



Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC281313
Original Issued Date: 10/15/2019
Issued Date: 09/10/2020
Expiration Date: 10/15/2021

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: JustinCredible Cultivation, LLC

Phone Number: 301-885-9159 Email Address: justin@jccultivation.com

Business Address 1: 116 powell road

Business Address 2:

Business City: cummington Business State: MA

Business Zip Code: 01026

Mailing Address 1: 116 powell road

Mailing Address 2:

Mailing City: cummington Mailing State: MA

Mailing Zip Code: 01026

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Lesbian, Gay, Bisexual, and Transgender Owned Business, Minority-Owned Business, Veteran-Owned Business, Woman-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: 34

Percentage Of Control:

50

Role: Owner / Partner

Other Role: Executive

First Name: Reginald Last Name: Stanfield Suffix: 2nd
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 20 Percentage Of Control: 20
Role: Owner / Partner Other Role:
First Name: Terrance Last Name: Hanley Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 4.5 Percentage Of Control: 10
Role: Executive / Officer Other Role:
First Name: Chet'toia Last Name: Walker Suffix: 3rd
Gender: Female User Defined Gender:
What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: Percentage Of Control: 10
Role: Executive / Officer Other Role:
First Name: Jonathan Last Name: Siberon Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)
Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 10 Percentage of Ownership: 26
Entity Legal Name: AURORA BOREALIS OF W. MASS CORP. Entity DBA: DBA City: Northampton
Entity Description: Corporation
Foreign Subsidiary Narrative:
Entity Phone: Entity Email: Entity Website: n/a
Entity Address 1: Entity Address 2:
Entity City: Entity State: Entity Zip Code:
Entity Mailing Address 1: Entity Mailing Address 2:

Entity Mailing City:	Entity Mailing State:	Entity Mailing Zip Code:
Relationship Description: Corporation in an investor and consultant to Marijuana Establishment.		

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Chederis	Last Name: Polanco	Suffix:	
Types of Capital: Monetary/ Equity	Other Type of Capital: Cash	Total Value of the Capital Provided: \$120000	Percentage of Initial Capital: 20
Capital Attestation: Yes			

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: AURORA BOREALIS OF W. MASS CORP.	Entity DBA:		
Email: smtswaz@comcast.net	Phone: 413-537-4812		
Address 1: 31 Henry St	Address 2:		
City: Northampton	State: MA		
	Zip Code: 01060		
Types of Capital: Monetary/ Equity	Other Type of Capital:	Total Value of Capital Provided: \$101500	Percentage of Initial Capital: 29
Capital Attestation: Yes			

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 116 Powell RD	
Establishment Address 2:	
Establishment City: Cummington	Establishment Zip Code: 01026
Approximate square footage of the Establishment: 2000	How many abutters does this property have?: 5
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes	
Cultivation Tier: Tier 01: up to 5,000 square feet	Cultivation Environment: Indoor

FEE QUESTIONS

Cultivation Tier: Tier 01: up to 5,000 square feet Cultivation Environment: Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Aug 22, Doc 1.pdf	pdf	5b7e0b4b0d95792d85f42b43	08/22/2018
Community Outreach Meeting	MarijuanaMtg.pdf	pdf	5b7e107e4e62492d8f3448ab	08/22/2018

Documentation				
Certification of Host Community Agreement	Community Outreach.pdf	pdf	5b7e11ee377423394139410c	08/22/2018
Community Outreach Meeting Documentation	List of Abutters.pdf	pdf	5b7e11ff8d67cc394b81ba16	08/22/2018
Community Outreach Meeting Documentation	Town of Cummington Newspaper Clipping.pdf	pdf	5bdb4fc6bcbac00d7d74a72c	11/01/2018
Plan to Remain Compliant with Local Zoning	Municipality Compliance Plan - JCC.pdf	pdf	5bdb4fda6906170d879382cb	11/01/2018

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact 052819.pdf	pdf	5ced582f69291617ba85e2a4	05/28/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other Role:
 First Name: Reginald Last Name: Stanfield Suffix: 2ND
 RMD Association: Not associated with an RMD
 Background Question: yes

Individual Background Information 2

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

Individual Background Information 3

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

Individual Background Information 4

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

Individual Background Information 5

Date generated: 12/03/2020

Role: **Other Role:**
First Name: Chederis **Last Name:** Polanco **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Investor/Contributor **Other Role:**
Entity Legal Name: Aurora Borealis of W. Mass Corp **Entity DBA:**
Entity Description: Corporation
Phone: 413-537-4812 **Email:** smtswaz@COMCAST.NET
Primary Business Address 1: 31 Henry St **Primary Business Address 2:**
Primary Business City: Northampton **Primary Business State:** MA **Principal Business Zip Code:** 01060
Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	By laws.pdf	pdf	5b7e32f15e9b3d2d528a7a42	08/23/2018
Articles of Organization	JCC Certificate of Corporations.pdf	pdf	5b7ee96eb60ce4391d87ed36	08/23/2018
Department of Revenue - Certificate of Good standing	certificate of good standing.pdf	pdf	5b8713d0185bb22d71066706	08/29/2018
Secretary of Commonwealth - Certificate of Good Standing	Certificate good standing Sec..pdf	pdf	5b871430d389b22d7bd64531	08/29/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	proof.pdf	pdf	5f31e6ce193ee2646b47a8ab	08/10/2020
Department of Revenue - Certificate of Good standing	good standing revenue.pdf	pdf	5f3feb34f6d8f5082e44750c	08/21/2020
Department of Unemployment Assistance - Certificate of Good standing	Memo_DUA.pdf	pdf	5f403df17116b407de654245	08/21/2020

Massachusetts Business Identification Number: 001342765

Doing-Business-As Name: JustinCredible Cultivation, LLC

DBA Registration City: Cummington

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	JCC Business Plan Current 101.pdf	pdf	5b87436d8d67cc394b81c06a	08/29/2018
Plan for Liability Insurance	Liability Insurance Plan - JCC.pdf	pdf	5bdb4b8dbcbac00d7d74a71c	11/01/2018

Date generated: 12/03/2020

Plan for Liability Insurance	Liability Quote.pdf	pdf	5bdb4bb26906170d879382bb	11/01/2018
Plan for Liability Insurance	Property Quote.pdf	pdf	5bdb4bb32d1cf504966f26f2	11/01/2018
Proposed Timeline	Proposed Timeline-JCC.pdf	pdf	5bdb4bc782d97d04a0077687	11/01/2018

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Restricting Access to age 21 and older	Restriction of Age.pdf	pdf	5b7f393689bc002d9918ac41	08/23/2018
Transportation of marijuana	Transportation Procedures.pdf	pdf	5b7f48b589bc002d9918ac4d	08/23/2018
Policies and Procedures for cultivating.	Cultivation Plan-converted.pdf	pdf	5bdb4bf7e18f9d0d7384fac5	11/01/2018
Security plan	Security plan - JCC.pdf	pdf	5bdb4c0ebcbac00d7d74a720	11/01/2018
Prevention of diversion	Prevention of Diversion - JCC.pdf	pdf	5bdb4c1e6906170d879382bf	11/01/2018
Storage of marijuana	Cultivation Facility Storage Plan - JCC.pdf	pdf	5bdb4c31813a010d917abfc3	11/01/2018
Inventory procedures	Inverntory Plan.pdf	pdf	5bdb4c534287b10d4f36e802	11/01/2018
Quality control and testing	Quality Control and Product Testing Compliance Plan - JCC.pdf	pdf	5bdb4c6a25766f0d55cc250a	11/01/2018
Personnel policies including background checks	Personnel policy JCC.pdf	pdf	5bdb4c91fe03b20d5f6942a7	11/01/2018
Record Keeping procedures	Record Keeping Compliance Plan - JCC.pdf	pdf	5bdb4cc64088250d697fc958	11/01/2018
Maintaining of financial records	Maintenance of Financial Records Compliance Plan - JCC.pdf	pdf	5bdb4cd1e18f9d0d7384fac9	11/01/2018
Qualifications and training	Qualifications & Training - JCC.pdf	pdf	5bdb4cec6906170d879382c3	11/01/2018
Diversity plan	JustinCredible Cultivation Women's Fund Pledge Document signed.pdf	pdf	5cb77bd38e20fa4c3aba66ca	04/17/2019
Diversity plan	Diveristy plan - JCC 052819.pdf	pdf	5ced58ac622b7c1357f6f6c6	05/28/2019

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: JCC, Has made not had the opportunity to make progress with our Positive Impact Plan. Covid-19 halted the inspection process on 03/16/2020 the day of our post provisional inspection. We received our inspection on July 7, 2020 and await our final license. Without the license we are unable to produce the revenue that plays an important role in executing our positive impact plan.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: JCC has yet to start its first year of operation, we are a owner/family driven minority/woman/veteran and LBGQT small business. We are not planning on hiring any workers in our first year of operations. JCC however does plan on making connection with businesses that minority owned. JCC has a transportation contract with a company that is minority owned and we are planning to work closely with Elv8Cannabis another minority owned company.

HOURS OF OPERATION

Monday From: Open 24 Hours	Monday To: Open 24 Hours
Tuesday From: Open 24 Hours	Tuesday To: Open 24 Hours
Wednesday From: Open 24 Hours	Wednesday To: Open 24 Hours
Thursday From: Open 24 Hours	Thursday To: Open 24 Hours
Friday From: Open 24 Hours	Friday To: Open 24 Hours
Saturday From: Open 24 Hours	Saturday To: Open 24 Hours
Sunday From: Open 24 Hours	Sunday To: Open 24 Hours

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

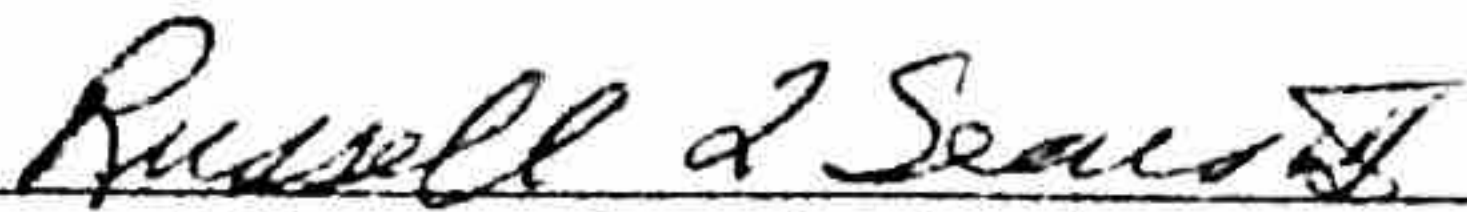
I, Reynold Stanfield, (insert name) certify as an authorized representative of Just a Credible Cultivation (insert name of applicant) that the applicant has executed a host community agreement with Cummington (insert name of host community) pursuant to G.L.c. 94G § 3(d) on May 17, 2018 (insert date).



Signature of Authorized Representative of Applicant

Host Community

I, Russell 2 Sears, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for Cummington (insert name of host community) to certify that the applicant and Cummington (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 5-17-18 (insert date).



Signature of Contracting Authority or
Authorized Representative of Host Community



Cummington, Massachusetts 01026

NOTICE

CUMMINGTON PLANNING BOARD

FOR

COMMUNITY OUTREACH MEETING

REGARDING MARIJUANA CULTIVATION FACILITY ON POWELL ROAD – ASSESSOR MAP 12 LOT 12

WHEN: JUNE 29, 2018

TIME: 7:00 P.M.

PLACE: Community House, 33 Main Street

6/18/2018

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, Reginald Stanfield, (insert name) attest as an authorized representative of Sustainable Cultivation (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 June 29, 2018 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on June 21, 2018 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on June 21, 2018 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on June 15, 2018 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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



TOWN OF CUMMINGTON

www.cummington-ma.gov

Board of Assessors

33 Main St, P.O. Box 74

Cummington, MA 01026

413-200-5010

boa@cummington-ma.gov

June 15, 2018

List of abutters for 0 Powell Rd, Map 12, Lot 12, 300' buffer distance.

Map 12, Lot 3 0 Powell Rd	Young Kim Westort, c/o Michael Westort 24 Main St, Montague, MA 01351
Map 12, Lot 5 233 Powell Rd	Kathy A McMahon 233 Powell Rd, Cummington, MA 01026
Map 12, Lot 11 0 Powell Rd	George Hoyer, Shannon K Hoyer & Stephen Hoyer 357 East Miami St, West Springfield, MA 01089
Map 12, Lot 14 0 Powell Rd	Bryna Greenspan & Tammy J Reid 234 Powell Rd, Cummington, MA 01026
Map 2, Lot 1 0 Berkshire Trail	Commonwealth of Massachusetts Department of Environmental Management 100 Cambridge St, Boston, MA 02204

Sincerely,

Joy Johns, Assessor/Clerk

Classifieds

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OBITUARY

Bradley D. Brisebois

Bradley D. Brisebois, 29, a landscaper for Exquisite Properties Lawn Care in Easthampton, passed away on Wednesday, June 13, at Cooley Dickinson Hospital in Northampton. He was born in Springfield on Jan. 27, 1989. He lived in Easthampton for the past three and a half years coming from South Carolina, Springfield and lived many years in South Hadley. He attended Gateway Regional High School. He leaves his father, Daniel L. Brisebois and his wife Nancy of Vernon, Conn.; his mother, Tracy L. Webb of Springfield; a daughter, Catherine M. Brisebois of Beaufort, S.C.; a sister, Sandra D.

Brisebois and her fiancé Michael R. Wissman, and a half sister, Stephanie Webb of Springfield. Bradley leaves his significant other, Kathryn M. Crossman of Easthampton. He leaves many aunts, uncles, nieces and nephews. He also leaves his stepbrother and step-sister, Elijah and Leah Fournier. Calling hours will be held on Saturday, June 23 from 1 p.m. to 3 p.m. at the O'Brien Hilltown Funeral Home, 27 Russell Road, Huntington, followed by a service funeral service at 3 p.m. Donations may be made to <https://www.gofund-me.com/easing-the-burden-of-bills> to help with the expenses.

DEATH NOTICE

BRISEBOIS, BRADLEY D.

Died June 13
Funeral Services June 23
O'Brien Hilltown Funeral Home

Country Journal OBITUARY POLICY

Turley Publications offers two types of obituaries.

One is a free, brief **Death Notice** listing the name of deceased, date of death and funeral date and place.

The other is a **Paid Obituary**, costing \$75, which allows families to publish extended death notice information of their own choice and may include a photograph. **Death Notices & Paid Obituaries** should be submitted through a funeral home to: obits@turley.com.

Exceptions will be made only when the family provides a death certificate and must be pre-paid.

PUBLIC NOTICES

TOWN OF BLANDFORD PLANNING BOARD PUBLIC HEARING NOTICE

The Blandford Planning Board will be holding a Public Hearing on **July 11, 2018 at 7:15 PM** in the Town Hall (Selectmen's Office), 1 Russell Stage Road Blandford, MA to consider the application of Sunpin Solar Development, LLC, 1901 Main Street, Suite 150, Irvine, CA 92614 for a Site Plan Approval as required under the following sections of the Blandford Zoning Bylaw:

- Section VIII - Large Scale Ground Mounted Solar Photovoltaic Installations
- Section IX - Site Plan Review

The applicant proposes to install a 4.23 MW large scale ground mounted solar photovoltaic (PV) facility on an approximately 21.4 acre portion (clearing 40.19 acres) of the approximately 186 acre parcel of land located off of the south side of Otis Stage Rd. (Assessor's Map Lot 402-0-43) owned by Philip Brent of Encino CA which is located within the Agricultural (AG) Zoning District.

The complete application

Hall lobby during regular business hours (8:00a.m.-7:00p.m.), at the Porter Memorial Library, 87 Main St. Blandford, MA and on the town's website at <http://town-ofblandford.com/>.

Anyone wishing information and/or to be heard on this matter should appear at the time and place designated.

Richard Barnard, Chair
Blandford Planning Board
6/21, 6/28/18

CUMMINGTON PLANNING BOARD FOR COMMUNITY OUTREACH MEETING

R E G A R D I N G
MARIJUANA CULTIVATION
FACILITY ON POWELL
ROAD, Assessor Map 12 Lot 12.

Date: **June 29, 2018**
Time: **7:00 P.M.**
Place: **Community House**
33 Main Street

6/21/18

NOTICE OF PUBLIC HEARING RUSSELL PLANNING BOARD

Notice is hereby given

the Town of Russell Zoning By-Law that the Russell Planning Board will hold a public hearing on **Tuesday, July 10, 2018** during a public meeting that begins at **6 P.M.** at Russell Town Hall, 65 Main Street, Russell MA. The public hearing relates to GE Solar's application for site plan approval for a solar ground mount installation on the existing landfill located at 52 Station Road. The specific property location is Town of Russell Parcel 17-6-1. The application and plans for this project are on file at Russell Town Hall and are available for public review.
6/21, 6/28/18

TOWN OF WILLIAMSBURG Office of the Zoning Board of Appeals Planning Board LEGAL NOTICE

A Public Hearing will be held at **6:00 PM on Monday, July 9, 2018** in the Williamsburg Town Offices, 141 Main St., Haydenville, MA to consider the following: The application of Daniel Bonham & JKC Properties, LLC of Williamsburg, MA for a Special Permit, as required

Town of Williamsburg, to permit a change of use by converting existing structure to four (4) residential units on a non-conforming lot at 14 Kingsley Ave., Williamsburg identified as Assessors Map K, Lot 80.0.

Charles Dudek, Chairman
Zoning Board of Appeals
6/21, 6/28/18

Please check the accuracy of your legal notice prior to submission (i.e., date, time, spelling).
Also, be sure the requested publication date coincides with the purpose of the notice, or as the law demands.

HOW TO SUBMIT PUBLIC NOTICES

All legal notices to be published in the *Country Journal* should be sent directly to notices@turley.com. Jamie Joslyn processes all legal notices for this newspaper and can answer all of your questions regarding these notices. Please indicate the newspapers and publication date(s) for the notice(s) in the subject line of your email. For questions regarding coverage area, procedures or cost, please call Jamie directly at 413-283-8393.

Turley Publications, Inc. publishes 14 weekly newspapers throughout Western Massachusetts. Visit www.turley.com for more information.

Municipality Compliance Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

Short Term Goals (within 2 years)

1. Meet all necessary satisfaction of the towns planning board

Long Term Goals (within 5 years)

1. JCC will ensure compliance with local codes, ordinances, and bylaws of the municipality as well as local licensing requirements for the adult use of marijuana as defined by the town of Cummington, Massachusetts.
2. Stay current and help with any changes the town may consider to control cannabis in the town of Cummington
3. Receive zero notices or fines by the town if Cummington for knowledgeable cannabis infractions

Program Policy & Procedures

- **Research:** JCC will research the Town of Cummington's codes, ordinances, and bylaws of the municipality as well as local licensing requirements for the adult use of marijuana once per month for any updates, amendments, and changes. As these bylaws frequently change, it is imperative that compliance is maintained as soon as the changes to information is made available.
- **Execution:** Once updates, amendments, and changes are found from the research the Town of Cummington, communication with the city will be made to confirm said updates, amendments, and changes. Once confirmed, JCC will hire the necessary contractors approved by the city of Cummington to make the changes to the establishment in order to remain within the codes, ordinances, and bylaws of the municipality as well as local licensing requirements for the adult use of marijuana within 30 days of confirmation.
- **Record Management:** JCC will maintain updated codes, ordinances, and bylaws of the municipality as well as local licensing requirements for the adult use of marijuana in a lock safe file system within the office of the establishment under 24/7 video surveillance. As updates, amendments, and changes are confirmed, old records will immediately be discarded and the newest versions will then replace the outdated versions.
- **City Meetings:** JCC will sit in on all meetings held by the municipality in regards to all codes, ordinances, and bylaws as well as local licensing requirements for the adult use of marijuana as

an added measure to maintain compliance as soon as any updates, amendments, and changes are found from the Town of Cummington.

- **Training:** Agent training will be mandatory to designated employees to understand and be efficient with researching the Town of Cummington's codes, ordinances, bylaws, and city meetings as well as local licensing requirements for the adult use of marijuana in order to remain compliant.

Measurement & Accountability

1. An annual inspection from city approved inspector will be held to ensure establishment compliance.
2. Upon completion of work of confirmed updates, amendments, and changes found from the research the Town of Cummington, an inspection will be performed to verify current compliance of all codes, ordinances, and bylaws as well as local licensing requirements for the adult use of marijuana.
3. An internal audit for all codes, ordinances, and bylaws as well as local licensing requirements for the adult use of marijuana paperwork and records will take place bi-annually to sustain order and organization for efficient record keeping.

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

In accordance with 935 CMR 500.101(1)(c)(7)(k); JustinCredible Cultivation, LLC (JCC) has developed short term and long-term plans to positively impact the area of Pittsfield Massachusetts that will increase the opportunities inside the cannabis industry for those individuals who identify as an individual from the areas outlined by the CCC

Goals

1. Become one of the select few minority companies that will open a cannabis-based business – Completing this goal will help areas of disproportionate impact by giving the communities that have been effected by cannabis laws a company that is ran and managed by people of the same background, attracting more individuals who may feel as though upper management may not be able to provide them with a comfortable work environment if upper management is comprised of individuals whom are not minorities.
2. Organize and track events that may profit from cannabis business participation in Pittsfield, Massachusetts. For example, there are businesses that provide services that a cultivator may need, such as cleaning, accounting services or lawyers. By tracking these businesses our company can partner with said businesses. By providing income to businesses in areas of disproportionated it will help raises jobs and opportunities to those residents.
3. JCC Donations - JCC will partner with Women's Fund as a corporate underwriter. The Women's Fund is a nonprofit organization focused on providing women with the necessary tools to climb corporate ladders and manage companies from a high-level. JCC will establish a relationship with Women's Fund and its CEO Donna Haghighat, to understand her chapter of the Women's Fund process of helping women in the area of Pittsfield and begin our process of giving back to the community through women's Fund. JCC will donate 1% of our annual sales. The Women's fund is a non-profit company that has multiple chapters, after speaking with the CEO of the chapter located in Pittsfield, we are ensured that their efforts are focused and geared towards women that are in the areas of Pittsfield, Springfield and Holyoke. By donating exclusively to this chapter, we will be providing financial support and help to a non profit that in geared towards the improvement of women specifically in the areas of Pittsfield.
4. Provide business plan support for those who have knowledge of cannabis, but lack knowledge of how to start a business. This support can include, investor attraction, strategic planning, equipment research support, (defining the difference between what you need and overpriced quotes), paperwork review and filing (we provide support on

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

how to become licensed and understand the process, what to expect, and assistance as requested) –

5. Provide an annual scholarship to an entrepreneur or individual seeking to help develop their community through positive business practices. We are seeking to donate \$10,000 dollars, as a scholarship to an individual whom is a resident of Pittsfield, Springfield or Holyoke. Individuals must be over 21 years of age and is seeking to further their education.

Programs

JCC Meets the Community- no cannabis, or cannabis related advertising, sponsoring or promotion will take place at any event. JCC will follow all guidelines and regulations mandated by the 935 CMR 500

This program will assist in building a significant amount of the structure needed to positively affect the area of Pittsfield, Massachusetts. Businesses donate and give funds to areas and, perhaps create jobs, however JCC leadership has a personal responsibility in how it influences these areas, because knowing the community it is based in is important;

1. Job fairs – JCC will actively seek applicants from fairs that are hosted in the Pittsfield area. Since promotion and advertising is prohibited, JCC will assign a member of our management team to attend these events and interact with individuals looking for opportunities. The team member will not be dressed or wearing any JCC apparel. This will give us insight on businesses seeking to help individuals, and what type of programs, jobs and educations individuals of these areas find attractive.
2. Community days – Most towns have days where they celebrate their community and give opportunities for businesses to sell and display their work. During these days, JCC will host at least one (1) job fair every six months starting the 2nd fiscal year, as the start of fiscal year allows. We will capitalize on these opportunities by giving out information (non-cannabis related, and regulation compliant), and show examples of successful minority owned businesses. This will allow the introduction of JCC to individuals that are seeking opportunities to enter into entrepreneurship. We will go to community days within communities that are designated as areas of disproportionate impact. During these community days, no cannabis related, or JCC related materials will be advertised or marketed to the public. These events will be used as informational experience only.

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

JCC Interns and Mentorship:

This program will positively impact the communities of Pittsfield, Massachusetts. Our leadership (from a minority perspective) understands the lack of interns and mentorships effect on the adults in these communities. Individuals who meet the age requirements, 21 or older, will be given the opportunity to be mentored by either our owners or senior staff. Hands on training can easily spark the desire to own or become a cannabis professional. JCC plans to target these potential intern/mentees by building relationships with local colleges, and universities, and setting up a program through their respective career development departments to uplift and provide opportunities to the young leaders of the future who meet the age requirements as set forth in 935 CMR 500.105(4), without using advertising or marketing tools.

Measurement & Accountability

Accountability for social responsibilities is extremely important. Planning and executing are two sides of the coin that sometimes do not come together in big corporation and business. We will hold our owners and managers to these standards by doing the following;

- Owners will have regularly scheduled programs to develop a “check and balance” system of goals and their completion. Some programs may face obstacles as the cannabis industry is constantly changing. All goals require completion prior to the end of the owners expected term as an officer of JCC.
- Our owners must attend one (1) event per quarter which benefits an area of disproportionate impact. It will rise and double every year until all goals are meet. This applies pressure and gives an opportunity to work on goals and learn how the community views the effects of cannabis first hand from residents of areas of disproportionate impact.
- Our CEO’s must partner and support the start-up of a retail or manufactured cannabis business within the first three (3) years of the company’s life. We will invest in and fund start-ups created by individuals whom are residents of areas of disproportionate impact. If JCC has not grown to the point of financial support, support will be provided by advising on application processes and business practices. This includes registering a business or the general skills required to register a business independently. Data will be provided on the success of these businesses.
- All plans and programs shall be reviewed and audited to assess plans, progress, and

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

success, and shall be prepared for submission to the Commission annually.

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

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

BYLAW
S OF
JustinCredible Cultivation, LLC, a
Massachusetts Limited Liability
Company

ARTICLE I

Shareholders

Section 1.1. **Annual Meetings.** An annual meeting of shareholders of JustinCredible Cultivation, LLC (the “Company”) shall be held for the election of directors on a date and at a time and place either within or without the state of Massachusetts fixed by resolution of the Board of Directors (sometimes referred to as the “Board”). Any other proper business may be transacted at the annual meeting. Annual meetings must be held in person with all members present. There will be one in-person meeting held in either the month of January or December, at the Board’s discretion.

Section 1.2. **Mandatory Meetings.** Mandatory shareholder meetings will be set as the following:

- One annual in-person meeting
- Twelve video conferences
- Twenty-four teleconferences

Section 1.3. **Special Meetings.** Special meetings of the shareholders may be called at any time by the Board of Directors or by the holders of not less than 10% of the outstanding shares entitled to vote at any meeting of the shareholders if such holder(s) sign, date and deliver to the Secretary of the Company written demands for the meeting describing the purpose for which it is to be held. Special meetings will be held at the date, time and place either within or without the state of Massachusetts as may be stated in the notice of the meeting. Business transacted at any special meeting of the shareholders shall be limited to the purposes stated in the notice.

Section 1.4. **Notice of Meetings.** Whenever shareholders are required or permitted to take any action at a meeting, a written notice of the meeting shall be given not less than 10 nor more than 60 days before the date of the meeting to each shareholder entitled to vote at the meeting. Such notice shall state the place, date and hour of the meeting, and (i) in the case of a special meeting, the general nature of the business to be transacted, and no other business may be transacted, or (ii) in the case of the annual meeting, those matters which the Board of Directors, at the time of the mailing of the notice, intends to present for action by the shareholders. The notice of any meeting at which directors are to be elected shall include a list of the names of the nominees intended at the time of the mailing of the notice to be presented by the Board of Directors for election.

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

Section 1.5. **Adjournments.** When a shareholders’ meeting is adjourned to another time

or place, except as otherwise provided in this Section 1.5, notice need not be given of any such adjourned meeting if the date, time and place thereof are announced at the meeting at which the adjournment is taken. At the adjourned meeting, the Company may transact any business which might have been transacted at the original meeting. If the adjournment is for more than 120 days after the date of the original meeting, a new record date must be fixed for the adjourned meeting, and a notice of the adjourned meeting shall be given to each shareholder of record entitled to vote at the meeting.

Section 1.6. Validating Meeting of Shareholders; Waiver of Notice. The transactions of any meeting of shareholders, however called and noticed, and wherever held, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice or a consent to the holding of the meeting or an approval of the minutes thereof. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting.

