



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR281989
Original Issued Date: 10/26/2020
Issued Date: 10/26/2020
Expiration Date: 10/26/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Green Biz LLC

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

Business Address 1: 45 Bodwell St

Business Address 2:

Business City: Avon

Business State: MA

Business Zip Code: 02322

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

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:

Date generated: 12/03/2020

Page: 1 of 9

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:

Entity Email:

Entity Website:

248-705-0988

nwgardensupply@gmail.com

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:

Entity Mailing Country:

98108

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

Entity DBA:

Entity Description: Point of Sale Technologies

Entity Phone: 248-705-0988

Entity Email:

Entity Website:

nwgardensupply@gmail.com

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	Owner Last Name: HUANG	Owner Suffix:	
QING			
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 Retailer			
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			
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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 Mailing Address 1: 6790 28th Ave S	Entity Mailing Address 2:	Entity Country: USA
Entity Mailing City: Seattle	Entity Mailing State: WI	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: Portland	Entity State: OR	Entity Zip Code: 97230
Entity Mailing Address 1: 12903 NE AIRPORT WAY	Entity Mailing Address 2:	Entity Country: USA
Entity Mailing City: Portland	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 Mailing Address 1: 6790 28th Ave S	Entity Mailing Address 2:	Entity Country: USA
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: Pittsfield	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: Pittsfield	Marijuana Establishment State: MA	

Individual 3

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 4

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	

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 177 Main St	
Establishment Address 2:	
Establishment City: Northampton	Establishment Zip Code: 01060
Approximate square footage of the establishment: 2000	How many abutters does this property have?: 103
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
Community Outreach Meeting Documentation	177MainStCommunityOutreachAttestation.pdf	pdf	5bedab7ee18b8a04881dda2c	11/15/2018
Community Outreach Meeting Documentation	177AttachmentALegalTear.png	png	5bedac2982d97d04a007829f	11/15/2018
Community Outreach Meeting Documentation	177AttachmentBCityNotice.png	png	5bedac53d84f77046ceed6da	11/15/2018
Certification of Host Community Agreement	177MainStHostAgreementCertification.pdf	pdf	5bedac976427cd044e6287d9	11/15/2018
Plan to Remain Compliant with Local Zoning	177MainStZoningPermit.pdf	pdf	5bedaf2ebcbac00d7d74b353	11/15/2018

Community Outreach Meeting Documentation	Attachment C Notifying Abutters.pdf	pdf	5e78b04dbddf0438d21d9b20	03/23/2020
Plan to Remain Compliant with Local Zoning	LocalZoning177MainStCompliance.pdf	pdf	5e78b333482e703583b78a15	03/23/2020

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Positive Impact Plan 5.13.20.pdf	pdf	5ebeb1445f1314349d5f9198	05/15/2020
Other	Greenbiz2020letter.pdf	pdf	5ebeb150f16b5934c591b303	05/15/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner	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: Manager	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 (specify)	Other Role: Financer
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	5bd077306906170d87937950	10/24/2018
Department of Revenue - Certificate of Good standing	DORCertificateofGoodStandingGreenBiz.pdf	pdf	5bd077bf813a010d917ab684	10/24/2018

Bylaws	Green Biz LLC Bylaws.pdf	pdf	5bd0780c4287b10d4f36ded6	10/24/2018
Secretary of Commonwealth - Certificate of Good Standing	LetterOfGoodSOCStanding1.3.20.pdf	pdf	5e78c0351cdd2e3910a50326	03/23/2020
Department of Revenue - Certificate of Good standing	LetterOfGoodStandingDOR1.8.20.pdf	pdf	5e7d21a62b97cf38fa373f5a	03/26/2020

No documents uploaded

Massachusetts Business Identification Number: 001319829

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	BusinessPlan177MainNorthampton.pdf	pdf	5cab7dcc3183181258e20c0f	04/08/2019
Business Plan	Business Plan Clarification.pdf	pdf	5cab7dd65fd63c1b24ebaee5	04/08/2019
Proposed Timeline	177MainProposedTimelineNorthampton.pdf	pdf	5e7916ee2b97cf38fa373358	03/23/2020
Plan for Liability Insurance	177MainStPlanForLiabilityInsurance.pdf	pdf	5e791894482e703583b78c5f	03/23/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan for Obtaining Marijuana Norham.pdf	pdf	5bd0c0f4813a010d917ab70a	10/24/2018
Prevention of diversion	177 Prevention of Diversion Norham.pdf	pdf	5bd22879d84f77046ceec463	10/25/2018
Storage of marijuana	177 StorageOfMarijuana Norham.pdf	pdf	5bd22a5a813a010d917ab88c	10/25/2018
Quality control and testing	177 Quality Control Norham.pdf	pdf	5bd22fc6fe03b20d5f693b6b	10/25/2018
Dispensing procedures	177 Dispensing Procedures Norham.pdf	pdf	5bd231654088250d697fc1f6	10/25/2018
Personnel policies including background checks	177PersonnelPoliciesOperatingProceduresNorham.pdf	pdf	5bd33cfce18b8a04881dc81e	10/26/2018
Security plan	177SecurityPlanNorham.pdf	pdf	5bd36984e18f9d0d7384f4a6	10/26/2018
Security plan	177FloorPlanSchematics.pdf	pdf	5bd36d91bcbac00d7d74a101	10/26/2018
Security plan	177MainStFloorPlanKeyed.png	png	5bd36e16e18f9d0d7384f4c2	10/26/2018
Security plan	177MainStBasementCameras.png	png	5bd36e96906170d87937cac	10/26/2018
Security plan	177MainStBasementFloorLayout.png	png	5bd36e9ebcbac00d7d74a109	10/26/2018
Security plan	177MainStExteriorCameraLayout.png	png	5bd36ec96906170d87937cb0	10/26/2018
Security plan	177MainStEmergencyExit.png	png	5bd36f03813a010d917ab9d9	10/26/2018
Security plan	177MainStInteriorCameraLayout.png	png	5bd370cdbcbac00d7d74a113	10/26/2018

Qualifications and training	177 Main St Norham Employee Guide.pdf	pdf	5bd70b62813a010d917abb50	10/29/2018
Transportation of marijuana	Transportation Plan Norham.pdf	pdf	5cab7f09293a5312448eef13	04/08/2019
Qualifications and training	Qualifications Norham.pdf	pdf	5cab7f398d16491b5c0fdd5f	04/08/2019
Inventory procedures	Inventory Procedures.pdf	pdf	5e791c53b7c619391b8b6f72	03/23/2020
Restricting Access to age 21 and older	Restricting Access to 21+.pdf	pdf	5e791ee0172cbc35459733f7	03/23/2020
Record Keeping procedures	Record Keeping Procedures.pdf	pdf	5e79248df0445c357cb04c4e	03/23/2020
Maintaining of financial records	Maintenance of Financial Records.pdf	pdf	5e792c245f1da0353e2b074d	03/23/2020
Diversity plan	Diversity Plan 5.13.20.pdf	pdf	5eb5395fa02a2d3651d9a5	05/15/2020

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

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

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 10/22/18 (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 10/15/18 (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 10/12/18 (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 10/12/18 (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.

BUSINESS & SERVICE DIRECTORY
413-586-1700
classifieds@gazettenet.com
MON - FRI 8AM - 5PM

Antiques
ATTICS TO CELLARS Buying Antiques, coins, jewelry. 1 place or entire estate \$50-1200 or \$50-980

Driveways
PATRIOT DRIVEWAY Sealing, repairs, striping. 50% off FREE crack repairs with SealCoating! 413-446-7981

Dry Wall
B.B. INTERIORS Fine plastering, stucco, veneer, drywall. Bruce Roth, 585-9023

Estate Liquidation
"I Call Does It All" Org or sm. estate clean outs, property purchases, fully ins. Mark Battey, Owner. Windsor, (413) 586-1388

MERCHANDISE
Fast Action Ads
SWINE BACK Wooden, with place for wine glasses \$35 (413) 527-5371
SANDALS Black Leather, size 7.5, good condition. \$20 (413) 528-3402
BOOTS extreme cold waterproof mens 12M wide size 9.5 (413) 268-3562
TWO Single Rock maple beds, Sweet-Corning, company. 1900s \$250 413-527-5371
Weight Bench, Bars, Wts \$40 247-5848

REAL ESTATE FOR SALE
Land
NEW TO MARKET! 10 ACRES - VIEWS ONLY \$48,900! BEAUTIFUL HOMESITE ATOP HILL! READY TO BUILD! FARM POND, TOWN WATER, SUBDIVISABLE. FINANCING AVAILABLE. WALK-IN AVAILABLE. CALL/TEXT TODAY! (413) 582-5390

Realtors/Brokers
GODDINS REAL ESTATE www.goddinsrealty.com Northampton's #1 Realtor

REAL ESTATE FOR RENT
Apartments Unfurnished
Available Nov. 1, Sunderland, 2BR, 2-bath apt. Quiet neighborhood, no dogs, no smoking. Ref. required. \$550/mo. HEAT INCL. 413-555-5495 leave msg after 5pm.

EASTHAMPTON 2+ Bedroom, Newly remodeled. Walking distance to town. \$250+ 413-530-4722. Prices at apartments.com

MARSHES FALLS APARTMENTS Sunny, hardwood flrs, incl. heat, HW, units are pet-in. 1200 sq. ft., garage, stone. 413-587-8995
2BR and floor plan, no. w/low HW floors, pantry, central storage space \$200+ 413-987-9817
Private 1BR, incl. heat HW, incl. DW, EX. \$500 413-687-8995

Help Wanted
Newspaper Home Delivery
Stapog Distribution, Inc. is seeking Delivery Service Providers (DSPs) for newspaper home delivery routes. DSPs are independently contracted.
Routes are Mon-Sat, 2-3 hours daily, starting around 2-4AM.
\$350-\$500/bi-weekly.
Routes available in: Northampton/So. Deerfield, Southampton
No \$\$ collections.
Must be 18+ with a reliable means to provide delivery.
Call STAPOG DISTRIBUTION, INC. 413-687-4567

Flooring
A. DION & SON Floor Contractors installing, sanding, refinishing hardwood floors. (413) 684-6170

Home Improvement
AAREN'S HOME IMPROVEMENT Kitchens, baths, remodeling, decks, all home repairs. Lic. Ins. 1867-5584.
STRUCTURAL post & beam, all timber, sagging floors, termite damage, foundations, home repairs, born repairs (413) 667-3149

T. SOKOLOSKI HOME IMPROVEMENT Metal roofing, Free estimates, insured. 289-8260

Painting
A BETTER PRICE Bob's Painting. No job too small. 529-2260. Interior/Exterior
A. BRUSH ABOVE Al Tardy, Interior/Exterior. Free estimates. Vice/MC 588-4150

PAINTING & WALPAPERING Old walls restored. Ins. Jimmy Quinn. 413-330-1958

Seat Weaving
CUSTOM SEAT WEAVING Canvas, Bush, Road & Donnell Cord. 40 yrs. Exp. 268-7786

Wood Splitting
FIREWOOD Cut, split & delivered. Log length available. Stocking available. (413) 582-3389

REAL ESTATE FOR RENT
Apartments Unfurnished
Northampton, 77 Prospect St. 2BR, Hard/HW/Storage/maint. incl. Avail. now. \$375, price reduced! 252-7878 northamptonnyc.com

Northampton/So. Deerfield Beautiful 3-bedroom apartment available November 1st at 263 Pleasant Street in Northampton. Spacious, in-town, 2-bedroom apartment on 2nd floor above Northampton Coffee with refinished original hardwood floors, granite, full kitchen, off-street parking and on-site laundry facilities. (413) 427-7845 michaeljohnny@gmail.com or omerhusein@hotmail.com

Office Space
1100 sq. ft. offstreet parking, public & private entrances, flexible lease. 413-588-0320

Rental Agencies
Free Landlord Service www.RentInfo.com 582-0300

AUTOMOTIVE & BOATS
Auto Dealers
SUBARU & TOYOTA Dependable, long warranty, service. \$3,000 and up. Export Auto - 30 years in business. (413) 536-2373

Legals
TOWN OF HADLEY INVITATION FOR BIDS USED VEHICLE
The Town of Hadley seeks bids for the purchase of a used septic truck for the Sewer Division. Specifications are available from the Select Board's Office, 100 Middle Street, Hadley, MA 01035. Bids should be submitted to the Select Board's Office at the above address, in sealed envelopes marked "SEPTIC TRUCK" no later than 2:00 p.m. on Nov. 5, 2018.
October 15
20050

SEARCH ONLINE
market place. gazettenet.com

Legals
CITATION ON PETITION FOR FORMAL ADJUDICATION Commonwealth of Massachusetts The Trial Court Probate and Family Court Hampshire Probate and Family Court
33 King Street Northampton, MA 01060 (413) 586-8500
Docket No. FR18P0577EA
Estate of Irene Rita Courchesne Date of Death: 01/23/1988
To all interested persons:
A Petition for Formal Adjudication of Intestacy and Appointment of Personal Representative has been filed by Jacquelynne Williams of Springfield, MA requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.
The petitioner requests that: Jacquelynne Williams of Springfield, MA be appointed as Personal Representative of said estate to serve Without Surety on the bond in an unsupervised administration.
IMPORTANT NOTICE
You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceedings. To do so, you or your attorney must file a written appearance and objection at this Court before 10:00 a.m. on 11/07/2018.
This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you fail to file a timely written appearance and objection followed by an Affidavit of Objections within thirty (30) days of the return date, action may be taken without further notice to you.
U N S U P E R V I S E D ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)
A Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.
WITNESS, Hon. Linda S. Fidnick, First Justice of this Court, Date: October 3, 2018
Michael J. Carney, Register of Probate
October 15
20054

