been rendered unusable will be stored in a container used only to hold marijuana product that has been rendered unusable and will be stored in the inventory room prior to being transferred to a locked trash bin on site, which will be picked up by a licensed waste disposal provider.
- No cannabis related material that is not sold or otherwise properly transferred out of our facility by a licensed marijuana entity will exit our facility unless it has passed through our waste disposal process and has been rendered unusable.

*Please see product disposal procedure for further information.*



Secured Entrances: We have one entrance and exit on the premises – one door at the front of the facility and an emergency exit at the rear of the building. Staff will not enter or exit through this rear door. Each door is equipped with a security alarm that will trigger if opened/tampered with while the system is armed. The front and rear doors will have a qualified lock that only our administrators have a key to.

Secured Inventory Storage & Procedure: Our inventory is organized in the back-office inventory storage room, which is a limited-access area. The inventory will be within a locked room so it can be secured and only accessed by authorized agents on duty. The room will be locked at all times and will only be unlocked to facilitate incoming product, store product that is being removed from the show floor, or to collect product for the show floor.

Continued: Inventory on the show-floor will have the ability to be quickly locked away. All display cases can be locked and product on carts can quickly be move to the inventory storage room. Any product outside of a display case, storage receptacle, or storage room will be able to be quickly deposited into one of the secure areas and locked away if needed.

Continued: At the end of the night, all cannabis product will be taken off the show floor and placed in the back-office inventory storage room and locked away. Most of the product displayed on the show floor will be empty packaging with no cannabis product inside of it. Only packages that contain cannabis product will be removed and stored in the inventory storage room.

Continued: At opening, product will be brought from the back office inventory storage room and placed on the show floor in either the display cases or product carts. Throughout the day the inventory agents will be responsible for replenishing the inventory levels on the show floor.

Robbery: In the event of a robbery, the staff is instructed to comply with the demands to ensure the safety of the staff, customers, and bystanders. Once the party has left that has committed the robbery, the manager on staff is instructed to alert local authorities and the Marijuana Establishment administrator(s). An incident report will be created, an investigation into the event will take place, and the CCC will be notified.

There are hold-up buttons by every register, in the back office, and at the front entrance checkpoint that alert local authorities of an emergency situation at the establishment. Employees are trained to trigger this switch in emergency situations where they are unable to call for help if it is safe to do so. Any false alarm triggered by our employees will be investigated internally to determine the circumstance of the false alarm. If we find carelessness or other unfavorable motives related to the trigger, the employee will be subject to termination.

Drop Safe/Till Balance: Each till will start the day with \$200 and will end the day with \$200. Throughout the day, a manager or shift lead will regularly replace an active drawer with one that has been previously balanced. The manager or shift lead will take the unbalanced drawer to the main office and balance it back to \$200, they will create a report on a bank envelope, place the excess cash in the envelope, and deposit the envelope in the main safe and fill out the *Safe Access Log* with the transaction information.

Secured Locks: At no time shall any equipment, such as a safe, file cabinet, inventory room, or security room door, be left unlocked and unattended. All locks may only be left unlocked while the agent who unlocked the door is present. Once the reason for unlocking the specific lock is complete the lock is to be relocked immediately. If there is ever an issue with the capability of a lock it must be replaced immediately.

Key Return Policy: At the end of each employee's shift, the employee is instructed to check out with a manager or shift lead and leave their access keys & ID badge upon exiting the facility. The manager or shift lead will store the keys in a locked key box and hang the ID badge in the back office. All keys will be locked within the back office each night.

Continued Key Return Policy: Managers and shift leads that have opening or closing duties will be allowed to take home keys. All other employees will be required to leave their keys at the facility when they are not working a scheduled shift. The employee will be given keys by a manager or shift lead when they arrive for their shifts.

\*No keys shall be left in a lock at any time. No keys shall be left out in the open at any time. All keys should remain on the agent's person unless it is placed in a secure location that only the agent has access to, or other agents will the same authorizations, and that can be locked away. Disciplinary actions will occur in the event of lost or misplaced keys.

\*No codes shall be shared at any time with any other personnel, including other agents. Disciplinary actions will occur in the event of shared security codes.

Transaction Record Errors/ Diversion: If funds are found missing during an end of day deposit or if inventory is discovered to be missing at any time – an investigation will be initiated by authorized agents utilizing the store's camera systems and POS to determine where the error or theft occurred. If product is found to be missing a full inventory audit will need occur to identify what was lost and help to narrow the time frame of when the product was in the store. Security footage will also be reviewed for that particular time frame to find the event of product theft. An incident will be filed and the CCC will be notified.

Opening Procedure: The alarm system will be disarmed by a code entered by the authorized agent opening the facility. Agents will obtain their ID badge and access

keys when they arrive for their shift and check in with their manager or shift lead on duty. All employees will use the POS system registers to clock in. Agents will then prepare the show floor for opening and sales.

Closing Procedure: Cannabis product on the show floor will be transferred to the inventory storage room each night. Once all product has been moved off the show floor the inventory room will be locked. The security system will be armed and all points on entry will be securely locked. Some exterior lighting will remain on to illuminate the premises.

### **Emergency Procedures:**

Fire: In the case of a fire, there are two exits – one at the front and one at the rear of the building. An escape map is posted on the premises outside of the employee breakroom and employees will be informed of the protocol upon hiring. Employees will be instructed to vacate the premises immediately upon discovery of fire. If the fire appears to be manageable by an onsite extinguisher, an employee will be able to attempt to extinguish the fire. All employees will be instructed how to use the fire extinguisher (the P.A.S.S. method) upon hiring. Once the employees are in a safe space outside of the facility (even if the fire has been extinguished) they are to contact local authorities and then the Marijuana Establishment's head administrator(s), if not present. The security system will have already contacted local authorities, however, our employees will be instructed to make a manual call themselves in case of a potential error in the security system and for safe measure.

Weather Emergency: Our policy is to follow the instruction of local officials in regard to weather emergencies. The Accuweather App is on the security agent's iPad and the office desktop, this can be used to track advisory's and weather-related data. Employees are instructed to stay inside the facility until local officials advise that conditions have become more favorable. If employees choose to leave or act otherwise, it will be at their own risk. We understand some employees may have obligations to take care of in emergency situations, we understand and respect that and will allow them to do as they wish, even if it is against what is advised. Managers on staff will be instructed to keep administrators of the establishment informed as is possible.