Attendance of a person at a meeting shall constitute a waiver of notice of and presence at such meeting, except when the person objects, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened and except that attendance at a meeting is not a waiver of any right to object to the consideration of matters required by law to be included in the notice but not so included, if such objection is expressly made at the Meeting. Neither the business to be transacted at nor the purpose of any regular or special meeting of shareholders need be specified in any written waiver of notice, consent to the holding of the meeting or approval of the minutes thereof, except as required by the Massachusetts Business Company Act.

Section 1.7. Quorum. A majority of the shares entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of the shareholders. The shareholders present at a duly called or held meeting, at which a quorum is present, may continue to transact business until adjournment notwithstanding the withdrawal of enough shareholders to leave less than a quorum, if any action taken (other than adjournment) is approved by at least a majority of the shares required to constitute a quorum. In the absence of a quorum, any meeting of shareholders may be adjourned from time to time by the vote of a majority of the shares represented either in person or by proxy, but no other business may be transacted, except as provided in this Section 1.7.

Section 1.8. Organization. Meetings of shareholders shall be presided over by the Chairperson of the Board of Directors, if any, or in the absence of the Chairperson of the Board of Directors by the Vice Chairperson of the Board of Directors, if any, or in the absence of the Vice Chairperson of the Board of Directors by the President, or in the absence of the foregoing persons by a chairperson designated by the Board of Directors, or in the absence of such designation by a chairperson chosen at the meeting. The Secretary, or in the absence of the Secretary, an Assistant Secretary, shall act as secretary of the meeting, or in their absence, the chairperson of the meeting may appoint any person to act as secretary of the meeting.

Section 1.9. Voting. Unless otherwise provided in the articles of Company of the Company, as may be amended from time to time (the "Articles of Company"), each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote of shareholders. The President holds the tie breaking vote on all hung votes and must be the final vote tallied.

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

Except as otherwise provided in the Articles of Company and subject to the Massachusetts Business Company Act, directors are elected by a plurality of the votes. Each shareholder who is entitled to vote at an election of directors has the right to vote the number of shares owned by him or her for as many persons as there are directors to be elected and for whose election the shareholder has a right to vote. Shareholders do not have a right to cumulate their votes for directors unless the Articles of Company so provide.

In all other matters, unless otherwise provided by the Massachusetts Business Company Act, the Articles of Company or the bylaws of the Company, as may be amended from time to time (the "Bylaws"), the affirmative vote of the holders of a majority of the shares entitled to vote on the subject matter at a meeting in which a quorum is present shall be the act of the shareholders. Where a separate vote by class or classes is required, the affirmative vote of the holders of a majority of the shares of such class or classes at a meeting in which a quorum is present shall be the act of such class or classes, except as otherwise provided by the Massachusetts Business Company Act, the Articles of Company or the Bylaws.

Section 1.10. Shareholder's Proxies. At all meetings of shareholders, a shareholder may vote by proxy executed in writing by the shareholder or by his or her duly authorized attorney-in-fact. Such proxy shall be filed with the Secretary of the Company before or at the time of the meeting. No proxy shall be valid after the expiration of 11 months from the date thereof unless otherwise expressly provided in the proxy. Every proxy continues in full force and effect until revoked by the person executing it prior to the vote pursuant thereto except as otherwise provided in this Section 1.10. Such revocation may be affected by a writing delivered to the Company stating that the proxy is revoked; by a subsequent proxy that is executed by the person who executed the prior proxy and presented to the meeting; or by voting in person by the person executing the proxy.

Section 1.11. Inspectors. In advance of any meeting of shareholders, the Board of Directors may appoint inspectors of election to act at the meeting and any adjournment thereof.

Section 1.12. Fixing Date for Determination of Shareholders of Record. In order that the Company may determine the shareholders entitled to notice of any meeting or to vote or to express consent to corporate action in writing without a meeting or entitled to receive payment of any dividend or other distribution or allotment of any rights or entitled to exercise any rights in respect of any other lawful action, the Board of Directors may fix, in advance, a record date, which shall not be more than 70 days before the meeting or action requiring a determination of the shareholders.

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

Section 1.13. Consent of Shareholders in Lieu of Meeting. Unless otherwise provided in the Articles of Company, any action which may be taken at any annual or special meeting of the shareholders may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, is dated and signed by the holders of outstanding shares having at least the minimum number of votes that would be necessary to authorize or take such action at a meeting. No written consent shall be effective to take the corporate action referred to therein unless, within 60 days of the date of the earliest dated consent delivered in the manner required by this Section 1.13, written consents signed by the number of shareholders required to take action are delivered to the Company by delivery to its principal office in the state of Massachusetts, its principal place of business, the corporate secretary, or another officer or agent of the Company having custody of the book in which proceedings of meetings of shareholders are recorded. Any written consent may be revoked prior to the date that the Company receives the required number of consents to authorize the proposed action. No revocation is effective unless in writing and until received by the Company at its principal office.

Within 10 days after obtaining authorization by written consent, notice must be given to those shareholders who have not consented in writing or who were not entitled to vote on the action. The notice shall fairly summarize the material features of the authorized action. If the action causes dissenters' rights to be provided under the Massachusetts Business Company Act, the notice shall contain a clear statement of the right of shareholders dissenting therefrom to be paid the fair value of their shares upon compliance with further provisions of the Massachusetts Business Company Act regarding the rights of dissenting shareholders.

ARTICLE II

Board of Directors

Section 2.1. Powers; Number; Qualifications. The business and affairs of the Company shall be managed by, and all corporate powers shall be exercised by or under, the direction of the Board of Directors, except as otherwise provided in the Bylaws or in the Articles of Company. The number of directors comprising the Board of Directors shall be six (6), unless and until otherwise determined by vote of a majority of the entire Board of Directors.

Section 2.2. Election; Term of Office; Resignation; Newly Created Directorships and Vacancies. At each annual meeting of shareholders, directors shall be elected to hold office until the next annual meeting. Each director, including a director elected to fill a vacancy, shall hold office until the expiration of the term for which elected and until a successor has been elected and qualified. Any director may resign effective upon giving written notice to the Chairperson of the Board of Directors, and/or the Secretary or the Board of Directors unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected to take office when the resignation becomes effective. There will be four (4) permanent seats reserved for the founders, or a person elected by the founders, of JustinCredible Cultivation, LLC on the Board. The officer seats on the board will be permanent until the company has been active in business for 10 years. Once the company has been active in business for 10 years, the Board will vote on the need for new officers.

Subject to the provisions of the Articles of Company, any director, beside the four Officer Board Members elected within the first 10 years, may be removed with or without cause at any time by the shareholders of the Company at a special meeting called for such purpose.

Unless otherwise provided in the Articles of Company or the Bylaws, newly - created directorships resulting from an increase in the number of directors, shall be filled by vote of a majority of the directors then in office, although less than a quorum, or by a sole remaining director.

Unless otherwise provided in the Articles of Company or the Bylaws, vacancies on the Board of Directors may be filled by appointment by the Board of Directors. The shareholders may elect a director at any time to fill a vacancy not filled by the Board of Directors. A director elected to fill a vacancy shall be elected to hold office for a term expiring at the next annual meeting of shareholders, or until his or her earlier death, resignation or removal.

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

Section 2.4. Special Meetings; Notice of Meetings; Waiver of Notice. Special meetings of the Board of Directors may be held at any time or place within or without the state of Massachusetts whenever called by the Chairperson of the Board of Directors, by the Vice Chairperson of the Board of Directors, if any, or by any four directors. Special meetings shall be held on five days' notice by mail or 48 hours' notice delivered personally or by telephone, facsimile or any other means of communication authorized by the Massachusetts Business Company Act. Notice delivered personally or by telephone may be transmitted to a person at the director's office who can reasonably be expected to deliver such notice promptly to the director.

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

Section 2.5. Participation in Meetings by Conference Telephone Permitted. Annual meetings that require in-person attendance will allow a Teleconference option for individuals who cannot attend, with Notice of Reason filed by the Secretary. Members of the Board of Directors, or any committee designated by the Board of Directors, may participate in a meeting of the Board of Directors or of such committee, as the case may be, through the use of teleconference or similar communications equipment permitted by the Massachusetts Business Company Act, so long as all members participating in such meeting can hear one another. Participation in a meeting pursuant to this Section 2.5 shall constitute presence in person at such meeting.

Section 2.6. Quorum; Adjournment; Vote Required for Action. At all meetings of the Board of Directors, a majority of the authorized number of directors shall constitute a quorum for the transaction of business. Subject to the provisions of the Massachusetts Business Company Act, every act or decision done or made by a majority of the directors present at a meeting at which a quorum is present shall be the act of the Board of Directors unless the Articles of Company or the Bylaws require a vote of a greater number. Each director present will have one vote, regardless of the number of shares of stock held by such director.

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

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

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

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

Section 2.10. **Interested Directors; Quorum.** No contract or transaction between the Company and one or more of its directors or between the Company and any other Company, firm, association or entity in which one or more of the Company's directors are directors, officers or financially interested shall be void or voidable because of such relationship or interest, because such directors (the "Interested Directors") are present at the meeting of the Board of Directors or a committee of the Board of Directors which authorizes, approves, or ratifies such contract or transaction, or because the votes of Interested Directors are counted for such purpose if:

a) the facts about the relationship or interest of the Interested Directors are fully disclosed to, or are known to, the Board of Directors or the committee and a majority of the Board of Directors or committee with no relationship or interest in the contract or transaction authorizes, approves or ratifies the contract or transaction by a vote sufficient for the purpose without counting the votes or consents of the Interested Directors; provided that, if the Board of Directors is comprised of a single director, the Board of Directors may not authorize, approve, or ratify a transaction under this subsection;

b) the facts about the relationship or interest of the Interested Directors are fully disclosed to, or are known by, the shareholders and such contract or transaction is authorized, approved or ratified by the holders of a majority of the shares entitled to vote under this subsection in good faith (i) without counting the votes or consents of the shares owned by or voted under the control of an Interested Director and (ii) with the holders of a majority of the shares, whether or not present, entitled to vote on the transaction under this subsection constituting a quorum for the purpose of taking such action under this subsection; or

c) the contract or transaction is fair and reasonable as to the Company at the time it is authorized by the Board of Directors, a committee, or the shareholders.

ARTICLE III

Executive and Other Committees

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

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

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

ARTICLE IV

Officers

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

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

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

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

Commented [1]: Add Chief Officers - CEO add compensation, - Exec Offc Level of Compensation: housing, car maintenance, etc

Section 4.5. **Chairperson.** The Chairperson shall be the Chief Executive Officer of the Company and shall have general supervision over the business of the Company; subject, however, to the control of the Board of Directors and of any duly authorized committee of directors. He or she shall preside at all meetings of the shareholders and of the Board of Directors. He or she may, with the Secretary or the Treasurer or an Assistant Secretary or an Assistant Treasurer, sign certificates for shares of capital stock of the Company. He or she may sign and execute in the name of the Company deeds, mortgages, bonds, contracts and other instruments, except in cases where the signing and executing thereof shall be expressly delegated by the Board of Directors or by the Bylaws to some other officer or agent of the Company, or shall be required by law otherwise to be signed or executed; and, in general, he or she shall perform all duties incident to the office of Chairperson and such other duties as from time to time may be assigned to him or her by the Board of Directors.

Section 4.6. **President.** The President shall be the Chief Financial Officer of the Company and shall have general supervision over the day-to-day affairs of the Company, subject, however, to the control of the Chairman, the Board of Directors and any duly-authorized committee of directors. The President shall, if the Chairperson shall not be present, preside at meetings of the shareholders and at meetings of the Board of Directors. He or she may, with the Secretary or the Treasurer or an Assistant Secretary or an Assistant Treasurer, sign certificates for shares of capital stock of the Company. He or she may sign and execute in the name of the Company deeds, mortgages, bonds, contracts and other instruments, except in cases where the signing and execution thereof shall be expressly delegated by the Board of Directors or by the Bylaws to some other officer or agent of the Company, or shall be required by law otherwise to be signed or executed; and, in general, he or she shall perform all duties incident to the office of President and such other duties as from time to time may be assigned to him or her by the Board of Directors.

Section 4.7. **Vice Presidents.** At the request of the President, or, in his or her absence, at the request of the Board of Directors, the Vice Presidents shall (in such order as may be designated by the Board of Directors or, in the absence of any such designation, in order of seniority based on age) perform all of the duties of the President and so acting shall have all the powers of, and be subject to, all restrictions upon the President. Any Vice President may, with the Secretary or the Treasurer or an Assistant Secretary or an Assistant Treasurer, sign certificates for shares of capital stock of the Company. Any Vice President may sign and execute, in the name of the Company, deeds, mortgages, bonds, contracts or other instruments authorized by the Board of Directors, except in cases where the signing and execution thereof shall be expressly delegated by the Board of Directors or by the Bylaws to some other officer or agent of the Company, or shall be required by law otherwise to be signed or executed. Each Vice President shall perform such other duties as from time to time may be assigned to him by the Board of Directors, by the Chairperson or by the President.

Section 4.8. **Secretary.** The Secretary, if present, shall act as secretary of all meetings of the shareholders and of the Board of Directors, and shall keep the minutes thereof in the proper book or books to be provided for that purpose; he or she shall see that all notices required to be given by the Company are duly given and served; he or she may, with the Chairperson, the President or a Vice President, sign certificates for shares of capital stock of the Company; he or she shall be custodian of the seal of the Company and may seal with the seal of the Company, or a facsimile thereof, all certificates for shares of capital stock of the Company and all documents the execution of which on behalf of the Company under its corporate seal is authorized in accordance with the provisions of the Bylaws; he or she shall have charge of the stock ledger and also of the other books, records and papers of the Company relating to its organization and management as a Company, and shall see that the reports, statements and other documents required by law are properly kept and filed; and shall, in general, perform all the duties incident to the office of Secretary and such other duties as from time to time may be assigned to him by the Board of Directors, by the Chairperson or by the President.

Section 4.9. **Treasurer.** The Treasurer shall have charge and custody of, and be responsible for, all funds, securities and notes of the Company; receive and give receipts for moneys due and payable to the Company from any source whatsoever; deposit all such moneys in the name of the Company in such banks, trust companies or other depositories as shall be selected in accordance with these Bylaws; against proper vouchers, cause such funds to be disbursed by checks or drafts on the authorized depositories of the Company signed in such manner as shall be determined in accordance with any provisions of the Bylaws, and be responsible for the accuracy of the amounts of all moneys so disbursed; regularly enter or cause to be entered in books to be kept by him or her or under his or her direction full and adequate account of all monies received or paid by him or her for the account of the Company; have the right to require, from time to time, reports or statements giving such information as he or she may desire with respect to any and all financial transactions of the Company from the officers or agents transacting the same; render to the Chairperson, the President or the Board of Directors, whenever the Chairperson, the President or the Board of Directors, respectively, shall require him or her so to do, an account of the financial condition of the Company and of all his or her transactions as Treasurer; exhibit at all reasonable times his or her books of account and other records to any of the directors upon application at the office of the Company where such books and records are kept; and, in general, perform all the duties incident to the office of Treasurer and such other duties as from time to time may be assigned to him or her by the Board of Directors, by the Chairperson or by the President; and he or she may sign with the Chairperson, the President or a Vice President certificates for shares of capital stock of the Company.

Section 4.10. **Assistant Secretaries and Assistant Treasurers.** Assistant Secretaries and Assistant Treasurers shall perform such duties as shall be assigned to them by the Secretary or by the Treasurer, respectively, or by the Board of Directors, by the Chairperson or by the President. Assistant Secretaries and Assistant Treasurers may, with the Chairperson, the President or a Vice President, sign certificates for shares of capital stock of the Company.

ARTICLE V

Forms of Certificates; Loss and Transfer of Shares

Section 5.1. **Forms of Certificates.** Every holder of shares in the Company is entitled to have a certificate signed in the name of the Company by (a) the President, any Vice President, Chairperson of the Board of Directors or Vice Chairperson of the Board of Directors, and (b) by the Chief Financial Officer, Treasurer, Assistant Treasurer, Secretary or Assistant Secretary, of the Company, certifying the number of shares and the class or series of shares owned by such shareholder. If such certificate is manually signed by one officer or manually countersigned by a transfer agent or by a registrar, any other signature on the certificate may be a facsimile. If any officer, transfer agent or registrar who signs or whose facsimile signature is placed upon a certificate ceases to remain in such position before such certificate is issued, it may be issued by the Company with the same effect as if such person were such officer, transfer agent or registrar at the date of issue.

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

ARTICLE VI

Records and Reports

Section 6.1. **Shareholder Records.** The Company shall keep, at its principal executive office or at the office of its transfer agent or registrar, a record of the names and addresses of all shareholders and the number and class of shares held by each shareholder, as well as all written communication with shareholders within the past three (3) years.

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

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

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

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

Section 6.6. **Financial Statements.** The Company shall keep a copy of each annual financial statement, quarterly or other periodic income statement, and accompanying balance sheets prepared by the Company on file in the Company's principal office for 12 months; these documents shall be exhibited at all reasonable times, or copies provided, to any shareholder on demand.

Section 6.7. **Director and Officer Records.** The Company shall keep a list of the names and business addresses for the Company's current directors and officers.

Section 6.8. **Form of Records.** Any records maintained by the Company in the regular course of its business, with the exception of minutes of the proceedings of the shareholders, and of the Board of Directors and its committees, but including the Company's stock ledger and books of account, may be kept on, or be in the form of, magnetic tape, photographs, microphotographs or any other information storage device, provided that the records so kept can be converted into clearly legible form within a reasonable time. The Company shall so convert any records so kept upon the request of any person entitled to inspect the same.

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ARTICLE VII

Miscellaneous

Section 7.1. **Principal Executive or Business Offices.** The Board of Directors shall fix the location of the principal executive office of the Company at any place either within or without the state of Massachusetts. The Company may also have additional offices in other places as the Company's business may require, and as the Board of Directors may determine from time to time.

Section 7.2. **Fiscal Year.** The fiscal year of the Company shall be determined by the Board of Directors.

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

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

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

Section 7.6. **Dividends.** The Board of Directors may from time to time declare, and the Company may pay dividends on its outstanding shares in the manner and upon the terms and conditions provided by Massachusetts law and its Articles of Company. No distribution may be made if, after giving it effect:

- a) The Company would not be able to pay its debts as they become due in the usual course of business; or
- b) The Company's total assets would be less than the sum of its total liabilities plus the amount that would be needed, if the Company were to be dissolved at the time of the distribution, to satisfy the preferential rights upon dissolution of shareholders whose preferential rights are superior to those receiving the distribution.

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

[Remainder Intentionally Left Blank.]

CERTIFICATE OF SECRETARY OF

JustinCredible Cultivation, LLC

The undersigned, Reginald Stanfield, as Secretary of JustinCredible Cultivation, LLC, a Massachusetts Company (the "Company"), hereby certifies the attached document is a true and complete copy of the bylaws of the Company and that such bylaws were duly adopted by the Board of Directors of the Company on the date set forth below.

IN WITNESS WHEREOF, the undersigned has executed this certificate as of
_____, 20____.

Jonathan M. Siberon
Secretary



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: 001342765

1. The exact name of the limited liability company is: JUSTINCREDIBLE CULTIVATION, LLC

2a. Location of its principal office:

No. and Street: 0 POWELL ROAD

City or Town: CUMMINGTON

State: MA

Zip: 01026

Country: USA

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

No. and Street: 0 POWELL ROAD

City or Town: CUMMINGTON

State: MA

Zip: 01026

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:

AGRICULTURAL

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: SHARI THOMAS

No. and Street: 63 FLORENCE ST

City or Town: BROCKTON

State: MA

Zip: 02301

Country: USA

I, SHARI THOMAS 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	REGINALD STANFIELD 2ND	0 POWELL ROAD CUMMINGTON, MA 01026 USA
MANAGER	CHETOIA WALKER	0 POWELL ROAD CUMMINGTON, MA 01026 USA
MANAGER	TERRANCE HANELY	0 POWELL ROAD CUMMINGTON, MA 01026 USA
MANAGER	JONATHAN SIBERON	0 POWELL ROAD CUMMINGTON, MA 01026 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

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	REGINALD STANFIELD 2ND	0 POWELL ROAD CUMMINGTON, MA 01026 USA
REAL PROPERTY	TERRANCE HANELY	0 POWELL ROAD CUMMINGTON, MA 01026 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 23 Day of August, 2018,
REGINALD STANFIELD
(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:

August 23, 2018 10:14 AM

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



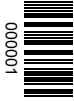
Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L1627275904
Notice Date: August 24, 2018
Case ID: 0-000-485-523



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



REGINALD STANFIELD
JUSTINCREDIBLE CULTIVATION
0 POWELL ROAD
CUMMINGTON MA 01026

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, JUSTINCREDIBLE CULTIVATION 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?

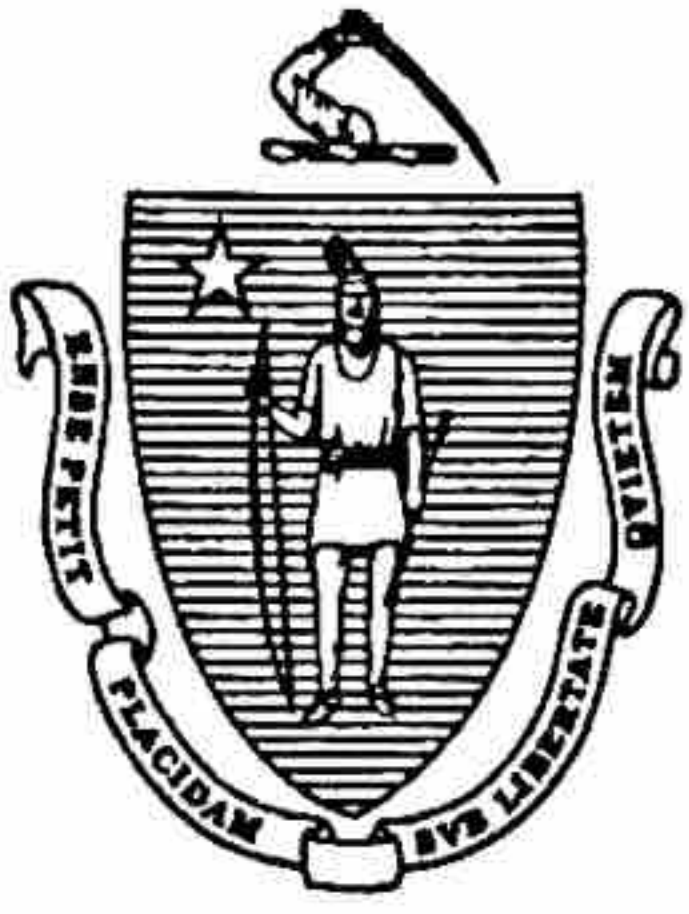
If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

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



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

William Francis Galvin
Secretary of the
Commonwealth

August 24, 2018

TO WHOM IT MAY CONCERN:

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

JUSTINCREDIBLE CULTIVATION, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **August 23, 2018.**

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

I also certify that the names of all managers listed in the most recent filing are: **REGINALD STANFIELD 2ND, CHETOIA WALKER, TERRANCE HANELY, JONATHAN SIBERON**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **REGINALD STANFIELD 2ND, CHETOIA WALKER, TERRANCE HANELY, JONATHAN SIBERON**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **REGINALD STANFIELD 2ND, TERRANCE HANELY**

In testimony of which,

I have hereunto affixed the

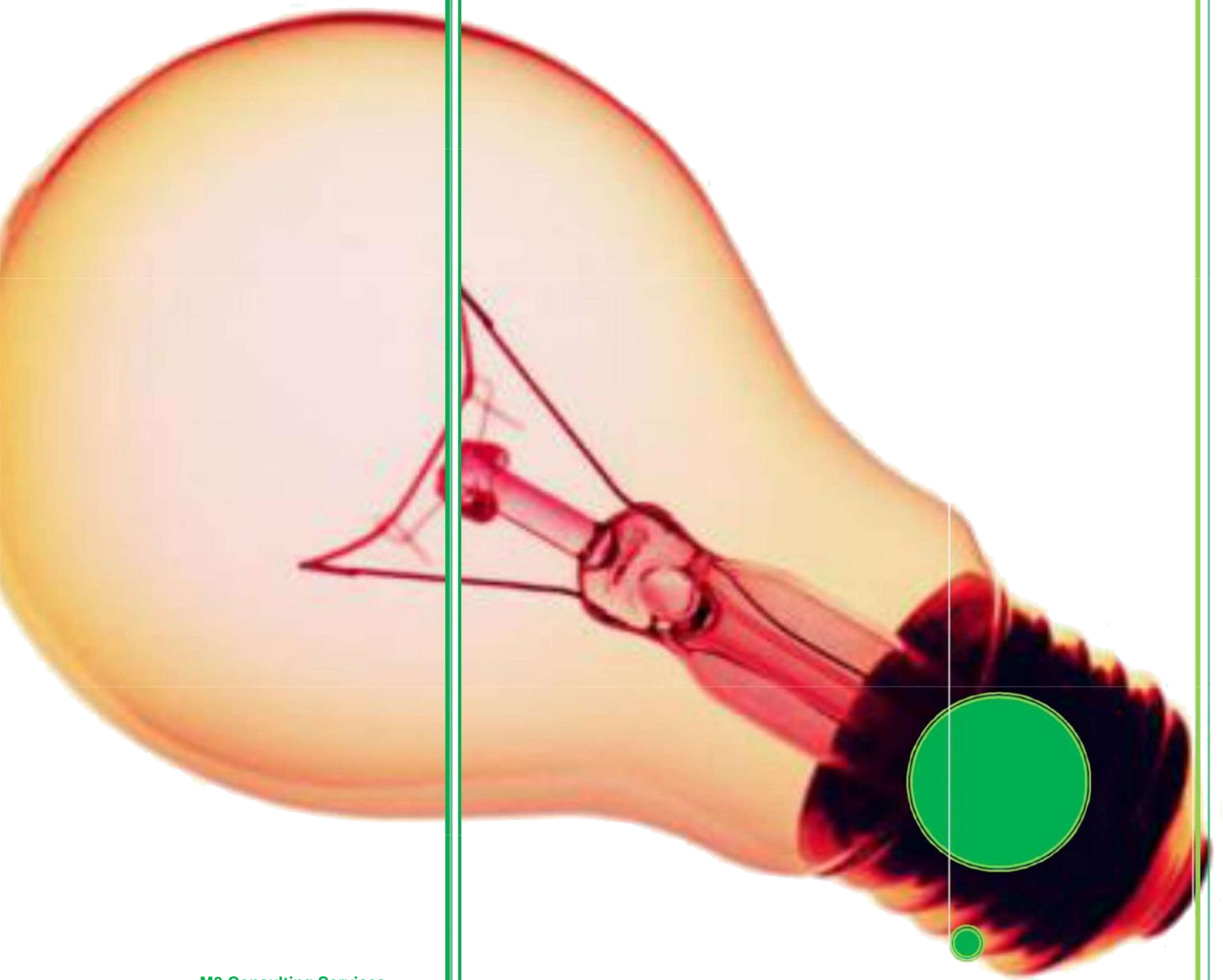
Great Seal of the Commonwealth

on the date first above written.



William Francis Galvin

Secretary of the Commonwealth



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JustinCredible Cultivation

Business Plan 2018

EXECUTIVE SUMMARY

JustinCredible Cultivation, LLC (JCC), is breaking into the Cannabis industry as a family owned Certified Disadvantaged Business Enterprise. JCC Board of Directors, managers, and volunteers are made up of individuals belonging to distinct cultures and individual preferences. This allows JCC to meet the qualifications of a Minority owned and Veteran owned business. The top priority of JCC is to surpass business ethics and to provide a future cornerstone of progressive and safe cannabis regulated practices into the state of Massachusetts and city of Cummington. The cannabis industry is a highly regulated industry that requires a high level of awareness and capital to break into the industry. Entering this industry also creates a variety of obstacles for small businesses that may seem to impede or completely deter small business entrepreneurs from thriving in the industry. Our plans are to create a business model that can be an example for small business entrepreneurs.

JCC will focus on a developmental plan that creates growth and opportunity for massive expansion. JCC will do this by bringing the community into our business through proper cannabis education & awareness, and through multiple outreach programs. Since JCC is a for-profit business, developed with a product that may still be considered taboo for some, and even a dangerous substance, it is important that our community has a clear understanding of our regulation and security practices. Keeping our product securely tracked and only in the hands of our consumers, which includes the dispensaries and manufacturers, is one of our main focuses.

Mission: JCC will focus on organic and high-quality growth. This will give our consumers a more home-grown based idea to a commercial cultivation facility. Using high quality equipment and the best practices, our cultivation facility will shine in the industry. Keeping our cultivation facility known, but not sensed, is an important part of our business future practices. Using carbon filters to eliminate smell, a light sealed space to not add light pollution to the community, and a secure location and facility will deter problems with unlawful activities.