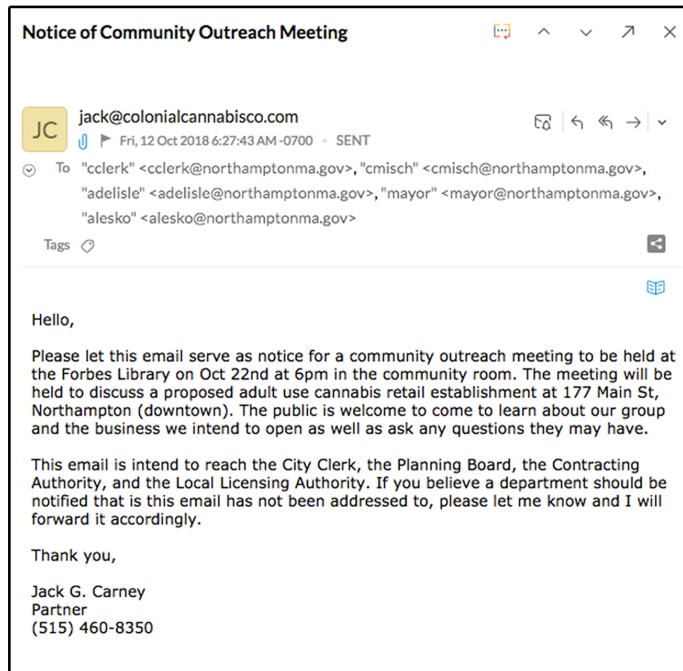
CITATION ON PETITION FOR FORMAL ADJUDICATION Commonwealth of Massachusetts The Trial Court Probate and Family Court Hampshire Probate and Family Court
33 King Street, Suite 3 Northampton, MA 01060 (413) 586-8500
Docket No. FR18P0577EA
Estate of Carol A. Rioux Date of Death: 05/09/2016
To all interested persons:
A Petition for Formal Probate of Will with Appointment of Personal Representative has been filed by Deborah A. Tapp of South Hadley, MA and Caroline Wojcik of Belchertown, MA requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.
The petitioner requests that: Deborah A. Tapp of South Hadley, MA and Caroline Wojcik of Belchertown, MA be appointed as Personal Representative(s) of said estate to serve Without Surety on the bond in an unsupervised administration.
IMPORTANT NOTICE
You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceedings. To do so, you or your attorney must file a written appearance and objection at this Court before 10:00 a.m. on 11/07/2018.
This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you fail to file a timely written appearance and objection followed by an Affidavit of Objections within thirty (30) days of the return date, action may be taken without further notice to you.
U N S U P E R V I S E D ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)
A Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.
WITNESS, Hon. Linda S. Fidnick, First Justice of this Court, Date: October 3, 2018
Michael J. Carney, Register of Probate
October 15
20058

COMMUNITY OUTREACH MEETING
There will be a community meeting held at 20 West St. Northampton, MA 01060 (Forbes Library) on October 22nd at 6pm in the community room. The topic of the meeting will be to discuss a proposed Adult-Use Cannabis Retail establishment to be located at 177 Main St, Northampton, MA 01060. This meeting is open to the public and anyone who is interested is encouraged to come so they may learn more and ask questions.
19979

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19979

PLEASE RECYCLE THIS NEWSPAPER.

Attachment B



Notice of Community Outreach Meeting

Please let this serve as notice for a community outreach meeting that will be held by Green Biz LLC at 6pm on Monday, October 22nd, at the Forbes Library located at 20 West St, Northampton, MA 01060. The purpose of this meeting will be to discuss a proposed cannabis retail establishment that will be located at 177 Main St, Northampton, MA.

During the course of this meeting the following topics will be discussed (but will not be limited to):

- **Explain the type of marijuana establishment (retail) and how it will operate – what to expect**
- **Site Security**
- **Plans to prevent underage use**
- **Plans to positively impact the community**
- **Provide information to show the establishment will not be a nuisance to the community.**
- **Take any questions the public may have**

The public is invited to attend the meeting to ask any questions they may have and receive more information on the topic.

Notice has been issued in MetroWest and has also been sent to abutters within 300ft of the establishment, residents, and city departments & authorities from a list acquired from the Assessor.

Thank you,

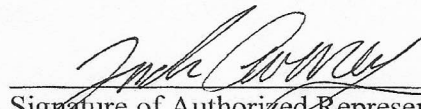
Management, Green Biz LLC

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).

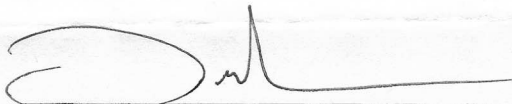
Applicant

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 11/08/18 (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 11/9/18 (insert date).


Signature of Contracting Authority or
Authorized Representative of Host Community

File # MP-2019-0030

APPLICANT/CONTACT PERSON GREEN BIZ LLC - JACK CARNEY
ADDRESS/PHONE 45 BARDWELL ST (515) 460-8350

PROPERTY LOCATION 177 MAIN ST
MAP 31D PARCEL 141 001 ZONE CB(100)

177 Main St
Zoning Permit

THIS SECTION FOR OFFICIAL USE ONLY:
PERMIT APPLICATION CHECKLIST

	ENCLOSED	REQUIRED	DATE
ZONING FORM FILLED OUT			
Fee Paid			
Building Permit Filled out			
Fee Paid			
Type of Construction: ZONING - ADULT USE MARIJUANA RETAIL LOCATION			
New Construction			
Non Structural interior renovations			
Addition to Existing			
Accessory Structure			
Building Plans Included:			
Owner/ Statement or License			
3 sets of Plans / Plot Plan			

THE FOLLOWING ACTION HAS BEEN TAKEN ON THIS APPLICATION BASED ON INFORMATION PRESENTED:

☒ Approved ☐ Additional permits required (see below)

PLANNING BOARD PERMIT REQUIRED UNDER : § _____

Intermediate Project : _____ Site Plan AND/OR _____ Special Permit with Site Plan
Major Project: _____ Site Plan AND/OR _____ Special Permit with Site Plan

ZONING BOARD PERMIT REQUIRED UNDER: § _____

Finding _____ Special Permit _____ Variance* _____

_____ Received & Recorded at Registry of Deeds Proof Enclosed _____


_____ Other Permits Required:

_____ Curb Cut from DPW _____ Water Availability _____ Sewer Availability

_____ Septic Approval Board of Health _____ Well Water Potability Board of Health

_____ Permit from Conservation Commission _____ Permit from CB Architecture Committee

_____ Permit from Elm Street Commission _____ Permit DPW Storm Water Management


Signature of Building Official

10/12/18
Date

Note: Issuance of a Zoning permit does not relieve a applicant's burden to comply with all zoning requirements and obtain all required permits from Board of Health, Conservation Commission, Department of public works and other applicable permit granting authorities.

* Variances are granted only to those applicants who meet the strict standards of MGL 40A. Contact the Office of Planning & Development for more information.



Attachment
"C"

Green Biz LLC

45 Bodwell St

Avon, MA 02322

To whom this may concern,

Green Biz LLC is applying for a license to operate an Adult Use Cannabis Retail Establishment at 177 Main St, Northampton, MA 01060. We will be holding an outreach meeting on Monday, October 22nd, to offer more information on our group, the business we intend to open, and answer any questions that attendees may have for us. The meeting will begin at 6pm in the Community Room of the Forbes Library located at 20 West St, Northampton, MA 01060.

Thank you,

Management

OBJECTID	Version	ACCOUNT_NC	MB	OWNER_NAME_1	OWNER_NAME_2	MAILING_ADDRESS_1	CITY	OR_CD	ZIP_CODE
1	2018-08-06	31B-271-001	31B-271			210 MAIN STREET	NORTHAMPTON	MA	01060
2	2018-08-06	31B-282-001	31B-282			210 MAIN STREET	NORTHAMPTON	MA	01060
3	2018-08-06	31B-284-001	31B-284			P O BOX 790	HOLYOKE	MA	01041
4	2018-08-06	31B-286-001	31B-286			129 MAIN ST	NORTHAMPTON	MA	01060
5	2018-08-06	31B-287-001	31B-287			40 CENTER ST	NORTHAMPTON	MA	01060
6	2018-08-06	31D-120-001	31D-120			PO BOX 714	NORTHAMPTON	MA	01060
7	2018-08-06	31D-120-002	31D-120			188 WARNER ST	FLORENCE	MA	01062
8	2018-08-06	31D-120-003	31D-120			188 WARNER ST	FLORENCE	MA	01062
9	2018-08-06	31D-120-004	31D-120			32 MASONIC ST #4	NORTHAMPTON	MA	01060
10	2018-08-06	31D-120-005	31D-120			105 HONEY POT RD	HADLEY	MA	01035
11	2018-08-06	31D-120-006	31D-120			32 MASONIC ST APT 6	NORTHAMPTON	MA	01060
12	2018-08-06	31D-120-007	31D-120			32 MASONIC ST UNIT 7	NORTHAMPTON	MA	01060
13	2018-08-06	31D-120-008	31D-120			32 MASONIC ST #4	NORTHAMPTON	MA	01060
14	2018-08-06	31D-120-009	31D-120			32 MASONIC ST UNIT A	NORTHAMPTON	MA	01060
15	2018-08-06	31D-120-010	31D-120			32 MASONIC ST UNIT B	NORTHAMPTON	MA	01060
16	2018-08-06	31D-120-011	31D-120			32 MASONIC ST UNIT C	NORTHAMPTON	MA	01060
17	2018-08-06	31D-120-012	31D-120			32 MASONIC ST UNIT D	NORTHAMPTON	MA	01060
18	2018-08-06	31D-120-013	31D-120			32 MASONIC ST UNIT E	NORTHAMPTON	MA	01060
19	2018-08-06	31D-121-001	31D-121			32 MASONIC ST	NORTHAMPTON	MA	01060
20	2018-08-06	31D-126-001	31D-126			46 CENTER ST	NORTHAMPTON	MA	01060
21	2018-08-06	31D-126-002	31D-126			46 CENTER ST	NORTHAMPTON	MA	01060
22	2018-08-06	31D-127-001	31D-127			PO BOX 2749	ADDISON	TX	75001
23	2018-08-06	31D-130-001	31D-130			59 NORTH ST	NORTHAMPTON	MA	01060
24	2018-08-06	31D-130-002	31D-130			7 HOBBIE RD	SOUTH DEERFIELD	MA	01373
25	2018-08-06	31D-130-003	31D-130			P O BOX 1396	NORTHAMPTON	MA	01061-1396
26	2018-08-06	31D-130-004	31D-130			59 NORTH ST	NORTHAMPTON	MA	01060
27	2018-08-06	31D-130-005	31D-130			59 NORTH ST	NORTHAMPTON	MA	01060
28	2018-08-06	31D-130-006	31D-130			59 NORTH ST	NORTHAMPTON	MA	01060
29	2018-08-06	31D-131-001	31D-131			ONE SHORT ST	NORTHAMPTON	MA	01060
30	2018-08-06	31D-132-001	31D-132			237 MAIN ST	NORTHAMPTON	MA	01060
31	2018-08-06	31D-134-001	31D-134			P O BOX 686	NORTHAMPTON	MA	01061
32	2018-08-06	31D-134-002	31D-134			33 BAYBERRY DR	EASTHAMPTON	MA	01027
33	2018-08-06	31D-134-003	31D-134			P O BOX 686	NORTHAMPTON	MA	01061
34	2018-08-06	31D-134-004	31D-134			33 BAYBERRY DR	EASTHAMPTON	MA	01027
35	2018-08-06	31D-134-005	31D-134			221-227 MAIN ST UNIT 3	NORTHAMPTON	MA	01060
36	2018-08-06	31D-134-006	31D-134			18 LAUREL ST	NORTHAMPTON	MA	01060
37	2018-08-06	31D-134-007	31D-134			221 MAIN ST #5	NORTHAMPTON	MA	01060
38	2018-08-06	31D-134-008	31D-134			33 HIGHLAND AVE	MONTAGUE	MA	01351
39	2018-08-06	31D-135-001	31D-135			ONE SHORT ST	NORTHAMPTON	MA	01060
40	2018-08-06	31D-136-001	31D-136			P O BOX 686	NORTHAMPTON	MA	01061
41	2018-08-06	31D-136-002	31D-136			P O BOX 686	NORTHAMPTON	MA	01061
42	2018-08-06	31D-136-003	31D-136			P O BOX 686	NORTHAMPTON	MA	01061