Miscellaneous Emergency: In the event of all other types of emergencies which may be, but is not limited to; a pipe burst, flooding, CO2, gas leak, mold, chemical spill, structural failure, or any other emergency that warrants immediate action, business at the establishment will shut down and employees will be instructed to leave, so long as it is safe to do so. Administration will be notified immediately. If it is not safe for employees to leave, administrators, local officials, or emergency responders will advise employees on next steps. No employees will be detained, but they may be asked to stay for the best interest of their safety. These situations will be handled on a case-by-case basis. In most circumstances, employees will be instructed to go home and the business will remain closed until the emergency situation is resolved.

In any event, once the situation is under control and it is safe to do so, a report will be created and the CCC will be informed.

In the event of emergency relating to diversion, theft, or loss; all product will be moved to the back office area (limited-access area) into the secure product storage room where it can be secured to be reviewed by an authorized agent. With the entire product secured, we can review security footage to identify the cause of the loss. At this time, a full inventory audit will occur to identify what may be missing.

### **Customer Service Policy:**

It is one of our overall goals to give our customers a great experience while they visit our establishment. Our intention during training is to hire and develop employees that understand this goal and how to best achieve it.

Complaint Protocol: If we receive a complaint from a customer, we will initiate an internal review. The review will entail visiting with staff that was on duty during the time of the complaint. After hearing from staff - management and administration will check other references that may bring more information to light (security cameras, other customers, etc). With all the information in management and administration's hands, a determination will be made in regards to the employee that is subject of the complaint.

*Please see our Security Plan for further information relating to criteria set forth in 935 CMR 500.10.*

### **Hours of Operation**

Monday – Thursday: 10am – 8pm

Friday – Saturday: 10am – 10pm

Sunday: 12pm – 8pm

*Note: It is our intention to gather data on our busy hours as well as to gather information from our clientele as to the hours they would like to see us operate. If we find it may be beneficial to stay open later into the night or open later on in the day we will make the adjustments accordingly.*

After Hours Contact:

Jack Carney, Manager

Cell: (515) 460-8350

Email: [jack@colonialcannabisco.com](mailto:jack@colonialcannabisco.com)

## **Storage of Marijuana**

### **Storage Areas:**

At all times, our cannabis products will be stored in one of the following three areas in our establishment. All areas are within a controlled environment where the conditions are being kept at specific levels.

1. Product Storage Room – this is a lockable room, which serves as our primary storage area for cannabis products.
  - a. Inside of the room are several racks with labeled bins on the racks. Product will be organized in these bins. These are open bins, not closed and sealed. Packaged product will be placed in them.
  - b. Also inside the room will be a separate cabinet for unsellable product. Damaged product, compromised product, outdated product, product being destroyed, or in any way unsellable according to 935 CMR, will be placed in this cabinet to be returned or destroyed according to our waste and disposal procedures.
  - c. There will be a bin dedicated to cannabis product that has been rendered unusable. All products that have been rendered unusable will be stored in this bin. The contents of this bin will be transferred to an on site locked trash bin to be picked up by a licensed waste disposal provider.
2. Display Cases – The showroom is designed with a perimeter of display cases separating the customer from our marijuana agents as well as four display cases mounted on the wall behind the floor display cases. All of the display cases are lockable.

**Upkeep:** The areas where cannabis products are kept are maintained on a daily basis to ensure that we are meeting sanitation protocols and limiting the likelihood of any type of infestation of pests.

**Monitoring:** Security cameras capture all activity in areas where cannabis products are being stored.

When product is being received and checked prior to stocking, this process is video recorded and manifests are kept detailing the reception of the product. The marijuana agent that was in receipt and conducted the review signs the manifest.

*Please see our Storage of Marijuana Plan for more detailed information on our storage protocol.*

## Product Variation

We will carry the following types of cannabis products. Product types will be added to this list over time as new products and product types are made available in the market.

**Flower** – Dried buds of the cannabis plant.

**Concentrates** – Solvent based product that is a result of an extraction process of cannabis buds and other plant materials.

**Vape Cartridges** – Concentrates of various solvent types filled into cartridges that can be used with vaporizer pens.

**Edibles** – Edible products that have been infused with THC or CBD. The most common forms of edibles will be brownies, cookies, soft drinks, and hard/soft candies, chocolates, caramels, etc.

**Topicals** – These are lotions that are usually CBD dominant that can be used to apply to sore muscles for quick and natural relief.

All products will be pre-packaged, tested, and labeled before our reception by the cultivator or product manufacturer licensee that we acquire the product form.

## Record Keeping

All physical documents are kept in a secured and locked file cabinet in the back office. Only authorized agents have access to this file cabinet. A running list of agent's authorizations is also kept in the back office.

Filing Procedure: Documents relating to:

- Waste disposal
- Inventory (delivery manifests, confirmation of delivery receipt reports, audits, and destruction/disposal reports)
- Completed visitor log sheets
- Daily sales reports
- Deposit reports relating to cash pick-ups
- Deposit reports relating to any other kind of deposits

All of the items listed above, as well as, any other documentation relating to operations on the premises shall be submitted to a drop safe by agents and then filed away in the secure and locked file cabinet in the back office by authorized agents. Real time inventory will be accessible through our POS system and our most recent inventory audits.

*\*No files shall be disposed of by agents, unless they are an authorized agent and the file is deemed unnecessary to maintain pursuant to the requirements in 935 CMR 500, the authorized agent may shred the document on site.*

Digital Real Time Inventory: Inventory numbers will be reflected in real-time by our POS system and reports will be printed and filed weekly relating to inventory counts

and monthly relating to inventory audits. Our POS system will also differentiate products in our inventory that are sellable and products that are unsellable.

**Real Time Inventory Continued:** In addition to our digital real time inventory, we will keep a running log within the unsellable product cabinet to show all of the product that is within the cabinet at any given time. This log will be hung on the door of the cabinet, not to leave its designated spot. All product that is deemed unsellable will also have a form filled out and attached to it. The form will detail the reason it was deemed unsellable. This form will stay attached to the product until it is destroyed or returned. Once it is destroyed or returned the form will be filed away in the back office with the disposal records. The log on the unsellable product cabinet will be updated to reflect the current contents of the cabinet.