Vision: JCC is a great example of a small business entering into a market made for giants. Expanding rapidly while helping develop the community simultaneously is a long-term goal of our company. Changing the belief of cannabis use and educating the community will be on the forefront of our agenda while also upholding the standards/regulations of the state of Massachusetts Cannabis Control Commission (CCC).



TARGET MARKET

Our target market is solely business-to-business sales. This creates a high-level product for dispensaries and manufactures to sell and use in the making of their products.

Potential Available Market (PAM)- We have a potential population of 6.9 million citizens and 8.3 million tourists visiting the state each year. Compared to Washington state's 7 million citizens and 19 million tourists, California's 39.5 million citizens and 251 million tourists, Oregon's 4.143 million citizens and 9 million tourists, Nevada's 3 million citizens and 43 million tourists and Colorado's 5.6 million citizens and 77 million tourists. Our potential consumer base is comparable to Oregon and slightly to the state of Washington.

Total Available Market (TAM)- Our Total Available Market will be the dispensaries and manufacturers in the state of Massachusetts. JCC will be a wholesaler and supply the dispensaries with the product that will be at high demand. The Massachusetts CCC began releasing cultivation licenses on July 1st with only 22 Registered Medical Dispensaries (RMD) open and cultivating cannabis. In the months needed to produce a viable product, we will have our sale of market. Currently, there are 17 retail shops and 12 manufactures' licenses submitted, and JCC will be contacting and building relationships with the complete list of licensed businesses.

Serviceable Available Market (SAM)- We have the capability of 100% of the market, since the surge of demand will be high and there may not be a high number of cultivators that were granted licenses.

Serviceable Obtainable Market (SOM)- In the state of Massachusetts, there are almost 1 million cannabis users. This leaves our market of 14% of the population as a potential market. This compares closely to California at 14.9%, 5.5% lower than Oregon at 19.5%, 6% lower than Washington at 20% and 7% lower than Colorado at an amazing 21.6% of citizens that are daily consumers of cannabis.

Our competition is currently the 22 RMDs that are seeking recreational applications and licenses and the 18 cultivators that have submitted their application. Massachusetts has the potential to sell an estimated amount of 70,000 to 150,000 lbs. of cannabis. If all businesses equally share the market, then each cultivator must produce between 1,707-3,658 lbs. of cannabis each. With our cultivation strategy, we plan to produce 187 lbs. per harvest and 15 harvests per year.

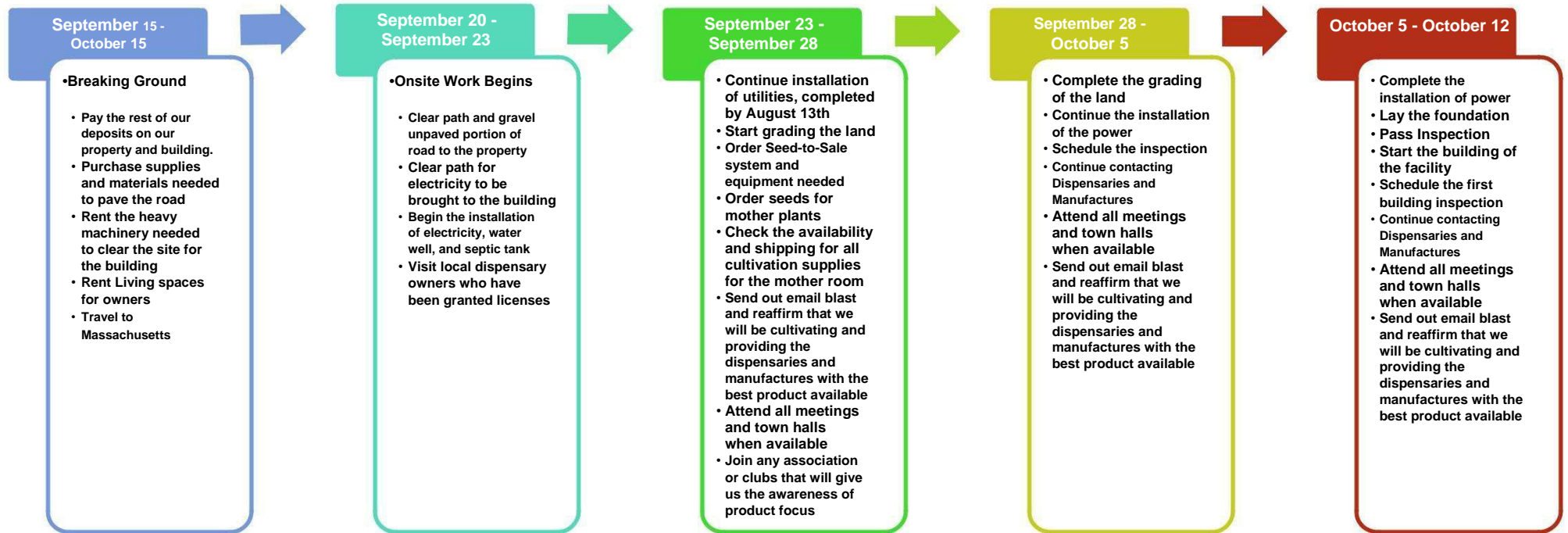
TRACTION

JustinCredible Cultivation has created traction in the most important area when applying for a cultivation facility. Being accepted by the community and placing a contract, or lease, on a location is becoming a challenge for companies entering Massachusetts' industry. We have already gained the approval of the city of Cummington and will attach a copy of the Host Community Agreement. Cannabis locations in the state of Massachusetts are not at high supply. Half of the city municipalities have voted to ban cannabis businesses or placed moratoriums, leaving cultivation locations at a high demand. Massachusetts has yet to reward licenses to dispensaries. As a startup business in this industry, JCC cannot legally gain customers until post-license approval. As of now, traction represented through sales are not possible.

Our ownership will use its experience expanding its business to gain clients and business partnerships. Doing simple practices by reaching out to the owners of the dispensaries, offering competitive pricing, and being transparent about cultivation practices will raise our brand's reputation.

JustinCredible Cultivation, being a wholesale distributor to the manufactures and the dispensaries, will open up our entire customer base. The price to sell one unit of cannabis is unknown because certain factors will be determined when each dispensary opens, and the market presents its supply and demand levels. There is an advantage to be gained by entering into the market place before the competition floods and dilutes the market. Being first in business-to-business relationships has the same effect of being the first product the consumer experiences and loves. History has shown that the industry pioneers usually control and dominate the market: Coca-Cola, Heineken, and Gatorade were the first of their kind, and they are currently first or second in market shares. We plan to be one of the first cultivators that the dispensaries and manufacturers are familiar with and ensuring that they are satisfied with our product.

PRODUCT ROAD MAP



October 12 - October 19

- Complete the building
- Pass first building inspection
- Install electrical and fire suppression
- Schedule second building inspection
- Order all lights, growing materials and nutrients
- Order supplies to build grow rooms
- Schedule final inspection
- Schedule provisional license inspection
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls when available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available

October 19 - November 2

- Finish all rooms inside grow facility
- Install security cameras and sensors
- Train staff on daily procedures
- Test security system
- Pass final inspection
- Receive full license
- Start Germination of mother plants
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls we are available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available

November 2 - November 23

- Grow mother plants to clone-ready state
- Clone mother plants and start the propagation stage
- Train and practice procedures for the growing and transporting of cannabis
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls we are available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available

November 23 - December 28

- Finish the Propagation stage
- Start and complete the Vegetative cycle
- Train and practice procedures for the growing and transporting of cannabis
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls we are available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available
- Start the perpetual growth cycle

December 28 - February 8

- Start and complete the flower cycle
- Train and practice procedures for the growing and transporting of cannabis
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls we are available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available

February 8 - February 18

- Harvest all plants
- Dry and trim plants to company standards
- Begin curing progress
- Train and practice procedures for the growing and transporting of cannabis
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls we are available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available

February 18 - March 8

- Complete the curing process
- Begin packaging the product
- Complete 2nd harvest
- Train and practice procedures for the growing and transporting of cannabis
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls we are available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available
- Transport product for sell
- Complete 3rd harvest

March 8 - March 15

- Continue perpetual growth cycles
- Interview and hire employees
- Train and practice procedures for the growing and transporting of cannabis
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls we are available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available

March 15 - April 15

- Train Employees
- Transport product for sale
- Complete 4th harvest
- Transport product for sell & pay all city taxes
- Complete 5th harvest
- Transport product for sell & pay all city taxes
- Complete 6th harvest
- Train and practice procedures for the growing and transporting of cannabis
- Continue contacting Dispensaries and Manufactures
- Attend all meetings and town halls we are available
- Send out email blast and reaffirm that we will be cultivating and providing the dispensaries and manufactures with the best product available

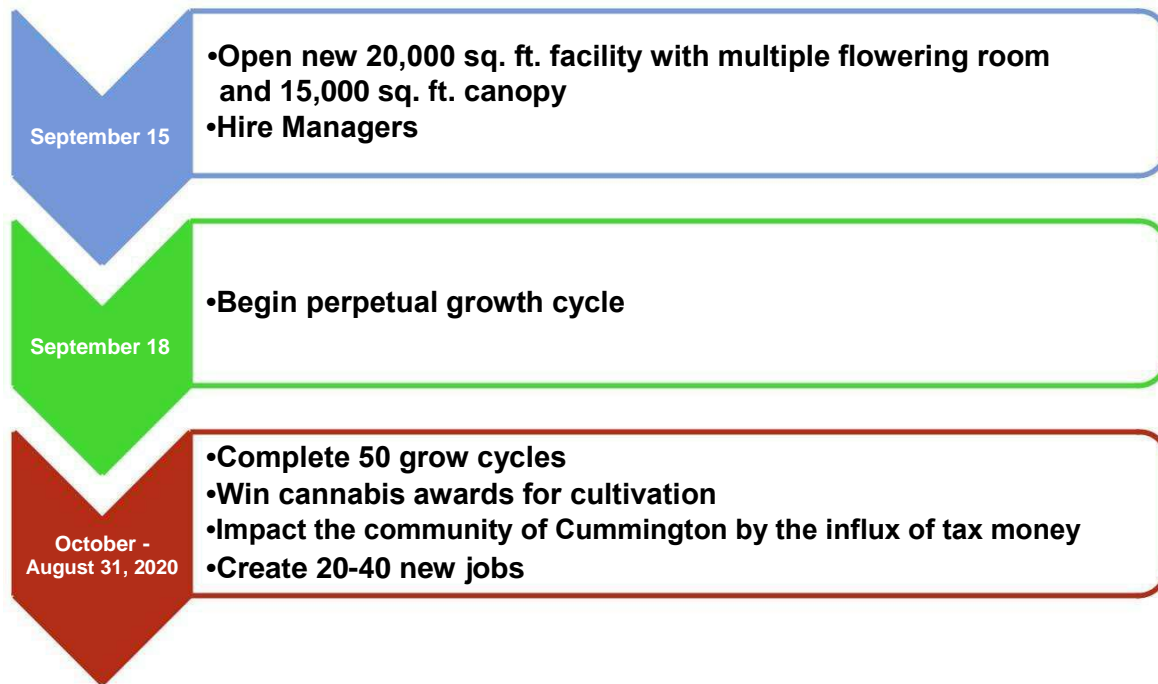
April 15 -
September 1, 2019

- Complete 6th-15th harvest
- Transport and sell & pay all city taxes
- Plan and apply for 20,000 sqft. canopy
- Repay initial investment
- Send fiscal yearend financial statements to owners
- Start new fiscal year
- Train and practice procedures for the growing and transporting of cannabis

PRODUCTION MILESTONES – YEAR ONE



PRODUCTION MILESTONES – YEAR TWO



HARVEST MILESTONE – YEAR ONE

Date	Harvest Order
February 10	1 st
February 17	2 nd
March 3	3 rd
March 17	4 th
March 31	5 th
April 14	6 th
April 28	7 th
May 12	8 th
May 26	9 th
June 9	10 th
June 23	11 th
July 14	12 th
July 28	13 th
August 11	14 th
August 25	15 th

SELL MILESTONE – YEAR ONE

Date	Sell Order
February 8	1 st
February 15	2 nd
March 29	3 rd
April 12	4 th
April 26	5 th
May 3	6 th
May 31	7 th
June 14	8 th
July 5	9 th
July 26	10 th

HARVEST MILESTONE – YEAR TWO

Date	Harvest Order
September 1	1 st
September 8	2 nd
September 15	3 rd
September 22	4 th
September 29	5 th
October 5	6 th
October 12	7 th
October 19	8 th
October 26	9 th
November 3	10 th
November 10	11 th
November 17	12 th
November 24	13 th
December 1	14 th
December 8	15 th
December 15	16 th
December 22	17 th
December 29	18 th
January 5	19 th
January 12	20 th
January 19	21 st
January 26	22 nd
February 9	23 rd
February 16	24 th
February 23	25 th
March 1	26 th

March 8	27th	
March 15	28th	
March 22	29th	
March 29	30th	
April 5	31st	
April 12	32nd	
April 20	33rd	
April 26	34th	
May 3	35th	
May 10	36th	
May 17	37th	
May 24	38th	
May 31	39th	
June 7	40th	
June 14	41st	
June 21	42nd	
June 28	43rd	
July 5	44th	
July 12	45th	
July 19	46th	
July 26	47th	
August 2	48th	
August 9	49th	
August 16	50th	

PROBLEM SOLVING

Massachusetts will create a major demand for cannabis. By not allowing for huge companies to corner the market, it will create space for smaller cultivation facilities to capture a part market share. Massachusetts will open with only 22 RMD cultivators. Once they allow recreational cultivations to begin operating, there will be a drought during the months needed to grow, harvest, and prepare for sell. Therefore, there will be a high demand for product. Opening our cultivation center in a small-town hosts multiple benefits such as minimal air pollution, organic reliability, and the stamp of cannabis being cultivated in a rural farm town. JustinCredible Cultivation can build relationships that depend on a home style niche of cultivating. In Massachusetts, people value home based products, fruits, and vegetables sold by farmers who set up stands, and these prices are usually at a higher value than their counterparts sold at chain food grocery stores. The people of Massachusetts also value home tapped maple trees that produce high quality syrup. JustinCredible Cultivation will replicate this style and cultivate cannabis that dispensaries will demand sold in their stores. Every market has a home style product that exploits the market and meets the customer's needs. In the beer industry, companies such as Corona and Red Stripe are authentic beers that gained their share of the market by providing the native niche taste of their countries.

MARKET INDUSTRY TIMING

Our company is Minority owned and Veteran owned. Massachusetts will be excited by supporting a business that brings diversity to the cannabis industry. Most companies are targeting bigger cities, so bringing our cultivation facility to a rural area provides a need for those rural cities that do not attract larger companies. By entering into the Massachusetts industry at its beginning, we are expecting market demand comparable to the other states that passed legislation to allow recreational cannabis. Massachusetts is set to hit a billion dollars in sales in its first two years. With every rush and market surge, there is a bubble. Entering first in a market that has already been tested and proven in other markets is a strategy that will allow JustinCredible Cultivation the ability to survive the flux of competitors.

All companies in every industry where their products or services cannot be patented are vulnerable to competitors that want their piece of the market as well. Coca-Cola has fought off Pepsi, RC Cola, and other brands for years. Heineken has been in the top two of imported beer since it was initially imported to the Americas. Sony also holds a grip on the gaming console industry even with Nintendo's legacy and Xbox's impressive technology. Marketing strategies will always change, the consumers and how they are reached will always need new and adaptive strategies. Even with the changes, once a consumer has accepted the brands that are numbers 1 and 2, it is hard to remove the quality from the brand's reputation. JCC will develop its reputation being one of the first MWV owned cannabis businesses focusing on organic and home style cultivating techniques. Being one of the first facilities opened is highly important and we cannot stress the benefits of entering the industry before it is diluted with competition. Because of the influx in competition, cultivators will not focus on the quality and meet the standards desired for future customers and business partners in comparison to the standards of JustinCredible Cultivation.

CULTIVATION STRATEGY

Our cultivation strategy is centered around the first four years of business operations. From research, we have found that the first four years of the industry life is where the most growth is seen. After Year 5, most states have a surplus that drops the price of cannabis to all-time lows. At this time, JCC will be a symbol of cultivation in the Massachusetts industry, starting from a 2,000 square foot facility expanding in Year 2 to a 20,000 sq. ft. facility. We are able to achieve this because of our owners' dedication and willingness to work the first year without drawing a salary from the company. Salary is a huge expense and we have decided to reinvest into JCC and draw salary for our employees the second year. The increase will allow us to jump from an 1,800 sq. ft. canopy to a 15,000 sq. ft. canopy. This allows us to become more efficient, have multiple flower rooms, and a higher harvest rate. With the market expected to hit \$1 billion by Year 3, this increase will come at the perfect time. We will spend our first year proving quality and building our reputation. The second year will move us into a major market position. The 3rd and 4th years will double expansion and product output. We are expecting the market to be at its peak, and JCC will have already positioned itself as a longtime cultivator in the market. Year 5 will be the surplus year and our retained earnings and planning will make the decrease in product value a smooth transition. Our cultivation rate is extreme, but within a market that opens with a limited number of suppliers and high demand, it is expected. Comparable to Colorado, which started with 4 RMDs before recreational, the expansion of the market was amazing. Massachusetts will follow suit, with its surrounding states still being illegal, recreational and medical, its market will blossom within the first four years. With that, we plan to start off small and explode with the market as it settles with the residents and mortarium's decrease and demand increases.

BUSINESS STRATEGY

The Recreational Cannabis industry is a high demand industry and our strategy is to focus on quality, compliance, and community. Most cannabis companies fail because of lack of planning, lack of security, and non-compliance. With JCC being a veteran owned business, we will use the security expertise of our Chief Compliance Officer (CCO). Using his background, serving in the military, our measures will be designed to maximize security and over achieving compliance regulations. Being a smaller business, our cultivation process will be easier to track and maintain consistency. It is a common franchise practice to have owners work in their stores for the start-up years. Our owners, being the ones who will develop, build and execute our Standard Operating Procedures (SOPs), will lessen the disconnect between upper management and add individual responsibility in every part of our SOPs. Starting small and building upon success is our strategy and the backbone of capitalism. JCC will be successful with our hands on, from the ground up, approach.

PEST Analysis

Political: <ol style="list-style-type: none"> 1. Increased Regulation 2. Deregulation 3. Federal Interference 4. City Moratoriums, Zoning & Bans 5. Negative perception amongst the community 6. Banking and profit management 7. Government-backed Facilities 	Socio-Cultural: <ol style="list-style-type: none"> 1. City Moratoriums, Zoning & Bans 2. Demand for product variety 3. Demand for product specification 4. User viewpoint on recreational cannabis 5. Charitable Contribution
Economy: <ol style="list-style-type: none"> 1. Competition could dilute the market 2. Deregulation can slow the turnover of certain strains, with more supply 3. Being unable to expand into more markets 4. Market Value of product 5. Expense of supplies 6. Tax Rates 	Technological: <ol style="list-style-type: none"> 1. In-house cultivation being automated

PEST Analysis provides an insight into our plans to develop JCC. There will be several challenges that can occur, and we will overcome them with proper planning. With American society becoming more progressive with alternative recreational additives and enhancers, we can see a trend of more states and even the federal government deregulating marijuana. Therein allowing people to cultivate freely in their homes and making the establishment of a cultivation facility easier; which will increase supply and lower demand. Once marijuana is federally deregulated, the government can financially back facilities and add to the competition of the market. By increasing quality and providing competitive pricing consistently, we will build up a brand and reputation for JCC. Crossing strains and creating our own brand of cannabis will keep our company viable in the industry. Creating a unique strain that is heralded by dispensaries will battle the flood into the market. Federal government still considers marijuana as completely illegal, and it can shut down all marijuana businesses if it chooses to. Massachusetts has already released statements saying they will uphold the decisions made by the residence of Massachusetts to allow the licensed cultivation, manufacturing, and selling of commercial cannabis. The city can also create road

blocks that can deter the progression of the cannabis industry by using moratoriums, and zoning & bans to temporarily or permanently shut down the industry in their city.

Tracking finances is important. Being on top of inventory and finances is a vital part of compliance. Since banks must be federally compliant, they do not accept marijuana businesses as members. Creating a sound financial foundation and being prompt with taxation deadlines will ensure compliance on all fronts. Tax rate changes are important and can change Return on Investments (ROI's) along with the market value and cost of supplies.

Our communities view of our impact on the resident population is a top priority to keep our reputation in good standing. Through education and appropriate transparency, we will keep the mysteries and unknowns to a minimum. When people are aware of all our Standard Operating Procedures (SOPs), they will be able to make an appropriate judgment of our business. This will leave little room for speculation and rumors to be assumed.

Charitable contributions and the moral responsibility to the community is a major part of our plan. Upon expansion, JCC will offer employment opportunities to the underprivileged. Providing employment will add to the economy and uplift this disadvantage. JCC will donate 1% of our net income to education and seek to start a not-for-profit to help kids who deal with obesity and malnutrition in the city of Springfield.

Technology can decrease the market share by providing automated cultivation machines for people to produce their own cannabis. Being unique and keeping our developed strain exclusive will give us an edge against all our competitors.

SWOT Analysis

Strengths: 1. Location 2. Business Experience 3. Security and Compliance Experience 4. Simplicity in company structure 5. Personal hands-on operation	Opportunities 1. Entering into a new industry market 2. Expansion 3. Creating a unique brand 4. Providing employment and opportunity 5. Charitable contributions
Weaknesses: 1. Regulations 2. Weather 3. Still Federally Illegal	Threats 1. Deregulation 2. Taxation 3. Change in Regulation

Our SWOT Analysis provides the perspective of the dynamics our business will deal with in our daily operations. Our location is deep within the rural city of Cummington. With 16 acres, we can choose the best location that has solitude and privacy, so we can ensure the security of our facility. Our company manages startups that have growing reputations and expand yearly. We have built our first company to be the first of its type to receive an A+ with the Better Business Bureau. With our management experience, JCC will build our business rapidly within the guidelines of the Massachusetts Cannabis Control Commission. Our company being managed and operated by the owners and volunteers, we will have a distinct advantage of ensuring our company's success. Since responsibilities are at the hands of the owners who have the most to lose, employee mistakes will not happen. JCC will focus on compliance instead of just earning a pay check. Once our company expands, JCC will personally select and train our first and new employees.

Entering into a newly developed market allows us to carve out our niche and capture market share while it's still available. Entering into a market late and after the smaller cultivators are established will increase the difficulty we will face carving out our market share. Expansion will be the by-product of compliance and consistency. Staying compliant and aware of our business practice will bring value and allow our business to successfully operate in the cannabis industry; which turns into income for expansion. With our property being on 26 acres, we will only start by using a small portion of the available property. We plan on expanding rapidly after our first full year of production. Moving from a 2,600 square foot facility to a 20,000 – 40,000 sq. ft. facility.

With our facility expansion, we will also use our space to provide free housing to our employees. This gives them a space to live, access to a close commute to their work place, and a healthy environment enabling success. A larger cultivation facility means more workers and more capital to develop programs throughout Cummington and Massachusetts overall. From education, to helping drug abuse and battered women, our company has an extreme interest in giving back and providing opportunities. We have donated our time and efforts by training and providing opportunities for those who would not normally have access.

Our weaknesses are highlighted as regulations, the weather, and federal interference. These weaknesses are an industry standard & preparing properly, staying state compliant, and having alternative plans in case of inclement weather can decrease the possible loss of production that may occur.

OWNERS' BIO

Reginald Stanfield – A self-made entrepreneur, built his first business from ground up. He graduated from Bowie State University, with a BS in Finance and Money Banking. Reginald worked for a medium company and quickly worked his way up the ladder from intern to Finance Manager in a matter of nine months. His duties included, managing Payroll, preparing expense reports, and supporting the CEO & COO which quickly put him on the fast track to become the company's CFO. During this time, Reginald started his first company, Masters of Mixology, LLP (M2), a private event bartender's service, thrusting him into the entrepreneur lifestyle and he didn't turn back. Starting from the ground up and putting all of his energy into M2, made it one of the first in its industry to receive an A+ rating and accreditation from the Better Business Bureau. As the business grew, so did the need for additional partnerships. Shortly in the development of M2, Reginald established a

partnership with Terrance Hanley (see Bio below). In addition to being educated in the world of Business, Reginald experienced the farm life. Being raised on a farm in North Carolina, Reginald has 20+ years of horticulture experience growing a variety of vegetables from tomatoes, squash, cucumbers and cabbage. He was also a part of multiple outdoor/indoor cannabis cultivations, and helped farm tobacco fields.

Terrance Hanley – A military veteran with vast experience in security, systems development, and multiple areas provides creative and compliance to our team. In 2016, Terrance and Reginald partnered to develop an Audio/Visual company by the name of JustinCredible Installs (JCI). JCI's main job was to plan and execute the special task of installing high-tech equipment in commercial establishments that used designed audiovisual systems. In the company's first year, JCI received gross income of \$84,000. With these projects, Terrance trained technicians, solved multiple problems, and lead a team of individuals that reached 10+ people. Terrance also holds a degree in Business and has construction experience building photography studios and apartment renovations.

MANAGEMENT POSITIONS

Chief Executive Officer: Reginald Stanfield

Qualifications: Bachelor's in a Business focused major, including 24 hours of management experience. With at least 4 years of experience in management positions. Developing a business from ground up. Some experience in horticulture. No felony or violent crime convictions.

Responsibilities: The CEO, being the visionary, is an extremely important role in every company, setting the tone for the company while upholding compliance and standards set forth in our SOPs and company bylaws. The CEO will be the face and median between the company and the community. Making sure the communities expectations are being met and there are no concerns that need to be addressed. The CEO will be an active worker on the day by day operations of JCC. Closing and opening the cultivation facility each morning will be the personal duty of the CEO for the first year of operation.

Experience: Reginald Stanfield has 10 years of agriculture experience, 10 years of accounting experience, 12 years of managerial experience, 5 years of business expansion and development experience, and 3 years of cannabis horticulturalist experience.

Reginald Stanfield was raised in a small town in North Carolina on a family farm where he learned agriculture from the age of 5 until adulthood. Learning how to cultivate fruits, vegetables, and tobacco, he gained a vast knowledge in the field of commercial agriculture. Maintaining water supply, managing pest, and harvesting crops were daily duties acquired throughout his childhood. This experience enables him to use his talents acquired in the work force to develop JustinCredible Cultivation. From 2000-2005 Reginald Stanfield learned firsthand how to care for cannabis on a private personal farm. His experience during this time is perfect because cultivating cannabis has its similarities to tomatoes but the variance in the nutrient upkeep and the need for special attention can only be gained through experience.

Experienced gained relative towards cannabis cultivation:

- Learning multiple training techniques such as Low-stress Training (LST), Lollipop, SCROGing, main lining, sea of green & super cropping, will be invaluable in the commercial recreational industry in order to produce top product efficiency.
- Learning all watering techniques, including top feeding, from individual water supplies, nutrient reservoirs that lead to drain to waste tables on drip systems, reservoirs that water through flood to waste systems, and deep-water culture systems.
- Pest management is a key role with all agriculture; even if it is an indoor cultivation facility. Reginald's experience in organic mixtures that rid spider mites, thrips, and other pests that harm the plants, prepares him to handle all the pest that can harm JustinCredible Cultivation crops.
- Harvesting is one of the most vital parts of the cycle of the commercial cannabis cultivation cycle. The quality of the trim job is important; cannabis is valued by its THC quantity, testing purity, and consistency. The hundreds of hours spent trimming equipped Reginald to become a master of trimming.
- Curing and drying are all personalized techniques each cultivator can produce, but it is important that this process is done correctly. Incorrect drying can destroy the smell of the product, making it less appealing to our customers. Reginald Stanfield will work closely with the Director of Horticulture (DoH) to develop and continue to improve the drying and curing of the cannabis flower.

In 2012, Reginald developed his first business by the name of Masters of Mixology (M2) while still working towards his bachelor's degree in Finance. The bartending industry is dominated by caterers and event planners leaving small room for bartender's service. Overcoming the challenge was hard for Reginald, but he developed a business model that is sustainable and constantly growing. Solving a major problem for the caterers by providing consistency was key to gaining market share. Reginald started by developing bartenders training that was accepted by the Maryland Higher Education Commission (MHEC) and used this training to focus on private events. Most staffing companies use bartenders that were trained to work behind a full bar, but Reginald's training produced bartenders that worked seamlessly with caterers and relieved them of the responsibilities of the bar and the bartending staff. Reginald developed M2 until it expanded from Maryland to Virginia, the District of Columbia, Pennsylvania, and lastly Texas in 2018.