43	2018-08-06	31D-136-004	31D-136		P O BOX 686	NORTHAMPTON	MA	01061
44	2018-08-06	31D-136-005	31D-136		P O BOX 686	NORTHAMPTON	MA	01061
45	2018-08-06	31D-136-006	31D-136		P O BOX 686	NORTHAMPTON	MA	01061
46	2018-08-06	31D-136-007	31D-136		P O BOX 686	NORTHAMPTON	MA	01061
47	2018-08-06	31D-136-008	31D-136		P O BOX 686	NORTHAMPTON	MA	01061
48	2018-08-06	31D-137-001	31D-137		292 OLD WILSON RD	FLORENCE	MA	01062
49	2018-08-06	31D-138-001	31D-138		193 MAIN ST	NORTHAMPTON	MA	01060
50	2018-08-06	31D-139-001	31D-139		292 OLD WILSON RD	FLORENCE	MA	01062
51	2018-08-06	31D-139-002	31D-139		292 OLD WILSON RD	FLORENCE	MA	01062
52	2018-08-06	31D-140-001	31D-140		14 THOMAS CIR	SOUTHAMPTON	MA	01073
53	2018-08-06	31D-141-001	31D-141		181 MAIN ST	NORTHAMPTON	MA	01060-3124
54	2018-08-06	31D-142-001	31D-142		1441 MAIN ST	SPRINGFIELD	MA	01103
55	2018-08-06	31D-143-001	31D-143		1 AMBER LANE	NORTHAMPTON	MA	01060
56	2018-08-06	31D-144-001	31D-144		P O BOX 2581	AMHERST	MA	01004
57	2018-08-06	31D-144-002	31D-144		721 ROOSEVELT AVE	SPRINGFIELD	MA	01118
58	2018-08-06	31D-144-003	31D-144		311 LOCUST ST	FLORENCE	MA	01062
59	2018-08-06	31D-144-004	31D-144		P O BOX 2581	AMHERST	MA	01004
60	2018-08-06	31D-144-005	31D-144		721 ROOSEVELT AVE	SPRINGFIELD	MA	01118
61	2018-08-06	31D-144-006	31D-144		311 LOCUST ST	FLORENCE	MA	01062
62	2018-08-06	31D-144-007	31D-144		47 HARLOW AVE	NORTHAMPTON	MA	01060
63	2018-08-06	31D-144-008	31D-144		47 HARLOW AVE	NORTHAMPTON	MA	01060
64	2018-08-06	31D-144-009	31D-144		47 HARLOW AVE	NORTHAMPTON	MA	01060
65	2018-08-06	31D-144-010	31D-144		155 MAIN ST 3RD FLOOR	NORTHAMPTON	MA	01060
66	2018-08-06	31D-144-011	31D-144		155 MAIN ST #8	NORTHAMPTON	MA	01060
67	2018-08-06	31D-145-001	31D-145		63 STATE ST	NORTHAMPTON	MA	01060
68	2018-08-06	31D-146-001	31D-146		141 MAIN ST	NORTHAMPTON	MA	01060
69	2018-08-06	31D-146-002	31D-146		141 MAIN ST	NORTHAMPTON	MA	01060
70	2018-08-06	31D-146-003	31D-146		143 MAIN ST	NORTHAMPTON	MA	01060
71	2018-08-06	31D-147-001	31D-147		P O BOX 1212	NORTHAMPTON	MA	01061
72	2018-08-06	31D-147-002	31D-147		P O BOX 1347	NORTHAMPTON	MA	01061
73	2018-08-06	31D-148-001	31D-148		16 CENTER ST	NORTHAMPTON	MA	01060
74	2018-08-06	31D-149-001	31D-149		P O BOX 790	HOLYOKE	MA	01041
75	2018-08-06	31D-150-001	31D-150		P O BOX 797	NORTHAMPTON	MA	01061
76	2018-08-06	31D-151-001	31D-151		P O BOX 686	NORTHAMPTON	MA	01061-0686
77	2018-08-06	31D-156-001	31D-156		12 CRAFTS AVE UNIT 2	NORTHAMPTON	MA	01060
78	2018-08-06	31D-157-001	31D-157		P O BOX 686	NORTHAMPTON	MA	01061
79	2018-08-06	31D-158-001	31D-158		6 CRAFTS AVE	NORTHAMPTON	MA	01060
80	2018-08-06	31D-159-001	31D-159		561 FLATS HILL RD	AMHERST	MA	01002
81	2018-08-06	31D-160-001	31D-160		3 MASSASOIT AVE	NORTHAMPTON	MA	01060
82	2018-08-06	31D-161-001	31D-161		P O BOX 284	WHATELY	MA	01093
83	2018-08-06	31D-162-001	31D-162		859 WILLARD ST SUITE 501	QUINCY	MA	02169
84	2018-08-06	31D-163-001	31D-163		MAIN ST	NORTHAMPTON	MA	01060
85	2018-08-06	31D-164-001	31D-164		220 MAIN ST	NORTHAMPTON	MA	01060

86	2018-08-06	31D-165-001	31D-165		210 MAIN ST	NORTHAMPTON	MA	01060
87	2018-08-06	31D-239-001	31D-239		21 PLEASANT ST	NORTHAMPTON	MA	01060
88	2018-08-06	31D-241-001	31D-241		1441 MAIN ST	SPRINGFIELD	MA	01103
89	2018-08-06	31D-247-001	31D-247		MASONIC ST	NORTHAMPTON	MA	01060
90	2018-08-06	31D-250-003	31D-250		474 SPRING ST	LEEDS	MA	01053
91	2018-08-06	31D-250-004	31D-250		12 LAUREL LN	WILBRAHAM	MA	01095
92	2018-08-06	31D-250-005	31D-250		8 SYLVIA HEIGHTS	HADLEY	MA	01035
93	2018-08-06	31D-250-006	31D-250		8 SYLVIA HEIGHTS	HADLEY	MA	01035
94	2018-08-06	31D-250-007	31D-250		51 FISKE RD	WELLESLEY	MA	02482
95	2018-08-06	31D-250-008	31D-250		231 MAIN ST #3R	NORTHAMPTON	MA	01060
96	2018-08-06	31D-250-009	31D-250		231 MAIN ST #4L	NORTHAMPTON	MA	01060
97	2018-08-06	31D-250-010	31D-250		231 MAIN ST UNIT 4-R	NORTHAMPTON	MA	01060
98	2018-08-06	31D-261-001	31D-261		79 MASONIC ST	NORTHAMPTON	MA	01060
99	2018-08-06	32C-001-001	32C-001		P O BOX 686	NORTHAMPTON	MA	01061
100	2018-08-06	32C-003-001	32C-003		142 MAIN ST SUITE 1	NORTHAMPTON	MA	01060
101	2018-08-06	32C-004-001	32C-004		PO BOX 1091	TRURO	MA	02666
102	2018-08-06	32C-005-001	32C-005		132 MAIN ST	NORTHAMPTON	MA	01060
103	2018-08-06	32C-007-001	32C-007		132 MAIN ST	NORTHAMPTON	MA	01060

Local Zoning Compliance

On 10/12/18 our location at 177 Main St, Northampton, MA was approved for a Zoning Permit by the Building Official. We have worked closely with the Mayor's Office and Planning Department to ensure compliance with local zoning codes. This location is currently in compliance with all local codes and we will continue to work closely with city departments to ensure our location is in constant compliance with local code. This use is allowed in this zone without a special permit. We will not need to renew any permits at this location.

Attached is a copy of our Zoning Permit.



COLONIAL CANNABIS COMPANY

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

Plan for Positive Impact

Green Biz, LLC intends to positively impact its surrounding community in multiple ways. Our company will work with a non-profit family outreach program based in Amherst, MA to assist financially and through volunteer time to benefit the citizens of Amherst and improve overall quality of life. During our hiring process, our company will hold public workshops in Holyoke, MA for those who are looking to obtain employment in the cannabis industry.

Our Goals:

1. Provide support for the community of Amherst, an area of disproportionate impact, through the donation of assets (\$5000 annually) and personal time (100 hours of employee time annually).
2. Advertise employment opportunities to citizens of Holyoke, an area of disproportionate impact, through workshops held in public settings at least 3 times a year.

Programs:

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

1. Non-Profit

- a.) Our establishment intends to contribute an annual donation of \$5,000 to Family Outreach of Amherst. These funds will be allocated to families in need throughout the community per the organization’s discretion and are in addition to the programs involved in below.
- b.) We will provide a minimum of 100 hours of time each year to Not Bread Alone, which is a community meal program. Our plan is to send administrators and employees to help with meal prep, serving, and cleanup for the evening meal on Wednesday once a month.
- c.) The company will also be participating in Friends of Family Outreach, this particular program will put our company on a list to receive emails requesting resources on an as-needed basis. These email notices are specific to individual family cases and we can reach out with help depending on what we are able to offer the family/person that’s in need at the time.
- d.) To involve our staff at the store level, once a year we’d like to have our employees vote on a program of their choice to participate in. These programs could be winter coat drives, more work with Not Bread Alone, putting together back-to-school kits, etc. This will be up to the employees and put to a vote. Whatever program is decided on, the company will facilitate and measure. Based on the type of donation the goal will be to beat the prior years’ accomplishments.

2. Employment Opportunity

When hiring, workshops will be held that are open to residents of the city of Holyoke. The workshops will be advertised at least one week prior in a local paper and 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 scope of work that hired employees would perform. 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 want to give members of the community that do not have access to those resources an opportunity to apply for the job through our workshops. We intend to hold at least 3 of these workshops per year.

Monitoring Results/ Accountability

A file will be created to hold all of the gathered information listed below relating to the review of the multiple components of our Positive Impact Plan. The file will include a full review of each portion of the Positive Impact Plan and will be available upon request. The plan will be completed prior to our license being up for annual renewal.

1.) Non-Profit

- a.) The annual monetary donation will be made once a year, Family Outreach will follow up with the donation by sending a letter of acknowledgement that will be filed with the corresponding receipt of transfer whether this be a check stub, wire transfer confirmation, or money order.
- b.) Employee hours at Not Bread Alone will be paid but tracked separately for the purpose of accountability. To back up the hours spent working at the kitchen, we will provide an hour's log for our employees to fill out and have a leader at Not Bread alone sign-off or initial. These logs and payroll tracking will also be filed for review.
- c.) For participation in Friends of Family Outreach, when a resource request email is picked up on our end we will print or save the thread once we receive a confirmation that resources have been accepted. This email correspondence will be filed with a receipt of transaction. The transaction could be a confirmation of paying a utility bill or a receipt for winter boots, this all depends on the request that was responded to.
- d.) When setting up the employee vote the company will provide a sign-up sheet for employees to list their ideas of how to give back. Once the vote commences, the physical votes will be saved with the sign-up sheet. We will keep track of any hours, funds, or tangible items that are donated. After the vote each year the team will meet on ways to surpass what was given the prior year.

2.) Employment Workshops

Meeting notices will be saved, and a check-in sheet will be present at the meetings to obtain names and contact information, so we may follow up with attendees. Employees that are hired that applied through the workshop will have that information identified within their employee file. These employees will be interviewed prior to the end of the year to receive feedback on their experience relating to the employment workshop they

were hired through to determine how the event can be improved in the following year. These interviews will be kept in a file and will be available upon request of the Commission. A summary of our review will be kept on file and will be available upon request.

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.



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: 001319829

1. 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:

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

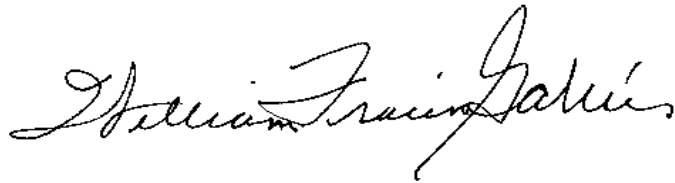
9. Additional matters:

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, flowing style with a large initial 'W' and 'G'.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



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 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

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.

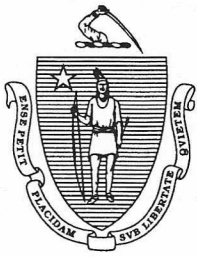
Member Roles:

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.



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

William Francis Galvin
Secretary of the
Commonwealth

January 3, 2020

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; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; 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



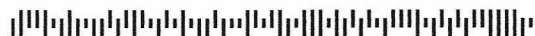
Commonwealth of Massachusetts
Department of Revenue
Kevin W. Brown, Acting Commissioner

mass.gov/dor

Letter ID: L0309532736
Notice Date: January 8, 2020
Case ID: 0-000-861-711



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) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



Business Plan

For:

Green Biz LLC

Adult-Use Cannabis Retail

October 2018

45 Bodwell St, Avon, MA 02322

(515) 460-8350

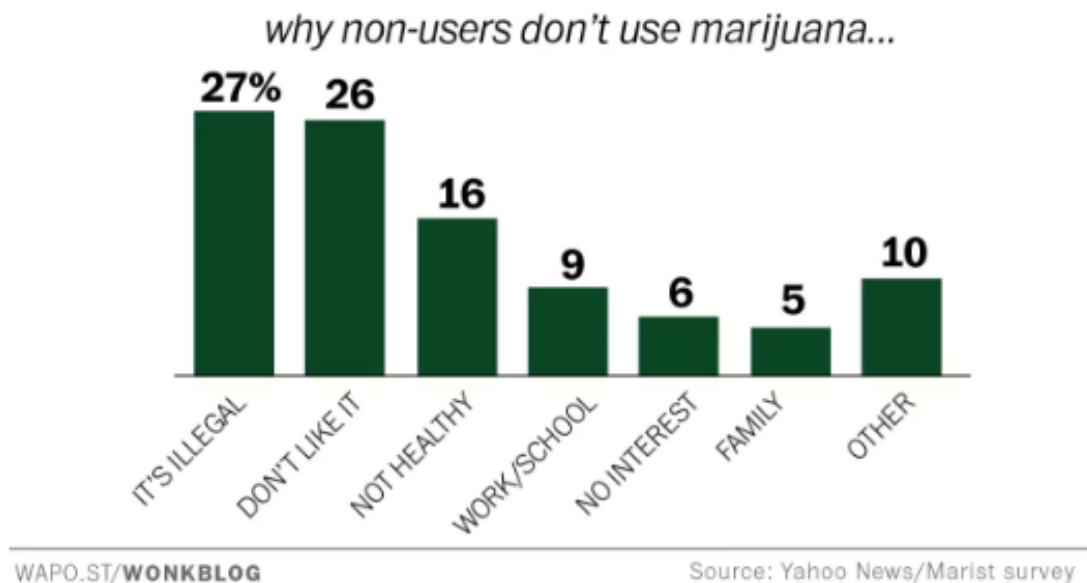
Opportunity

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.