**Hard Drive Storage:** When hard drives near capacity their data will be exported to external hard drives and stored in a secured and locked safe or cabinet in the back office. If a hard drive is removed from a device it will also be stored in a secured and locked safe or file cabinet. All hard drives will be erased before disposal.

**Weekly Inventory Reports:** At the end of each week, we will perform an inventory count on the entirety of the product we have on hand. A manifest will be printed out showing exactly what our POS tells us is currently in stock. Our agents will then manually account for each product to compare their findings with the POS manifest. A report of each weeks findings will be created and filed in the main office.

**Continued:** In the event of any discrepancies relating to lost product, an internal investigation will be initiated to locate the potential accounting error or loss of product. If a resolution cannot be found relating to the inconsistency between the physical product on hand and the product reported to be on hand by the POS, the CCC and local law enforcement will be informed immediately as we continue to investigate the loss. The report will be filed away in the secure file cabinet.

**Monthly/Yearly Audits:** We will conduct our weekly inventory counts throughout the year and once a month will issue a monthly inventory audit report that will show the amount of product that is on the premises, summary of findings, the date of the audit, names and signatures of those involved in the audit, and their titles. The report will be filed away in the secure file cabinet.

\*All audit reports relating to inventory will be filed according to the filing procedure detailed above.

## **Further Recording Keeping**

All physical and digital records are kept on site in one of two areas.

1. Locked and secured file cabinet with multiple folders allowing the establishment to categorize documents and allow for ease in locating specific documentation when needed.
2. Locked and secured safe for sensitive materials and hard drives from POS software and another other computers at the establishment that handle sensitive information relating to the establishment, its administrators, agents, or customers.

**Operating Policies/Procedures:** Our operating policies/procedures are made available in the break room and in the back office. Both will be placed in an easy to access area and all agents are informed of their location so they can refer to the operating procedures if they ever have an inquiry as to how a specific circumstance is to be handled. The operating procedure also has contact information for an administrator that can be reached at any time if a specific question must be answered immediately.

**Inventory Records:** Records relating to delivery receptions, inventory audits, or any other documentation relating to our inventory are filed away in the secured and locked file cabinet in the back office. The records will be available upon request at the establishment.

**Personnel Records:** Personnel of the establishment each have a file made in their name. All documents relevant to the employee and their employment will be stored within their folder. The employee file will be kept for at least one calendar year after their employment is terminated at our establishment.

**Business Records/Files/Documents:**

- Licenses and permits will be presented according to regulation and, depending on the specific document, may be presented on the wall of the establishment in clear view of the public.
- In the secured and locked file cabinet in the back office, there is a business document section for all of the establishment's personal documents relating to its license and any state or local permits.

**Waste Disposal Records:** In the secured and locked file cabinet, there is a file for waste disposal records categorized by month and saved per year. The record will display information on the waste disposal, the time and date, the contents and weight, and a signature of two marijuana agents that were present during the weighing of the waste. There is a record of when the waste was disposed of and a signature of the agent who conducted the disposal.



## **Quality Control**

Upon reception of a delivery of product, our marijuana agent compares the delivered product with the manifest received from the marijuana establishment the product came from. The product is inspected and weighed by our marijuana agent to make sure there is accuracy between what is detailed on the manifest and the content of the order that we physically received. During this inspection, our marijuana agent also inspects the packaging of each product to ensure it is adhering to the label requirements and testing requirements in 935 CMR 500.160. Also, the agent checks to make sure the packaging has not been breached or tampered with and that the product has not expired. Any product that does not adhere to the criteria will be returned to the driver to then be returned to the marijuana establishment it came from. This procedure is to ensure all the product we are receiving is up to code and able to be sold.

During our weekly inventory report, our marijuana agents pay attention to the dates on each package to make sure that the product is not out of date and that the package has not been breached or tampered with. If the product is out of date, it is moved to a secured cabinet within our back office storage cage to ensure that it will be destroyed and disposed of according to our waste disposal protocol.

Our facility is cleaned on a daily basis to sterilize all surface areas that receive regular contact. All areas where cannabis products are stored will also receive up keep on a daily basis to ensure a clean and unobstructed storage area as well as to mitigate the likelihood of a pest related issue.

## **Pest Control**

In the event of any pest issues that are unmanageable by over the counter products, we will immediately contact Minute Man Pest Control Co, a local pest control service provider, who is nearby and will be able to quickly assist with any pest related issues we encounter.

## **Testing**

NO product will be available for sale at our location that arrives at our facility without a testing result label on its packaging. The product will be returned to the delivery driver and then returned back to the marijuana establishment that it came from.

NO product that does not comply with the standards required under 935 CMR 500.160 will be available for sale at our location. The product will be returned to the delivery driver and then returned back to the marijuana establishment that it came from.

## **Sanitation**

### **Employee Sanitation Requirements:**

- Maintain adequate personal cleanliness
- 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
- After using the bathroom, hands are required to be washed similar to food prepping facilities

### **Workplace Sanitation/Cleanliness:**

- Proper organization of establishment to offer sufficient space for placement of equipment and storage of materials necessary for the maintenance of sanitary operations
- Litter and waste will be removed on a daily basis to minimize the development of odor
- Walls, floors, and ceilings shall be cleaned regularly to maintain a clean professional workplace
- There is safety lighting throughout the facility that will turn on in the event of a power outage that will allow for ample lighting in the establishment
- All contact surfaces will be cleaned on a daily basis including shelving, display cases, all door handles, all desks, scales, and other surfaces that experience regular contact will be cleaned on a daily basis to maintain a clean and sanitized workplace
- All toxic items shall be identified and stored in a specific trash receptacle used only for toxic items
- There is one bathroom on site that maintains proper plumbing and access to water and it will be cleaned regularly to maintain sanitation
- The marijuana establishment has a controlled environment to allow for the best storage conditions for our inventory – product that requires more specific conditions (like refrigeration) will be stored accordingly to best maintain the products. Additional equipment will be brought in to combat excess humidity or dry conditions if needed.

## **Staffing Plan & Records**

At this time our facility will have a minimum of ten marijuana agents on duty.

- One agent to secure the entry checkpoint and verify IDs
- One agent to work the show floor
- Three cashiers
- One inventory agent
- Three additional floor agents to assist with transactions
- One manager/shift lead to oversee all activities at the establishment

Additional agents will be scheduled to assist in times of high traffic. Example of times of high traffic will be Fridays after 5 PM, and weekends during the day and night. But, at all times, the establishment will have a minimum of four agents on duty.