Experience gained from starting and developing Masters of Mixology, LLP:

- Starting a business from ground up
- Making connections with other businesses and supplying them with a service
- Training individuals with limited to no experience to become well trained and experienced workers
- Expanding and targeting customers in a new market
- Business compliance and following industry rules
- Handling large amounts of cash during busy events
- Training Management staff
- Leading a team of Executives

Chief Operations Officer: Chétoia Walker

Qualifications: Bachelor's in Business, Logistics, Organization, or Communication. At least 4 years of organization experience, or business management experience. No felony or violent crime convictions.

Responsibilities: The COO must manage the operations of the business practices of JCC. He/she must know every code, regulation, and standard operating procedure implemented by JCC and its Board Members. The COO is responsible for tracking all items brought in and out of the facility, overseeing the community outreach programs, and charitable programs planned by JCC and its Board Members.

Experience: Chétoia has worked several years serving in the Federal Government in the areas of Human Resources and Information Technology. She began her professional career as a Technical Writer for the United States House of Representatives in the Chief Administration Office. This position gave Chétoia the opportunity to understand the inner workings of the Federal Government, its policies and regulations, and the aptitude to handle high profile/high visibility projects under strict and conclusive deadlines.

From there, Chétoia went on to pursue her Information Technology degree from the University of Maryland, University College with a minor in Small Business Entrepreneurship. This knowledge equipped her with the versatility to execute in a corporate environment as well as a more intimate start-up environment. Being able to understand the smaller details as well as seeing the bigger picture has served her well in all her professional endeavors.

By 2014, Chétoia was brought onto M3 Consulting Services; a company that helps start-ups and small businesses to reach their full potential. There she held the position as Chief Operations Officer. As the COO, Chétoia was responsible for not only the day-to-day operations of M3 Consulting Services but the overall operations of the affiliated subsidiaries therein. The heaviness of this responsibility gave Chétoia the tools further needed to work under tight time constraints and still deliver noteworthy results.

In conjunction with serving as COO for M3 Consulting Services, Chétoia went on to work for the United States Census Bureau headquarters near Washington, DC. Here she worked as an IT Project Manager for the Telecommunications Office with a special focus in Cyber Security. Although not easily understood by the name, the Telecommunications Office was responsible for the entire network and mainframe for the U.S. Census Bureau as a whole; this covers the U.S. and abroad. Leading a team of 75 and being a part of a team totaling 115 (including management and Chiefs), Chétoia was able to create and implement processes that helped the Telecommunications Office to run more efficiently. She was able to be an active member of the Change Control Board. This Board oversaw, approved, denied, and regulated all changes to the network and every area effected therein. Being able to oversee operations and work hand-in-hand with the different members gave Chétoia the skills necessary to thoroughly run operations on a large-scale. Her special focus in Risk Management is what gave her the edge over other team members. Heavy analytical skills serve as a great tool to create effective processes, foresee potential issues, and implement contingencies in correlation to. All businesses have associated risks, and all operations will need someone who can handle the heavy load while keeping up a strong morale for the team.

Even with Chétoia being a single mother of three, she was able to provide excellent skills and services to the US Census Bureau while simultaneously growing M3 Consulting Services and the businesses therein.

Experience gained from Project Management:

- Attention to detail and impeccable multi-tasking/organization skills
- Understanding team building
- Time management and meeting deliverables
- Process Development
- Liaising between teams and C-Suite authorities, etc.
- Facilitating meetings and other platforms to keep team members informed

Experience gained from Risk Management:

- In-depth analytical skill development
- Cyber Security/ system awareness
- Mitigation and Contingency development and implementation
- Training team members
- Creating, following, and implementing compliance standards

Experience gained from Operations Officer:

- Growing businesses from the ground-up
- Understanding various industry Best Practices
- Understanding regulations for different industries
- Internal communications development
- Marketing Strategies

Chief Security Officer: Terrance Hanley

Qualifications: Bachelor's in Security Management, Criminal Justice or Military Experience. At last 4 years of security or military experience. No felony or violent crime convictions.

Responsibilities: The CSO is responsible for the security of the cultivation facility and overseeing the transactions between dispensaries and manufacturers. The CSO will be the second key holder to open and close the facility. The CSO will make the schedule for security rotation and monitoring the 24/7 security system. The CSO must background check and clear all visitors inside of the facility.

Experience: Terrance Hanley, a highly regarded military veteran, brings to the table an exceptional blend of both educational background and professional/technical/procedural expertise. His vast experience in the area of security and systems development makes him the ideal team lead for JCC's Compliance Division.

In 2005, Terrance joined the U.S. Air Force as an enlisted member. After nearly five years of service, including two deployments, he earned an honorable discharge in 2010. During his

time in the military, Terrance served in several leadership positions. As an element leader in basic training, he had the privilege of leading a group of 15 young Airmen. During his two deployments to Iraq (Operation Iraqi Freedom and Operation Enduring Freedom), Terrance played a key role in multiple security details and missions manned with an average of 20 U.S. Army soldiers to secure and protect the local citizens from imminent danger. Upon completion of his two tours of war, Terrance was entered onto the rolls of the “Order of the Spur” through the U.S. Army, awarded an Air Force Combat Action medal, and an Air Force Commendation medal.

After serving his country, Terrance completed his bachelor’s degree in Business. His entrepreneurial mindset, coupled with the experience gained in the air force, paved the way for several successful and highly profitable businesses in subsequent years. Most notable S.E.T. Transport, a vehicle transport business, where Terrance mastered the intricacies of logistics management with acute detail and developed his problem-solving prowess.

He managed high stress problems which would prevent him from having punctual deliveries. Terrance overcame each problem within an average of an hour to ensure customer satisfaction. Terrance had to manage, protect, and safely transport approximately 300 luxury, sport, and repurposed vehicles. The company generated \$200,000 gross revenue under his supervision with just 6 subcontractors.

In 2015, JustinCredible Installs (JCI), an Audio/Visual installation company, was founded by Terrance Hanley and Reginald Stanfield. JCI provides project management services (planning and execution) for large scale installation projects in the commercial industry, including but not limited to, mega churches, college and NBA arenas, college and NFL stadiums, and restaurants. Noteworthy expertise garnered under the umbrella of JCI include the oversight of highly technical & intricate installation procedures, and a detailed understanding of Best Practices in the A/V industry. In the company’s first year, JCI generated a gross income of \$84,000. With these projects, Terrance trained workers, solved multiple problems, and lead a team of individuals that reached 10 plus commercial technicians.

Terrance also has construction and renovation experience building photography studios and renovating apartments for non-profit companies.

Expertise garnered while serving in the U.S. Air Force:

- Strong attention to detail
- Hand to hand combat training
- Small arms and rifle training
- Leadership and supervisory skills
- Moderate team administration
- Real world combat experience

Expertise garnered via bachelor’s degree in Business:

- Business networking
- Business structure
- Legal practices

- Marketing and branding expertise

Experience gained from S.E.T. Transport:

- Profound logistics proficiency
- Inventory management and tracking
- Problem solving skills
- Business to business relations and compliance

Experience gained from JustinCredible Installs:

- Systems creation and building
- State and city code regulations and compliance
- Large team management
- Construction acumen

Chief Financial Officer: Chétoia Walker

Qualifications: Bachelor's in a Business focused major, including 24 hours in either Accounting or Finance courses. At least 4 years of Bookkeeping & Financial Statements and developing & tracking sales or invoices for a company with at least one million dollars of transactions. No felony or violent crime convictions.

Responsibilities: The CFO oversees financial record keeping and bookkeeping, tracking every sale, and weekly reporting to the Board of Directors. The CFO will also be in person for the company's first 5-10 sales, taking the time to monitor each potential manager who will receive payments from dispensaries and manufacturers. The CFO will also oversee the seed-to-sale process.

- Identification of Financial Records
- Financial Record Generation
- Financial Recordkeeping and Traceability
- Financial Record Retention and Long-Term Storage
- Financial Record Maintenance

Chief Compliance Officer: Terrance Hanley

Qualifications: Bachelor's in Business Ethics or Administration. At least 4 years of compliance or regulation, holding leadership positions where the applicant must follow state or board mandated regulations. No felony or violent crime convictions.

Responsibilities: The CCO oversees all compliance procedures.

Chief Logistics Officer: Jonathan Siberon

Qualifications: Bachelor's in Logistics or Communications; At least 4 years of planning and managing a team of skilled workers.

Responsibilities: The LM will oversee all the internal logistic of the cultivation facility. Doing quarterly audits of the facility, which includes seed-to-sale, compliance and financial records on a macro level.

Jonathan gained vast experience managing staff in a group home, scheduling work times, specialty doctor visits, and oversaw all facets of treatment necessary to provide a nurturing environment for residents. Jonathon developed behavior plans, provided medical oversight and HIPPA medical records.

Experience Relative to Cultivation business:

- Scheduling and record keeping
- System tracking of items
- Staff Supervision
- Standard operating procedure development and implementation
- Travel coordination
- System Audits

Jonathan has also helped develop a business from the ground up, playing major roles in clientele acquisitions, business-to-business relation, employee scheduling, large event coordination, inventory ordering, and employee development. Jonathan has helped expand our business Master of Mixology (M2) and understands the challenges the company will meet entering into a new market.

Experience gained relative to the Cannabis Business:

- Employee Scheduling
- Hiring and onboarding
- Logistic management
- Business-to-Business development

Director of Horticulture: Reginald Stanfield

Qualifications: Bachelor's in Horticulture, or ten to twelve years related experience and/or training, or equivalent combination of education and experience. Must be able to pass applicable background checks, and agree to comply with policies, procedures, and confidentiality requirements as set forth by the employer.

Responsibilities: The Director of Horticulture (DoH) will drive the long-range strategic planning process for operations by overseeing and managing all horticulture operations, including horticulture itself, and inventory control. The DoH will be responsible for the product life cycle management, maintaining quality, safety, and regulatory compliance relating to the horticulture facilities. Additionally, the DoH will be involved in the development of operations-related plans, capacity, infrastructure, and procedures.

Cultivation Manager: Reginald Stanfield (interim)

Qualifications: Bachelor's or Associate degree from a college/university, or 5 years of experience managing horticulture and individuals. The individual's background should be within management, preferably in the agriculture field. He/she needs to be able to oversee a team of individuals to ensure all plants are ready and harvesting on schedule.

Responsibilities: The Cultivation Manager (CM) is responsible for executing protocols and standard operating procedures (SOPs) for all phases of cultivation, including: propagation, vegetative, flowering, and harvest. Must maintain cleanliness standards and oversee daily inspections and inventory management. Must be able to maintain safe working practices and report occurrences of diversion and loss or workplace hazards immediately.

Office Manager: Chétoia Walker

Qualifications: Bachelor's or Associates degree from a college/university, or 5 years of experience managing multiple teams of individuals and handling customer and vendor relations. The individuals background should be within management, preferably commercial/industrial sector. He/she needs to be able to oversee daily operations and assistance with orderly compliance.

Responsibilities: The Office Manager (OM) is responsible for the overall organization of the operation. The OM will handle record keeping, employee relations, personnel files, phone calls and emails, and all other administrative duties as necessary.

Chétoia has over 10 years of Project Management experience in Human Resources and Information Technology, it makes her the perfect candidate to handle our daily operations. Chétoia has handled high-profile projects with the Federal Government with a primary focus in IT Risk Management and Cyber Security Compliance.

Experience Relative to Office Management:

- Managing multiple teams
- Facilitating meetings and trainings
- Stakeholder Liaison
- Human Resource management

Vegetation Agent: Rufus Thomas III

Qualifications: The Vegetation Agent (VA) should have a High School Diploma at minimum or equivalent. The individual should have an interest in understanding the vegetative stage of the cultivation of cannabis. He/she needs to be able to collaborate with team members to ensure success of their area.

Responsibilities: VA ensures that the vegetative area is always clean, and all production goals are on schedule. Vegetative assistants will care for all plants in the vegetative growth

phase, following precise nutrient regimens & pest-prevention procedures to maximize plant health and prepare crops for the flowering phase.

Clone Agent: Hassan Queen

Qualifications: The Clone Agent should have a high school diploma at minimum or an equivalent. The individual should have an interest in understanding the clone stage of the cultivation of cannabis. He/she needs to be able to collaborate with team members to ensure success of their area.

Responsibilities: The Clone Agent ensures that the demand for new clones of the appropriate strains is propagated in a manner consistent with the CCO's schedule for production.

Flowering Zone Agent: Tyleasha Savoy (interim)

Qualifications: The Flowering Zone Agent (FZA) must have a high school diploma minimum or equivalent. The individual needs to have experience in agriculture and managing a team for at least two-three years. He/she needs to be able to identify problem areas and report to the team and management effectively. Must be able to coordinate with team members to ensure product standards.

Responsibilities: The FZA is responsible for executing protocols and SOPs for all phases of cultivation, including: propagation, vegetation, flowering and harvest. Must maintain cleanliness standards and report any pest or other infestation in a timely manner. Maintain safe working practices and report occurrences of diversion and loss or workplace hazards immediately.

Processing Manager: Jonathan Siberon

Qualifications: The Processing Manager (PM) must have a high school diploma minimum or equivalent. Experience working within a manufacturing or agricultural setting and managing staff. Experience studying cannabinoid products and developments. Critical thinking skills and ability to adjust plans based on needs presented in real time. Must be well-versed in regulations. The PM is responsible for curing, trimming, processing into marijuana-infused-product (MIP), and packaging of all cannabinoid products. Experience and qualifications include the ability to perform repetitive tasks for a continuous period. Basic labor skill set required, with experience working within a manufacturing or agricultural setting preferred.

Responsibilities: The PM oversees all phases of processing beginning at plant harvest. Phases include curing, trimming, MIP production, processing, and packaging. Additional responsibilities include quality control and damaged product/waste disposal. Being proficient with tracking and monitoring systems. Post-production is the highest risk phase for diversion and loss, and this position will work closely with the Chief Security Officer (CSO) to maintain regulatory compliance and prevent loss. The PM is responsible for manifesting

all finished products from cultivation facility inventory into the cultivation facility inventory. Must ensure the production outputs are in line with the workflow.

Packaging Team Lead: Tremaine Watson

Qualifications: The Packaging Team (PT) Lead must have a bachelor's or Associate degree from a college/university. The individual's background should be within management, preferably in the agriculture field or packaging industry. Or 5 years of experience within packaging, inventory and/or storage. He/she needs to be able to oversee a team of individuals to ensure all packaging is ready and on schedule for delivery to dispensaries.

Responsibilities: The PT Lead ensures the packaging of all products of the facility are labeled and packaged correctly in order to meet the demands of the customers. The packaging team is responsible for all daily packaging operations at the cultivation facility. This includes, but is not limited to, supervision of team members; inventory control; compliance with laws and regulations; packaging forecasting; health, safety and sanitation requirements; and other various duties.

Packaging Agent: Hassan Queen

Qualifications: The Packaging Agent (PA) must have a High School Diploma minimum or equivalent. The individual should have an interest in understanding the packaging of the cultivation of cannabis. They need to be able to collaborate with team members to ensure success of their area.

Responsibilities: PA's are responsible for packaging all products produced by the facility.

Inventory Agent: Tremaine Watson

Qualifications: 4 years of inventory and merchandise; No felony or violent crime convictions.

Responsibilities: The inventory manager will oversee all inventory, including equipment, water levels and unsold merchandise.

FINANCIALS

JCC will be seeking investments to total the amount of \$255.5k to establish our 2,000 sq. ft. facility. The facility will be able to produce 1,800 total sq. ft. of plant canopy and launch JCC as a Tier 1 licensed facility. Starting small has multiple advantages; one of which allows the community to learn how they will be affected and benefited from our company. With the needed security, compliance software, plant material, building and residence, we can operate our cultivation facility for the first nine months with the initial investment. With our owners and family volunteers, JCC will open doors two months after we have approval from the Massachusetts Cannabis Control Commission.

Start-up cost: 255.5k

Location

Dismantle cost

Cultivation Facility

Exhaust System

Building Finishing

Business Transportation Vehicle

Building Foundation

Travel accommodations

Building Permit

Power:

- Vegetation Room: 12 Black dog LED Lights running 18 hours a day using KWH of 226.8 per day
- Flower Room: 30 Black dog LED Lights running 12 hours a day consuming 378 KWH per day
- Mother Room: 5 T5 Lights running 24 hours a day consuming 51.84 kwh per day
- Clone Room: Six T5 Lights running 24 hours day consuming 9.12 KWH per day
- Building Lights, Fans, A/C, Dehumidifiers, pumps and water filtration system estimated usage 100 kwh per day
- Cummington average rate is 10 cents per kwh
- JCC estimated usage is 765.76 kwh per day X 30 days per month X 12 months a year equals 275673 total KWH per year costing JCC an efficient \$27,567.36 per year; \$2,300 per month



Water & Sewage	Carbon filters	Growing trays
Water Filtration system	Smart pots	Watering containers
water tank	Security doors	Shelves
T5 Grow lights	Seed-to-Sale, Software	Meters
Cultivation Equipment	Seeds	Lock closets
Humidifiers	Security System	Packaging
AC units	Growing Media	Emergency Generators

Our cultivation cycles will produce a harvest every other week, but every other cycle will have a harvest on back to back weeks, leaving JCC with 10 harvests a year (with 400 plants being harvested each time). We have 720 square feet available space for the vegetative cycle. Allowing for two sq. ft. per plant JCC will produce a perpetual cultivation cycle that will produce, at worst case, 10 complete cycles per year. Our flowering room will have 1,000 sq. ft. available to flower our plants. We will allow 2.25 square foot per plant to reach its maximum potential with our training techniques. We are expecting 5 ounces of cannabis per plant, with 400 plants harvesting 10 times per year. JCC will produce 2,000 ounces per harvest at 10 harvests per year. We are grossing 20,000 ounces a year equaling 1,250 pounds. Average bottom rate going per a lb. is \$2,000; therefore 1,250 pounds would gross sale of \$2.5 million in Year 1. With the tax rate being a maximum of 9.5%, we will contribute \$162,500 to the state of Massachusetts, \$75,000 to the city of Cummington, and \$25,000 to the charity of our choice. JCC will spend \$282,332 of income, in the first year, on expenses and the repayment of initial investment of \$227,500 - leaving our net yearly profit at \$1.7 million.

Year 1: Per cycle: 400 plants producing 2,000 ounces harvested, equals 125 lbs., sold at \$2,000 per pound equaling \$250,000 per harvest, \$16,250 state taxes, \$7,500 city taxes, \$28,750 in operational expenses, \$2,500 charitable support by producing 10 total cycles per year.

Year 2: (20,000 sq. ft. facility) Per cycle: 2,680 plants producing 13,400 ounces equaling 837.5 lbs., sold at \$1,650 per pound equaling \$1.38 million per harvest, 40 total cycles per year. Expanding from a 2,000 sq. ft. facility to a 20,000 square foot facility.

Year 3: (60,000 sq. ft. facility) Per cycle: 5,360 plants producing 26,800 ounces equaling 1,675 lbs., sold at \$1,300 per pound equaling \$2,177,500 per harvest, 50 total cycles per year. Expanding from a 20,000 sq. ft. facility to a 60,000 sq. ft. facility.

Year 4: (120,000 sq. ft. facility) Per cycle: 10,720 plants producing 53,600 ounces equaling 3,350 lbs., sold at \$1,200 per pound equaling \$4,020,000 per harvest, 100 total cycles per year. Expanding from a 60,000 sq. ft. facility to a 120,000 sq. ft. facility.

Year 5: (120,000 sq. ft. facility) Per cycle: 10,720 plants producing 53,600 ounces equaling 3,350 lbs., sold at \$900 per pound equaling \$3,015,000 per harvest, 100 total cycles per year. Expanding from a 60,000 sq. ft. facility to a 120,000 sq. ft. facility.

Valuations

JustinCredible Cultivation has decided to use the Berkus Method to present the valuation of our company for two main reasons: the companies in the industry we are entering in to cannot test the market because it requires a full license to reach customers, and the industry itself has yet to be started in Massachusetts. This valuation will propose the clear advantages we have without the testing of the product. We are unable to reach business to business relationships until the licenses are granted and those companies are made known to the industry.

Berkus Method of Valuation

Characteristic	Add to Pre-money Valuation
Quality Management Team	400,000
Sound Idea	500,000
Working Prototype	325,000
Quality Board of Directors	275,000
Product Rollout or Sales	0

Quality Management Team

Our management team provides amazing value to JustinCredible Cultivation. From our CEO to our Agents, everyone is dedicated to the building our company. The lack of university certified education is our one disadvantage. We have four members with bachelor's degree but currently have zero plans to hire a PHD holder in this field until expansion. The management team and its agents hold around 40 years of combined agriculture experience whose balances and values overstate any degree obtained. Start-up experience is where we are invaluable, our management has dealt with failures and successes. We have built the first bartenders service on the east coast to receive an accreditation from the Better Business Bureau, and earned almost 100k in year one of our Audio/Visual installation companies, and expanded to multiple areas. Having the experience to create business to business relationships are extremely important as a start-up cultivator not owned by a dispensary and we will use our experience to solidify relationships. In both industries it would be impossible for our company to strive without working with a carter or a larger tech business that gains the contracts and subcontracts specialty work.

Sound Idea

Our idea received a perfect Berkus rating because of our location, industry entry timing, and regulations placed to promote small businesses in Massachusetts' cannabis industry. Entering the market as a goliath may harm the chances of cultivation facilities now that the industry is becoming less taboo. Huge cultivation facilities have carried the stigma of less quality and more quantity. During the time of complete regulation of the cannabis, home and small secret grows' products were demanding 500 to 1,000 more per pound than huge illegal cultivations. The cycle will repeat itself. The smaller cultivation facilities have to up the quality and exclusivity of their product to provide value as it becomes a sought-after commodity. We plan to be the leaders in this niche. While we are considered a small cultivation facility, we will highlight this with our products. And with expansions, we will keep the consistency of quality ensuring that our brand will be a sought-after product even when we are mass produced. In an industry where patents are scarce, gaining a solid foundation and reputation will allow our business to thrive during surpluses while the newer established cultivation facilities will not be as fortunate.

Working prototype

A working full-scale prototype is impossible to accomplish because of the regulations placed upon the industry. Our management team has worked with large scale cultivations and has also designed small scale tent cultivations of the method we plan to use. The prototype is working and when moved to scale, the efficiency will be maximized, and our assumed results will be out preformed.

Quality of Board Members

Our Advisory Board is a weakness because of the regulations prohibiting Federal Government employees from associating with the industry. This has limited us from using the trusted individuals that we associate with our other businesses. Nevertheless, our Board will be infused with individuals that will provide value.

Product Sale

Our product sale is nonexistence. We are a pre-revenue company and cannot sell product or even produce product until we are licensed by the state.

Summary

Our company total valuation under the Berkus Method has our company pre-revenue value at \$1.5 million. With our management team and its experience, we are primed to carve out a place for JustinCredible Cultivation in the Massachusetts market, a market projected to be worth more than 1 billion dollars of cannabis sales by 2020.

Risk Factor Summation Method

The [Risk Factor Summation Method](#) has a bit more quantitative workings on specific risk factors, which brings further risk management and governance consideration into the pre-money valuation. We prefer this valuation method paired with the Scorecard Valuation Method for comparison.

Valuation criteria based upon an average of \$2 million pre-revenue valuation. We are going to address a list of risks associated with the startup and its industry:

1. Management Risk
2. Stage of the Business
3. Legislation/Political Risk
4. Manufacturing Risk (or supply chain risk)
5. Sales and Marketing Risk
6. Funding/Capital Raising Risk
7. Competition Risk
8. Technology Risk
9. Litigation Risk
10. International Risk
11. Reputation Risk
12. Exit Value Risk

Rating	Risk Rationale	€ Adjustment to Pre-Money Valuation
+2	Extremely positive mitigation	Add €500,000
+1	Positive mitigation	Add €250,000
0	Neutral	Add/Minus nothing
-1	Negative mitigation	Minus €250,000
-2	Extremely negative mitigation	Minus €500,000

Risk Factors	JustinCredible Ratings	Additions/Subtractions	
Management Risk	1.5	250,000	
Stage of Business	2	500,000	
Legislation/Political Risk	-1	-250,000	
Manufacturing Risk	2	500,000	
Sales and Marketing Risk	1	250,00	
Funding/Capital Risk	1	250,00	
Competition Risk	-2	-500,00	
Technology Risk	0	0	
Litigation Risk	2	500,000	
International Risk	0	0	
Reputation Risk	1	250,00	
Exit Risk	2	500,000	
Total	9.5	2,250,000	

Management Risk

Our management team provides amazing value to JustinCredible Cultivation. From our CEO to our agents, everyone is dedicated to the building our company. The lack of university certified education is our one disadvantage. We have four members with bachelor's degree but currently have zero plans to hire a PHD holder in this field until expansion. The management team and its agents hold around 40 years of combined agriculture experience whose balances and values overstate any degree obtained. Start-up experience is where we are invaluable, our management has dealt with failures and successes. We have built the first bartenders service on the east coast to receive an accreditation from the Better Business Bureau, and earn almost 100k in year one of our Audio/Visual installation company, and expanded to multiple areas. Having the experience to create business to business relationship is extremely important as a start-up cultivator not owned by a dispensary and we will use our experience to solidify relationships. In both industries it would be impossible for our company to strive without working with a carter or a larger tech business that gains the contracts and subcontracts specialty work. With the experience and dedication of our team, our Management Risk is low, scoring a positive 1.

Stage of Business

The cannabis industry has shown an undeniable trend within every market that has allowed recreational cannabis. Market demand opens high and within Year 4 and Year 5 hits its peak and the surplus of cannabis causes a huge drop of prices. The perfect time to enter a cannabis industry is at its inception. This allows us to carve out market share and gain a favorable reputation. Our Stage of Business is rated as a positive 2.

Legislation and Political Risk

The cannabis industry is still federally illegal. This is a negative because Federal Agencies have the power to dismantle operations if they find evidence leading to that establishment's wrong doing or receive an order to shut down cannabis business within an area. Since Massachusetts' authority office has said they would not promote any order to deter the progression of legal cannabis business, our Political Risk is only a negative 1.

Manufacturing Risk

We see this risk as a strength since JustinCredible Cultivation will be a wholesaler to the industry and not actually depending on another business to provide its product. Cultivating inside also protects from weather conditions, pests, and disease effecting our crops. Our Manufacturing Risk is rated at a positive 2.

Sales and Marketing Risk

This rating is based upon our management team's successes developing its previous businesses with business-to-business relations. In the first four years, market demand will be moving towards it peak and product from all legal sources will be demanded. Where the risk becomes a factor is when market reaches its peak and surplus draws down wholesale prices. With this information, our Marketing and Sales risk rates a positive 1.

Funding and Capital Risk

Once JCC has reached Year One of completion, we will have proved how lucrative and notable our position in the industry has grown. If there is a need for more capital infusion, then the risk will be low. The confidence gained by receiving a license from the state is also another risk determining factor because the state has made it necessary to prove the business' ability to become successful in its industry. Our Capital Risk rate is a positive 1.

Competition Risk

Competition should be the highest risk to any business without a patentable product. All businesses that are granted a license can compete with each other no matter the size. Dispensaries and manufacturers will place the value in the product's tested results not the name of the cultivator. This stage is the most important part of our company's strategy. We will be a high quality and sought-after commodity. With our owners and workers all working without salary the first year of business, we will position ourselves in ways that other business' overhead cost will not allow. With the growth of our business, the growth of our position will equally correlate and place us in a position to sustain ourselves. Our Competition Risk rates at a negative 2.

Technology Risk

Technology in agriculture is a cultivator's choice and not one piece of technology has been shown to overwhelmingly out-perform the other. Cultivation is purely experience, gaining our Technology Risk at neutral.

Litigation Risk

All of our transactions will be tested through a third party and done between business-to-business transactions. Leaving us secure with future litigation, rating our Litigation Risk at a positive 2.

International Risk

Our business cannot sell across state lines, leaving our international risk at neutral.

Reputation Risk

If we were a dispensary, then the risk of a minor receiving our product through criminal ways would be a concern for our company. Since our products will be sold only to other licensed businesses, our reputation will only grow from the charitable contributions and jobs created in the location of our establishment.

Exit Risk

Exiting this industry will be lucrative after Year 3, regardless of the position held in the market. Once our company has expanded, invested interest will have seen returns of above 1,000% of initial investment. The exit risk is a strength of our company and is rated a positive 2.

Summary

Our company's valuation based upon this method is \$2 million. With our limited exposure to litigation and market entry timing, we have a valuable strategy to enter and become a major cornerstone of the cannabis industry in Massachusetts. Our management team has experience that cannot be taught in any school as well as hands-on cultivation knowledge with cannabis and other plants. The ROI provides a clear investment opportunity and a proven exit strategy after the third year.