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 177 Main St, Northampton, MA 01060. The location consists of roughly 2000 square feet of space, of which roughly 1200 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 with parking available in front of the building and to the rear of the building. The establishment is located in the popular downtown district of Northampton, so it sees a lot of foot traffic and is within 2-300ft of a heavily used bus stop.

Milestones & Metrics

Milestones Table

Milestone	Due Date	Details
Obtain provisional license	March 1, 2019	We intend to obtain a provisional license from the CCC by March of 2019. The application should be submitted by early November of 2018 allowing for 5 months to review.
Hiring Procedures Begin	Mid April, 2019	Once we have received a provisional, completed our buildout, and scheduled of inspection - we will begin interviewing potential employees.
Complete all local licensing	Mid March, 2019	By mid March of 2019 we intend to have a zoning permit, executed host agreement, and business license with the city of Northampton.
Complete interior buildout	Mid May, 2019	By early April of 2019, we intend to have our interior buildout completed and will then request inspection.
Open for business	Mid July, 2019	After passing inspection from the CCC we will begin preparations for opening and intend to open in this time frame.

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. We have implemented a 3-point ID check procedure that will be conducted on each patron that wishes to enter our establishment. Details about this procedure can be found in our Operating Procedures and Security Plans.

- 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
Revenue	\$1,065,000	\$1,600,000	\$2,100,000
Direct Costs	\$362,100	\$544,000	\$714,000
Gross Margin	\$702,900	\$1,056,000	\$1,386,000
Gross Margin %	66%	66%	66%
Operating Expenses			
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
Total Operating Expenses	\$288,288	\$433,985	\$554,141
Operating Income	\$414,612	\$622,015	\$831,859
Interest Incurred			
Depreciation and Amortization			
Income Taxes	\$0	\$0	\$0
Total Expenses	\$650,388	\$977,985	\$1,268,141
Net Profit	\$414,612	\$622,015	\$831,859
Net Profit / Sales	39%	39%	40%

Business Plan Clarification

The business plan we submitted had a title referring to “Colonial Cannabis Company”. This was a mistake and we have updated it and resubmitted accordingly. Colonial Cannabis Company is a registered DBA we have in Pittsfield, MA for Green Biz LLC. The location we have at 1021 South St, Pittsfield, MA is maintained by Green Biz LLC and has obtained a provisional license from the commission and it is our intention to open that storefront as “Colonial Cannabis Company”. We are not certain as to if we will also use the DBA “Colonial Cannabis Company” in Northampton for this location at 177 Main St. When we come to a decision we will file for the DBA with the City of Northampton – until then, the only registered business name for this location is Green Biz LLC.

Liability Insurance

Once we have a provisional license we will transition the current insurance we have on our space at 177 Main St, Northampton, MA. We are currently working with Cannasure Insurance on our other marijuana related properties. We will obtain a general liability policy with coverage of up to \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually. Each policy will have a deductible of no more than \$5000.

Quality Control & Testing Procedures

Testing

NO product will be available for sale at our location that does not arrive at our facility with a testing result label on its packaging from an authorized and licensed Massachusetts lab. 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, held, and stored in a specific trash receptacle used only for toxic items in our designated trash area.
- There is one bathroom on site that maintains proper plumbing and access to water and they will be cleaned regularly to maintain sanitation

- The cleaning supplies for the bathroom will be stored in the bathroom and outside of it in the basement storage area where no cannabis product is to be kept or brought.
- The marijuana establishment will have a controlled environment relating to the temperature and humidity 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.
- * We don't intend to sell refrigerated products at the onset of sales. However, our plan will be to place a refrigerator behind the display cases on the show floor and then also place a refrigerator in the back office inventory cage. Both refrigerators will be able to be locked.
 - All refrigerated products will be kept according to the instruction of the manufacturer. If a product is not kept according to this instruction, it will be stored with other products that are unsellable and destroyed and disposed of.

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 iPads camera to confirm its authenticity. The agent will then use a black-light flashlight/lamp to check for other authenticity markers. The final check will be to check that the birthdate confirms the individual is 21 or older. 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 ID's 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. Once an agent is available, the agent will answer any questions the patron may have and will guide them 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, our floor manager will escort them to the exit. There will be at least 4 agents managing the entry and customer access area at all times. 2 agents to assist customers in selecting product, 1 floor manager to manage the flow and escort customers out after their transaction, and 1 agent at the front ID checkpoint.

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 scheduled visits. If the individual does not have an appointment, the manager may come to the front to schedule one with 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 iPads camera to confirm its authenticity. The agent will then use a black-light flashlight/lamp to check for other authenticity markers. The final check will be to check that the birthdate

confirms the individual is 21 or older. Once the ID is confirmed to be authentic and they are of the legal age, they will be asked to sign in on a visitor log sheet. They will print their name, sign, record check-in time, reason for visiting, company info (if applicable), date, and list the number of their visitor badge that is given to them. The agent will present them with a visitor badge and inform the visitor that it must be worn at all times during his visit. The visitor will then wait at the ID checkpoint until one of our *marijuana establishment agents* is available to escort them through the *limited-access area*. 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 the fake ID's 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. The agent will then use a black-light flashlight/lamp to check for other authenticity markers. The final check will be to check that the birthdate confirms the individual is 21 or older. 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 card is confirmed to be authentic and confirmed to belong to the visiting driver, they will be asked to sign in on a visitor log sheet. They will print their name, sign, record check-in time, reason for visiting, company info (if applicable), date, and list the number of their visitor badge that is given to them. The agent will present them with a visitor badge and inform the visitor that it must be worn at all times during his visit. The visitor will then wait at the ID checkpoint until one of our *marijuana establishment agents* is available to escort them through the *limited-access area* where we will check-in the delivery with the previously printed manifest. The visitor's ID badge will be required for the duration of their visit and must be clearly visible at all times. 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 ID's 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.

Limited Access Area: 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.

Loitering Prevention: Our ID checkpoint will be occupied by one of our marijuana agents at all times during our operating hours. Along with the software and devices used for ID analysis the agent will have a monitor that shows them a view of the outside cameras. The agent will be instructed and trained to inform one of our other marijuana agents, a manager, if they suspect any suspicious, illegal, or inappropriate activity going on around our premises. In this event, our marijuana agent (manager) will be trained and instructed 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 follow the following procedures to store, secure, and manage our cannabis related waste.

- In the back office area (limited-access area) we will have a designated trash area with a trash bin that is padlocked shut at all times and secured to the wall as well as a recycling bin and toxic waste bin both secured in the same manner with a chain and padlock, a table for sorting/destroying product, and a sink.
- Whenever we have product that needs to be disposed of that is cannabis related, we will bring the product to the trash area. The product will be weighed and the weight will be recorded. This will also take place while being video recorded with two agents present.
- 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 then placed into the trash bin. Concentrates will be mixed with the Seventh Generation Chlorine Free Bleach and then disposed of. Edibles will be ground up and sprayed with Seventh Generation Chlorine Free Bleach and then disposed of. Cartridges will be opened and sprayed with Seventh Generation Chlorine Free Bleach and then disposed of. Liquids will be poured down the drain in the trash area and then the container will be dipped in Seventh Generation Chlorine Free Bleach and disposed of.
- The report will be filed away 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 to neutralize any remaining cannabis material and then placed in a recycling bin/trash bin.
- When the trash bin is ready to be emptied, one of our marijuana agents will take the trash bin with cannabis material to a solid waste facility to be disposed of. Each disposal trip of trash containing cannabis material will be recorded and stored along with cannabis waste disposal reports.

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 that is accessible through the basement. This rear exit of the establishment leads into a maintenance room that then has an exit out of the building. This maintenance room will not be apart of our establishment as it is the maintenance room for the entire building and the maintenance crew will need access for reasons not relating to our establishment. The door separating our establishment from the maintenance room will be locked at all times and will only be used in the event of an emergency. Staff will not enter through this door as they will not have a key to the door that leads into the maintenance room from the outside. The maintenance crew will not have a key for the door that separates our establishment from the maintenance room. The ownership will have a key, but they will not have knowledge of our security codes, so if they enter without our knowledge the alarm will sound and the authorities, as well as our administration, will be immediately notified. Each door will be equipped with a security alarm that will trigger the alarm if opened/tampered with while the system is armed. The system will always be armed for the door that separates our establishment and the maintenance room and an alarm will sound if it is ever opened. The front and rear doors will have a qualified lock that only our administrators have a key to.

Secured Inventory Storage & Procedure: Our inventory will be strategically organized in our back office that is a limited-access area. The inventory will be caged so that it can be locked and only accessed by our administrator on duty that has a copy of the key. The cage will be locked at all times and will only be unlocked to store new incoming product, store product that is being removed from the show floor, or to collect product for the show floor.

Inventory on the show-floor will have the ability to be quickly locked away. The display cases can be locked and a cage can be brought down from the ceiling to lock and secure all product on the shelving. This is for emergency situations; the product will not be stored outside of business hours in this manner.

At the end of the night, all inventories will be taken off the show floor and placed in the back office storage cage and locked away. This also offers the ability to do an inventory check each night. A manifest from the POS will be printed off and as

product is moved from the show floor to the back office storage cage, it will be accounted for and compared with the manifest from the POS.

At opening, product will be brought from the back office inventory cage and placed on the show floor in either the display cases or on the shelves. Only a few products will be brought out to display, the mass majority of the product will remain in the back office cage until it is needed.

Theft/Robbery: In the event of a theft or robbery, the staff will be trained/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 theft/robbery, the manager on staff is trained/required to alert local authorities and the Marijuana Establishment administrator(s). An investigation into the event will take place and the CCC will be notified.

We will implement a switch both by the register and at the front entrance checkpoint that will be able to alert local authorities of an emergency situation at the establishment. Employees will be trained to trigger this switch in emergency situations where they are unable to call for help due to the situation. 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, an administrator will monitor the registers and regularly balance them back to \$200, create a report on a bank envelope, place the excess cash in the envelope, and deposit the envelope in the drop safe. The drop safe will be emptied at the end of the day by the administrator and moved to the main safe.

Secured Locks: At no time shall any equipment, like a safe, file cabinet, or security room door, shall be left unlocked and unattended. All locks may only be left unlocked while the administrator 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 a noticed issue with the capability of a lock, it must be replaced immediately.

*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 administrator's person unless it is placed in a secure location that only the administrator has access to 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 administrators. Disciplinary actions will occur in the event of shared security codes.

Internal Theft/Transaction Record Errors: In the event of a nightly audit resulting in funds found missing to cover the amount of product that was sold during that day and/or inventory discovered missing – an investigation will be initiated by administrators utilizing the stores camera systems to determine where the error or theft occurred. The CCC will be notified.

Theft/Diversion During Business Hours: In instances of theft/diversion during store hours, the store will be temporarily closed while the following occurs. In the event of emergency relating to diversion or theft all product will be moved to the back office area (limited-access area) into a locked cage where it can be secured by an administrator for further review. 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 was lost. A report will be filed with the CCC and a copy will be sent to local law enforcement.

Actions During Live Theft/Robbery: In the event of a robbery or instance where authorities are required but unable to be notified due to circumstances, there will be distress buttons near each register and front entry checkpoint that will notify local law enforcement when pressed. We will work with local law enforcement to ensure that this button is proper working order by checking its functionality regularly.

Opening Procedure: The alarm system will be disarmed by a code entered by the administrator opening the facility. All employees will use the POS system registers to clock-in. ID badges will be worn at all times by our marijuana agents. Agents will then bring product from the back office storage cage out to be displayed in the display cases and on the shelving in the show room.

Closing Procedure: All products will be locked in the back office storage cage. Product on the show floor will be transferred to the back storage cage each night before closing and at this time a manifest from the POS relating to the inventory will be printed out so a physical count of the product can be compared with the POS inventory manifest. Once all product is locked and secured, only the emergency lighting on the interior of the premises will be left on. The security system will be armed and all points on entry will be securely locked. 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 will be posted on the premises 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 is not manageable by an on site extinguisher. If manageable by an on site extinguisher, an employee will be able to attempt to extinguish the fire. No matter, 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 regards to weather emergencies. 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 so 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.

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 a locked cage where it can be secured by an administrator for further review. 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 was lost.

In the event of a robbery or instance where authorities are required but unable to be notified due to circumstances, there will be distress buttons near each register and front entry point that will notify local law enforcement when pressed. We will work with local law enforcement to ensure that this button is proper working order by checking its functionality regularly.

*Unnecessary use of the distress button will result in suspension, internal investigation, and potential dismissal.

Customer Service Policy:

It is our overall goal 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 administrations 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, Managing Member

Cell: (515) 460-8350

Email: jack@colonialcannabisco.com

Storage of Marijuana

Storage Areas:

At all times, our cannabis products will be stored in one of the following 3 areas in our establishment. All areas are within a controlled environment where the temperature and humidity levels are being kept at specific levels.