Until it is no longer needed, we will maintain a third-party security agent in our parking lot.

Employment will be full-time with the option for part-time work if it is requested.

### **Personnel Records**

Each employee, upon hiring, will have an employee file opened. The employee file will serve as an organizational tool for our establishment to store specific information and documentation relating to the employee to satisfy the requirements laid out in 935 CMR 500.105(9)(d).

### **Workplace Policies**

The following activities will be prohibited on our premises (this includes the parking lot):

- Smoking or vaping of cannabis, tobacco, or any other substance
- Drinking alcohol
- Possession of any drugs that are not prescribed by a doctor or available over the counter
- Being under the influence of drugs or alcohol
- Discrimination of any kind

**Fake/Counterfeit Identification:** If a patron's identification is found to be fake, counterfeit, or not belonging to the individual who presented it, our agents will be instructed to confiscate the ID and ask the patron to leave. If the patron refuses to leave and requests their ID back, they will be informed that local law enforcement is being called. No matter, local law enforcement will be informed and the fake IDs will be turned over to them. We cannot detain the patron. We will offer our security footage to law enforcement if they wish to investigate the occurrences.

#### Actions resulting in immediate dismissal of marijuana agents:

- Failure to check or properly verify an ID at any time when it is required relating to the procedures we have laid forth in training.
- Sharing of information relating to security protocols or other sensitive information relating to procedures for the movement of product or cash that could put the business, workplace, employees, and its patrons at risk.
- Failure to wear registered agent ID while on duty at the establishment.
- Failure to check in and wear guest badge while visiting (outside of scheduled hours) and entering limited access areas.

- Being unaccompanied while visiting and in a limited access area. (Example, unaccompanied in the back office with no other on duty agents present)
- Failure to accompany a visitor while they are in our limited access area.
- Diversion of cannabis products.
- Engaging in any actions deemed unsafe with regards to the operation.
- Been convicted or entered a guilty plea, plea nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in any jurisdiction.

In the event any of our registered agents are suspected to be guilty of any of the previously listed reasons for dismissal, the agent will be immediately suspended without pay while we investigate the suspected actions to determine if the suspicion can be verified. If the suspicion can be verified, the agent will be terminated from our employment, the CCC will be informed, and local law enforcement will be informed depending on the nature of the reason for dismissal.

### **Handling & Storage of Confidential Information**

All confidential information is stored in a secure and locked file cabinet that only administrators have access to.

Employee files, which may contain confidential information, will be stored in a secured and locked file cabinet.

If an employee obtains a document they believe to be confidential information, they are instructed to pass the document off to an authorized agent to be immediately placed in the secure file cabinet. If an authorized agent is not available, the document is to be placed in the back office drop safe.

Once information is no longer needed, it will be shredded on site and then disposed of. Records will be kept for the duration of what is required by the regulations set forth throughout 935 CMR 500 and may be kept longer for reasons relating to our establishment's best interest.

### **Information on Board Members**

Until our website is up and operational and a tab can be created to allow patrons to request information relating to the board members of the establishment, our employees will be instructed to offer information for the members of the board via computer printout.

## Cash Handling

**Till Balance/Drop Safe:** Each till will have a balance level of \$200. The till will begin and end the day at \$200. Throughout the day a manager or will 'pull' a till that has received a large amount of cash transactions and replace it with one that has previously balanced to \$200. This will happen several times a day. Our agents will be instructed to pay attention to the cash level of their till. For instance, if they receive several large transactions consecutively, the agent should inform a manager and have the till balanced after their next transaction. The agent will print a receipt and hand the manager or shift lead their till to be counted in the main office. The manager or shift lead will count the cash contents of the till and return \$200 to the till, the remaining amount will be placed in a bank envelope, a receipt will be printed from the register to represent all transactions made up to that point. The manager or shift lead will write the cash total on the outside of the bank note along with the registers ID, sign their name, and write the time and date of the deposit. The bank envelope with the cash contents inside will then be placed in the main safe.

**Transfer from Drop Safe to Primary Safe:** At the end of the day, the manager or shift lead in charge of closing duties will remove any bank envelopes from the drop safe and transfer it to the main safe. The total from the bank envelopes for the day will be added together and should be equal to the total sales number printed from the POS system at the end of the day. The entrance in to the main safe will be logged in the *Safe Access Log* and the safe will be secured.

**Cash Storage Locations:** At any time, cash will be located within one of three places; the cash register tills, the back office drop safe, or the office safe.

**Safe storage:** The safe will have a running *Safe Storage Log* that any authorized agent making the deposit will be required to fill out on each entry into the safe. The information to be documented will be; date, time, printed name, reason (deposit, withdraw, audit), withdraw amount, deposit amount, new total, and signature. Even if no contents are added or removed, a log of the opening of the safe and signature of the authorized agent that opened the safe must be recorded (this would be recorded as an "audit"). The safe will be organized so that deposits from the drop safe for each day can be organized in their own section.

**Deposit Method & Frequency:** All of our deposits will be made via a licensed and certified currency transportation company and delivered to a GFA bank branch for deposit. We are currently working with Empyreal Enterprises MA, LLC who is an armored carrier provider that has been approved by our bank. We have also spoken with Plymouth Armor Group, who has been vetted by our bank, and we may utilize their services during our course of business as well. We will schedule pick-ups at randomized times.

## **Preventing Sale of Product to Minors**

The following protocols are implemented to prevent the access of cannabis products to any person under the age of 21.

- Clear signage at the immediate point of entry indicating all who enter must be 21 or older and must present a valid form of ID.
- Immediate ID check upon entry.
- Secondary ID check at the point of transaction to ensure the patron is 21 or older.
- Perimeter cameras showing all vantage points outside of our facility that will be monitored at all times during operational hours by our marijuana agent at the front entry checkpoint. They will have a monitor to view, which will show camera angles outside of the establishment. The agents will be trained to take notice of any suspicious activity occurring on the premises.
- Parking lot signage stating that the area is under 24-hour surveillance.
- Interior signs stating that diversion to anyone under the age of 21 is a felony offense.
- During training, it will be made a point of emphasis that restricting the access of cannabis product to minors is a focus of our daily activities. Our agents will be instructed to always be looking for signs of this taking place.
- In the event that one of our agents is made aware of a situation where the sale of cannabis to minors is occurring, they will be instructed to share this information with administration. In the event that one of our agents is found to have had knowledge of this crime and did not inform administration – the agent will be suspended without pay and an investigation will be conducted to verify the suspicion. In the event the suspicion is verified, the agent will be terminated and the CCC will be notified. If necessary relating to the circumstances and the nature of the actions that lead to the termination, local law enforcement will be informed.