RETURN ON INVESTMENTS

Cash Flow Worksheet

Month	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	Total
Cash Balance at the start of each Month	\$10,000	\$121,000	\$20,555	\$17,380	\$13,055	\$8,380	\$905	\$345,780	\$556,205	\$900,830	\$1,245,505	\$1,411,030	
Operating Revenue													
Cash from Dispensaries & Manufacturers	\$0	\$0	\$0	\$0	\$0	\$0	\$400,000	\$250,00	\$400,000	\$400,000	\$200,000	\$400,000	\$2,000,000
Other Operating Revenue Received	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Operating Revenue	\$0	\$0	\$0	\$0	\$0	\$0	\$400,000	\$250,000	\$400,000	\$400,000	\$200,000	\$400,000	\$2,000,000
Other Sources of Cash Inflows													
Proceeds from Sale of Assets	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Capital Investment	\$250,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$276,000
Other Sources of Cash Inflow	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Other Cash Inflows	\$250,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$276,000
Total Monthly Cash In	\$250,000	\$0	\$0	\$0	\$0	\$0	\$400,000	\$250,000	\$400,000	\$400,000	\$200,000	\$400,000	\$2,276,000
Cash Out (record when actually paid)													
General & Administrative													
Bank Charges	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Credit Card Commission	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Accounting/Legal/Consultant Fees	\$500	\$500	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000
Management	\$600	\$600	\$600	\$600	\$600	\$600	\$600	\$600	\$600	\$600	\$600	\$600	\$7,200
Telephones	\$400	\$400	\$400	\$400	\$0	\$0	\$400	\$400	\$400	\$400	\$400	\$400	\$4,000

Business Insurance	\$300	\$75	\$75	\$75	\$75	\$75	\$75	\$75	\$75	\$75	\$75	\$75	\$1,125
Total General & Administrative	\$1,800	\$1,575	\$1,075	\$1,075	\$675	\$675	\$1,075	\$1,075	\$1,075	\$1,075	\$1,075	\$1,075	\$13,325
Marketing & Promotional													
Dispensary Relationship Development	\$250	\$0	\$250	\$250	\$0	\$250	\$250	\$0	\$250	\$0	\$250	\$0	\$1,750
Total Marketing & Promotional	\$250	\$0	\$250	\$250	\$0	\$250	\$250	\$0	\$250	\$0	\$250	\$0	\$1,750
Start-up Expenses													
Cleaning & Cleaning Products	\$100	\$0	\$0	\$100	\$0	\$100	\$0	\$100	\$0	\$100	\$0	\$100	\$600
Heavy Equipment Rentals	\$1,500	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,500
Gravel and Other Paving	\$1,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000
Foundation & Excavation	\$36,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$36,000
Septic Install	\$8,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$8,000
Power Installation	\$15,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$15,000
Moving Expense	\$2,000	\$2,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$4,000
Total Start-up Expenses	\$63,600	\$2,000	\$0	\$100	\$0	\$100	\$0	\$100	\$0	\$100	\$0	\$100	\$66,100
Motor Vehicle Expenses													
Vehicle Purchase	\$10,000	\$500	\$500	\$500	\$500	\$500	\$500	\$500	\$500	\$500	\$500	\$500	\$15,500
Fuel	\$500	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$4,350
Vehicle Service Costs	\$0	\$0	\$0	\$100	\$0	\$0	\$0	\$100	\$0	\$0	\$0	\$100	\$300
Tires & Other Replacement Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Insurance	\$150	\$150	\$150	\$150	\$150	\$150	\$150	\$150	\$150	\$150	\$150	\$150	\$1,800
Total Motor Vehicle Expenses	\$10,650	\$1,000	\$1,000	\$1,100	\$1,000	\$1,000	\$1,000	\$1,100	\$1,000	\$1,100	\$1,000	\$1,100	\$21,950

Building Expenses

Purchase of Building	\$40,000	\$6,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$46,000
Electrical Building Installation	\$0	\$15,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$15,000
Plumbing Install	\$0	\$3,500	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,500
Building Insurance	\$750	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$3,500
Building Finishing	\$0	\$6,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,000
Total	\$40,750	\$30,750	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$74,000
Employment Expenses													
Salaries/Wages	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Employer Taxes	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Recruitment Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$50	\$50	\$150
Hourly Employee Wages	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Employee Taxes	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Recruitment Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Workers' Comp. Insurance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$50	\$50	\$150
Employee Benefits	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Employment Expenses	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$100	\$100	\$300
Cultivation Expenses													
Grow Lights	\$0	\$47,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$47,000
Cultivation Materials	\$0	\$12,000	\$0	\$0	\$0	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$26,000
Cultivation Equipment	\$0	\$0	\$0	\$0	\$0	\$450	\$450	\$450	\$450	\$450	\$450	\$450	\$3,150
Nutrients	\$0	\$800	\$0	\$0	\$1,200	\$1,200	\$4,800	\$4,800	\$4,800	\$4,800	\$4,800	\$4,800	\$32,000
Seed-to-Sale System	\$0	\$5,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,000
Electricity	\$0	\$320	\$600	\$1,200	\$1,200	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$16,520

Waste Removal	\$250	\$0	\$0	\$100	\$100	\$100	\$100	\$100	\$100	\$100	\$100	\$100	\$1,150
Water Filter	\$600	\$0	\$0	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$2,850
Total Cultivation Costs	\$850	\$65,120	\$600	\$1,550	\$2,750	\$5,200	\$9,600	\$9,600	\$9,600	\$9,600	\$9,600	\$9,600	\$133,670
Other Expenses	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Bank Interest	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Other Expenses	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Purchase of Lease	\$6,100	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,100
Dismantlement Fees	\$5,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$5,000
Principal Loan Repayments	\$0	\$0	\$0	\$0	\$0	\$0	\$1,200	\$1,200	\$1,200	\$1,200	\$1,200	\$1,200	\$7,200
Monthly State Taxes	\$0	\$0	\$0	\$0	\$0	\$0	\$26,000	\$13,000	\$26,000	\$26,000	\$13,000	\$39,000	\$143,000
Monthly City Taxes	\$0	\$0	\$0	\$0	\$0	\$0	\$12,000	\$6,000	\$12,000	\$12,000	\$6,000	\$18,000	\$66,000
Monthly Charitable Donations	\$0	\$0	\$0	\$0	\$0	\$0	\$4,000	\$2,000	\$4,000	\$4,000	\$2,000	\$6,000	\$22,000
Investment of Surplus Funds	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000,000	\$1,000,000
Payments to the Owner/s	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$515,497	\$515,497
Retained Earnings	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$174,358	\$174,358
Total Other Cash Outflows	\$11,100	\$0	\$0	\$0	\$0	\$0	\$43,200	\$22,200	\$43,200	\$43,200	\$22,200	\$1,795,155	\$1,980,255
Total monthly cash out	\$129,000	\$100,445	\$3,175	\$4,325	\$4,675	\$7,475	\$55,125	\$34,325	\$55,375	\$55,325	\$34,475	\$1,807,380	\$2,268,350
Net Monthly Income †	\$121,000	\$20,555	\$17,380	\$13,055	\$8,380	\$905	\$345,780	\$511,455	\$856,080	\$1,200,755	\$1,366,280	\$0	

JustinCredible Cultivation - Projected Profit & Loss Statement									
	Year 1	% increase	Year 2	% Increase	Year 3	% Increase	Year 4	% Increase	Year 5
			2						
Building sq. ft.	2,000	670	20,000	200	60,000	200	120,000	-	120,000
Net product sales	2,500,000	-	55,275,000	-	108,875,000	-	402,000,000	-	301,500,000
Total admin expenses	7,850	670	55,595	200	111,190	200	222,380	-	222,380
Total marketing exp.	4,400	670	29,480	200	58,968	200	117,936	-	117,936
Total startup expenses	31,950	-	-	-	-	-	-	-	-
Total motor vehicle exp.	10,100	670	67,670	200	135,340	200	1,713,432	-	1,713,432
Total building expense	60,862	670	407,775	200	815,550	200	1,631,100	-	500,000
Total employment expense	300	-	2,130,000	200	4,260,000	200	8,520,000	-	17,040,000
Total cultivation expense	167,170	670	1,120,039	200	2,240,078	200	4,480,156	-	4,480,156
Long term loan principal repayment	11,350	-	127,300	-	-	-	-	-	-
Long term loan interest repayment	15,150	-	-	-	-	-	-	-	-
Monthly state taxes	162,500	-	3,592,875	-	7,076,875	-	26,130,000	-	19,597,500
Monthly city taxes	75,000	-	1,658,250	-	3,266,250	-	12,060,000	-	9,045,000
Monthly charitable contributions	25,000	-	552,750	-	1,088,750	-	4,020,000	-	3,015,000
Reinvestment	1,000,000	-	3,000,000	-	6,000,000.00	-	3,000,000	-	-
Net profit	928,368	-	42,533,266	-	83,821,999	-	340,104,996	-	254,804,551
Owners distribution	928,368		32,533,266		58,579,747		213,419,992		127,402,275

CHARITABLE CONTRIBUTION & COMMUNITY OUTREACH

By using our first year to build capital, JCC will create a not-for-profit organization that focuses on childhood obesity, women care, youth mentorship, and community development. Listening to our community and neighboring communities allows JCC to help them in a way customized exactly to build and raise the standard of living. We have programs developed such as KidFit, which will provide a safe and healthy environment for children to exercise with their parents. Our company has worked with a not-for-profit that helps single mothers and plan to develop a sister company in either Cummington or a surrounding area that can benefit.



Cities that welcome cannabis companies into their community benefit greatly, monetarily, and socially. Companies pledge 1% of their income to the community their facilities are located by funding education, helping improve roads, and many more great benefits. The crime rate dips and provides guidelines that are easily followed and reasonable. Also, alcohol related crimes and deaths, such as DUIs, decreased in states that allow cannabis companies.

Education is important, and our company will do the best we can to educate the community on the facts and benefits of cannabis. Through our website and free trainings, the community will have access to the knowledge first hand. By doing controlled tours and holding informational workshops, we can teach the community a vast amount of information. This knowledge ranges from Entrepreneurship to horticulture. JCC has a lot to offer the community. Shadow programs provide a first-hand look into the daily activities of our business such as office management, financial management, trimming, plant inspection, watering & irrigation systems, and personnel policies. Internships allow us to develop entry level positions and provide work-place experience to guide individuals into higher positions.

As an organization, we realize that when we begin operations we become a member of the surrounding communities and as such we want to become a valuable and productive member within said communities. Safety for our employees and the surrounding communities is of utmost importance to our organization.

Good Neighbor Policy

It is our policy to implement and execute a Good Neighbor Policy and respond to any reasonable complaint immediately to the complainant with a proposed solution within 10 days or as requested by the Massachusetts Cannabis Control Commission. All neighbor communications must be maintained as part of our company records.



The intent is one of mutual respect between neighbors; to avoid adversarial positions, to treat others as one would like to be treated; to keep an open mind; and be willing to cooperate with neighbors all with a simultaneous goal of creating a safe and healthy neighborhood environment.

JCC has worked hard to build positive relationships with the residents and businesses and will continue to build relationships with the community through:

- Introduction meetings with all surrounding businesses, building owners, and residents
- Educational information sessions to discuss the benefits of cannabis and the company's overall mission and goals
- Open feedback channels so any new concerns can be immediately addressed through our website, telephone, or mail
- Complete compliance with all state and local ordinances
- Non-obtrusive business practices that ensure our business is discreet and operates like any other business
- No signage with offensive symbols or verbiage (JCC will only use compliance mandated signage)



DIVERSITY

Our company proudly represents all dynamics presented in this category, because of that, we actively promote equality and diversity in our company. JCC will expand and open multiple positions within our company; from record keeping and office work, to having Lady's Day and, teaching women about the great industry of cannabis. Our company is focused on making teaching and creating opportunities

for all people a priority. Our owners have faced extreme challenges developing our businesses, and we will help create opportunities for people from our same background.

Our company is built upon the unity of diversity. We actively promote equality and diversity in all of our companies.

Our owners cover various classifications of diversity, we are a Woman, Black, Veteran, and Hispanic owned business. We have plans to expand and open multiple positions within JCC. We will be developing an extensive outreach program. Our CEO's main goal is to build businesses that place morality and social responsibility ahead of all other company duties. Our owners have overcome extreme challenges developing our subsidiaries, therefore we will help create opportunities for all with fairness and produce more careers for minorities and disempowered individuals.

Our first company developed in Maryland, an A+ rated business by the Better Business Bureau, has expanded to four states and did it by putting our staff first. We developed a price structure that paid bartenders 50% of event revenues, trained and equipped college students and minorities, and provided opportunities for individuals to add valuable work experience. We promote from within and believe in hiring people based upon qualifications and potential. Our owners come from backgrounds that include college graduates, military veteran and working-class individuals. Our owners built their success by hard work and the morality approach in all our business.

JCC diversity is all about respecting and valuing the differing backgrounds, skills and experiences we all bring to the workplace. It also involves recognizing the value of individual differences to support our broader collective goals. A diverse workforce, truly reflective of the communities it serves, is better able to meet the needs of our employees, Board members, and the community. Workplace diversity integrates the principles of equal employment opportunity to include groups who are under-represented in our workforce. This includes: Aboriginal and/or Torres Strait Islander people, people with disabilities, people whose first language is not English, members of racial, ethnic and ethno-religious minority groups, young people under 25, and women in senior leadership roles. Other elements of diversity may include age, gender balance in non-traditional roles, career responsibilities, marital status, sexual orientation, educational level, life experience and socio-economic background. Your perception of workplace diversity may vary depending on your own identity and perspectives, the environment in which you work, and the people you meet.

There are duties that will need to be handled that are suited for all people, trimming can be done by disabled or those who cannot stand. Those who need to walk, can host tour visits, do inventory, and check water levels. For veterans who can be more active and have security experience, we will have opportunities once we expand. Providing diversity opportunities and promoting as a diversity employer, we will attract the best diversity employees.

Retention is a must with all employees, to develop and retain a high-quality diverse workforce, we will:

- Provide capability development opportunities to staff from under-represented groups
- Promote pathways for staff from under-represented groups to progress their careers
- Build the capability of leaders and managers to support the performance planning, management and development of a diverse workforce
- Increase the utilization of knowledge, skills and broad perspectives of a multi-generational workforce
- Focus on ageing workforce challenges through the increased use of flexible work practices, innovative knowledge management, and succession planning.

Pay equity is simply the right thing to do. By achieving pay equity in JCC, women will earn the same as men when you factor in similar roles, markets, and performance. Every year, we examine the compensation employees receive and adjust where necessary to ensure that we maintain pay equity. As part of our commitment to pay equity, we will not be inquiring about candidate's salary history. Our commitment to diversity also extends to our suppliers. We will make thoughtful and inclusive decisions and seek out certified diverse suppliers. And we will target our network to include businesses owned by women, minorities, Veterans, people with disabilities, and LGBTQ individuals.

PERSONNEL POLICIES

Our staff will be made up of our Officers and Managers. This gives us the ability of upper level hands-on responsibility. All personnel are required to follow all compliance requirements and meet expectations developed in our bylaws.

- All personnel must attend weekly safety and compliance meetings, where staff will be refreshed on company policies. Fire protection plans, inclement weather procedures and emergency procedures plans.
- All equipment must not leave the facility.
- Any broken equipment or plant matter must be reported to the DoH and COO and either destroyed or replaced.
- All reports must be turned in by COB on designated days.
- Any reports must have been requested and filed within 24 hours of said request, unless it needs an emergency meeting or requested by any government entity, then it will be expedited.
- All personnel must use hand sanitizer, wear a hair net, cultivation coat, and shoe cover while entering the cultivation facility.

- Any spills must be cleaned up promptly, no water should be left standing on a floor. If floor is wet, the COO must be notified, and a sign will be placed until dry.

TRAININGS

JCC being operated by its owners will give it an upper hand when it comes training and compliance. Each owner will teach and give weekly trainings on their tasks that they oversee.

The Chief Compliance Officer (CCO) will overview the Compliance Training, which will include information on the seed-to-sale process, how to securely lock the cultivation facility, and how to oversee visitors.

The Director of Horticulture (DoH) will overview the issues that would require the plant buds to be contaminated and discarded, how to use the Seed-to-Sale process on each phase, procedures to handle the packaging and storing of the flower, and training on securing the transport of the flower. The DoH will also train employees on which labels must be placed on each packaging, including warnings, restrictions, THC percentages, strain name and type, batch number and time and date of packaging.



Staff Meetings: Team meetings will be implemented organization-wide and will provide opportunities for team members to receive updated training as required by 935 CMR 500.101, and to discuss current trends and ideas on how to make processes more effective or efficient. Team meetings will, at the very least, be held once a week for each facility as well as a weekly meeting between all facility managers.

Shift Meetings: Shift meetings will be held daily between team members and the facility manager or department leads. A shift meeting will be held prior to the start of business each day to discuss workflow and goals for the shift. A meeting will also be held at the closure of business to discuss the day's operations and to determine if shift goals were achieved.

Room Areas & Descriptions

Secured Entry

Pursuant to 935 CMR 500.120 to entering the cultivation facility, all employees must be identified by security or management personnel at the secured entry point. All employees will enter the facility through the main secure entrance with the head security officer maintaining the secured entry. Once inside the secured entrance area, employees must change into clean working uniforms before entering the working areas of the cultivation facility.

Receiving Areas

In accordance with 935 CMR 500.120, after cannabis products are transferred from the facility or are received from a wholesale distributor, must be inventoried and checked in. These products are then assigned an attribute number or ID for inventory tracking and POS identification.

Nutrient Storage Area

All nutrients will be stored in the nutrient storage area of the facility. The facility manager is responsible for this area.

Propagation Area

All clones are stored in the propagation area until they are ready to be transplanted and transferred to a vegetative area. The propagation area must be maintained at 80°F/26.7°C and 80% relative humidity. The Vegetation Agent (VA) is responsible for maintaining this area.

Vegetative Areas

The vegetative area is where plants are grown to the appropriate size before being transferred to the flowering area. The vegetative area consists of three zones: mother plant quarantine (V1), early- veg area (V2), and the pre-flowering area (V3). Lighting remains on for a minimum of 18 hours a day within all vegetative zones. The VA is responsible for maintaining this area.

Flowering Areas

The flowering area of the cultivation facility grow area is where full size plants produce flowers. The flowering area is divided into many zones. Plants grow in each zone for eight weeks before being harvested. All flowering areas must receive 12 hours of uninterrupted darkness for plants to produce flowers. Light interruptions will cause plant stress.

Secured Areas

All areas within the cultivation facility are limited to licensed personnel. The facility manager is responsible for ensuring all areas within the facility remain secured and limited to authorized personnel.

Employee Break Room

The employee break room will be in an area without any cannabis production activities.

Secured Product Storage Area

After cannabis is harvested, the Chief Security Officer (CSO) secures them within the facility safe to wait for testing and shipment. After the cannabis passes required testing, it will be transferred to the dispensing organization facility for sale and distribution. These products will be maintained in the secured product storage area in commercial-grade safes.

Quarantined Product Storage Area

Any cannabis will be stored in a secured, quarantined area within the licensed facility. In addition, in accordance with 935 CMR 500.120, a non-conforming batch of cannabis or will be quarantined separate from all other inventory during retesting.

Chemical Storage Area

All chemicals for cleaning, as well as pest and disease control, will be held in the chemical storage area of the cannabis-infused products facility. The DoH will maintain this area and ensure information about chemicals is readily available by maintaining:

- ☐ An on-site chemical list;
- ☐ Material safety data sheets (MSDS) for all chemicals; and
- ☐ An emergency spill kit.

Emergency Protocol

JCC will establish emergency procedures and protocols to be implemented organization wide. Employees of the organization will be fully trained on emergency protocols once employed by the company. Emergency protocols will be developed to also cover robbery or theft, fire emergency, chemical spill and for other emergencies as needed.

Robbery or Theft

- ☐ If being robbed at gunpoint or you feel your life is in danger, comply with all requests from perpetrator. Give them whatever they ask for.
- ☐ Try to signal for help through security panic buttons provided or through the panic button or police services button located on the alarm panel.
- ☐ Contact police as soon as possible
- ☐ Notify any required state or local authorities

Fire Emergency

- ☐ If fire is small and isolated, try to exhaust the fire with one of the fire extinguishers.
- ☐ In case of a fire emergency, dial 911 for Fire Department or push the symbol on the alarm panel for fire emergency.

Chemical Spill

- ☐ Try to use chemical spill kit for smaller incidents of chemical spill.
- ☐ If chemical spill is large or you do not know how to handle the situation, get the facility manager to handle the situation.

Other Emergencies

- ❑ Contact 911 for break-ins or burglaries.
- ❑ Contact any required state or local authority in cases of theft, break-ins or burglaries

SECURITY PLANS AND PROCEDURES

Security plans are extremely essential. They will start with a secure facility. Massachusetts codes requires three accessible doors within the facility. JCC will have one front door, and two side exits (steel-bolted doors), which will be emergency exits and upon opening sound



an alarm. The facility will be monitored 24/7 by HD cameras, all rooms inside the facility (minus the office's bathroom) will be monitored 24/7. The front door will be double bolted and secured under an alarm system. The CEO, the DoH, and the CSO will be the only individuals with the code to the alarm system. There will be a second set of doors to enter the facility's cultivation area. The door will require two keys, one held always by the CSO and the other by the CEO. Once the operations have expanded, the CSO will select and monitor the employees who are chosen to open and close the facility. The process of cloning and germinating a seed must be signed off by three individuals, the DoH, CSO, and CEO. This will make sure that the beginning of the Seed-to-Sale happens accurately.

Compliance with the seed-to-sale process is one of our company's top goals. The recreational cannabis industry was created to deter consumers from obtaining cannabis illegally and JCC wants to be a part of the solution to help deter consumers from ever receiving our product without purchasing it through a dispensary. Every time a plant or any plant like matter moves from one room to the next, the process must be tracked and recorded. The process will be audited weekly and reported to the Board of Directors. Once plants are moved from the Flower room to the Trim room they must be trimmed and stored in our locked, drying cabinets with keys, held by the CSO and DoH. This process will guarantee that any time flower is being trimmed and stored, it can be tracked and under the responsibilities of our officers. Once flower has been dried correctly, it will be packaged and once again locked in a cabinet that has key controlled by the DoH and CSO.

Transporting the flower will be handled by the transporter company or dispensary if the dispensaries offers the service. Once the transporter arrives, the DoH will sign off on the amounts of the transportation of the flower and escort the transporter and CSO to the vehicle. The DoH will watch until the transporter and CSO leave and the liability will be passed on to the transporter and CSO. If our officers are transporting the cannabis flower, then the DoH will background check the individual and audit his/her transport route. Mapping out routes and giving distinct time periods when the driver should deliver the package will be key. Also, the transporter and CSO will have a company issued phone, which they will have tracking on through Location Sharing; which requires a password to disable. Only the DoH and CSO will have access. This will prevent any company transporter from turning off their geo-tracking app and ensuring that we know exactly where our company's

product is at all time. JCC will track all bulk packages with tracers so that if unforeseen circumstances happen, we have a last line of defense. If the transporter misses the arrival time, fail to answer the phone, and miss three phone calls from our DoH, then we will report the product as missing immediately to the authorities.

Once funds are received and stored in our safe, our CFO will record the transaction and update records. Every week the CCO, CFO, and DoH will audit our processes. The amount of plants moving into the trimming room should equal between 30-40% of the total flower being transported and received by the dispensary. Multiply the total amount received by the dispensaries by the agreed upon amount per lb., minus transport fees, we will have an accurate amount of sales. Reconciling our books will ensure that nothing is unaccounted for and JCC stays compliant.

Reporting will happen on multiple increments. Weekly, Monthly, Quarterly and Bi-Annual reporting will be required from the CFO to the Board of Directors. The CFO must be able to produce emergency records if an emergency board meeting is called. The CFO is responsible for ensuring that the financial records they generate are legible, accurate, and timely. The CFO must send reports to all members, update the files and reports, and pay all taxes owed by the company to the city's tax collector. The CFO must report all tax payments to the CCO and file receipts in the companies archive. All records must be maintained for the following minimum time:

- Articles of Incorporation: if the company exists
- Bank reconciliation: six years or as required by law
- Bank statement: six years or as required by law
- Financial statements: if the company exists
- General ledger: if the company exists
- Journal entry: 10 years or as required by law

Pursuant to 935 CMR 500.110, no person, except cultivation facility agents, subcontractors, local law enforcement, the department or the department's authorized representative, DPH inspectors, or other federal, state or local government officials may enter the cultivation facility except for the following:

- Independent laboratory staff may enter the cultivation facility for the sole purpose of identifying and collecting cannabis samples for purposes of conducting laboratory tests.
- Emergency personnel may enter the cultivation facility when necessary to perform their duties upon cleared background check.
- Upon written notice to the department, the cultivation facility staff may allow contractors to enter the cultivation facility when they are working on a job unrelated to cannabis, such as installing or maintaining security devices or performing electrical wiring upon cleared background check and escorted by the CSO.
- Upon prior written request, the department, or the department's authorized representative, may permit other persons to enter the cultivation facility.

All persons who are not cultivation facility agents, but who are permitted on the premises of the cultivation facility pursuant to subsection 935 CMR 500.110, will obtain a visitor identification badge from cultivation facility security personnel prior to entering the cultivation facility, and will always be escorted and monitored by licensed agents of the cultivation facility. Visitor identification badges will always be visibly displayed while the visitor is within the cultivation facility.

All visitors must present a valid government issued identification card with a picture to be permitted within the premises. All visitors will be logged in and out, and that log will include the date, time, and purpose of the visit and will be maintained and made available to the department, at any time, for a minimum of six years. All visitor identification badges will be returned to cultivation facility security personnel upon the visitor exiting the cultivation facility.

Photography or video recording inside a cultivation facility is allowed only to the cultivation facility, the department, law enforcement personnel, or persons approved in writing by the department.

Cultivation employee services pursuant to 935 CMR 500.101, JCC has established written policies and procedures governing the qualifications, recruitment, hiring, and training of operators, employees, and subcontractors working at the cultivation location.

PAYCHEX Paychex Services - Payroll Services. In addition to processing the organizations regular payroll for both exempt, and nonexempt employees, Paychex will ensure compliance with federal and state regulations regarding payroll taxes by managing withholdings for federal, social security, Medicare, state & local taxes, and provide end of year W-4 processing.

Employee Handbook: Paychex offers a service that can assist in writing the employee handbook that implements company specific policies, and matches company culture, while still maintaining regulatory compliance with local, state, and federal law. The **Employee Assistance Program (EAP)** provides employees, and their eligible family members access to BalanceWorks, a confidential service that aids via quick online or telephonic support to assist with day-to-day issues or improve work/life balance and enhance well-being. Assistance is made available via referrals, research, information, and/or price discounts in the following areas: Travel, child care, financial information, relocation, home projects, eldercare, pet care, automotive services, event planning, and medical information. In addition, the EAP offers a wellness program. The wellness program includes a comprehensive health risk assessment, up to three sessions with a personal wellness coordinator, hotline help to navigate wellness services, 24/7 access to a virtual fitness trainer, and wellness tools, trackers, and articles.

Applicant Tracking System (ATS) Recruiting and Applicant Tracking will be streamlined using the Paychex ATS to assist in creating a positive candidate & new hire experience by providing a paperless software to express interest in open positions, storing job descriptions, and employee onboarding.

Safety Plan

To protect the organization from costly non-compliance penalties, stabilize worker's compensation costs, enhance productivity, and reduce turnover, a sound safety plan is absolutely required. Paychex will assist in the development of the plan by writing a safety program manual tailored to the organization's needs and provide on demand WebEx safety trainings. JustinCredible Cultivation will provide training upon hire as well as monthly to each employee including but not limited to:

- Health, safety, and sanitation standards as required by the Massachusetts Cannabis Control Commission
- Security procedures
- Prohibitions and enforcement as described by 935 CMR 500.110.
- Confidentiality and all other provisions of 935 CMR 500.101 that apply to the individual's scope of employment.

Record Keeping

JCC, will retain all records, both physical and electronic for a minimum of six years. Electronic data will be encrypted and stored on secure servers in secure storage areas under 24-hour video surveillance. Physical records will also be stored in a secure storage room under 24-hour surveillance. The secure storage room will have limited access.



The cultivation facility may utilize biometric security measures as well as PIN protection. Access Logs will be analyzed daily to ensure no unauthorized entry has occurred. Access Logs, as well as all other records required by the department in 935 CMR 500.120, will be stored for a minimum of six years including but not limited to:

Inventory Tracking

Inventory tracking including transport of Cannabis and manufactured Cannabis products.