1. Back office storage cage – this is a locked cage where the bulk of our inventory will be held.
 - a. Inside of the cage will be several racks with labeled bins on the rack. Product will be organized in these bins. These are open bins, not closed and sealed. Packaged product will be placed in them.
 - b. Inside the cage will be a separate cabinet, equipped with a lock that has a separate key from the cage itself. Damaged product, compromised product, outdated product, or in any way unsellable according to 935 CMR, will be placed in this cabinet to be destroyed according to our waste and disposal procedures.
2. Display Cases – The showroom will be designed with a perimeter of display cases separating the customer from our marijuana agents. Product will be removed from the display case on a nightly basis to be secured in the back office storage cage. The display cases will be able to be locked in the event that product needs to be secured as quickly as possible.
3. Shelving – Behind the marijuana agents on the show-floor will be shelving units with small bins to hold product. Product will be removed from the shelves on a nightly basis to be secured in the back office storage cage. However, the shelves will have a cage that can drop down from the ceiling to

secure the product in an event where the product needs to be secured as quickly as possible.

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

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

When product is being received and checked prior to stocking, this process will be recorded and records will be kept detailing the reception of the product and then signed by the marijuana agent that was in receipt and conducted the review.

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

Product Variation

We intend to carry the following types of cannabis products. We foresee that some product types may not be made available at the onset of our store opening its doors. But, we predict that we will be able to acquire and offer these product types eventually.

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 manufacture licensee that we acquire the product form.

Record Keeping

All physical documents will be kept in a secured and locked file cabinet in the back office. Only administrators will have access to this file cabinet.

Filing Procedure: Documents relating to Waste Disposal, Inventory (delivery manifests, confirmation of delivery receipt reports, audits, and destruction/disposal reports), completed login sheets (kept at the front entry point), nightly sales reports, deposit reports relating to cash pick-ups, deposit reports relating to any other kind of cash deposits, and any other documentation relating to operations on the premises shall be submitted to a file box by agents and then filed away in the secure and locked file cabinet in the back office by administrators. Real time inventory will be accessible through our POS system and our printed nightly inventory audits.

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

Digital Real Time Inventory: Inventory numbers will be reflected in real-time by our POS system and manifests will be printed each night during closing procedures to audit the inventory as it is moved to the back storage cage.

Hard Drive Storage: Hard drives from computers located on the premises will be stored in a secured and locked safe in the back office. The hard drive will be removed from the computer by an administrator and transferred to the secured safe. Hard drives will be available upon request on site.

Closing Procedure/Nightly Audit: At the end of each day, all the product that is in the display cases or the shelves on the show floor will be removed and organized in the back office storage cage. During this time an inventory audit will be performed to check that all inventory is accounted for and matches the inventory count of the POS system. A manifest will be printed from the POS and the agent(s) performing the closing audit will make a manual count of each product and compare it with the manifest. This report will include but not be limited to the date, a summary of the audits findings, and the names, signatures, and titles, of the agents present during the audit. The report will be filed away in the secure file cabinet.

In the event that inventory is lost, an internal review will immediately be initiated. POS data, security footage, prior inventory audits from nights past, and the physical product on hand will all be reviewed to determine where or how the product was lost. A report will be created and local law enforcement will be informed. A report will be sent to the CCC as well.

Weekly Audits: At the end of each week, we will perform an inventory audit on the entirety of the product we have on hand at that time. A manifest will be printed out showing exactly what our POS tell us is currently in stock. Our marijuana agents will then manually account for each product to compare their findings with the POS manifest.

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 audits 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 detail:

All physical and digital records will be 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 Procedures: Our operating procedure packet will be made available both on the show floor in the limited-access area and in the back office. Both will be placed in an easy to access area and all agents will be informed of their location so that 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 will also have 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 will be 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 will each have a file made in their name. Within their file the following articles will be stored/found:

- The full name, date of birth, and address of the employee

- All aliases previously or currently used, including maiden name if applicable
- Attestation that the individual will not engage in the diversion of marijuana products
- Written acknowledgement by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth
- All background information descriptions that are required under 935 CMR 500.030(2)(f)
- Proof of payment of the application fee by the marijuana establishment
- Any further information that may have been requested by the Commission
- Documented verification of provided references
- Job description including duties, authorities, responsibilities, and qualifications
- Documentation of all conducted training relating to the employee including training regarding privacy and confidentiality requirements and a signed statement from the individual stating the time, date and place he/she received the documented training, the topics discussed, and the name and title of the presenters
- Documentation of performance evaluations
- Record of any disciplinary actions or instances where the employee was subject of a review for any reason
- Notice of completed vendor training
- Any background check reports relating to the employee

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 will be a business document section for all of the establishments personal documents relating to its license and any state or local permits. The following documents will be found in this section of the file cabinet.
 - Assets & Liabilities (recent balance sheet from CPA)
 - Monetary Transactions (sales records)
 - Books of accounts (invoices, proof of payments received, open accounts, balance of accounts, notes, and receipts of all payments)
 - Further sales records relating to orders and cost of inventory and payment.
 - Information on financial arrangements with all employees and members of the establishment, their compensation, and the form in which they are compensated.
 - Bank records & records of deposits and detail on how each deposit was made.

Waste Disposal Records: In the secured and locked file cabinet, there will be a file for each year's waste disposal records categorized by month. 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 will also be a record of when the waste was disposed of and a signature of the agent who conducted the disposal.

Waste Disposal

As a retail establishment, the majority of our waste will not be cannabis related. However, we will follow the following procedures to store, secure, and manage our cannabis related waste. Please reference the diagrams at the bottom of this document for the location of the waste disposal area in the premises.

- In the back office area (limited-access area) we will have a designated trash area with a trash bin that is padlocked shut at all times and secured to the wall as well as a recycling bin and toxic waste bin both secured in the same manner with a chain and padlock, a table for sorting/destroying product, and a sink.
- Whenever we have product that needs to be disposed of that is cannabis related, we will bring the product to the trash area. The product will be weighed and the weight will be recorded. This will also take place while being video recorded with two agents present.
- 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 then placed into the trash bin. Concentrates will be mixed with the Seventh Generation Chlorine Free Bleach and then disposed of. Edibles will be ground up and sprayed with Seventh Generation Chlorine Free Bleach and then disposed of. Cartridges will be opened and sprayed with Seventh Generation Chlorine Free Bleach and then disposed of. Liquids will be poured down the drain in the trash area and then the container will be dipped in Seventh Generation Chlorine Free Bleach and disposed of.
- The report will be filed away 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 to neutralize any remaining cannabis material and then placed in a recycling bin/trash bin.
- When the trash bin is ready to be emptied, one of our marijuana agents will take the trash bin with cannabis material to a solid waste facility to be disposed of. Each disposal trip of trash containing

cannabis material will be recorded and stored along with cannabis waste disposal reports.

Quality Control

Upon reception of a delivery of product, our marijuana agent will compare the delivered product with the manifest received from the marijuana establishment the product came from. The product will be 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 will also inspect the packaging of each product to ensure it is adhering to the label requirements and testing requirements in 935 CMR 500.160. 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 nightly and weekly inventory audit, our marijuana agents will be paying attention to the dates on each package to make sure that the product is not out of date. If the product is out of date, it will be 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 will be 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.

Testing

NO product will be available for sale at our location that does not arrive at our facility with 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, held, 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 they will be cleaned regularly to maintain sanitation
- The marijuana establishment will have a controlled environment relating to the temperature and humidity 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

Staffing Plan & Records

At all times our facility will have a minimum of seven marijuana agents on duty.

- One agent to secure the entry checkpoint and verify I.D.s
- Two agents to work the show floor and help customers through their transaction
- One agent for each of the registers – two total.
- One show floor manager to manage the flow on the show floor
- One manager/administrator 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 both during the day and at night. But, at all times, the establishment will have 4 agents on duty.

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). The file will contain, at the least:

- The full name, date of birth, and address of the employee
- All aliases previously or currently used, including maiden name if applicable
- Attestation that the individual will not engage in the diversion of marijuana products
- Written acknowledgement by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth
- All background information descriptions that are required under 935 CMR 500.030(2)(f)
- Proof of payment of the application fee by the marijuana establishment
- Any further information that may have been requested by the Commission
- Documented verification of provided references
- Job description including duties, authorities, responsibilities, and qualifications
- Documentation of all conducted training relating to the employee including training regarding privacy and confidentiality requirements and a signed statement from the individual stating the time, date and place he/she received the documented training, the topics discussed, and the name and title of the presenters
- Documentation of performance evaluations
- Record of any disciplinary actions or instances where the employee was subject of a review for any reason
- Notice of completed vendor training
- Any background check reports relating to the employee

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 counterfeit, our agents will be instructed to maintain the ID and ask the patron to

leave. If the patron refuses to leave and request 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 ID's 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 occurrence.

Actions resulting in immediate dismissal of marijuana agents:

- Failure to check or properly verify an I.D. 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 I.D. while on duty at the establishment.
- Failure to check-in and wear guest badge while visiting 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)
- 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 the foreign jurisdiction, or a military, territorial, or Native American tribal authority.

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 will be stored in a secure and locked file cabinet that only administrators have access too.

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 administrator to be immediately placed in the secure file cabinet.

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 contact information for one of the board members via a business card that will be available next to the register. Patrons may request a list of board members and executives for the establishment using the contact information provided on the business card. The board member understands the regulations and will provide them with the information they are entitled to relating to regulations set forth in 935 CMR 500 but reserves the right to disclose other information at their own will.

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 an agent authorized to handle cash will "cash out" the till. 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 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 agent will write the cash total on the outside of the bank note along with the registers I.D., 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 drop safe.

Transfer from Drop Safe to Primary Safe: At the end of the day, our administrator in charge of closing duties will remove the bank envelopes from the drop safe and transfer it to the main safe. The total from the bank envelopes will be added together and should total up to equal the total sales number printed from the POS system at the end of the day. If there is a difference, the administrator will be able to organize the bank envelopes from each till and compare the deposits to the receipts printed from the specific register the deposit came from. The administrator will then be able to identify the register the accounting error occurred at and investigate into the loss further. In the event the loss cannot be rectified, the administrator will

create a report and the instance will be investigated to determine where the cash has gone. By using our cameras and comparing the footage to the drops, the receipts from the POS, and the total cash received, the exact amount will be determined and the missing cash should be found. If it is believed to have been stolen, the cameras will be reviewed and the agents that interacted with the till during the day of the loss will be interviewed. If an agent is found to have misplaced cash, they may be reprimanded or demoted. Misplacing of cash could also lead to their termination. If the cash is found to have been stolen, the agent will be terminated and local law enforcement will be informed. The CCC will also be informed.

Safe storage: The safe will have a running *safe storage log* that the administrator 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 administrator 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.

**Safe storage audit: Once a month, we will audit the safe storage log by running through security footage and comparing the entries to the safe with the total contents log to ensure that each entry into the safe was properly logged. In the event that an entry is unlogged, the administrator will be suspended without pay while a further investigation is conducted relating to an audit of the safe and any missing funds. If no funds are found to be missing, the administrator will be dealt with internally and may be demoted from their administrator status. The failure of the administrator to log their entry could also lead to their termination if it is determined to be necessary.*

Deposit Method & Frequency: All of our deposits will be made via Dunbar Armored and delivered to a local Citizen’s Bank branch. We will schedule pick-ups at random times but never more than 3 days apart. If the safe reaches \$20,000, an immediate pick-up will be scheduled within the same day or immediately the next morning.

Preventing Diversion to Minors

The following protocols will be implemented to prevent the diversion of cannabis products to those under the age of 21.

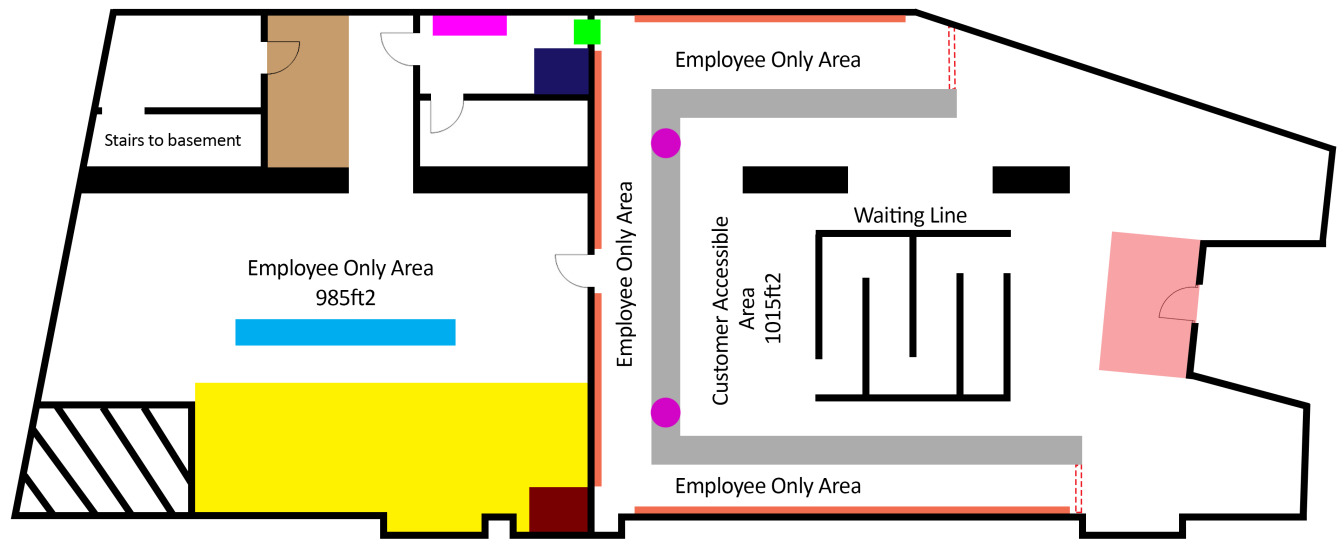
- Clear signage at the immediate point of entry indicating that all who enter must be 21 or older and must present a valid form of ID.
- Secondary ID check at the point of transaction to ensure the patron is 21 or older.
- Perimeter cameras showing all vantage points outside of our facility that will be monitored at all times during operational hours by our marijuana agent at the front entry checkpoint. He/she 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.