## **Energy Efficiency and Conservation Procedures**

1. High efficiency interior lighting
2. Lighting will only be utilized when necessary.
3. We are currently pursuing energy efficiency in our retail operation by leveraging the Mass Save incentive programs and working with local distributors to continually have the most efficient delivery methods in Northampton area.

Contact Manager Jack Carney @ (515) 460-8350 at anytime with questions relating to any of the above.



# COLONIAL CANNABIS COMPANY

“NOT THOMAS JEFFERSON’S HEMP.” | EST. 2019 | NORTHAMPTON, MA

## Qualifications & Agent Training

### Hiring Procedure:

Potential applicants will be interviewed by administrators to determine competency, knowledge, experience, and ability to perform the jobs tasks. If the applicant shows that they can be an asset to our team, they may be awarded the position.

A background check will be conducted on the applicant to determine if they fit all the criteria set forth by the CCC to be a registered Marijuana Agent. This will include a CORI background check. If they meet all the criteria, we will gather their information and all materials required by the CCC (935 CMR 500.030) to submit an application for the new employee to receive the agent registration. We will cover all costs relating to background checks and marijuana agent registration. All background check results will be kept in the employee’s file.

### Roles & Qualifications:

**Security Agent:** We will have one security agent on duty at all times. At onset, we will likely have three or more agents on duty to assist with customer flow both inside and outside of our facility. One security agent will always be stationed at our ID checkpoint in the front vestibule of the establishment and will be responsible for checking IDs of customers that enter the establishment using our 3-point check protocol. This agent will also be tasked with monitoring the exterior of the facility to ensure there is no suspicious activity occurring around the premises. If the agent identifies any suspicious activity, the agent will be instructed to inform the manager or shift lead on duty.

#### Qualifications

- 21 years of age or older.
- Experience in security or similar role with ID check procedures.
- Ability to maintain professionalism in tense situations.
- Communication/customer service skillset.
- Ability to follow directions and adhere to strict protocol.
- Punctuality.

- Willingness to participate in background screening to become a Registered Agent.
- Willingness to perform light cleaning duties as part of side work.

**Security Agent Assistant:** The assistant helps the security agent in maintaining and monitoring the entrance of the facility. This role is will be a resource to the security agent in times of high volume and is a developmental role meant to familiarize the assistant with the inner workings of the establishment.

Qualifications:

- 21 years of age or older.
- Willingness to participate in background screening to become a Registered Agent.
- Verbal & written communication skills.
- High value for customer service.
- Willingness to learn a new skill.
- Ability to understand and uphold policies.
- Ability to follow direction.

**Floor Agent:** We will have up to three floor agents on the sales floor at a time. The floor agents will be responsible for ensuring the show floor is flowing properly – making sure everyone is entering into the waiting line correctly, adjusting the rope and polls of the waiting line according to the customer volume, and making sure customers are exiting through the correct door. They will speak with customers as they are deciding upon the product they wish to purchase. They will answer any questions they may have and direct them to a register to make their purchase when they are ready to do so and a register is available.

Qualifications:

- 21 years of age or older.
- Willingness to participate in background screening to become a Registered Agent.
- Must be outgoing and possess great customer relations skills.
- Ability to work as a team in a fast-paced environment.
- Ability to stand for long periods of time.
- Ability to be knowledgeable and articulate a large array of products.
- Ability to communicate customer needs to Budtenders or Managers.
- Basic math and computer skills.
- Willingness to follow instruction and adhere to strict protocol.
- Detail oriented and motivated to go the extra mile to help a guest leave happy.



**Floor Agent Assistant:** The person holding this position will be a resource to the sales floor during times of high volume. They will be a friendly and helpful face for the company, while learning the mechanics of how the sales floor is run.

Qualifications:

- 21 years of age or older.
- Willingness to participate in background screening to become a Registered Agent.
- Verbal communication skills.
- High value for customer service.
- Willingness to learn a new skill.
- Ability to understand and uphold policies.
- Ability to follow direction.

**Budtender/Cashier:** We will have at least two to three cashiers at onset of opening. The cash register agents will be stationed behind the floor display cases at registers. They will be responsible for checking customers IDs prior to entering the transaction into the system, answering any questions the customers may have, and processing the transaction.

Qualifications:

- 21 years of age or older.
- Willingness to participate in background screening to become a Registered Agent.
- Customer service or cashier experience.
- Attention to detail and high level of accuracy.
- Basic math & computer skills.
- Ability to stand for long periods of time.
- Ability to work in a fast-paced, high energy environment.
- Ability to work within a team to provide excellent customer service.
- Have a communicative and empathetic approach to customer complaints.
- Willingness to follow instruction and adhere to strict protocol.
- Ability to learn and inform customers about wide range of products.

**Inventory Manager:** We will hire one inventory manager at onset. The inventory manager's job will be to organize and maintain the inventory storage room. The manager will also be responsible for conducting the check-in procedure of deliveries to the establishment and will oversee the inventory assistant.

Qualifications:

- 21 years of age or older.

- Willingness to participate in background screening to become a Registered Agent.
- Ability to follow strict operational procedures.
- Experience in inventory control.
- Strong attention to detail and ability to analyze data.
- Problem solving skills and outstanding organization.
- Experience in a managerial role.
- Exemplary leadership skills.
- Willingness to work extended hours.

**Inventory Assistant:** We will hire one inventory assistant at onset. The inventory assistant will be trained to assist the inventory manager with their job tasks by performing day-to-day maintenance of the secured storage area so that the inventory manager can take on more administrative duties.

Qualifications:

- 21 years of age or older.
- Willingness to participate in background screening to become a Registered Agent.
- Understanding of the importance in following procedure.
- Capacity for basic math and counting.
- Strong attention to detail and knack for organization.
- Willingness to work extended hours.
- Historically reliable.
- Ability to follow direction and work in a team-based atmosphere.
- Desire to grow in a role and take on new tasks.