Financial Records

Financial records including income, expenses, bank deposits and withdrawals, and audit reports.

Entry and Exit Logs recording every individuals entrance and exit from the cultivation facility.

INVENTORY MANAGEMENT/INVENTORY METHODOLOGY

JCC will utilize the First-In, First-Out (FIFO) inventory model. This implies that the oldest inventory items are sold first. Facility management will ensure that all employees are trained properly on the inventory method to ensure that the oldest products are being sold first.

Inventory/Tracking Requirements

Inventory management is a critical factor in every area of the cultivation facility. Pursuant to 935 CMR 500.120, the tracking of all cannabis from seed-to-sale will be done through an advanced electronic inventory control system with multiple checks and balances in place to allow our staff to have a complete awareness of all inventory through each stage of processing from propagation to point-of-sale, disposal, or destruction including: seedlings and clones, germinating plants, vegetative plants, flowering plants, harvested plants and

batches, curing batches, pre-tested dry flower, pre-tested trim, post-tested approved dry flower, post-tested approved trim, all unapproved (quarantined) flower & trim, and waste. The electronic inventory control system will allow the department to monitor in real-time, the facility's tracking system and inventory records. All data collected will be recorded using template log sheets, computer systems in accordance with 935 CMR 500.110, the cultivation facility will maintain a record of clear and unbroken chain of custody at all stages.

Physical inventory counts will be done on a daily, weekly, and monthly basis at the cannabis cultivation facility. In addition to scheduled inventory checks, random audits will be performed. Inventory control procedures will be utilized as the primary way of determining whether there has been any product diversion and ensuring that all cannabis is only being distributed to licensed dispensing organization facilities. Physical inventory template log sheets will be filled out each morning before the start of business and again at the closure of business. All weekly inventory/tracking requirement procedures will be conducted in full compliance with 935 CMR 500.130. Data collected during daily, weekly, annual and random inventory procedures will be logged and input into computer and Metrc systems. Inventory figures will be cross-referenced with the system inventories and data to determine that there are no quantity discrepancies and the chain of custody is maintained in a clear and unbroken manner. In the case of a discrepancy within inventory, we will investigate the root cause of the discrepancy to determine the cause. If the discrepancy is due to employee theft or diversion, we will act quickly to terminate the employment of the perpetrator and contact all necessary authorities for further action. All inventories, procedures, and other documents required by the department will be maintained on the



premises and always made available to the department. In the event of a breach or failure of the tracking system, JCC will suspend operations depending on the tracking system until such time that the tracking system becomes operational. The Cultivation Manager will notify the department immediately upon such event and again when the operations are resumed.

Inventory Control

JCC will designate, in writing, the cannabis establishment agent who has oversight of the inventory/tracking control system of the cannabis establishment. The Chief Compliance Officer (CCO) will be responsible for oversight of the inventory control system and is listed as the establishment agent. The following information outlines how the JCC staff will maintain inventory control within the facility. The CCO is the designated agent who will always oversee the cultivation inventory control system to ensure that daily inventory documentation, batch specific documentation, product transfers, inventory discrepancies, and record keeping are always maintained and up to the minute. The appropriate facility staff member will document the following items as they occur:

- Initial inventory documentation

Prior to commencing business, the cultivation facility CCO will:

- o Ensure all security measures have been maintained
- o Establish ongoing inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of cannabis, which will enable the cultivation facility to detect any diversion, theft or loss in a timely manner.

- Weekly inventory documentation

Upon commencing business, the cultivation facility CCO will ensure a weekly inventory of material in stock, which will include, at a minimum:

- o Date of the inventory;
- o Summary of the inventory findings;
- o Name, signature and title of the individuals who conducted the inventory, and the agent-in-charge who oversaw the inventory; and
- o Product name and quantity of cannabis plants at the facility.

- Daily Inventory Documentation

The CCO will establish and implement an inventory control system that documents each of the following:

- o Each day's beginning inventory
- o Acquisitions
- o Harvests
- o Sales
- o Disbursements
- o Disposal of unusable cannabis
- o Ending inventory



- **Batch Specific Inventory Documentation**

For each batch of cannabis cultivated, the Inventory Manager (IM) will document the following into the inventory control system:

- o Batch number;
- o Whether the batch originated from cannabis seeds or cannabis cuttings;
- o Strain of the cannabis seeds or cannabis cuttings planted;
- o Number of cannabis seeds or cannabis cuttings planted;
- o Date on which the cannabis seeds or cuttings were planted;
- o List of all chemical additives used in the cultivation, including, without limitation: nonorganic pesticides, herbicides, and fertilizers;
- o Number of cannabis plants grown to maturity;
- o Harvest information, including, without limitation: the date of harvest, the final yield weight of processed usable cannabis, and the name and cannabis establishment agent registration card number of the cannabis establishment agent responsible for the harvest; and
- o Disposal of cannabis that is not usable cannabis, including a description of and reason for the cannabis being disposed of, including, if applicable: the number of failed or other unusable cannabis plants, the date of disposal, confirmation that the cannabis was rendered unusable before disposal, the method of disposal through green waste, and the name and cannabis establishment agent registration card number of the cannabis establishment agent responsible for the disposal.

- **Product Transfer Inventory Documentation**

When providing cannabis to another cannabis establishment, the following information will be recorded in the system:

- o Amount, strain, and batch number of cannabis provided to the cannabis establishment;
- o Name and cannabis establishment registration certificate number of the other cannabis establishment;
- o Name and cannabis establishment agent registration card number of the cannabis establishment agent who received the cannabis on behalf of the other cannabis establishment; and
- o Date on which the cannabis was provided to the cannabis establishment.

- **Sales and Disposal Records:**

The CCO will ensure documentation of all cannabis sold or otherwise disposed, including but not limited to:

- o Date of sale;
- o Name of the dispensary facility to which the cannabis was sold;
- o Batch number, product name and quantity of cannabis sold; and
- o Date, quantity, way, and reason why any cannabis was destroyed (if applicable).

- **Documentation of Inventory Discrepancies**

- o If an agent from JCC identifies a reduction in the amount of cannabis in the inventory of the cultivation facility not due to documented causes, the CCO will

determine where the loss has occurred and take and document corrective action form. If the reduction in the amount of cannabis in the inventory of the facility is due to suspected criminal activity by a cannabis establishment agent, CCO will report the cannabis establishment agent to the division and to the appropriate law enforcement agencies.

o Any loss or theft of cannabis will be documented and reported from the establishment to the appropriate law enforcement agency and to the division. The cultivation facility head of security will ensure copies of all documentation are maintained as required for at least SIX years after the date pursuant to 935 CMR 500.110 on the documentation and will provide copies of the documentation to the division for review upon request. Sentimental occasion

- **Waste Inventory Documentation**

All data pertaining to the disposal of all cannabis that is not usable will be tracked in the inventory control system including:

- o A description of and reason for the cannabis being disposed of, including, if applicable, the number of failed or other unusable cannabis plants; o Date of disposal;
- o Confirmation that the cannabis was rendered unusable before disposal; o Method of disposal through green waste; and
- o Name and cannabis establishment agent registration card number of the cultivation facility agent responsible for the disposal

- **Product Information**

For each batch of cannabis produced in the cultivation facility, the following information will be recorded for internal use and to be made available to the purchasing dispensary upon or prior to delivery:

- o Batch number
- o Whether the batch originated from cannabis seeds or cannabis cuttings o Strain of the cannabis seeds or cannabis cuttings planted o Number of cannabis seeds or cannabis cuttings planted
- o Date on which the cannabis seeds or cuttings were planted
- o List of all chemical additives used in the cultivation, including, without limitation, nonorganic pesticides, herbicides and fertilizers o Number of cannabis plants grown to maturity
- o Harvest information, including, without limitation:
 - ☐ The date of harvest
 - ☐ The final yield weight of processed usable cannabis
 - ☐ The name and cannabis establishment agent registration card number of the cultivation facility agent responsible for the harvest.

- **Inventory Record Keeping**

- o Cultivation facility CCO will maintain the documentation required for at least six years after the date on the document and provide the documentation to the department for review upon request.

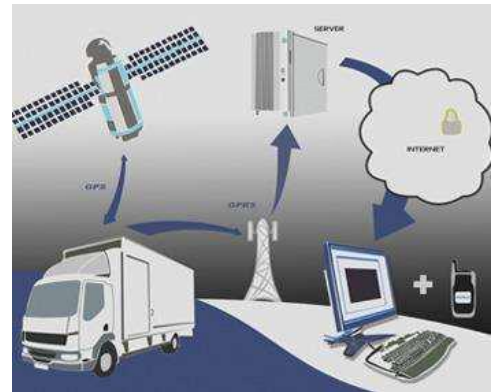
- **Loss or Theft**

- o if any loss or theft of cannabis from the cultivation facility occurs, the Inventory Manager (IM) will document and report the incident to the appropriate law enforcement agency and to the department. All records and documentation required will be maintained for a minimum of six years after the date recorded of the documentation. Copies of the documentation will be made available to the department for review upon request.

Tracking Requirements

Per 935 CMR 500.110, Tracking Requirements:

All cannabis in the process of production, distribution, transfer, or analysis will only be accessible to the minimum number of specifically authorized personnel essential for efficient operation and will be returned to its secure location immediately after completion of the process or at the end of the scheduled business day. If a production process cannot be completed at the end of a working day, the processing area or tanks, vessels, bins or bulk containers containing cannabis will be securely locked inside an adequately secured area. All cannabis and manufactured cannabis products will be tracked electronically to maintain clear and unbroken chain of custody at all stages.



Chain of Custody

The chain of custody of all cannabis will be documented, through scanning and logging, always as it moves through each process within the cultivation facility. Chain of custody documentation will be maintained for six years and will be made available to the Massachusetts Cannabis Control Commission upon request. All plants within a plant group will be given a unique batch number during the initial transplant. Batch numbers will remain with each plant and plant group through final packaging and sale. Transplanting will occur prior to a plant reaching 18 inches in height. At the time of transplant from clone to the second vegetative phase, all plants will be assigned a specific number and tagged with an individual tag containing the batch number and plant number. Information pertaining to each plant, and batch of plants, including the strain and location, will be recorded electronically or kept in an electronic file until harvest or destruction. All plants will be physically inventoried on a weekly basis by the cultivation team and records of the inventory will be kept at the facility for a minimum of six years. All batch movements will be tracked and recorded so their physical location is always known during the cultivation and production processes. Any plants removed from a batch will be recorded on a permanent record and maintained on-site for a minimum of six years. All batch numbers will be included on approved labels for all products designated for distribution to a dispensary.

Loss and Diversion

Per 935 CMR 500.300, all cannabis in the process of production, distribution, transfer or analysis will be stored in such a manner as to prevent diversion, theft or loss, and will be returned to its secure location immediately after completion of the process or at the end of the scheduled business day. If a production process cannot be completed at the end of a working day, the processing area or tanks, vessels, bins or bulk containers containing cannabis will be securely locked inside an adequately secured area. To ensure that cannabis is securely stored and avoid any threat of loss and diversion, the DoH will:

- ☐ Not produce or maintain cannabis more than the quantity required for normal, efficient operation;
- ☐ Store all cannabis in a safe, vault or secured room and in such a manner as to prevent diversion, theft, or loss;
- ☐ Keep all approved safes, vaults, or other equipment or areas used for the production or storage of cannabis securely locked or protected from entry, except for the actual time required to remove or replace cannabis;
- ☐ Keep all locks and security equipment in good working order;
- ☐ Not allow keys to be left in the locks and not store or place keys in a location accessible to persons other than specifically authorized personnel;
- ☐ Not allow other security measures, such as combination numbers, passwords or electronic or biometric security systems, to be accessible to persons other than specifically authorized personnel; and
- ☐ always Keep the cultivation facility securely locked and protected from unauthorized entry.

Any additional safeguards required by the department regarding special security issues, such as extremely large stock of cannabis, exposed handling or unusual vulnerability to diversion, theft or loss, will be complied with immediately. Pursuant to 935 CMR 500.300, if a breach or failure of the security system has occurred, the cultivation facility will suspend operations at once and secure the facility until the security system is fully operational.

The department will determine the appropriate storage and security requirements for all cannabis in the cultivation facility and may require additional safeguards to ensure the security of the cannabis. If a reduction in the amount of cannabis in the cultivation facility's inventory is due to suspected criminal activity, the cultivation facility's CCO will immediately report the reduction to the department.

All areas of JCC containing cannabis, including any rooms with approved safe or approved vaults, will have a sign posted at all entryways, which will be a minimum of 12 inches in height and 12 inches in length and will state: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height. No JCC agents and/or security policies will prohibit members of the department, local law enforcement or other federal, state, local government officials, or persons authorized by the department from entering any area of the cultivation facilities to perform their governmental duties, in accordance with 935 CMR 500.300.

Pursuant to 935 CMR 500.300, the cultivation facility will provide the department with the address, tax map key number, and a copy of the premises title or lease of the proposed

location of the production center and allow the department to inspect the premises in compliance with this law, at least 30 days prior to producing cannabis.

INVENTORY PROCEDURES;

Tracking inventory is important and will be handled by the Inventory Manager (IM) and audited by the COO. Having a consistent inventory manager will develop a sound procedure JCC can trust. Ordering nutrients before they run out, and packing and labeling always being stocked, will ensure that our process is streamlined. The IM will ensure that water is filtered and supplied for the CM to use for watering/feeding the plants. Every week, the IM must check all nutrient levels, supplies and equipment. Report needs and any missing equipment to the COO. The COO will place an order and report transactions to the CFO.

All packaged flower must be accurately handled in these following categories:

1. Weight, the exact weight of the package must be clearly identified.
2. Batch number must be clearly displayed
3. A THC alert label clearly stating that this package contains THC and must be kept out of the reach of children
4. The THC amounts must be present in large easily readable bold font
5. The name of the flower
6. The package must display the time and date of packaging of flower
7. The transaction code must be displayed
8. The sentence “The cannabis contained within this package complies with the mandatory contaminant testing required by rule and its label.”
9. The packaging must be sealed before exchanged.
10. The DoH must approve all packages for the first year, after the first year the DoH will have trained and assign employees to approve packages and report to the CCO and COO.

QUALITY CONTROL & CONTAMINANT TESTING PROCEDURES

Quality control will be handled every harvest by sending off samples from each strain to a testing facility for quality and THC potency. Supplying our consumer, the best product available, and correct THC levels is a must. Quality control can show any flaws in our cultivation practice for us to improve upon. Striving for excellence will be a constant process and regular testing is important.

All reports from testing will be analyzed by the DoH and recommendation for improvements will be reported to the COO. Once approved, the DoH will begin changes. If a decrease or increase in nutrient levels or supplements, the DoH will report changes to the IM.

Environment and Quality Control Propagation materials used in cultivation operations will be appropriate for use in food production. Cultivation operations will follow the propagation material manufacturer's usage and storage recommendations. It is the goal of the JCC team to deliver the highest quality, purest cannabis with consistency of product. To achieve these high standards, JCC is engineered for year-round production. Our cultivation rooms are all capable of maintaining constant environmental conditions including temperature, humidity, and CO2. In addition, we introduce fresh air through an advanced smell-eliminating air flow system that works in conjunction with other controls such as UV light to avoid all mold, bacteria, mildew, and fungal outbreaks. Our closed loop ventilation system will lessen the potential of pest contamination and reduce the need for any organic pesticides. The microclimate within each section of JCC must be constantly maintained to prevent pest and disease and achieve the highest and purest quality. To maintain an optimal environment, the Vegetation Agent (VA) will ensure that the following conditions are constantly maintained:

- **Temperature Control:** Room temperature in all vegetative and flowering areas should be maintained at 78 F/25.5 C. Each cultivation room will be equipped with adequate HVAC to maintain required temperatures. Temperature will be monitored daily by the JCC staff.
- **Humidity:** Relative humidity levels must be kept at or below 55% humidity in vegetative areas and at or below 45% in flowering sections of the JCC. Humidity level in the propagation area will be maintained at 80%. Humidity will be monitored daily by JCC staff.
- **Air Circulation:** Circulation fans are used to improve air quality, strengthen plants, and prevent pest and disease. Circulation fans will be placed every four to six feet throughout all growing and drying areas of the facility. We will keep fans running 24 hours a day. Air ventilation and humidity will leave each growing space through an activated carbon filter via a main trunk line.
- **Odor Reduction:** After air leaves each working area, it is filtered through carbon a second time and then treated with ozone before leaving the building through a roof top stack. Detailed description of air treatment systems that will reduce off-site odors: JCC will contain a three-phase odor reduction system to eliminate odor within and around our production facility. Cannabis production is organized into a series of separately sealed zones including but not limited to: vegetative, flowering, trimming, curing, storage, processing, and hallways connecting rooms. Within each zone, a predetermined number of activated carbon filters will circulate and scrub the air at a flow rate calculated to filter all the air in the room every 15 minutes. Each zone will maintain neutral air pressure created by exhausting the air through one point at the same rate fresh air enters the zone. The exhaust from each zone is filtered a second time through an activated carbon filter before entering a sealed ducting system to be transferred to a common air bank. Before exiting the building through a filter

system, all exhaust is filtered a third time through a series of activated carbon filtration screens thoroughly reducing odor emission rates.

Odor Reduction Plan:

Step 1: Create sealed zones

Step 2: Exhaust system with neutral pressure

Step 3: Three-Phase odor reduction system:

- o Air within zone filtered through activated carbon
 - o Air exhausted from rooms filtered through activated carbon, transferred through sealed ducting system.
- **Carbon Dioxide:** CO₂ levels will be maintained at 1,000 ppm in all vegetative areas and 1,450 ppm in all flowering areas. CO₂ levels will be monitored daily by JCC staff.
- **Lighting:** Vegetative lighting will consist of florescent lighting for mother plants, clones, and early vegetation. Larger vegetative plants will be placed under LED or 600-1,000-watt Blue Metal halide lamps to achieve appropriate size to be transferred into the flowering area. Flowering plants will be grown using 480-watt COB lights. Lighting will be monitored daily by JCC staff and intensity verified and logged monthly.
- **Drainage:** All plants not in auto-pot or hydroponic systems will need appropriate drainage. Drainage will be achieved through the plumbing of each cultivation surface and will be brought to a central floor pipes located in each section of the cultivation facility. Drainage will be monitored daily by the cultivation staff.
- **UV Filtration:** Environmental scrubbers will be used throughout the cultivation facility to clean harmful contaminants found in the air. EVS systems work to combat mold and other diseases that flourish in humid conditions.

Cannabis Basic Needs

Plants need air, water, and light to produce glucose for energy. Cannabis will only grow as fast as its most limiting factor. As each element increases in strength, so will the other elements to reach MGP. We strive to maintain a perfect balance of each element, so each plant produces a consistent product. The CM will work with each zone agent to achieve the appropriate balance of each element of plant growth to achieve maximum genetic potential. Components of photosynthesis, hydrogen, carbon, and oxygen are essential non-mineral elements necessary for plant growth as all play major roles in photosynthesis.

Photosynthesis is a process used by plants and other organisms to convert light energy, traditionally from the sun, into chemical energy that later can be utilized to fuel the organisms' activities. Light energy is used to form glucose from CO₂ taken in by leaves and water taken in through the root system. Oxygen, which humans breathe, is a bi-product of plant respiration. Air (CO₂, Carbon) absorbed by the plant leaf, CO₂ plays an essential role

in the photosynthesis process. CO₂ levels must be increased to optimal levels for plants to achieve their full potential. 390 ppm is the average amount of CO₂ in the air outdoors, however, indoors, under optimal light and nutrient conditions, plants can benefit from CO₂ levels up to 1,500 ppm. Each zone manager is responsible for checking air quality daily and reporting any variances to the CM. As part of the photosynthesis process, plants take in CO₂ and other nutrients through tiny holes in the leaf surface called stomata. Be aware that spray pesticides can clog up stomata. Each zone agent is responsible for utilizing ethical pest management (EPM) practices, JCC will only use organic pest management methods.

- **Temperature:** Plants uptake more CO₂ in warmer environments, however, cannabis quality also diminishes at higher temperatures; therefore, we utilize a comfortable mid-range temperature no higher than 78° F/ 25.5° C. Each zone manager is responsible for keeping temperature at the above-mentioned temperatures. All variances will be reported to the CM.

- **Humidity:** Plants thrive in humid conditions. To avoid fungal issues, humidity must be kept in the mid-range. Each zone manager is responsible for keeping humidity at or lower than 55% in vegetative zones, and 45% in flowering zones. Zone agents will report any humidity variances to the Chief Compliance Officer (CCO).

- **CO₂:** CO₂ level should be maintained at or below 1,500ppm in all flowering rooms and 1,000ppm in all vegetative rooms unless otherwise dictated by the CM. The Flowering Zone Agent (FZA) is responsible for monitoring CO₂ levels within their respective zone and reporting any variances to the CM. **Water (H₂O, Hydrogen and Oxygen)** Water is taken in through the plant's root system and is a necessary ingredient for photosynthesis. Water provides hydrogen and oxygen, two critical requirements for proper plant health, and works as a transport agent for nutrients. The FZA is responsible for preparing water that is ready to be fed directly to or mixed with nutrients, compost teas, beneficial microbes and/or other biological controls.

- **Initial water quality:** The CCO will determine the initial water quality to implement an adequate filtration process. Reverse osmosis is only recommended as a last resort as it removes all micronutrients from water. In the event reverse osmosis must be used, the CCO will ensure an adequate replacement formula to meet all plant requirements.

- **Determining a plant zone's optimal watering schedule:** Over-watering and under-watering can be detrimental to a plant's health. The CM will train each FZA to properly assess the watering needs within each plant zone. In coco coir, place your finger two inches below the coco coir surface; if it feels dry, water is needed. In a semi-soilless mix, the medium should maintain a moist feeling without feeling soggy.

- **Under-watering:** If plants wilt prior to watering, and the coco coir is dry, plants are severely under-watered. If plants wilt immediately after watering, it is also likely they are being under-watered. There are two solutions to under-watering: increase water amount, or watering intervals. The CCO will work with each FZA to assess the watering requirements within each zone and achieve the proper growing medium moisture level for maintaining healthy plants.

- **Over-watering:** Over-watered plants will also wilt; however, the medium will be very soggy versus dry. Over-watering plants, in effect, drowns them and stunts overall growth by hindering proper root development. If it is determined a root zone is over-watered, it is imperative to allow the medium to fully dry and then begin to re-moisturize slowly just as if the plant were recently transplanted. The addition of mycorrhizae and nutrient teas can help reinvigorate a plant's root zone and decrease the recovery time after over- watering has occurred. The CM will work with each FZA to avoid and correct over-watering scenarios.
- **Water prep:** Each zone manager is responsible for preparing the water to be used for plant cultivation within his or her respective zone. Preparing water is a two-part process:
 - o **Filtration:** All water should be filtered through, at a minimum, a two-stage filtration process. Water should be filtered a minimum of 24 hours in advance to prepare for aeration.
 - o **Living Water:** All water should be brought to “life” by proper aeration. Air stones will be placed at the bottom of all water reservoirs after water has been properly filtered. Aeration time is a minimum of 24 hours.
- **Vortex:** When mixing nutrients, water will be stirred in an alternating clock- wise and counter clockwise motion. When water is stirred in a vortex motion, it becomes electrically charged and allows for better nutrient absorption. All zone managers will utilize a vortex motion while mixing solutions to be applied to crops. Vortex mixing instructions: Stir 20 seconds until a vortex occurs in one direction and then reverse the direction.
- **Optimal pH:** Cannabis absorbs available nutrients best in the pH range of 5.5-6.5. The plant's pH will be checked before and after mixing nutrients and adjusted accordingly by the zone manager for each respective zone. Cannabis absorbs nutrients better in slightly more acidic conditions when in coco coir rather than in soil gardens.

Lighting

Light provides the energy to turn water and CO₂ into usable plant food (glucose) and oxygen during photosynthesis. When the optimal lighting spectrum and strength combine with CO₂, large amount of nutrients can be taken up through the plant's root system and used for vigorous growth. The CM will work with each zone manager to monitor lighting and ensure the intensity and photoperiods are always maintained.

- **HID lighting:** High Intensity Discharge (HID) lighting is currently the best replacement for the natural sun, which is by far the best light for production, taste, terpene profile, and root formation. Producers of agricultural lighting products have created HID lighting to attempt to mimic the sun for indoor cultivating purposes.
- **HPS lighting:** High Pressure Sodium (HPS) lighting has been the go to light for vigorous growth indoors for years. Traditional HPS produces the most intense light and helps plants reach a large size and produce large amounts of resinous flowers. Recently LED lighting has proven itself to be a slightly better choice than traditional HPS, however, new HPS technologies have surpassed current LED lights in production capacity.

- **Traditional HPS lighting:** Traditional HID lighting is no longer an effective option for the emerging cannabis market where the environment and cost must be considered for large cannabis cultivation facilities.
- **High Frequency HPS lighting:** HF HPS lighting with newer double-ended lamps are currently the most efficient light available for cannabis production. The light produced from lamps such as Gravitas and ePapillion registers a slightly higher PAR value than the natural sun. The cultivation facility will utilize HF HPS throughout all flowering zones to optimize energy consumption and produce the highest quality cannabis with consistent dosage.
- **Metal Halide lighting:** Metal halides have always been an excellent light source for vegetative growth. Metal halides with blue spectrum create dense growth, large green fan leaves, and short internode length. Plants that vegetate under blue spectrum metal halide can easily achieve MGP. 1,000-watt blue spectrum metal halides will be used for late vegetative growth in the V3 zone to prepare plants to go under 480-watt LED lighting in their designated flowering zone.
- **T5 Florescent lighting:** T5 florescent lighting is perfect for areas where heat and ceiling height may be an issue and where small plants, clones, or mother plants are being grown. T5 fluorescents save energy and produce healthy plants. T5s will be utilized in the mother, early vegetation and for cloning in the cultivation facility.
- **LED may be utilized in the V2 section of the cultivation facility for the second phase of vegetative growth.** Additionally, one flowering room will act as a research and development center to continue to test new LED products as they hit the market to determine their efficiency. Once they are proved, the entire facility will eventually utilize LED lighting.
- **Induction lighting:** Induction lighting has been developed specifically for plant cultivation and currently is very useful in the vegetative phase. However, due to the high cost associated with it, it is still in the Research & Development phase and may be tested in the V2 zone along with LEDs.
- **Photosynthetic Spectrum** An efficient lamp will turn as much energy as possible into photosynthetic energy. The only light plants use for photosynthesis appears within the PAR (photosynthetic active radiation) region. The PAR region occurs from 400 to 700 nm within the light spectrum. The main spectrums of usable light for the cannabis plant are blue and red. The light spectrum (color blend) strongly influences the development of the plant. Blue spectrum lighting promotes dense growth and short internode length.

Metal halide lights with high quality blue bulbs are recommended for vegetative growth. High intensity fluorescent lights are recommended in the smaller/early stages of vegetative growth and mother quarantine sections to save energy and reduce heat. Newer lights such as LED have a more balanced light spectrum and will soon surpass traditional metal halides for vegetative growth. Red spectrum lighting promotes large plants with big beautiful blooms. Red spectrum lights provide more intensity for the later stages of plant growth and are currently recommended for flowering. Traditionally, HPS lights have been used. When the facility is using traditional HPS, the cultivation facility CM will ensure the bulbs are

replaced every six months with new high-quality bulbs such as the Hortilux 1000-watt HPS bulb.

- **Hybrid lighting:** Plants grow best in a mix of red and blue light. Currently, LED lighting appears to have the best spectrum potential, however, the intensity is still not quite on par with newer high frequency HPS technology. Newer double ended bulbs designed for lights like the Gavita and e-Papillion have a more balanced spectrum and should be used in all flowering spaces where heat is not an issue.
- **Light Intensity requirements:** The DoH will ensure lighting intensity is maintained throughout the plant growing cycle. The CM will ensure all lamps within each flowering area of the cultivation facility are providing 1,500 umol within the propagation range.
- **Measuring light intensity:** The CM will use a light meter that measures light in micromoles such as the apogee to measure lighting intensity. A lighting strength inspection will be done monthly by the respective manager with in each zone.
- **Micromoles:** Micromole is a quantum unit, which quantifies the number of photons used in photosynthesis by measuring the number of photons that fall within one square meter. Plants grow faster and stronger in conditions up to 1,500 umols. Plants continue to up take more water up to 2,000 umol, however plant health begins to decrease above 1,500 umol.
 - o **DLI:** Daily light integral is the measurement of micromoles plants receive in a 24-hour period. Plants that receive a low DLI typically show delayed growth and development.
- **Photoperiod:** The photoperiod is the length of the day that plants are exposed to photons. Cannabis flowering is influenced by the photoperiod, so it must be constantly maintained to avoid plant stress. The CM will work with each zone manager to ensure all flowering zones receive 12 hours of un-interrupted darkness and that each vegetative zone receives a minimum of 18 hours of light throughout each day.