- Signs street side stating that the area is under 24-hour surveillance.
- Signs street side stating that the transfer of cannabis to anyone under the age of 21 is a felony offense.
- 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 the diversion to minors is a focus of our daily activities. Our agents will be instructed to always be looking for signs where the diversion to minors may be taking place.
- In the event that one of our agents is made aware of a situation where the diversion of minors is occurring, they will be mandated to share this information with administration. In the event that one of our agents is found to of had knowledge of the diversion 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. All interior lighting will be LED lights.
2. Lights situated near our front windows will be dimmed during the day if the natural light is sufficient. They will be turned up if natural light is not sufficient.
3. Lighting will remain on at all times to allow for ample light on our security footage. However, outside of operational hours, the lights will be dimmed to conserve energy – but not dimmed so much so that the camera footage is not clearly identifiable.
4. We are exploring options to implement solar panels on our roof, but it is not something that is addressed in our property lease, so, we are working with our landlord and neighboring tenants to explore how this could be achieved.
5. We are currently pursuing energy efficiency in our retail operation by leveraging the Mass Save incentive programs and working with local distributors to see the options we have in the Northampton area.



Key

	<i>Inventory Check</i>		<i>File Cabinet</i>		<i>Drop-Safe</i>		<i>Inventory Shelving</i>		<i>ID Checkpoint</i>
	<i>Inventory Storage Cage</i>		<i>Safe</i>		<i>Waste Disposal Area</i>		<i>Unsellable Product</i>		<i>Registers</i>

Employee Guide

This guide serves as a master document relating to all operating and personnel procedures at our establishment. All employees will be given their own copy upon hiring and will be required to read, learn, and understand all the policies and procedures laid forth.

1. Security

Visitor Check-in/Identification 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 iPads camera to confirm its authenticity. The agent will then use a black-light flashlight/lamp to check for other authenticity markers. The final check will be to check that the birthdate confirms the individual is 21 or older. 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 ID's 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. Once an agent is available, the agent will answer any questions the patron may have and will guide them 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, our floor manager will escort them to the exit. There will be at least 4 agents managing the entry and customer access area at all times. 2 agents to assist customers in selecting product, 1 floor manager to manage the flow and escort customers out after their transaction, and 1 agent at the front ID checkpoint.

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 an agenda of all scheduled visits. If the individual does not have an appointment, the manager may come to the front to schedule one with 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 iPads camera to confirm its authenticity. The agent will then use a black-light flashlight/lamp to check for other authenticity markers. The final check will be to check that the birthdate confirms the individual is 21 or older. Once the ID is confirmed to be authentic and they are of the legal age, they will be asked to sign in on a visitor log sheet. They will print their name, sign, record check-in time, reason for visiting, company info (if applicable), date, and list the number of their visitor badge that is given to them. The agent will present them with a visitor badge and inform the visitor that it must be worn at all times during his visit. The visitor will then wait at the ID checkpoint until one of our *marijuana establishment agents* is available to escort them through the *limited-access area*. 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 the fake ID's 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 iPads camera to confirm its authenticity. The agent will then use a black-light flashlight/lamp to check for other authenticity markers. The final check will be to check that the birthdate confirms the individual is 21 or older. 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 card is confirmed to be authentic and confirmed to belong to the visiting driver, they will be asked to sign in on a visitor log sheet. They will print their name, sign, record check-in time, reason for visiting, company info (if applicable), date, and list the number of their visitor badge that is given to them. The agent will present them with a visitor badge and inform the visitor that it must be worn at all times during his visit. The visitor will then wait at the ID checkpoint until one of our *marijuana establishment agents* is available to escort them through the *limited-access area* where we will check-in the delivery with the previously printed manifest. The visitor's ID badge will be required for the duration of their visit and must be clearly visible at all times. 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 ID's 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.

Loitering Protocol

Our ID checkpoint will be occupied by one of our marijuana agents at all times during our operating hours. Along with the software and devices used for ID analysis the agent will have a monitor that shows them a view of the outside cameras. The agent will be instructed and trained to inform one of our other marijuana agents if they suspect any suspicious, illegal, or inappropriate activity going on around our premises. In this event, our marijuana agent (likely a manager) will be trained and instructed to inspect the situation and ask these individuals to exit the premises. If the individuals refuse, they will be informed that the authorities will be called and our marijuana agent will contact local authorities.

We will also have signs on the exterior of our premises stating that the premises is under video surveillance 24/7, that no smoking is allowed, and that loitering is prohibited. We believe this will also help to deter loitering issues.

In the event that we have multiple issues with loitering, we will hire another marijuana agent to patrol the exterior of our premises similar to how many bank branches secure their properties lots.

Waste Disposal

As a retail establishment, the majority of our waste will not be cannabis related. However, we will follow the following procedures to store, secure, and manage our cannabis related waste.

- In the back office area (limited-access area) we will have a designated trash area with a trash bin that is padlocked shut at all times and secured to the wall as well as a recycling bin and toxic waste bin both secured in the same manner with a chain and padlock, a table for sorting/destroying product, and a sink.
- Whenever we have product that needs to be disposed of that is cannabis related, we will bring the product to the trash area. The product will be weighed and the weight will be recorded. This will also take place while being video recorded with two agents present.

- 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 then placed into the trash bin. Concentrates will be mixed with the Seventh Generation Chlorine Free Bleach and then disposed of. Edibles will be ground up and sprayed with Seventh Generation Chlorine Free Bleach and then disposed of. Cartridges will be opened and sprayed with Seventh Generation Chlorine Free Bleach and then disposed of. Liquids will be poured down the drain in the trash area and then the container will be dipped in Seventh Generation Chlorine Free Bleach and disposed of.
- The report will be filed away 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 to neutralize any remaining cannabis material and then placed in a recycling bin/trash bin.
- When the trash bin is ready to be emptied, one of our marijuana agents will take the trash bin with cannabis material to a solid waste facility to be disposed of. Each disposal trip of trash containing cannabis material will be recorded and stored along with cannabis waste disposal reports.

Secure Entrances

We will have 1 entrance and exit on the premises – one entry/exit at the front of the establishment and a rear exit, which will be used only in the case of an emergency, that is accessible through the basement. Each door will be equipped with a security alarm that will trigger the alarm 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. The rear door will only be accessible by the administrator and will be locked from the outside at all times – even during operating hours. The rear door will only be used in an emergency and an alarm will sound if it is ever opened.

Each door will be monitored by 2 security cameras. The cameras will record the on-goings of any attempted entries or exits.

Each door will have a sign stating “Only 21+ Allowed – ID required”

* All doors and windows will be secured with an alarm system.

Limited-Access Areas

Outside of our customer accessible area, which will also be known as the “show floor”, will be *limited-access areas*. Individuals will only be permitted to enter these areas if they are one of our marijuana agents wearing their registration badge, a visitor being escorted by one of our agents while wearing a visitor badge, or a delivery marijuana agent being escorted by one of our agents while wearing a visitor badge.

At all times, only our scheduled marijuana agents will be on site and able to access the limited-access areas. If an employee is not scheduled for a specific time and they wish to enter the limited-access area during that time, they will be required to sign in following our visiting patron procedure. To reiterate, only employees that are clocking in or already are clocked in are allowed to be in the limited access area – employees visiting outside of their schedule work time will be required to follow visitor procedures.

Employees can pick-up their employee badges at the ID checkpoint when they arrive for their shift and leave them there when they leave each day/night.

These areas will be clearly identified by a rope and sign stating that this is a limited access area and that only those with valid identification badges are able to pass through. It will also mention that all visiting agents must be accompanied by one of our marijuana agents.

Securing Inventory

Our inventory will be strategically organized in our back office that is a limited-access area. The inventory will be caged so that it can be locked and only accessed by our administrator on duty that has a copy of the key. The cage will be locked at all times and will only be unlocked to store new incoming product, store product that is being removed from the show floor, or to collect product for the show floor.

Inventory on the show-floor will have the ability to be quickly locked away. The display cases can be locked and a cage can be brought down from the ceiling to lock and secure all product on the shelving. This is for emergency situations; the product will not be stored outside of business hours in this manner.

At the end of the night, all inventories will be taken off the show floor and placed in the back office storage cage and locked away. This also offers the ability to do an inventory check each night. A manifest from the POS will be printed off and as product is moved from the show floor to the back office storage cage, it will be accounted for and compared with the manifest from the POS.

At opening, product will be brought from the back office inventory cage and placed on the show floor in either the display cases or on the shelves. Only a few products will be brought out to display, the mass majority of the product will remain in the back office cage until it is needed.

Accessibility of Security Measures

Administrators and certain managers (shift-lead managers will be considered an administrator if no other administrators are on site) will be the only ones with access to security code combinations, keys for locks on all safes, vaults, and/or cages, and will be held accountable for all unauthorized breaches into any of the areas that only they are to have access to while they are on duty. There will be a no-tolerance policy relating to un-authorized breaches and the liable party will be terminated upon review of security footage.

Emergency Policies

In instances of theft/diversion during store hours, the store will be temporarily closed while the following occurs. In the event of emergency relating to diversion or theft all product will be moved to the back office area (limited-access area) into a locked cage where it can be secured by an administrator for further review. 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 was lost. A report will be filed with the CCC and a copy will be sent to local law enforcement.

In instances of lost product, the store will not be required to close, but at the end of the business day that the loss was discovered, a full inventory audit will occur and security footage will be reviewed to identify the cause of the loss. A report will be filed with the CCC and a copy will be sent to local law enforcement.

In the event of an emergency where all employees and patrons are required to immediately evacuate (ex. Fire), 2 of our marijuana agents will be instructed to monitor the front and rear doors from a safe distance. When permitted, an administrator will re-enter the premises and secure all product. Once it is safe to do so, all product will be moved to the back office storage cage for an inventory audit to be performed.

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 will be posted on the premises 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 is not manageable by an on site extinguisher. If manageable by an on site extinguisher, an employee will be able to attempt to extinguish the fire. No matter, 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.

During a weather related emergency our policy is to follow the instruction of local officials in regards to weather emergencies. 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 so 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.

Local law enforcement and the CCC will be informed of any event that initiated our emergency policy.

In the event of a robbery or instance where authorities are required but unable to be notified due to circumstances, there will be distress buttons near each register and front entry checkpoint that will notify local law enforcement when pressed. We will work with local law enforcement to ensure that this button is in proper working order by checking its functionality regularly.

Administrators will meet on a monthly basis to discuss the effectiveness of this policy. If there have been any instances that resulted in an emergency policy being used, the administrators will discuss if there are any further steps that can be taken to improve the effectiveness of the policy. If a change is made to the plans, local law enforcement will be sent an update to our plans/policies. All employees will be informed of any changes to plans/policies.

*Unnecessary use of the distress button will result in suspension, internal investigation, and potential dismissal.

2. Sales, Show Floor, “See something, say something”

Secondary Identification

After the initial identification verification at the point of entry, the patron will be allowed to enter the show floor. They will be instructed to enter the queue on the show floor and wait their turn to speak with one of our registered agents. Once they have chosen a product to purchase, our marijuana agent will ask to see their ID before scanning the product and initiating the transaction at the register.

This procedure offers a secondary check to ensure the patron is 21+ or older.

Show Floor Capacity Management

To ensure our staff is capable of handling the amount of patrons we have on site at any given point in time, we will implement a show floor capacity level that will be monitored by our marijuana agent acting as floor manager and the agent running the front ID checkpoint. We will only allow 20 patrons on the show floor at any given time. If the show floor reaches 20 patrons, the marijuana agent at the door will only allow new patrons to enter the show floor when patrons currently on the show floor exit the facility.

In the event of a high volume number of patrons at one time, we will assign a second marijuana agent to the entry checkpoint to assist the other marijuana agent in managing the patrons as they enter the facility. One agent will regularly check the exterior of the building to make sure the line is queued and well managed.

If a problem persists where we regularly are having instances of long queues, we will hire additional staffing to help speed up the transaction process and move patrons through our facility at a faster pace. As well as, we will staff extra agents to assist in flow management.

All of this is implemented so that our employees are able to focus on following the procedures we have in place and are not inundated with patrons and unable to perform their tasks properly.

Limitation of Sale

There will be a limit of one ounce of marijuana or five grams of marijuana concentrate per transaction per customer. This is the legal limit a person may have on them at any given time in their personal possession outside of their residence.

Unauthorized Sales and Right to Refuse

We maintain the right to refuse sale to patrons relating to the following:

- Any patron unable to produce valid ID to verify they are 21+.
- At the discretion of our marijuana agent, we may refuse sale to a patron that we believe is in any way intoxicated or that would potentially place the public at risk if we were to sell them cannabis products.
- Refuse sale of more than one ounce of marijuana or five grams of marijuana concentrate.
- Refuse distribution of any cannabis products containing nicotine.
- Refuse distribution of any cannabis products containing alcohol.