**Shift Lead** There will be one shift lead on duty at all times. The shift lead will be cross-trained relating to all other position's responsibilities so that they can ensure that all jobs are being performed properly according to our operational procedures. The shift lead will be responsible for ensuring the processes of the establishment are all functioning properly. The shift lead will be responsible for balancing the cash drawers and depositing the balanced funds into the drop safe. The shift lead will also be responsible for depositing the funds at the end of the night if the general manager is absent, as well as, oversee the opening and closing procedures. The shift lead will have access to the back office, security server's room, and security codes.

Qualifications:

- 21 years of age or older.
- Willingness to participate in background screening to become a Registered Agent.

- Experience in a leadership role, delegating tasks and holding employees accountable for completion.
- Experience with cash handling procedures.
- Strong interpersonal skills and enjoys working with people.
- Ability to make quick decisions based on company policies.
- Enjoys problem solving and working with a group towards a common goal.
- Propensity to thrive in fast paced retail environment.
- Ability to master extensive menu and train team on new and existing products.

### **Training:**

All applicants will go through a multiple day training regiment to learn the protocol of the establishment. This will relate to security procedures, emergency procedures, inventory protocol, sales protocol, customer service policies, open/closing procedures, and the entirety of our written operating procedures.

Once the applicant is able to complete the training regiment, they will be added to our bi-weekly schedule and will begin work once they have acquired their agent registration.

### **Responsible Vendor Training**

All employees will be required to complete responsible vendor training within 90 days from the start of their employment. Throughout the year all employees who handle marijuana products **will be required to receive 8 hours of ongoing training.**

One year after the completion of the training, all owners, administrators, managers, and employees will be required to renew their training and receive a total of at least 8 hours of ongoing training.

Documents relating to the completion of responsible vendor training will be kept in the employees file in the locked and secured file cabinet in the back office and will be available upon request. The documents will be saved for at least four years.

If our establishment opens for business and there are currently no responsible vendor training sessions available at the time, we will run through the following criteria with our staff outside of business hours:

1. Physical effects of cannabis based on the type of product consumed/applied and the consumption/application method.
2. Anticipated amount of time before they can begin to feel effects relating to the product type and consumption/application method.

3. Telling signs of impairment and how to recognize them.
4. Run through procedures set to prevent diversion and sales/diversion to minors or those under 21.
5. Education on the store's procedures put in place to maintain compliance relating to regulations set forth in 935 CMR 500 that the employees will deal with on a daily basis.
6. Acceptable forms of ID and how to properly check an ID/other forms of ID and how to use our ID checking software and black light to further verify an ID.
7. Procedure for identifying a fake ID using our software and procedure relating to how to handle the situation if an ID is found to be counterfeit.
8. Examples of likely situations and how to handle them as well as who to inform in the event of specific situations.
9. Waste Disposal Protocol.
10. Safety and sanitation policies.
11. Workplace expectations for conduct.
12. How to handle documents, reports, and confidential information and who to ask if there are any questions relating to the procedure for specific documentation.
13. Purchasing limits.
14. Cash handling procedures.
15. Disciplinary actions.
16. Any further information the establishment feels necessary to go through with employees.

*\*All employees will be paid, and session will be mandatory.*



# COLONIAL CANNABIS COMPANY

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## Product Quality Control & Testing

The following steps will be taken during a products time at our establishment to ensure that products being sold at our establishment have been tested, remain in quality condition, have not been tampered with, and have not become expired or otherwise unsellable.

1. During check in when product has arrived at our establishment our inventory agent conducting the product check in will analyze each product to ensure the following:
  - a. The product is not expired.
  - b. The packaging the product is housed in is completely sealed and shows no signs of a breach.
  - c. The product bears a testing label from a licensed Massachusetts lab.
  - d. The product bears all required labeling and warnings.
    - i. “Contains THC”
    - ii. “Not Safe For Kids”
    - iii. Warning label
  - e. The product is housed in a package that is compliant with advertising requirements.
    - i. No neon colors.
    - ii. Opaque or plain in design.
    - iii. No resemblances to popular products that do not contain marijuana.
    - iv. No cartoons, images, characters, or any content that is directed to appeal to children or people under the age of 21.
    - v. Cannot feature symbols or celebrities that are commonly used to market products to minors.
    - vi. No images of minors.
2. When product is being stocked, moved, audited, or at any other time when product is being interacted with, our agents will be trained to take notice of the expiration date to ensure the product has not expired as well as to analyze the packing the ensure the product has been tampered with or breached. The agent will also ensure the testing label is still on the package.
  - a. If an agent finds a product to be expired or is within packaging that has been breached, the agent will create an unsellable product report and place the product in the unsellable product cabinet. If the agent is not authorized to access the inventory room, the agent will inform a manager of the discovery so an authorized agent can take the proper action.

3. At checkout our agent will be instructed to inspect the product before completing the transaction. Similar to the step above, the agent will be checking to ensure the product is not expired and that the packaging shows no sign of a breach of tampering. The agent will also ensure the testing label is still on the package.
  - a. If an agent finds a product to be expired or is within packaging that has been breached, the agent will create an unsellable product report and place the product in the unsellable product cabinet. If the agent is not authorized to access the inventory room, the agent will inform a manager of the discovery so an authorized agent can take the proper action.



# COLONIAL CANNABIS COMPANY

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## Facilities Quality Control & Sanitation

### Cleaning Schedule & Frequency:

Management will prepare a daily cleaning schedule and assign tasks to an agent. The agent will perform the task when it is appropriate to do so and will complete the task prior to the end of the day. In most cases, the task is expected to be completed prior to closing each day. The following are tasks that must be completed at least once or twice a week and more if conditions require.

- Mopping of all floors.
  - This will be done in sections determined by the manager who sets the schedule. The following are the sections.
    - Show Floor Sales Area
    - Show Floor Waiting Area
    - Entry Way
    - Exit Way
    - Bathroom
    - Back Hallway and surrounding area near rear emergency exit door.
- Vacuuming of all rugs & carpeted areas.
- Cleaning of all glass – exterior and interior.
- Dusting/Sanitizing of all shelving. (with necessary supervision)
- Sanitizing of all touch surfaces including ipads, door knobs, surfaces, menus, and etc.
- Cleaning and Sanitizing of all break room equipment.
- Cleaning of the bathroom sink, toilet, and mirrors. Sanitizing all bathroom surfaces as well.
- Ensure all utensils and tools used in weighing inventory for reception or disposal purposes even though they should be cleaned after use.