Food (nutrients)

While plants can survive on their basic needs alone, cannabis plants grown under optimal conditions will need nutritious food to thrive and reach MGP. It is the DoH's responsibility to utilize a precise feeding schedule to ensure plant nutrient needs are met throughout all growth phases. Primary macronutrients are: Nitrogen, Phosphorous, and Potassium (NPK). NPK are the three macronutrients required to cultivate healthy cannabis plants. It is the CM's responsibility to ensure all cannabis plants receive sufficient NPK. NPK can be found in all high-quality base nutrients and multiple organic additives such as guano.

- **Nitrogen (N):** Cannabis uses more nitrogen than any other nutrient. Nitrogen is most important in the vegetative and early flowering phases of the cannabis life cycle. Nitrogen helps plants produce chlorophyll, which gives plants their green color and is essential for photosynthesis. When a plant is deficient in nitrogen, its lower leaves will start to turn yellow and die. The CM will work with each zone manager to monitor for nitrogen deficiency.

- **Phosphorous (P):** Cannabis plants use phosphorous to create necessary chemicals during all stages of plant growth; however, cannabis requires higher phosphorous levels during floral development in the flowering stage. When plants are deficient in phosphorous, the stems will turn purple and growth vigor will decline. The CM will work with each zone manager to monitor for phosphorous deficiency.
- **Potassium (K):** Potassium plays a major role in chemical synthesis and metabolism within the cannabis plant. Having the correct amount of potassium in your plants gives them sturdy and thick stems, makes them disease resistance, and aids in water respiration as well in photosynthesis. Potassium is necessary for water transportation throughout the entire plant, and is utilized during all stages of growth, especially in flower formation. Lack of potassium can make plants vulnerable to diseases such as mold, fungus and mildew. Red stems declined plant vigor, along with the previously mentioned diseases are signs of a potassium deficiency. Be careful not to confuse a genetic trait of the plant (red stems) alone as a deficiency. The CM will work with each zone manager to monitor for potassium deficiency.

Understanding nutrient labeling

Nutrient containers display nutrient levels in NPK ratios, such as 10-10-10, located on the front label. Nitrogen is always the first number followed by phosphorous and then potassium. A numerical display of 10-10-10 means the solution contains equal parts of all three nutrients and each nutrient is at a concentration equal to 10% of the solution's weight. Secondary macronutrients are: Calcium, Magnesium, and Sulfur (CaMgS) are necessary in enough levels to reach MGP. The secondary nutrients promote plant growth and overall health. The DoH will plan the nutrient feeding schedule accordingly to avoid problems associated with calcium, magnesium, or sulfur deficiencies.

- **Calcium (Ca):** Calcium is a part of the cell wall development in the cannabis plant. It strengthens the stems and branches of cannabis and helps in the formation of the root and its tip's growth. A calcium deficiency causes rust spotting on leaves and impedes root system development. A high-quality calcium supplement is a must to avoid problems before they can adversely affect plant health and overall yields. The CM will work with each zone manager to monitor and avoid calcium deficiencies.
- **Magnesium (Mg):** Magnesium influences the formation of chlorophyll, which gives plants their green color and acts as a light absorber during photosynthesis. Magnesium also affects most enzymatic reactions within plants. The structures within cannabis plants (leaves and the veins) are healthy due to this element. Yellowing combined with leaf curl (especially upward) are signs the plant needs more magnesium. JCC will include a good magnesium supplement in the feeding schedule to keep plants happy and healthy. The CM will work with each zone manager to monitor and avoid magnesium deficiency.
- **Sulfur (S):** Sulfur participates in the formation of chlorophyll and the growth of the plant. The deficiency is presented by slower rates of growth along with pale green or yellow color on the top of the plant where new growth appears. The leaves on cannabis plants lacking enough sulfur will develop a mutation that causes them to round and roll upwards. The CM will work with each zone manager to monitor and avoid sulfur deficiency.

- **Micronutrients (trace elements):** Micronutrients are very important to overall plant health and are necessary when attempting to achieve MGP. The cannabis plant uses micronutrients in very small quantities. Since coco coir contains no micronutrients, adding more throughout the cultivating cycle is a good step towards preventing future health problems that can be hard to troubleshoot. The Vegetation Agent (VA) is responsible for utilizing teas and organic additions within the feeding schedule to meet the cannabis plants' micronutrient needs

- **Micronutrient list:** Micronutrient deficiencies can be difficult to diagnose; therefore, prevention is the best medicine. The CM will utilize the proper soil amendments, compost teas, and/or synthetic additives to ensure that all cannabis produced will have enough quantities of the following micronutrients to reach MGP: Essential mineral elements

• Iron	• Molybdenum Beneficial mineral elements	• Selenium Essential non-mineral elements
• Manganese	• Silicon	• Hydrogen
• Boron	• Sodium	• Carbon
• Zinc	• Cobalt	• Oxygen
• Copper		

- **Nutrient Sources and Preparations:** There are two main ways to meet the nutrients requirements of plants: organic and inorganic fertilizers. These two ways of feeding plants can be used alone or combined to form hybrid formulas. Combining these two methods is recommended when cultivating indoors under optimal conditions and will help each plant reach its maximum genetic potential. The DoH will determine the nutrient formula to be used throughout each stage of the cultivation process. It is important to note that plant nutrients, especially nitrates commonly found in cannabis fertilizers, can create problematic issues for natural habitats and for human health if they leach into groundwater. For this reason and to conserve water, the DoH will strive to achieve minimal run off throughout the cannabis feeding process. Nutrients used in cultivation operations must be appropriate for use in food production. The cultivation operations must follow the manufacturer's application, storage, and disposal recommendations for the nutrient product. The cultivation operations must not return unused rooting hormone to the source container. Nitrate-based and other oxidizing fertilizers must be stored away from solvents, fuels, and pesticides.

- **Inorganic and Synthetic Nutrients:** Inorganic and synthetic nutrients meet the plant nutrient requirements through immediate absorption through the plant's root system. These instantly bio-available nutrients have advantages in an indoor cultivating environment as they can be adjusted to meet a plant's nutrient requirements quickly to avoid and correct nutrient deficiencies, and aid in reaching MGP.

- **How to properly mix synthetic nutrients:** Always mix nutrients into water one at a time. The appropriate zone manager will mix all nutrients. The manager will use a reservoir with the appropriate amount of living water, measuring devices, and a stirring rod and will follow these steps:

- o Determine nutrient formula to be used

- o Make sure lid is closed tightly on nutrient container and shake vigorously to mix nutrients
 - o Measure and add part A of the base nutrient
 - o Replace lid on nutrient container
 - o Stir nutrient solution in a vortex motion; allow nutrient 10-15 minutes to fully mix into water
 - o Shake, measure and add part B, vortex
 - o Shake, measure and add any other base nutrients, vortex
 - o Make sure all nutrient lids are sealed tight.
 - o Check and adjust pH level to 5.5-6.3
 - o Measure and add remaining supplemental nutrients, enzymes, or beneficial microbes one at a time, and vortex thoroughly.
- **Organic Nutrients:** Traditional organic nutrients are mixed into soil and must break down over time providing the full spectrum of nutrients required for plant growth. Microbial life plays an essential role in breaking down organic matter in coco coir that contains all elements for healthy root systems and plants. Teas are highly recommended to supply fresh microbes and nutrients needed throughout the plant's life cycle. Top packs and spikes can also be utilized to provide nutritional component for plant growth later in the life cycle. Traditional organic gardening is consistent with true living organic (TLO) gardening. Newer bottled organic nutrients are often further processed and provide readily bioavailable nutrients along with soil enhancers. These nutrients can be used alone in an inert substrate or used in combination with traditional organic methods to improve cultivating time and correct deficiencies.
 - **Organic Compost Teas:** Compost teas should be used bi-weekly to ensure there is a healthy microbial level within the growing medium. Each zone manager will utilize the appropriate tea recipe for each phase of the cannabis life cycle. Teas will be applied on a two- week schedule. Teas feed the microbial life in the coco coir and create healthy plants that resist disease, yield more, and produce consistent cannabis with an excellent terpene profile. Basic tea requirements: Five-gallon bucket, living water, air pump, worm castings, humic acid, sea kelp, earth worm castings.
 - **Organic Bottled Nutrients:** Organic bottled nutrients can be used to maintain nutrient needs as the plant grows larger and nutrient requirements increase. In 100% organic growing, all nutrients will be OMRI listed organic nutrients.
 - **Hybrid organic/synthetic formulas:** Hybrid cultivating formulas combine aspects from both organic and synthetic cultivating styles. Hybrid methods are superior to either method separately in producing high yielding cannabis plants that still have great flavor and terpene profiles. Hybrid cultivating would utilize a light organic potting medium.

Deficiencies

- **Calcium Deficiency:** Calcium helps provide structure to the cannabis plant and helps it withstand stress. A calcium deficiency can sometimes be difficult to diagnose since it is often accompanied by magnesium, iron, and/or other deficiencies. Calcium moves relatively slowly through the plant, so calcium deficiencies tend to show up in newer growth (upper leaves) and middle vegetative growth. Calcium deficiencies are more likely to appear with filtered or reverse osmosis water, because tap water has enough calcium to prevent deficiencies. Supplementing soil-less grow mediums with lime will prevent calcium deficiencies. Because a calcium deficiency can occur at any stage of growth, the entire Cultivation Team is responsible for identifying and treating calcium deficiencies.

Treatment Plan:

1. Check pH. Calcium is best absorbed by the roots in the 5.8-6.5 pH range.
2. Flush the plants with clean, properly pH adjusted water with a regular dose of nutrients that includes calcium. This will remove any nutrient salts that may be affecting the uptake of calcium and help restore pH.
3. Check plant to make sure new growth does not contain calcium deficiencies. Old, damaged growth will not recover.
4. If deficiencies continue, feed the plant with Cal-Meg, a calcium and magnesium supplement.

- **Copper Deficiency:** Copper deficiency in cannabis plants is rare and manifests itself as leaves curling back, lack of growth, and unusual dark coloring of the leaves. Copper doesn't move easily through the plant and is considered low mobile. Leaves will appear dark, with purple or blue undertones and a metallic sheen. It is very unlikely that there is no copper available in the water or coco coir, so usually a copper deficiency in cannabis is caused by a pH problem at the roots that is restricting access to nutrients. Copper deficiency is often a problem with another nutrient or with the pH that causes the plant to appear deficient. Copper toxicity (too much copper) in cannabis plants is rare, though a severe case of too much copper can cause cannabis plants to suffer and die. Because a copper deficiency can occur at any stage of growth, the entire Cultivation Team is responsible for identifying and treating calcium deficiencies.

Treatment Plan:

1. Check pH. The roots in the 6-7 pH range best absorb copper.
2. Flush the plants with clean, properly pH adjusted water with a regular dose of nutrients.
3. Check plant to make sure new growth does not contain copper deficiencies. Old, damaged growth will not recover.

- **Iron Deficiency:** Iron deficiency in cannabis is relatively rare, and the symptoms of a cannabis iron deficiency appear most often alongside other nutrient problems or deficiencies. The main symptoms of an iron deficiency are yellowing of upper fan leaves and yellowing of

smaller inner leaves while the veins of leaves stay green. Sometimes effected leaves will even appear white. Often the symptoms appear near the top of the plant on newer leaves. This nutrient deficiency can look like a magnesium deficiency, but an iron deficiency will affect younger/upper/inner leaves (where a magnesium deficiency affects older/lower leaves). Because an iron deficiency can occur at any stage of growth, the entire cultivation team is responsible for identifying and treating iron deficiencies.

Treatment Plan:

1. Check pH. Iron is best absorbed by the roots in the 6-7 pH range. Iron tends to get locked out at higher pH levels. Keep pH levels under 6.5 to help flush the plant.

2. Flush the plant with clean, properly pH adjusted water with a regular dose of nutrients that includes Iron. This will remove any nutrient salts that may be affecting the uptake of iron and help restore pH.

3. Check plant to make sure new growth does not contain iron deficiencies. Old, damaged growth will not recover.

- **Nitrogen Deficiency:** Nitrogen deficiency will cause the older, lower leaves on the plant to turn yellow, wilt away and eventually die. The yellow leaves of a nitrogen deficiency may show signs of brown, and they will usually become soft before turning crispy and falling off on their own. Nitrogen is a mobile nutrient, which means it can move throughout the plant as needed. Cannabis needs nitrogen to keep leaves green and make energy from light. All new leaves get plenty of nitrogen to make them green and help with photosynthesis. If new leaves aren't getting enough nitrogen, the plant will start to "steal" nitrogen from the older, lower leaves, so that it can give it to newer leaves. This is what causes the yellowing and wilting of a nitrogen deficiency. Because nitrogen deficiencies are expected during the late flowering stage, the VA is most responsible for identifying and treating nitrogen deficiencies.

Treatment Plan:

1. Check pH. The roots in the 6-7 pH range best absorb nitrogen.

2. Flush the plants with clean, properly pH adjusted water with a regular dose of nutrients that includes nitrogen.

3. Check plant to make sure new growth does not contain nitrogen deficiencies. Old, damaged growth will not recover.

- **Phosphorus Deficiency:** Phosphorus deficiencies in the vegetative stage usually appear at the bottom of the plant on some of the oldest leaves and will progressively climb up the plant if left unchecked. New leaves may be smaller than average or look twisted or stunted. When there is a phosphorus deficiency, the lower (oldest) leaves will sometimes turn dark green, occasionally with a bluish or bronze tinge, and may thicken or curl downward before exhibiting dark gray, bronze or purplish splotches. A common symptom of a cannabis phosphorus deficiency is red or purple stems. It is important to remember that some cannabis strains naturally grow with red or purple stems even when all their nutrient needs are being fulfilled, so red or purple stems is not a symptom to worry about on its own. In the

flowering stage, a cannabis phosphorus deficiency usually manifests near the buds that are being hit with strong, direct light. Cannabis plants use phosphorus heavily in the flowering phase to produce flowers and are a crucial component of photosynthesis (turning light into energy for the plant). A phosphorus deficiency is most common in the flowering stage when plants are under very bright light, and cannabis is constantly using up phosphorus in the process of building buds and making energy from light. In the case of a cannabis phosphorus deficiency in the flowering stage, the leaves, which are not getting hit by direct light, will usually remain green. The leaves directly under the light and nearest to the buds are the first to turn reddish or yellow as they display the signs of a phosphorus deficiency. Because a phosphorus deficiency can occur at any stage of growth, the entire cultivation team is responsible for identifying and treating phosphorus deficiencies.

Treatment Plan:

1. Check pH. Phosphorus is best absorbed by the roots in the 6.2-7 pH range.
2. Overwatering and wet, compact soil can trigger a phosphorus deficiency. Check the soil for too much moisture.
3. Flush the plant with clean, properly pH adjusted water with a regular dose of nutrients that includes phosphorus. This will remove any nutrient salts that may be affecting the uptake of phosphorus and help restore pH.
4. Check temperatures in the cultivation room. Cooler temperatures and large temperature swings can make it difficult for the plant to absorb phosphorus.
5. Check plant to make sure new growth does not contain phosphorus deficiencies. Old, damaged growth will not recover.

• **Potassium Deficiency:** Potassium deficiency causes older leaves turn yellow then start getting dark, with scorched lesions around the edges of the leaves. Plants may stretch, and stems may become weak. The symptoms are very similar to an iron deficiency except the tips of the leaves curl as the edges burn and die. Potassium deficiency can occur at any stage of growth; therefore, the entire cultivation team is responsible for identifying and treating potassium deficiencies.

Treatment Plan:

1. Check pH. Potassium is best absorbed by the roots in the 6-7 pH range.
2. Flush the plant with clean, properly pH adjusted water with a half dose of nutrients that includes potassium. This will remove any nutrient salts that may be affecting the uptake of potassium and help restore pH. Potassium cannot be absorbed properly where there is too much calcium or nitrogen in the plant, so the half dose will flush out extra nutrients that cause lock out.
3. Check plant to make sure new growth does not contain potassium deficiencies. Old, damaged growth will not recover.

- **Magnesium Deficiency:** A light green or yellow coloring will begin to show on the veins and edges of the lower and older leaves. Magnesium is a mobile nutrient, which means that the plant can move it from old leaves to new leaves. The plant will pull magnesium out of older leaves and bring them to the newer leaves. That's why a magnesium deficiency usually appears towards the bottom of the plant and on older, less important leaves. The edges of the leaves may become yellow or bright green and may start feeling crispy to the touch. This crispiness around the edges is different from nutrient burn, which does not lighten the margins inside the leaves. Because a magnesium deficiency can occur at any stage of growth, the entire cultivation team is responsible for identifying and treating magnesium deficiencies.

Treatment Plan:

1. Check pH. Magnesium is best absorbed by the roots in the 6-7 pH range.
2. Flush the plant with clean, properly pH adjusted water with a regular dose of nutrients that includes magnesium. This will remove any nutrient salts that may be affecting the uptake of magnesium and help restore pH.
3. Check plant to make sure new growth does not contain magnesium deficiencies. Old, damaged growth will not recover.

- **Sulfur Deficiency:** Sulfur deficiency will manifest itself as all-over chlorosis (yellowing of leaves), usually starting with the newer leaves and at first may look like a nitrogen deficiency. The parts underneath the leaves may take on a pinkish red or orange color. The buds on a flowering plant may start dying off. Unlike most other deficiencies that cause chlorosis, a sulfur deficiency will start at the back of the leaf and move its way forward as opposed to starting at the tips. Because a sulfur deficiency can occur at any stage of growth, the entire cultivation team is responsible for identifying and treating sulfur deficiencies.

Treatment Plan:

1. Check pH. Sulfur is best absorbed by the roots in the 6-7 pH range.
2. Flush the plant with clean, properly pH adjusted water with a regular dose of nutrients that includes sulfur. This will remove any nutrient salts that may be affecting the uptake of sulfur and help restore pH.
3. Check plant to make sure new growth does not contain sulfur deficiencies. Old, damaged growth will not recover.

- **Zinc Deficiency:** Plants with zinc deficiency, younger leaves start yellowing in between the veins. Leaf tips get discolored and start dying. Cannabis plant leaves will take a unique banded appearance and the plant will stop growing vertically. There will be much less space between new nodes which will cause all the new leaves to start bunching together. If the plant is budding, its flowers may start dying. Because a zinc deficiency can occur at any stage of growth, the entire cultivation team is responsible for identifying and treating zinc deficiencies.

Treatment Plan:

1. Check pH. Zinc is best absorbed by the roots in the 6-7 pH range.
 2. Flush the plant with clean, properly pH adjusted water with a half dose of nutrients that includes zinc. This will remove any nutrient salts that may be affecting the uptake of zinc and help restore pH.
 3. Check plant to make sure new growth does not contain zinc deficiencies. Old, damaged growth will not recover.
- **Manganese Deficiency:** Cannabis Plant leaves may become yellow in between the veins, with mottled brown spots on the affected leaves. These brown dead patches may spread and eventually kill the leaf. Leaves may also shred and fall apart. Overall growth of the cannabis plant may be stunted. With a manganese deficiency, the yellowing will begin at the base of the leaf and move outwards towards the tips. Because a manganese deficiency can occur at any stage of growth, the entire cultivation team is responsible for identifying and treating manganese deficiencies.

Treatment Plan: 1. Check pH. Manganese is best absorbed by the roots in the 6-7 pH range. Higher pH ranges are where manganese deficiencies are more likely to occur.

2. Flush each plant with clean, properly pH adjusted water with a regular dose of nutrients that includes manganese. This will remove any nutrient salts that may be affecting the uptake of manganese and help restore pH.
3. Check plant to make sure new growth does not contain manganese deficiencies. Old, damaged growth will not recover.

PEST CONTROL & DISEASE MANAGEMENT

The Director of Horticulture (DoH) will ensure that each cultivation team member is thoroughly trained in ethical pest and disease management and other troubleshooting to ensure that any problem within the facility is quickly remedied. IPM –Pest (and Disease) Management. It is best to prevent pest and disease infestations altogether; IPM strives to do exactly this. The Cultivation Manager (CM) will maintain a healthy cultivation environment by ensuring biosecurity measures are always implemented and maintained.

Biosecurity

To prevent pest and disease infestations within the cultivation facility grow area, it has been designed with levels of biosecurity. Upon entering the building, all persons will step on a sanitation mat and pass through an air shower. All employees must then enter an area where they change into clean uniforms. Each section of the warehouse will be compartmentalized to prevent any cross contamination between departments. The vegetation zone will have three distinct phases each with two compartments, flower department will have its separate flowering compartments, the kitchen and laboratory will be separate and distinct compartments, and all product processing will be contained within distinct compartments for drying, curing, secured storage, packaging and transportation. Each

compartment will be equipped with its own cooling and heating source to prevent air exchange between compartments. All employees will remain within their designated working areas to further prevent potential chances for cross- contamination. All walls between compartments will be adequately sealed, and all air entering the cultivation facility grow area will be screened through a high-micron filtering system.

Pest and Disease Control Tracking

The DoH will keep a schedule for all pest and disease control prevention. All data pertaining to pesticide applications and other crop inputs will be recorded and the record maintained at the facility for a minimum of six years. All crop input records will be made available to the department upon request. The application record will include the following information:

- o Date and time of application
- o Date of start of vegetative stage of growth;
- o Registration Number;
- o Product name;
- o Copy of the label of the applied product;
- o Application site (the site will be identified by the location legend maintained by the facility);
- o Amount of product applied;
- o Size of the application area;
- o Name of individual making the application;
- o Section for comments or special conditions related to the application.

Infestation Level

The DoH will pre-determine an action threshold for each potential pest and disease. The action threshold will determine the type of pesticide and the rate of application.

Prevention

The cultivation team will always follow a standard prevention protocol. This protocol will include preventing pests from entering each cultivation space, preventing cross contamination from zone to zone, closely following environmental protocol for each zone, maintaining cleanliness standards always, using preventive biological/microbial controls, growing pest and disease resistant strains, and growing with organic methods and quantum cannabis methods that produce maximum plant health thus remaining resistant to pests and disease.

- **Monitoring:** Plants will be monitored daily by each zone manager. At the first sign of any pest or disease, the cultivation team will determine a treatment protocol for the affected zone and the entire cultivation facility grow area.

Immediate action

Plants will be monitored for new signs of pest and disease, so they can be treated immediately. Immediate action reduces the chance of complications within the growth cycle that will reduce quality, yield, and consistency of dose. Immediate action also reduces the amount and frequency of pesticide applications. Only those agents who have been approved by the department, obtained a license from the department, and have gone through the full training process will be permitted to make pesticide applications at the cultivation facility.

- **Training:** The DoH will train all vegetative agents in practices and the proper application standards for all crop inputs. All individuals responsible for applying pesticides on the premises will obtain the appropriate license from the department prior to making any applications. Cultivation operations must follow the EPA Worker Protection Standard 4 when preparing and applying pesticides. Indoor cultivation operations must comply with the pesticide manufacturer's published re-entry interval time periods when applying pesticides.

Initial training will include at a minimum:

- Sanitary requirements for pest and disease prevention
- Recognizing common pests and diseases
- Recognizing symptoms of pests and diseases
- Ruling out nutrient deficiencies
- Daily monitoring and spot checks
- Determining the infestation level/action threshold
- Approved areas for pesticide applications
- Controlling outbreaks in the vegetative phase
- Adhering to the agricultural use requirements of the label
- Use of personal protective gear
- Use of application equipment and process
- Procedures for spray applications
- Lighting requirements for spray applications
- Procedures for soil drenches
- Handling/laundrying protective wear



- Storage
- Disposal
- Approved products
- MSD Sheets

Pesticide Application Process

All pesticides will only be applied in the early stages of vegetative growth. Pesticide application will be strictly prohibited during the flowering phase. When an actionable infestation level is determined during vegetative growth, it is the responsibility of the vegetative lead and trained vegetative staff to act immediately to prevent further contamination. All individuals applying pesticides will adhere to the agricultural use requirements written on the label and will employ all personal protective equipment recommended on the product label. All JCC staff members will be aware of worker protection requirement standards for the restricted entry interval (REI) stated on each product's label prior to application.

1. Determine the infestation type
2. Determine the appropriate treatment
3. Review the instructions for application on the product label
4. Ensure the product intended for use is approved by the Department
5. Determine application methods, i.e. soil or foliar application
 - a. Atomizer (foliage sprayer)
 - b. Pesticides application pump and reservoir (soil drench)
6. Change into the appropriate protective clothing and equipment
 - a. Coveralls
 - b. Waterproof spray suit
 - c. Gloves
 - d. Boots
 - e. Goggles and face shield
 - f. Respirator
7. Prepare solution by strictly following the appropriate ratios for each product used.

8. If the solution is to be applied by spraying on foliage, turn off HID lights and use normal lighting. All HID lights are to remain off until foliage is completely dry to avoid concentrated light burn damage.

9. Perform application

10. Launder protective wear: All regulators and environmental control systems that regulate carbon dioxide emissions must be maintained in good working order and be serviced in accordance with the manufacturer's recommendations.

Equipment and Tools

Equipment used for measuring, regulating, or recording temperatures, pH, humidity, or other conditions related to the cultivation and processing of cannabis must be accurate and adequately maintained. Cultivation and processing tools that come in direct contact with cannabis plants should be disinfected as needed to protect plant health. Scales used for the weighing of cannabis must be calibrated at regular intervals.

Pesticide Storage

Proper storage of pesticides, fungicides and other bio-controls is imperative to ensure their efficacy over time. The JCC CM will maintain the storage of all pesticides in a manner that prolongs their shelf life while protecting JCC employees, and the environment, and does not allow for any possible contamination of plants beyond the vegetative phase and or finished product. All pesticides will be stored in the following manner:

- In locked cabinet
- Cabinet will be cool, dry and well ventilated
- In their original containers
- With proper labeling intact
- Dry pesticides above liquid pesticides
- Follow all storage recommendation on the label for special needs
- Off the ground in case of flooding
- MSD sheets and emergency numbers will always be on hand
- Always wash hands after any contact with chemicals
- No food or drink where chemicals are stored or used

Never store pesticides:

- In equipment used for application
- In any other contain except for the original

- Near food, nutrients, flowering plants or finished products, water, or protective clothing.
- Laundering protective gear All protective gear used during the pesticide application process will be laundered directly after the application process. Protective gear will be washed separately from the rest of the laundry. Any clothing soaked in pesticide will be discarded. The CCO will ensure the following processes are always followed when laundering protective gear after pesticide applications:
 - Wear rubber gloves when touching clothing
 - Wash with hot water
 - Use heavy detergent
 - Wash twice
 - Run washing machine a third time after disposal of all unused pesticide product will be performed in compliance with all state and federal laws and regulations and all directions on the product label. All pesticides applied at the cultivation facility will be from the department's approved list and will be OMRI certified. A list of pesticides approved for use will be maintained and displayed, by the JCC CM, in the pesticide storage area of the cultivation facility grow area. The JCC cultivation manager will monitor and post any updates to the approved list from the Massachusetts Cannabis Control Commission's website.

Approved Active Ingredients for Pesticides and Fungicides:

The following criteria will always be followed for selecting pesticides and fungicides for use. The product must only contain active ingredients from the list below:

- Certain products, as noted, must only be used in the vegetative stage of growth.
- All ingredients, including both active and inactive, must be listed on the label.
- Active must be listed by name and percentage of weight, and inert must be listed by name. Labels cannot contain false or misleading statements.

Approved pesticides are:

- Subject to a tolerance established for application to cannabis by the US Environmental Protection Agency (EPA);
- Identified by EPA regulation as exempted from tolerance
- Permitted for application to cannabis in other countries if the pesticide is also permitted for application to one or more food crops in the United States.

Department Approved Pesticides and Fungicides Names and Uses

• **Azadirachtin:** Azadirachtin is clarified hydrophobic extract of neem oil. Combined with cold pressed neem oil, it controls a wide variety of common pests and also acts as a fungicide. Uses: Mites, Gnats, Aphids, Whiteflies, Thrips. Use these products in vegetative and early flowering and avoid applying directly to flowers.

• **Neem oil:** Neem oil works well to control most common pest populations. Look for brands that combine neem with Azadirachtin for the most effective applications.