Customer Service Policy

It is our overall goal 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 administrations hands, a determination will be made in regards to the employee that is subject of the complaint.

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 an agent authorized to handle cash will “cash out” the till. 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 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 agent will write the cash total on the outside of the bank note along with the registers I.D., 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 drop safe.

Transfer from Drop Safe to Primary Safe: At the end of the day, our administrator in charge of closing duties will remove the bank envelopes from the drop safe and transfer it to the main safe. The total from the bank envelopes will be added together and should total up to equal the total sales number printed from the POS system at the end of the day. If there is a difference, the administrator will be able to organize the bank envelopes from each till and compare the deposits to the receipts printed from the specific register the deposit came from. The administrator will then be able to identify the register the accounting error occurred at and investigate into the loss further. In the event the loss cannot be rectified, the administrator will create a report and the instance will be investigated to determine where the cash has gone. By using our cameras and comparing the footage to the drops, the receipts from the POS, and the total cash received, the exact amount will be determined and the missing cash should be found. If it is believed to have been stolen, the cameras will be reviewed and the agents that interacted with the till during the day of the loss will be interviewed. If an agent is found to have misplaced cash, they may be

reprimanded or demoted. Misplacing of cash could also lead to their termination. If the cash is found to have been stolen, the agent will be terminated and local law enforcement will be informed. The CCC will also be informed.

Safe storage: The safe will have a running *safe storage log* that the administrator 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 administrator 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.

**Safe storage audit: Once a month, we will audit the safe storage log by running through security footage and comparing the entries to the safe with the total contents log to ensure that each entry into the safe was properly logged. In the event that an entry is unlogged, the administrator will be suspended without pay while a further investigation is conducted relating to an audit of the safe and any missing funds. If no funds are found to be missing, the administrator will be dealt with internally and may be demoted from their administrator status. The failure of the administrator to log their entry could also lead to their termination if it is determined to be necessary.*

Deposit Method & Frequency: All of our deposits will be made via Dunbar Armored and delivered to a local Citizen’s Bank branch. We will schedule pick-ups at random times but never more than 3 days apart. If the safe reaches \$20,000, an immediate pick-up will be scheduled within the same day or immediately the next morning.

Additional Protocols

Along with the protocol we have in place to make sure that no one under the age of +21 is allowed onto the premises – we will implement a policy called “See Something, Say Something”. This policy will ask our employees to report any suspicious activity they see on our premises. This could relate to a situation where someone meets outside of our location for someone who is 21+ to purchase product for them and the exchange takes place on our premises. In this case we would ask our employees to inform management so that we can report the case to local authorities. We will have cameras on site, as required, so we will be able to assist in any investigations as well. We will assist local authorities in any investigations by offering any footage that our cameras capture. We will also be willing to work with authorities in other manners that they see fit and appropriate to discourage diversion. Our marijuana agent at the front checkpoint will have security monitors at their desk so they can monitor the perimeter of the building and notice suspicious activities.

- Clear signage on door that I.D. is required for entry and that only those 21+ are allowed on the premises.
- Full time door man/woman.
- Immediate Security Checkpoint at point of entry of premises. Showing I.D. will be required to enter. We will utilize an iOS software that scans the barcode of an I.D. and pulls up information on the I.D. holder confirming their age. We will then utilize a black light to scan the card for holograms for addition security.
- Secondary I.D. checks pre-transaction.
- No tolerance policy. We will have no tolerance for 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 hiring and training.
- Parking lot signage informing patrons that the premises are under 24 hours surveillance.
- Parking lot signage informing patrons that smoking on the premises is strictly prohibited and violators will be prosecuted.

3. Product Storage

Storage Areas

At all times, our cannabis products will be stored in one of the following 3 areas in our establishment. All areas are within a controlled environment where the temperate and humidity levels are being kept at specific levels.

1. Back office storage cage – this is a locked cage where the bulk of our inventory will be held.
 - a. Inside of the cage will be several racks with labeled bins on the rack. Product will be organized in these bins. These are open bins, not closed and sealed. Packaged product will be placed in them.
 - b. Inside the cage will be a separate cabinet, equipped with a lock that has a separate key from the cage itself. Damaged product, compromised product, outdated product, or in any way unsellable according to 935 CMR, will be placed in this cabinet to be destroyed according to our waste and disposal procedures.
2. Display Cases – The showroom will be designed with a perimeter of display cases separating the customer from our marijuana agents. Product will be removed from the display cases on a nightly basis to be secured in the back office storage cage. The display cases will be able to be locked in the event that product needs to be secured as quickly as possible.
3. Shelving – Behind the marijuana agents on the show-floor will be shelving units with small bins to hold product. Product will be removed the shelves on a nightly basis to be secured in the back office storage cage. However, the

shelves will have a cage that can drop down from the ceiling to secure the product in an event where the product needs to be secured as quickly as possible.

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

Procedures

- 1) Upon receipt of a delivery, product will be weighed, sorted and compared with the delivery/order manifest (while being recorded) to make certain that the delivery contains the exact amount of product requested and as detailed in the order manifest. Any product received that is not on the manifest will be returned to the deliverer and returned to the marijuana establishment that it came from.
- 2) The product will then be sorted and stored in our storage area that is located in the back office area (limited-access area). The storage location is organized with bins on racks to allow for proper organization. Each bin is labeled to display the content of the bin. The bins can be found on racks inside of a cage that is locked at all times outside of stocking.
- 3) Once receipt of the order and stocking of the incoming product is complete, the storage area will be locked.
- 4) Any product found, at any time, to be tampered with, expired, damaged, deteriorated, mislabeled, or breached in any way will be dealt with according to the following procedure.
 - a) Identified as unsellable and notified on-shift manager.
 - b) Product is brought to the back office space, into the storage cage, and placed in a locked cabinet for all unsellable product.
 - c) When time is available, following our waste disposal protocol, 2 marijuana agents will weigh, destroy, and dispose of the product.
 - d) A waste disposal report will be made and given to the administrator on duty.
 - e) The administrator will file away the waste disposal report.
- 5) The only other times the storage area will be unlocked is when product is needed on the show-floor or is being removed from the show-floor.
- 6) Outside of operating hours, all product will be removed from the show-floor display cases and shelving and brought to the back office inventory cage. This will be done nightly and will also serve as an opportunity to perform an inventory check.
- 7) A manifest will be printed each night detailing the quantity of our inventory. While removing product from the show floor, our agents will account for all product and compare it with the manifest.

Maintenance

- All storage areas will be cleaned on a daily basis to ensure no obstruction and a clean and professionally kept workplace.
- Storage will be off the ground at all times, locked and secured, and away from potential pests. In the event of any pests found near product, measures will be taken to eliminate the culprit and move product until the area is safe of any further pest problems of any kind.
- All marijuana inventory will be viewable by multiple video cameras throughout the facility. This will allow complete transparency in relation to the movement of all product in our facility at all times.
- All marijuana inventory will be placed in a location where it is able to be locked and secured. *All inventory will be viewable at all times by our security cameras.

4. Product Reception/Incoming Transport

Receiving Protocol

- 1) Deliveries will be expected based on our communication with the marijuana establishment we are receiving the delivery from. We understand that transporters are to randomize their delivery schedules and routes, but we will have a ballpark idea as to when a delivery will be arriving.
- 2) Delivery drivers, like regular patrons and visitors, will check-in at our front entry checkpoint. Our marijuana agent occupying the entry checkpoint will have a list of expected deliveries and will check the delivery driver in by asking to see their marijuana registration ID and a drivers license to confirm the registered agent is one of the two agents listed on the manifest as the delivery driver. The ID will be checked according to our 3-point procedure checking the picture, checking the authenticity of the ID, and by checking that the individual is 21 or older. Once they have been identified, they will print their name, time in, company they are coming from, reason for their visit, their visitor ID badge number, and sign on our login sheet.
- 3) Once check-in is complete, the driver can then bring their delivery in through our front entry and be escorted by one of our marijuana agents, who will be given the manifest from our agent who checked in the driver at the entry point, through the limited-access area behind the counter all the way to our back office space (limited-access area).
- 4) The product will then be accounted for and compared to the manifest from the original order that we placed that will be printed out from the seed-sale traceability system or received via email/fax from the marijuana establishment the delivery is coming from. The product will be weighed and recorded following our inventory procedures.

- 5) Once the contents of the order that is listed on the manifest is confirmed to be present and accounted for, our agent will be able to sign the delivery driver's copy of the manifest to confirm receipt. Our agent will also fill in the other required fields relating to the date and time the products were inventoried upon reception and his or her name.
- 6) The completed manifest will be filed away with all other delivery manifest and saved for at least one year. The contents of the manifest will include but not be limited to:
 - a. The name of the marijuana establishment the product originated from.
 - b. The name of the marijuana transporter if different from the establishment the product is coming from.
 - c. The name of the two marijuana agents that accompanied the delivery.
 - d. The name of the destination (our establishment)
 - e. A detailed description of the products that were received, including name, type/form, quantity, and individual product weight.
 - f. The mileage of the transportation vehicle at the time of departure from their origin and the current mileage at the time of the delivery.
 - g. The time of departure from their point of origin and the time the delivery arrived at the facility.
 - h. A signature from our agent that is receiving and checking the product.
 - i. The weight and inventory of product at the time of packing the delivery and at the time of the delivery being received by our establishment.
 - j. The date and time of the products being re-weighed and inventoried.
 - k. The name of the agent at the establishment of origin that weighed and inventoried the delivery contents.
 - l. The delivery vehicle's make, model, and license plate number.
- 7) If there is anything in the delivery order that is not listed on the original order manifest (example, too much of a specific product or a product is present that was not ordered) it will be given back to the driver and he/she should return it to the marijuana establishment it came from.
- 8) Once the check-in of the order is complete, the driver may leave. He/she will be escorted back through the limited-access area to the front check-in where he/she can sign his time out and return his visitor ID badge.

5. Inventory Procedures/Protocol

Product Check-in

When product arrives from a delivery, the order is accounted for by comparing with the manifest that is received from the marijuana establishment that the order was placed with and sent from. The product is weighed for accuracy and checked to make sure all product is not tampered, the package is sealed, and all labels are accounted for (all while on camera). If there are any issues relating to any of the products, it is returned to the delivery driver and he/she should return it to the

marijuana establishment of origin. Once the order has been completely accounted for, our marijuana agent will sign the manifest from the driver and the driver will be able to leave the premises.

Real-Time Inventory

We will be using Green Bits POS and at the time of receiving products via a delivery, all products will be entered into the POS to maintain a completely accurate real-time representation of the inventory on the premises. When a product is purchased, the POS will update automatically to reduce the amount of that specific product in our inventory. At the end of the night, during the nightly audit, a manifest will be printed from the POS detailing all product and quantities. Employees will manually count all product and compare it to the manifest.

Opening Procedure

A sample of each product (some products may be chosen for various reasons to not be displayed, so not all product that we have will be on display) will be brought out of the storage cage and presented in either the display cases or the shelving on the show floor.

Closing Procedure/Nightly Audit

At the end of each day, all the product that is in the display cases or the shelves on the show floor will be removed and organized in the back office storage cage. During this time an inventory audit will be performed to check that all inventory is accounted for and matches the inventory count of the POS system. A manifest will be printed from the POS and the agent(s) performing the closing audit will make a manual count of each product and compare it with the manifest. This report will include but not be limited to the date, a summary of the audits findings, and the names, signatures, and titles, of the agents present during the audit. The report will be filed away in the secure file cabinet.

In the event that inventory is lost, an internal review will immediately be initiated. POS data, security footage, prior inventory audits from nights past, and the physical product on hand will all be reviewed to determine where or how the product was lost. A report will be created and local law enforcement will be informed. A report will be sent to the CCC as well.

Weekly Audits

At the end of each week, we will perform an inventory audit on the entirety of the product we have on hand at that time. A manifest will be printed out showing

exactly what our POS tells us is currently in stock. Our marijuana agents will then manually account for each product to compare their findings with the POS manifest.

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 as 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 audits 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

Product Criteria

All product must be received in sealed, labeled packages with a cannabinoid analytic report detailing the contents within the package as well as all other required package identifiers mentioned in 935 CMR 500.105(5).

Any product that appears to be tampered with, outdated, inaccurate labeling, untested, or is missing any piece of the criteria laid out in the labeling regulations will be stored in a secured cabinet inside of our secured inventory cage to be destroyed and disposed of.

Unsellable Product

Product that is found to be tampered with, improperly labeled, breached, out dated, or in any other manner deemed unsellable – the product will be transferred to a secured cabinet in the back office area inside of the secured inventory cage. The product will then be destroyed and disposed of according to our waste disposal procedures. This process will be recorded in the POS system to account for the product as well as in the nightly audit.

6. Quality Control & Testing Procedures

Testing

NO product will be available for sale at our location that does not arrive at our facility with a testing result label on its packaging from an authorized and licensed Massachusetts lab. 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, held, and stored in a specific trash receptacle used only for toxic items in our designated trash area near the rear emergency exit
- There is one bathroom on site that maintains proper plumbing and access to water and they will be cleaned regularly to maintain sanitation

- The cleaning supplies for the bathroom will be stored in the bathroom and in the basement storage area
- The marijuana establishment will have a controlled environment relating to the temperature and humidity to allow for the best storage conditions for our inventory – product that require more specific conditions (like refrigeration) will be stored accordingly to best maintain the products
- * We don't intend to sell refrigerated products at the onset of sales. However, our plan will be to place a refrigerator behind the display cases on the show floor and then also place a refrigerator in the back office inventory cage. Both refrigerators will be able to be locked.
 - All refrigerated products will be kept according to the instruction of the manufacturer. If a product is not kept according to this instruction, it will be stored with other products that are unsellable and destroyed of.