*\*When cleaning areas where the agent who is performing the cleaning does not have authorized access, the agent that does have access to the area must be present while the cleaning is being performed. Ex. Locked product shelving, back office, and back storage vault.*



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## Record Keeping Procedures

All records will be kept in a locked file cabinet in the back office. The file cabinet will be organized with folders and all procedures that require the creation of a record will have a folder for the records to be stored in.

Other types of records will be POS data and security footage data. POS data will be backed up on hard drives and will be secured in the locked file cabinet or a locked safe. Security footage that is not held on the security recording system will be downloaded onto an external server or HD and will be locked in the file cabinet or secured within the security servers room.

### Filing Procedure:

1. If a procedure calls for a report to be created, once the report is created it is to be filed away in the proper file within the file cabinet in the back office.
2. The back office is locked at all times when not in use. If the office is locked and a manager is not present or available with access to the office, the report is to be placed in the drop safe that hangs next to the door.
3. Once a manager is available, the manager will obtain the report that is in the bin and file it away in the file cabinet.
4. If a manager is present and/or available with access to the office, the report can be handed directly to them to be filed away.

### Filed Records:

1. Operating Procedures/Policies
  - a. Security Plan
  - b. Plan for Obtaining Marijuana Product
  - c. Restricting Access to 21+
  - d. Prevention of Diversion
  - e. Storage of Marijuana
  - f. Transportation of Marijuana
  - g. Inventory Procedures
  - h. Quality Control & Testing
  - i. Dispensing Procedures
  - j. Personnel Policies
  - k. Record Keeping Procedures
  - l. Financial Record Maintenance
  - m. Diversity Plan
  - n. Qualifications & Training
2. Inventory Records



3. Seed-to-Sale Tracking Records
4. Personnel Records (\*a folder will be maintained for each employee with the following)
  - a. Employee Job Description
    - i. There is a folder that contains a staffing chart and a job description document for each of our currently active employees.
  - b. All documents submitted to the CCC
  - c. Documentation of verification of references
  - d. Job description and/or employment contract
  - e. Documentation of all required training
  - f. Signed statement of training received by agent
  - g. Documentation of periodic performance evaluations
  - h. Record of disciplinary actions taken
  - i. Notice of completed responsible vendor training
  - j. Notice of eight hour related duty training
  - k. Background check results
  - l. Background check related documents
5. Business Records
  - a. Assets & Liabilities
  - b. Monetary Transaction Reports
  - c. Books of Accounts
  - d. Sales Records
  - e. Salary & Wage Records
  - f. Payment Records
  - g. Deposit Records
6. Waste Disposal Records

*Following the closure of our establishment, all records will be kept for one calendar year in a location that is acceptable to the commission.*

Other Records/Reports:

Below is a running list of all of the types of reports/documents that will be filed away in the file cabinet. More records/reports will be added over time.

- Inventory reception reports (delivery manifests)
- Inventory audit reports
- Monthly analysis of sales data and equipment (CMR 500.140 (6)d)
- Monthly analysis of security systems (CMR 500.110 (5)e)
- Returned/exchanged products from customers
- Returned products to vendors
- Documentation of all employees with keys & access, categorized by position (running – updated as necessary)



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## Restricting Access 21+

1. Clear signage on door that ID is required for entry and that only those 21+ are allowed on the premises.
2. Full time door agent in front vestibule monitoring entrance & exit door and checking identification.
3. Immediate security checkpoint within the vestibule at the point of entry to premises. Showing ID will be required to pass through the vestibule to a partitioned waiting area. We will utilize an iOS program that scans the barcode of an ID and pulls up information on the ID holder confirming their age. We can then utilize a black-light to scan the card for holograms for additional security.
4. Secondary ID check at cash register. Birthdate of customer must be entered into the POS to begin the transaction.
5. No tolerance policy. We not tolerate any employees that are unable to follow our security protocols. Failure to follow protocol will result in immediate termination. Employees will be informed of this during onboarding.
6. Fake ID’s or ID’s that do not belong to the individual that presented them will be confiscated and turned over to local law enforcement. We will work with law enforcement and allow them to view our security footage to investigate the attempted use of fake or stolen IDs.

## **Plans for Positive Impact**

Our LLC intends to be active in the community by sponsoring community events and being a proponent of safe and responsible consumption. When appropriate and possible, we would also like to hold our own events (fundraisers, outreach meetings, and workshops). These events will bring business to town, raise money for the community, and also bring the community together. We can use these events to educate the public on cannabis and responsible consumption methods as well as open doors of opportunity to members of the community. This is a very new industry and the more information we can deliver to the public, the better. Our LLC also intends to run informational advertising campaigns, where we will pay to host ads that inform the public of cannabis facts and statistics. This can relate to informing the public of how cannabis works in our bodies, how cannabis can help them, what they should do to protect themselves from potential cannabis harms, and statistics of how cannabis is effecting different issues we have in Massachusetts and nationwide.

In addition, our intention is to be a fair employer when dealing with job applicants, and we will not discriminate against those with petty cannabis crimes. Along with that, we also intend to inform the public, to the best of our ability, of how cannabis can help them and what they can do to practice the healthiest and safest consumption methods. An informed community is our ultimate goal. We hope our fundraising events can also assist in improving the quality of life in the community by raising funds to donate to different organizations that benefit the community.

*The event will adhere to requirements set forth in 935 CMR 500.105(4) relating to advertising, branding, marketing, and sponsorship practices.*

*The event will not have a conflict with the regulations relating to limitations on ownership or control or any other applicable state laws.*

### **Our Goals:**

1. Positively impact the surrounding community.
2. Raise awareness on the effects of cannabis, proper use, and knowledge of the regulations in Massachusetts.
3. Offer financial assistance to those looking to obtain a job at our establishment by providing a program to pay for their marijuana agent fees.
4. Become a leader in advancing the community and striving for improvements in the community in multiple regards.
5. Promote and welcome community engagement with our establishment.

## Programs:

The following programs have been designed to achieve the goals previously laid forth.

1. Our establishment intends to allocate funds to a yearly fund-raising event to be held in the city. Other local cannabis companies will be invited to chip in to improve the functions at the event as well as make any contribution of funds (this could be an agreement to donate a % of the total amount of funds raised during the event, or some other type of contribution).
  - a. The event will be either a concert or show of some sort, like a comedy show or music concert. The type of show will depend on the type of talent we are able to book, who has been in the area lately, and what we believe the community would most like to see. The type of music or comedy act will vary, but will be directed towards as broad of an audience as possible to make the event appealing to multiple age groups to increase turnout. For example, the event will not be targeted at a certain age group, like college students. Tickets or an entry fee will be charged and 80% of the proceeds will be donated. Drinks and food may also be served and a portion of these proceeds will also be donated.
  - b. The event will feature a booth from our establishment with some of our agents, volunteers, and representatives present to hand out fliers promoting information relating to cannabis regulations, statistics, and facts to promote knowledge on cannabis in the community. **This will give us a chance to distribute information (similar to the pamphlets we have at our store) to individuals that may not frequent our store and are unaware of the information we provide through brochures at our storefront.** Other licensed cannabis establishments in the community will be welcome to be apart of the event and have their own booths as well. We may charge these companies to have booths and the funds can be added to the pool of funds that will be donated back to the community.
  - c. A board will be created consisting of members of the community and our administrators to determine where the funds will be donated.
    - i. The funds must be donated to a not-for-profit entity OR
      1. A local school or the public school system. – Northampton Public Schools
      2. A rehabilitation facility. – Hairston House (Gandara) OR Grace House
      3. A local community organization with administrators from the community. – United Way of Hampshire County
      4. Local law enforcement or another community faculty. – Northampton Police Department/Police Association
    - ii. All of these entities have been contacted and would be grateful to receive the donation if chosen by our board. We also have

meetings set up with United Way of Hampshire County and Hairston House to visit with them to see first hand the work they do to better assess these entities. We have also met with the police department and will continue to work closely with them while we work in Northampton.

- iii. Entities not listed above will still be considered. The entities above are entities we have reached out to and have interest in donating the funds to – but, this does not mean they will be the only ones considered.
  - d. Furthermore, in our agreement with the city, we are voluntarily donating \$10,000/year to a local non-profit organization. The group that we decide to donate these funds to will be determined as laid out in “c” above. These funds **are in addition** to the fundraiser event we will be holding.
  - e. The events proceeds can be handled by the concert venue in which we hold the event at. For instance, the concert hall that the event is held at can manage the accounting of all the proceeds brought in and issue a signed report that we can keep on file. This way, a 3<sup>rd</sup> party is recording the events proceeds rather than our LLC. We will then take those proceeds and donate them to the group determined by our board. This will occur within one month of the conclusion of the event and a report will be ready upon request of the CCC.
2. In our establishment we will have multiple pamphlets available (these pamphlets are detailed in our dispensing procedures under customer education). We will distribute a pamphlet into every customers bag along with their product at the end of the transaction. The pamphlet will include the following information.
- a. Regulation on public consumption “Do not consume in public”
  - b. Basic regulations that pertain to our customers (ex. How much product they can legally have and where they can consume it)
  - c. Consuming and driving is strictly prohibited along with information as to how it negatively affects your ability to drive and endangers yourself and others.
  - d. Basic effects of how cannabis affects the mind and body and links for further information on the topic.
  - e. Information on how to identify dependency issues and contact information for a rehabilitation provider that the individual may consult if they believe they may have dependency related issues.
- There will be more informative materials made available at the front of our establishment near the exit for patrons to view and take – which is required. **We are looking to go one step further than what is required in 935 CMR 500.140 (8) and give the customer one of these pamphlets that summarizes multiple topics at the point of transaction so that every customer receives one.**
3. A scholarship program for potential employees that wish to work at our establishment to cover all the costs related to becoming a marijuana agent.

Candidates that are offered the position will be granted this opportunity and will be required to fill out a suitability form to determine if they qualify for the scholarship – approval will not unreasonably be withheld.

4. We will hold 3 public outreach meetings yearly that will be open to the public in which our administration and staff will inform the attendees of updates relating to the establishment and the regulations of the industry. We will also open the floor for discussion on any topics the public would like to bring forth relating to our establishment and the industry as a whole. **We believe this will strengthen our relationship with citizens within the community – especially ones that are not customers of our establishment.** These meetings will be advertised at least one week prior in a local paper, an agenda will be sent to the city offices so it can be added to the city's public agenda, and we will also advertise the event on our social media pages.
5. When we are looking for employment, we will hold workshops that are open to the public and we will advertise this event similar to how we advertise our public outreach meeting listed above in #4. These workshops will be similar to a career fair where members of the community will be invited that are interested in applying for work at our establishment. We will go over topics related to the type and scope of work our newly hired employees would be involved and/or tasked with. We believe this will offer an opportunity for members of the community that do not search for jobs through means of internet job sites or placement agencies. We will also advertise jobs through those means, but we want to give members of the community that do not use those means an opportunity to apply for the job through our workshops.

#### **Monitoring Results/Accountability:**

1. The following can be reviewed to assess and verify the activity and its effectiveness.
  - a. Verification that the proposed event took place. The advertisements leading up to the event will be kept on file.
  - b. Total funds raised during the event. As mentioned in the program details, the event venue can be responsible for auditing the funds of the event to provide confirmation of the funds that were brought in. A report of this will be held on file.
  - c. Evidence that the funds have been transferred to the entity that is selected by the board created of community members and administrators of our establishment. A confirmation letter from the entity that receives the funds can be held on file.
  - d. Overall attendance numbers of the event and commentary from local officials and residents as to their opinion of the effectiveness of the event and suggestions as to how the event can be improved for future events. This can be done by reaching out to attendees of the event and creating a report of the interactions and keeping this report on file.

2. We will record all hired employees that apply and are awarded a scholarship from our establishment for fees related to becoming a marijuana agent. These records will be available in the employee's file that will be held at the establishment.
3. We will save the notices of the meetings and have a check-in sheet at the meeting for attendees to sign in on when they arrive at the meeting. Using these materials, the events can be verified to have been held. Attendees can also be contacted to determine their thoughts on the event and assess their thoughts on its effectiveness towards the goal of the meetings.
4. Similar to that stated above, the meeting notices will be saved and a check-in sheet will be present at the meetings. Employees that are hired that applied through the workshop will have that information identified within their employee file.
5. All of the measurement tools listed above are implemented to maintain accountability that our establishment is working towards achieving its goals through the programs we have listed above and provide a manner in which to assess them.