7. Dispensing Procedure/Policies & Sales Cont.

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 I.D. 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 out of date product will be sold
7. No product that has not been tested according to the regulations in 935 CMR will be sold

Recoding Sales

Our establishment will utilize the Green Bits POS software – this is software we are very familiar with and are currently using at a store in Washington State.

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, payroll, and much more.

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 representative from Green Bits POS to audit our POS to ensure that over the past month there were no interior or exterior influences on the sales data that is being reported by the system. The audit will also ensure that the POS is in good 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 apart of the monthly POS audit. The report will be filed away and kept on hand in case it is every requested by the CCC.

Sales & Record Keeping

All sales and other records relating to the sale, transfer, purchase, and disposal of products and 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 to maintain proper business organization tactics for efficiency and 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 to 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.

Product Variation

We intend to carry the following types of cannabis products. We foresee that some product types may not be made available at the onset of our store opening its doors. But, we predict that we will be able to acquire and offer these product types eventually.

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 manufacture licensee that we acquire the product form.

8. Record Keeping Procedures & Policies

All physical documents will be kept in a secured and locked file cabinet in the back office. Only administrators will have access to this file cabinet.

Filing Procedure: Documents relating to Waste Disposal, Inventory (delivery manifests, confirmation of delivery receipt reports, audits, and destruction/disposal reports), completed login sheets (kept at the front entry point), nightly sales reports, deposit reports relating to cash pick-ups, deposit reports relating to any other kind of cash deposits, and any other documentation relating to operations on the premises shall be submitted to a file box by agents and then filed away in the secure and locked file cabinet in the back office by administrators. Real time inventory will be accessible through our POS system and our printed nightly inventory audits.

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

Digital Real Time Inventory: Inventory numbers will be reflected in real-time by our POS system and manifests will be printed each night during closing procedures to audit the inventory as it is moved to the back storage cage.

Hard Drive Storage: Hard drives from computers located on the premises will be stored in a secured and locked safe in the back office. The hard drive will be removed from the computer by an administrator and transferred to the secured safe. Hard drives will be available upon request on site.

Closing Procedure/Nightly Audit: At the end of each day, all the product that is in the display cases or the shelves on the show floor will be removed and organized in the back office storage cage. During this time an inventory audit will be performed to check that all inventory is accounted for and matches the inventory count of the POS system. A manifest will be printed from the POS and the agent(s) performing the closing audit will make a manual count of each product and compare it with the manifest. This report will include but not be limited to the date, a summary of the audits findings, and the names, signatures, and titles, of the agents present during the audit. The report will be filed away in the secure file cabinet.

In the event that inventory is lost, an internal review will immediately be initiated. POS data, security footage, prior inventory audits from nights past, and the physical product on hand will all be reviewed to determine where or how the product was lost. A report will be created and local law enforcement will be informed. A report will be sent to the CCC as well.

Weekly Audits: At the end of each week, we will perform an inventory audit on the entirety of the product we have on hand at that time. A manifest will be printed out showing exactly what our POS tell us is currently in stock. Our marijuana agents will then manually account for each product to compare their findings with the POS manifest.

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Monthly/Yearly Audits: We will conduct our weekly audits 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 detail:

All physical and digital records will be 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 Procedures: Our operating procedure packet will be made available both on the show floor in the limited-access area and in the back office. Both will be placed in an easy to access area and all agents will be informed of their location so that 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 will also have 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 will be 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 will each have a file made in their name. Within their file the following articles will be found:

- The full name, date of birth, and address of the employee
- All aliases previously or currently used, including maiden name if applicable
- Attestation that the individual will not engage in the diversion of marijuana products
- Written acknowledgement by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth
- All background information descriptions that are required under 935 CMR 500.030(2)(f)
- Proof of payment of the application fee by the marijuana establishment
- Any further information that may have been requested by the Commission

- Documented verification of provided references
- Job description including duties, authorities, responsibilities, and qualifications
- Documentation of all conducted training relating to the employee including training regarding privacy and confidentiality requirements and a signed statement from the individual stating the time, date and place he/she received the documented training, the topics discussed, and the name and title of the presenters
- Documentation of performance evaluations
- Record of any disciplinary actions or instances where the employee was subject of a review for any reason
- Notice of completed vendor training
- Any background check reports relating to the employee

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 will be a business document section for all of the establishments personal documents relating to its license and any state or local permits. The following documents will be found in this section of the file cabinet.
 - Assets & Liabilities (recent balance sheet from CPA)
 - Monetary Transactions (sales records)
 - Books of accounts (invoices, proof of payments received, open accounts, balance of accounts, notes, and receipts of all payments)
 - Further sales records relating to orders and cost of inventory and payment.
 - Information on financial arrangements with all employees and members of the establishment, their compensation, and the form in which they are compensated.
 - Bank records & records of deposits and detail on how each deposit was made.

Waste Disposal Records: In the secured and locked file cabinet, there will be a file for each years waste disposal records categorized by month. 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 will also be a record of when the waste was disposed of and a signature of the agent who conducted the disposal.

9. 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 counterfeit, our agents will be instructed to maintain the ID and ask the patron to leave. If the patron refuses to leave and request 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 ID's 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 occurrence.

Actions resulting in immediate dismissal of marijuana agents:

- Failure to check or properly verify an I.D. 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 I.D. while on duty at the establishment.
- Failure to check-in and wear guest badge while visiting 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)
- 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 the foreign jurisdiction, or a military, territorial, or Native American tribal authority.

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.

Staffing Plan & Records

At all times our facility will have a minimum of seven marijuana agents on duty.

- One agent to secure the entry checkpoint and verify I.D.s
- Two agents to work the show floor and help customers through their transaction
- One agent for each of the registers – two total.
- One show floor manager to manage the flow on the show floor
- One manager/administrator 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 both during the day and at night. But, at all times, the establishment will have seven agents on duty.

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). The file will contain, at the least:

- The full name, date of birth, and address of the employee
- All aliases previously or currently used, including maiden name if applicable
- Attestation that the individual will not engage in the diversion of marijuana products
- Written acknowledgement by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth
- All background information descriptions that are required under 935 CMR 500.030(2)(f)
- Proof of payment of the application fee by the marijuana establishment
- Any further information that may have been requested by the Commission
- Documented verification of provided references
- Job description including duties, authorities, responsibilities, and qualifications
- Documentation of all conducted training relating to the employee including training regarding privacy and confidentiality requirements and a signed statement from the individual stating the time, date and place he/she received the documented training, the topics discussed, and the name and title of the presenters
- Documentation of performance evaluations
- Record of any disciplinary actions or instances where the employee was subject of a review for any reason
- Notice of completed vendor training
- Any background check reports relating to the employee

10. Miscellaneous Information

Handling & Storage of Confidential Information

All confidential information will be stored in a secure and locked file cabinet that only administrators have access too.

We will not obtain confidential information from our customers.

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 administrator to be immediately placed in the secure file cabinet.

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 contact information for one of the board members via a business card that will be available next to the register. Patrons may request a list of board members and executives for the establishment using the contact information provided on the business card. The board member understands the regulations and will provide them with the information they are entitled to relating to regulations set forth in 935 CMR 500 but reserves the right to disclose other information at their own will.

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, Managing Member

Cell: (515) 460-8350

Email: jack@colonialcannabisco.com

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.

After holding the interview, three administrators will meet to discuss the applicant. While reviewing the applicant they will record the decisions whether the applicant will be offered the job or denied. If they are offered the job and the job is accepted, the report will be placed in their employee file. If they are not offered the job OR they are offered the job and decline, a report will be filed away with all reports of applicants that interviewed and were not offered the job and applicants that were offered the job but did not accept. This way we are able to review our ability to diversify our workplace by having complete transparency as to all the applicants we have dealt with and offered jobs to – with notes as to why from the administrators that were apart of the decision.

The applicant will be screened to determine they fit all the criteria set forth by the CCC to be able to be a registered Marijuana Agent. If they fit 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. This will include a CORI background check. We will provide the applicant with the proper paperwork, request they fill it out in its entirety and provide the \$25 fee, then we will have the paperwork filed and await the results of the background check.

Roles & Qualification:

Security Agent: We will have one Security Agent on duty at all times. This agent will be stationed at our ID checkpoint at the front 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 security monitors at the ID checkpoint when they are not checking IDs to ensure there is no suspicious activity occurring on the premises. If the agent identifies any suspicious activity, the agent will be instructed to inform the Shift/Lead Manager on duty.

Qualifications

- Preferred past experience in dealing in security or a similar atmosphere where ID checking is required (ex. Bar, night club, package store, etc).
- Ability to handle confrontation in a professional but stern manner.
- Pleasant demeanor and welcoming when dealing with customers.
- Willing and able to take instruction and strictly follow operational procedures.

- Punctual.

Floor Agent: We will have up to two Floor Agents at a time. The Floor Agents 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:

- Preferred past experience in customer service.
- Pleasant demeanor and welcoming when dealing with customers.
- Willing and able to take instruction and strictly follow operational procedures.
- Basic knowledge of various types of cannabis products and their effects.
- Punctual.

Floor Manager: There will be one Floor Manager on duty at a time. The Floor Manager 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. The Manager will also be responsible for overseeing the Floor Agent(s).

Qualifications:

- Preferred past experience in customer service.
- Pleasant demeanor and welcoming when dealing with customers.
- Willing and able to take instruction and strictly follow operational procedures.
- Basic knowledge of various types of cannabis products and their effects.
- Past managerial experience.
- Ability to give orders and work well with others.
- Can handle stressful situations and continue to perform job tasks efficiently.
- Punctual.

Budtender/Cashier: We will have two to three cashiers at onset of opening at the least. The Budtenders 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:

- Preferred past experience in customer service.
- Preferred past experience with cash handling.
- Pleasant demeanor and welcoming when dealing with customers.
- Willing and able to take instruction and strictly follow operational procedures.
- Basic knowledge of various types of cannabis products and their effects.

- Punctual.

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 Asst. Manager. The Manager will also organize product displayed on the show floor.

Qualifications:

- Willing and able to take instruction and strictly follow operational procedures.
- Past experience with inventory management.
- Ability to pay attention to small details and perform the job tasks efficiently.
- Past experience in a managerial role.
- Punctual.

Inventory Asst. Manager: We will hire one Inventory Asst. Manager at onset. The Asst. Manager will be trained to assist the Inventory Manager with their job tasks. They will have similar roles.

Qualifications:

- Willing and able to take instruction and strictly follow operational procedures.
- Past experience with inventory management.
- Ability to pay attention to small details and perform the job tasks efficiently.
- Punctual.

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

Qualifications:

- Past experience serving in a similar positions (Shift/Lead Manager).
- Past experience handling cash.
- Past experience with inventory management.
- Technologically savvy with experience dealing with point of sale systems, servers, data storage, data transfer, and security systems.
- Pleasant demeanor and welcoming when dealing with customers.
- Ability to pay attention to small details and perform the job tasks efficiently.

- Can handle stressful situations and continue to perform job tasks efficiently.
- Willing and able to take instruction and strictly follow operational procedures.
- Basic knowledge of various types of cannabis products and their effects.

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

Regulations require that all owners, administrators, managers, and employees of our establishment must complete a responsible vendor training program through a 3rd party entity that is accredited with the CCC by July 1, 2019. After July 1 of 2019, all of our new 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 of our procedures to prevent diversion and sales/diversion to minors or those under 21.

5. Procedures 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 form 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 required to attend the session.*



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Restricting Access 21+

1. All employees must be 21 years of age or older. All customers and visitors to the establishment must also be 21 years of age or older.
2. Clear signage on door that ID is required for entry and that only those 21+ are allowed on the premises.
3. Full time door agent in front vestibule monitoring entrance & exit door and checking identification.
4. 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.
5. Secondary ID check at cash register. Birthdate of customer must be entered into the POS to begin the transaction.
6. 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.
7. 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.



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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.

All records shall be maintained in accordance with general accounting principles.

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, which will be kept for at least 3 years

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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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 date 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.



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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. To begin with, our manager handling hiring duties will complete a diversity and inclusion training course. By the end of the year we intend to have another agent trained on diversity and inclusion for a total of at least two employees.

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 at our establishment. We will utilize this platform at least 3 times a year.

Employing a Diverse Workforce – 50% or more of our workforce will be made up of women, minorities, or veterans at all times.

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.

Employing a Diverse Workforce – When hiring employees, it will be our goal to obtain and retain a workforce that is made up of at least 50% women, minorities, or veterans. For instance, when hiring, if our current workforce demographic does not meet this goal, an individual will be hired who meets this criteria.

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.

Employing a Diverse Workforce – At anytime, our employee files can be reviewed to determine the make-up of our current workforce as documentation within the employee's file will detail the employee's ethnicity, gender, or veteran status.

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, with the annual date falling on the day we originally received a provisional license, a full report will be created detailing our review of the effectiveness of this plan and will continue on a yearly basis. Any updates to the plans will be submitted to the CCC for review prior to implementation.