• **Garlic oil/Powder:** Garlic: is antifungal, anti-bacterial, and insecticidal. Garlic spray can be made and used every few days as a preventative. Microbial and Biological Pesticides and Fungicides

- **Bacillus pumilus Strain GB34:** grows on roots and is used to prevent soil-born fungus spores from germinating.
- **Bacillus subtilis:** Colonizes the roots and protects against pathogens by inhibiting spore germination and preventing pathogens from attaching to the plant.
- **Bacillus thuringiensis:** A bacterial insect disease and when colonized within soil, it can protect against a wide variety of pests and their larvae. BT works great to control fungus gnat populations.
- **Isaria fumosorosea:** A fungus that infects and kills whiteflies, thrips, aphids, and spider mites.
- **Pythium oligandrum DV 74**
- **Streptomyces griseoviridis strain k61**
- **Streptomyces lydicus WYEC 108:** When applied to soil, SI protects against a wide range of root decay fungi.
- **Trichoderma asperellum ICC 012:** Naturally occurring and helps protect plants from fusarium oxysporum, a pathogenic soil-born fungus.
- **Trichoderma gamsii ICC 080:** Prevents soil-born fungal pathogens by competing for nutrients and space. Tg also attacks the cell walls of pathogenic fungi by utilizing enzymes.
- **Trichoderma harzianum Rifai KRL-AG2:** A naturally occurring fungus that is utilized to prevent harmful plant fungi that cause disease.
- **Trichoderma virens G-41:** Inhibits and kills plant pathenogenic fungi Rhizoctonia and fusarium.
- **Reynoutria sachalinensis:** Sprayed on plants in order to activate an internal defense system of several fungi including powdery mildew and gray mold. RS is an extract of giant knotweed.

Common Pest Varieties and Symptoms

The following guide has been compiled to aid in troubleshooting plant symptoms and determining infestation varieties to implement immediate treatment protocol.

Thrips

Thrips are common in cannabis gardens. They appear in three different colors and are visible with the naked eye. Thrip damage will most likely be seen before the insect is detected. Thrips cut into the leaf and feed off the sap. A heavy thrip infestation will result in shiny silver streaks on fan leaves. A heavy infestation will require topical treatments, however, they breed in the soil, and so biological/microbial regimens will keep out breaks from having negative effects on crops.

Thrips Treatment:

- Foliar- Organic insecticide
- Soil- Beneficial fungi
- Spider Mites Spider mites are by far the most important infestation to avoid.

Mites

Mites are microscopic therefore plant damage will most likely be the first sign of infestation. Mites double breed very quickly doubling their population daily, so just one mite can easily turn into thousands and thousands into millions. Outdoors spider mites have natural predators that keep their populations from exploding, however, indoors it can be very hard to control outbreaks. Spider

Mites Treatment:

- Treatment:
- Foliar - Spray miticide

Aphids

Aphids are common in cannabis gardens. They are visible to the naked eye and appear in an array of colors. Aphids are nasty little bugs; heavy infestations will cause serious crop damage rotting large flowers and deeming them waste.

Aphids Treatment: Aphids breed in the soil, so they are easily prevented through biological/microbial controls in the soil. If aphids become visible, the above ground population should be treated immediately, and applications of soil fungi should be increased.

- Foliar: Organic pesticides
- Soil: Beneficial fungi

- **Fungus Gnats** Fungus gnats eat plant roots and weaken the plant thus reducing the plant's ability to achieve maximum results. Gnats are visible to the naked eye and once spotted, it is essential to increase the beneficial fungi applied to the soil. Adult gnats do not need to be sprayed; simple sticky traps will collect the majority, and the rest should be controlled in the soil.

Fungus Gnats Treatment:

- **Soil:** Biological/microbial beneficial bacteria
- **Air:** Sticky fly traps

Common Plant Diseases

The DoH will follow every environmental control set forth to prevent such diseases, however, if such a disease still occurs, it is important to catch it and eliminate it immediately to prevent contamination of other batches within the cultivation facility grow area. The following guide can help determine common problems and solutions to eliminate potential for further contamination and crop destruction.

Powdery Mildew

Powdery Mildew is a fungal disease appears on cannabis plants as a white, powdery film common to both certain strains of hops and cannabis plants. It begins as bumps on the top of the leaves. It can be caused by poor circulation in the cultivation room.

Root Rot/Pythium

This fungal disease can destroy the roots of the cannabis plant, particularly in those plants that have already been weakened by other sources of stress or disease. Plant leaves begin to wilt and turn yellow at the edges. This fungus can be carried by gnats. The best prevention for root rot is to keep the cultivation room clean, well-ventilated, and pest-free.

Mold/Botrytis

This necrotic fungus often attacks the flowers of the cannabis plant approximately a month before harvest. It can be diagnosed by examining the interior of the flower for grey, white, or blue-green moldy hairs protruding. These spores live in the air; therefore, it is important to prevent an outbreak of the disease by keeping the cultivation room clean and well ventilated.

Fusarium Wilt

Fusarium is a fungus that lives in the soil of the cannabis plant and attacks root systems during an outbreak. It can be diagnosed by small dark spots on the leaves, which can quickly turn the leaves yellowish before wilting. The disease prevents nutrients from traveling through the plant. Plants infected with a fusarium outbreak must be separated from the rest immediately and destroyed.

Sustainable Energy Plan

The cultivation facility will strive to achieve maximum efficiency and reach maximum genetic potential for all crops produced within the cultivation facility. Current agricultural practices that include high doses of chemical fertilizers and chemical pesticides only allow plants to produce 20% of their genetic potential. By using advanced organic techniques, plants can achieve 80-90% of their genetic potential thus decreasing energy expenditure through efficiency by 300%.

Energy Efficient Lighting Plan

The newest technology will be used throughout the cultivation facility to ensure that all lamps used in the propagation and growth of cannabis are the most efficient to date. Ongoing research and development on lighting technology will allow the JCC staff to switch to more efficient lighting means as they become available. The efficiency of lighting technologies will be measured in grams of cannabis produced per watt and the number of cannabinoids per gram.

☐ LED

LED lights allow you to provide the optimal lighting spectrum for photosynthesis. They are perfect to utilize in vegetative growth and can replace lights such as metal halides, easily reducing vegetative electrical consumption for lighting by 20-30%. LEDs also produce substantially less heat therefore reducing cooling cost by around 50%.

☐ Florescent(T5)

Florescent lighting technologies are perfect for early vegetative growth and mother plants. They use far less electricity and produce very little heat, making them perfect for reducing overall electrical consumption.

Water Plan

Facility procedures utilizing water will be created with conservation in mind.

☐ Smart Filtration

Water filtration is necessary in commercial agriculture to avoid contaminants often found in normal tap water. Such contaminants can destroy microbial life and defeat the purpose of following an organically grown cultivation regimen. All water within the cultivation facility grow area will be tested and only filtered as needed. When water filtration is necessary, it will be done with the newest filtration technologies that produce minimal wastewater.

☐ Re-capturing

In addition to smart filtration, the cultivation facility will use an advanced series of pumps and filters to recapture and re-use all water collected within the facility through the HVAC system and de-humidification processes.

☐ Wastewater

Our gardening requires minimal run-off from the watering of plants. All water that does run off from daily watering practices can be captured and filtered along with any water used for cleaning within the facility.

CULTIVATION PLAN

The cultivation process will begin with the purchasing of top genetics. We have planned for having a room of 50 mother plants that we will cultivate and clone 3 complete cultivation cycles. Once the plant has been cloned completed 3 cycles, the mother plant will be flowered, and its place replaced with new mother plant that will be germinated to take its place.

From months 1-2, the first 50 mother plants will be vegetated, once each mother plant can provide 10 clones we will start the cloning process. Each clone will have tracked and reported to the COO from the DOH.

Week 1-2: The clones will be transported to the cloning room, placed into the aero hydro cloner and left for 2 weeks. The clones will be from a strain that needs extra flower time, dominantly Indica strains will start the process. With their longer flower time and their effect as more of a body high gives us the extra time to flower while we add a shorter time genotype such as a predominately sativa strain that takes 8 weeks to flower. Their uplifting and light high flowers perfectly in a shorter time than most indices.

Week 2-5: The clones will be transported into the vegetation room and transplanted into their 2-gallon smart pots.

Week 3: The DoH cuts more clones, reports the clones to the COO.

Week 5: The DoH will transfer the plants into the Flower room.

Week 5: The clones will be moved in the Clone room and into their 2-gallon smart pots.

Week 5-8: The plants in the veg room will fill in the flower room.

Week 8-9: Clones are cut and reported to the COO.

Week 9-12: Clones are moved into the vegetation room into their 2-gallon smart pots.

Week 14-15: Clones will be cut and placed into the aero cloner and reported to the COO.

Week 14-16: The plants will start pre-flowering in the vegetation room.

Week 8-16: The plants will finish up flowering and will be moved into the trimming room. Each plant will be trimmed, weighed, and inventoried and unused plant matter will be disposed of through green waste and tracked accordingly. Once inventory is finished, the flowers will be placed in their secure dry cabinet locked by the DoH.

Once dried and cured, the flowers will be packaged and transported to the dispensary for sale. The process will continue over and over, the only difference would be the germination of the seeds on the 3rd cycle at week 1 of flower. The germinated seeds must be tracked and reported by the DoH to the COO.

CULTIVATION PROCEDURES

Once the CSO and the CEO opens the cultivation area of the Facility to the DoH and Inventory Manager, the day begins.



Before anyone walks into a room into the cultivation area, the CSO will make sure all doors are still secure, to ensure no one has been inside the cultivation area or rooms once locked the night before.

The Inventory Manager will begin his/her day by checking the water supply, starting the filtration system and starting the inventory check.

The DoH will check every room and update the status of each cultivation section. Checking the humidity levels, Co2 Levels and fan leaves of plans for sign of sickness. Inspecting the floors for leaks and trays to ensure water is not resting around the pots. Marking down all problems or concerns that need to be addressed and reporting them to the COO and Inventory Manager if adjustment in nutrients or watering is needed. If trimming is needed the CEO/DoH/Inventory manager will start trimming, weighing and storing all flowers, and disposing unusable plant matter through the green waste method. All delivers will be targeted to be done between the hours of 9-5, to ensure there are enough people at the facility so that the workforce is not depleted by the absence of the CSO and DoH during transfer procedures. Once the DoH is done inspecting each individual room, the DoH will mix the nutrients to feed both rooms, which will be automatically feed with timers. The DoH will check on water PH and PPM at least twice a day. If any problems are found, such as powdery mildew, or bud rot the DOH must document and report to the COO.

Bud rot and mildew-stricken buds will be disposed of, we will not treat bud rot to save damaged buds but only to stop it from spreading to unaffected buds. All plants that have been affected by any sickness or infestation will be quality checked before their flower is sold to dispensaries to ensure product quality.

Since all 4 rooms will have different time periods the DoH will have opportunities for breaks during the middle of the day and work during the night period.

The Clone room will have lights running 24/7 during the cloning weeks.

The Mother room will run 24/7 during the mothers first four weeks of life, after the fourth week the schedule will be changed to 18 hours of lights on and 6 hours of darkness. We are targeting lights being off from 1pm-6pm for the veg room and mother room while their light period is 18/6. The flower room will be 12 hours of lights on and 12 hours of darkness. From 12pm to 12am, the flowers will be darkness leaving the remaining 12 hours of light. Having most of the production during the night time we are taking advantage of non-peak hours of usage. This allows us to operate during night and have our security on high alert. The time where an act of crime will mostly take place.

Feeding times will be 1 hour after lights were cut on and 1 hour before lights go off. The DoH will mist the plants in Veg before lights off.

Water will be used then ran through a reverse osmosis filtration system that can produce and filter out 5000 gallons daily, we are only expecting to use 1000-1500 gallons per watering and filtering the used water will help reduce water us. Any time the water tank has been compromised, the tank must be drained and ran through the reverse osmosis filter.

Nutrients will be mixed 2 hours before scheduled feeding, allowing for 1 hour after mixing for the solution to sit and balance itself. The second hour will be used to ph. the water and wait for all fluctuations.

All containers that aren't being used will be sterilized with light bleach, including pots, sheers and all surfaces being used.

In accordance with 935 CMR 500.120, all cannabis tracking will begin when a seed or part of the parent plant is removed, and a propagating plant or clone is created. At this point, a unique plant RFID identification number will be assigned, labeled, and recorded by the vegetative zone manager which then will be used to track the history and data through propagation, vegetation, flower, harvest, processing, cure and final packaged inventory. Each plant will always be tracked by its physical grid location in the premises. All significant dates and observations will be recorded as key data points in the SIS for referencing needs throughout the plant's life cycle. This information can be used to recall any contaminated medium, nutrient, or issue that may occur during the stages listed above and allows for easy removal from production or inventory of any product that does not meet the requirements of the state. An inventory of cannabis in the cultivation stage will be conducted each week. During the cultivation process, physical location will be broken up into a grid system and each square will have a designated number of plants per grid area. Auditing the inventory of all plants will be effectively and efficiently accomplished with spot checks done daily to mitigate any diversion during cultivation, processing and/or packaging, as well as detecting any human error that may have occurred while entering information during the plant's life cycle. After the flowering cycle has been completed and the plant is harvested, inventory will be transitioned from the flowering zone to the processing department and prepared for trimming. During this transfer, all product will be scanned, tracked and logged. At this point, a pre-trimming weight will be determined and logged. After being weighed and logged, all flowers will be cleaned, trimmed, and prepared for drying in the secured vault. Each batch is transferred through each state with the entirety of the batch. All green waste from the trimming process will be weighed, logged and disposed of according to our policy for managing waste from cannabis plants (see transportation protocol). After drying and curing, each batch will be tested for efficacy. Once a batch has passed all regulated testing protocol and our standards set forth by business management, it will be released for packaging and labeling. Before being transferred to packaging, the entire batch will be weighed again, scanned and logged into the inventory tracking system via RFID. As each package is wrapped and processed, each individual package will be weighed again and reconciled against the total batch weight. Once packaged, all product will be scanned, logged and placed in secured inventory area until transported to dispensary. All packages will be scanned before being transported and logged. Upon acceptance of dispensary, all packages will be scanned one final time and the end of the Seed-to-Sale process is complete.

SELECTING CANNABIS STRAIN VARIETIES

Planning strain varieties to produce is essential to meet consumers demands, produce quality cannabis, and to ensure consistency. Feedback from retail distributors and the cultivation team will be combined with comprehensive test results to set production goals for the facility. In addition, a given strain's ease of propagation and overall yield must be taken into account in order to reach production goals and maximize energy and space efficiency within the facility. The Cultivation Agent (CA) will plan a cultivation calendar in order to meet demand and production goals. The following represent other important strain differentiations that will be taken into account by the cultivation manager:

Synergies between Terpenes and Cannabinoids

Terpene and cannabinoid profiles of strains will be taken into account in order to provide the best product for consumers.

Terpenes

Terpenes are compounds that constitute what is arguably the largest and most diverse class of natural products. The majority of these compounds are found in plants. They provide the flavor and the smell to cannabis, but also provide an array of medicinal benefits. The CA will plan production of a wide range of strain varieties in order to produce multiple terpene profiles and combinations in order to fulfill the need of all consumers. The following are examples of terpenes commonly found in cannabis and their medicinal benefits:

☐ Linalool

Lily, floral, spicy. Treats anxiety and acts as a sedative.

☐ Caryophyllene

Rich spicy, sweet, woody, clove, camphor, pepper. Anti-septic, anti-tumor, anti-inflammatory, anti-fungal, anti-bacterial.

☐ Myrcene

Clove, earthy, citrus, mango, mint. Antiseptic, anti-tumor, analgesic, antidepressant, muscle relaxant. Most common terpene in cannabis, found in higher levels in indicas. Makes cell walls more permeable thus increasing the effect of cannabinoids.

☐ Limonene

Citrus, rosemary, juniper, peppermint. Increased circulation, pain relief.

☐ Humulene

Hoppy, coriander. Common in sativa. Anti-inflammatory, anti-tumor, antibacterial.

☐ Pinene

Pine, rosemary, dill, basil. Mental focus, energy, bronchodilator, anti-inflammatory.

□ Delta3Carene

Pungent, sweet, pine, woody, cedar. Can help dry excess fluids such as runny nose and perspiration.

□ Cineole/Eucalyptol

Spicy, camphor, minty. Increased circulation, pain relief.

Cannabinoids

There are over 480 natural components found within the cannabis plant, of which at least 85 have been determined to be cannabinoids. Cannabinoids are chemicals found in animals and other plants as well, but nowhere are they more abundant and effective than in the cannabis plant. The most well-known and researched of these is THC or delta-9-tetrahydrocannabinol. THC is the substance primarily responsible for the psychoactive effects of cannabis. Like opiates and opiate derived pharmaceuticals, cannabinoids affect the user by binding with receptors within the cells of the body and different parts of the central nervous system. There are at least two kinds of cannabinoid receptors found to date, termed CB1 and CB2. Anandamide is a cannabinoid-like substance found within the brain commonly referred to as the “Bliss Molecule.” Naturally occurring anandamide binds to CB1 receptors. Other naturally occurring substances that bind to CB1 have recently been discovered, and these, together with the receptors, have been termed the endogenous cannabinoid system or endocannabinoid system.

The effects of THC are heavily influenced by the other components of the plant, most particularly, other cannabinoids. Differences between the cannabinoids found within the cannabis plant are determined by the extent to which they are psychologically active and the other medicinal benefits they correspond with. For example, CBG, CBC and 0CBD are not known to have a psychological effect, however they have been proven to have multiple medicinal benefits, while THC and CBN are cannabinoids often associated with the psychological effect of cannabis. Most cannabinoids are multifaceted with a wide array of effects and benefits. The CA will review test results for every batch in order to ensure that multiple strains are produced with varying cannabinoid profiles in order to properly and accurately provide consumers with different needs. By combining different cannabinoids and different terpene profiles, the possibilities for multiple healing are vast. The CA will utilize cannabinoid profiles when planning for strain production at all times. The following cannabinoids are all known to provide different effects and medicinal benefits:

□ THC

Delta 9 Tetrahydrocannabinol is the cannabinoid that gives cannabis the majority of its psychoactive affects. Cannabis has been bred for high levels of THC, and we are only now starting to breed for complimentary cannabinoids. THC can be used to treat pain, nausea, tumors, and ADHD.

☐ THC-A

THC-A is the most common cannabinoid found in cannabis. It is not psychoactive and has an array of medicinal effects including anti-tumor, anti-insomnia, anti-inflammatory, and anti-spasmodic.

☐ CBN

(Cannabinol) As THC oxidizes from exposure to heat and light, it turns into CBN. CBN is only mildly psychoactive and highly sedative.

☐ CGB

Cannabigerol is a non-psychoactive cannabinoid that stimulates brain cell development and bone growth. It is also antibacterial, anti-insomnia, and antitumor.

☐ CBC

Cannabichromene has been shown to be 10 times more effective than CBD for treating anxiety. CBC also stimulates bone growth. It is non-psychoactive.

☐ CBD

Highly effective in treating epilepsy and MS, cannabidiol is non-psychoactive. CBD is as effective at treating tumors and pain as THC, however very useful for children and to others whom do not wish for the psychoactive effects of THC.

CBD can treat diabetes by lowering blood sugar and is very effective in treating stress and insomnia.

☐ CBD-A

CBD-A is more commonly found in the ruderalis varieties, which are often bred with sativa and indica varieties for their auto flowering abilities. CBDA has been linked to anti-tumor and anti-inflammatory effects.

Varieties of Cannabis

☐ Cannabis Sativa

Cannabis sativa is the tallest variety of cannabis. All other varieties most likely evolved from the sativa plant. Most hemp is actually sativa. Sativa varieties are thin and wispy, most likely from evolving in hotter regions of the world where adequate airflow between branches was necessary to remain disease free. 100% sativa strains take up to six months to flower and can grow extremely tall making true sativa unsuitable for indoor and commercial production. The sativa strains commonly grown for medicine are actually hybrids that have been bred with Indica varieties to shorten both their height and flowering time. Sativa produces a cerebral effect that can be energizing, followed by an increase in appetite. Sativa hybrids are very helpful for anyone experiencing loss of appetite such as those undergoing chemotherapy or patients with HIV/AIDS.

☐ Cannabis Indica

Cannabis indica is short and bushy with thick stems. Most likely evolving in the cooler regions of Asia and Afghanistan, cannabis indica has a short flowering time, most likely to complete its reproductive cycle prior to freezing conditions. Most medicinal varieties of cannabis are a derived form of indica, and its cannabinoid profiles are well-balanced producing significant levels of THC, CBD, and CBN. Indicas produce a body-centered effect that allows relaxation, quality rest, and pain relief for patients.

☐ Cannabis Ruderalis

Cannabis ruderalis is of very poor quality and is only grown in hybrid form with sativa or indica due to its auto flowering capabilities. For the most part, ruderalis hybrids should be avoided in indoor cultivation. Ruderalis is the shortest cannabis variety, and it has minimal branching. Avoid all seeds and strains that state they are auto flowering.

☐ CBD Varieties

CBD varieties are now being bred as they offer many of the medicinal benefits of cannabis with little to no psychological effects making them suitable for children and adults who wish to remain clear headed. CBD effects on THC can be noticed with as little as 1% CBD, however, the ratio of THC to CBD can be widely influenced and tailored to create the desired effect for a particular ailment or specific patient. One-to-one ratio strains often have the best of both worlds where the psycho effects of THC are diminished by CBDs, however, all the medicinal effects from THC remain intact.

☐ Quantum Cannabis

QC gardening is a biodynamic approach to indoor cannabis cultivation that combines proven ancient wisdom with the newest technologies to achieve maximum efficiencies in energy and space. The results of QC are healthier plants and a healthier happier company culture. Additional side effects are larger yields, higher quality, increased terpene content and profile, and an increased employee retention rate.

Breeding Guide

Genetic model of chemotype - Overview

Genetic studies demonstrate control for cannabinoid accumulation in published, peer reviewed literature. Principal research was completed and published over four papers by de Meijer et al. 2003-2009.

Key findings:

- ☐ Accumulation of CBG, CDB, CBC and THC are under genetic control
- ☐ Genetic variation, needed for classic breeding to succeed, has been demonstrated to exist.

- ❑ Studies demonstrate clear and repeatable segregation for accumulation of cannabinoids, emphasizes need for genetic diversity in genetic library/collection
- ❑ Demonstrated that breeding efforts can be utilized to
- ❑ stabilize chemotype Genetic model of high CBC lines

CBC is not an accumulated cannabinoid like THC or CBD. CBC is not accumulated in floral tissue, it is found in leaves. CBC is a juvenility linked compound that the plant loses the ability to produce as it moves toward sexual maturity. Rarely found are plants that do not lose ability to create CBC, especially in the first 60 days of plant growth. Example I figured (d) maintains CBC vs. normal (b) loses CBC.

The rare plants can be found through repeated chemotype analysis; requires close collaboration with analytical lab to regularly test young plants. CBC retention is under genetic control and can be stabilized in self-progeny. Literature does not elucidate genetic control in crosses or other genetic situations (though likely recessive). Discovered in Afghan and Korean lines (de Meijer, 2009)

Challenges

Low amounts found: 0-4% w/w (15-100% CBC by weight of total cannabinoids)
%CBC increases with decreased light. To maximize yield, research needs to balance plant growth and CBC accumulation.

- ❑ Genetic model of high THC/CBD lines One genetic pathway controls ratios of THC/CBD. Leads to clear differentiation within a family as shown (figure right). Published report that THC/CBD ratios are stable in the plant in the first true leaves until maturity. This allows the chemo-typing of seedlings and discarding of unwanted proportion of family when plants are small; efficient breeding. Key to breeding progress for % accumulation of THC/CBD is intermating of nondrug and drug strains.

Requires repeated chemotype analysis with first true leaves and then confirmation of % accumulation of mature floral structure. Pure CBD lines may be difficult to achieve due to shared genetic pathway with THC. Highest CBD lines may accumulate a minor percentage of CBC, CBG, and/or THC. Similarly, high THC lines may accumulate a minor percentage of CBD, CBC, and/or CBG. Challenge is to improve accumulation and purity with breeding.

- ❑ Tissue Culture support of breeding/production plan. Methods described in great detail in Lata et al., 2009; specific method optimized for Cannabis. Proven genetic and chemotype stability over several generations. Protocols/Methods demonstrated commonly online; sterile technique required utilizing clean air hood.

Tissue Culture procedures can be utilized for:

- ❑ Multiplication/production aid for clonal propagation

- ☐ Maintain key clean lines/genetics in living library/backup; creating a living germplasm bank
- ☐ Seed germination aid – can be utilized for embryo extraction from older/degraded seed

Breeding 101

There are three main steps to breeding:

- ☐ Evaluate

Chemotype - using analytical laboratory capabilities to quantify range of population. Identify all cannabinoids and secondary metabolites of interest. **Phenotype** (physical type) – quantify ranges in traits key to success of production and/or market: rate of growth, days to flower, leaf shape, leaf size, other aesthetics (purples, golds, etc.) or traits of interest or differentiation.

- ☐ Select

Identify elite plants or high performers from population based on improved chemotype and phenotype.

- ☐ Recombine

Mate only high performers based on improved chemotype and phenotype. Sow seeds and Evaluate progeny to begin the breeding cycle again.

- ☐ Result

Advancing each generation beyond the previous generation in a continuous process.

Method for Establishing a Proprietary Clone

- ☐ Take 10-20 cuttings from original, elite, selected plant to establish new/improved clone.
- ☐ Root ½ of cuttings per convention and grow in production setting
 - o Confirm evaluation of chemotype and chemical yield
 - o Evaluate for growth rate, flowering characteristics, other key factors to production
- ☐ Initiate ½ of cuttings from original selected plant into tissue culture for future utility (method above)
 - o Keep tissue culture if line performs well in production, discard tissue culture if line fails.
- ☐ Begin process to convert line to proprietary, feminized seed form (above)

CANNABIS LIFE CYCLE SOPs

The following steps will be taken to ensure the quality of the cannabis, including purity and consistency of dose, and the presence of potential contaminants. This includes standard

operating procedures, a description of the testing process and frequency, and plans to engage with a lab to conduct the testing. The following processes also include Seed-to-Sale tracking in accordance with 935 CMR 500.120 to ensure all cannabis and cannabis products are constantly secured throughout the life cycle.

Starting From Seed (Germination)

There are several methods of germinating cannabis seeds. The vegetative zone manager will work with the CA to determine when and which varieties of seeds to germinate. Our process will be as follows:

1. Determine variety to germinate
2. Prepare the necessary tools for seed germination starting with a clean container that will hold at least 8 oz. of filtered room temperature water
3. Soak the seeds in the water for 24 hours. At first, the seeds will float on the surface of the water, but as the seeds begin to germinate, their surfaces will open allowing them to take on water and sink to the bottom. The seeds on the bottom of the container are germinated and can now be planted in an appropriate medium. Log results.
4. After soaking, place the seeds between two paper towels and place the paper towels between two plates turned to face each other. Place the plates in the propagation cabinet in propagation portion of the cultivation facility grow area and wait 24-48 additional hours. The seeds will be visibly germinated at this point and can be transplanted. Log results.
5. Once a seed is germinated, it will be given a unit number, batch number, tracking tag, and will be logged and entered into the SIS so tracking can begin. Planting seedlings
Once a seed has germinated, the vegetative manager will plant the seed in a prepared medium. Seeds should always be planted in small containers to establish a basic root system before being transplanted into larger containers.
 1. Prepare planting medium
 2. Fill 12 oz. container three-quarters of the way full
 3. Remove a pinch of medium from the center leaving a hole .25 inches deep
 4. Water the medium with living water
 5. Place germinated seed in the small hole and cover lightly with moist medium
 6. Container is labeled with tag and location and all pertinent data is recorded into the inventory tracking system.
 7. Place planted containers on shelves under T5 lighting
 8. Check daily for sprouts
 9. Once the plant is 1 inch tall, add .5 inches of medium

10. Repeat additional medium applications up to 2 times, until the plant has a sturdy base

11. Water seedlings when they feel dry at the surface

12. Transplant when plants require water daily

Determining Sex in the Cannabis Plant

Cannabis is a dioecious plant species meaning its flowers are either male or female. The zone manager responsible for the flowering of genetics from seed will monitor flowering plants daily for signs of being male. It is important to note that even if a plant has shown white pistils coming from its branches, it could still be hermaphroditic especially if the seed origins were of a feminized variety. If a plant is determined to be male, it is either returned to vegetative for future breeding or destroyed or disposed of in a manner consistent with green waste disposal procedures and logged accordingly.

Male Cannabis Plant

Male plants will grow distinct ball-like sacs. Once they open, a fine powder is released (pollen) that is dispersed throughout the room on the slightest breeze. The zone manager will take the most care to eliminate contamination risk when removing and destroying male plants.

Sexing a Cannabis Plant

All cannabis started from seed will be flowered in a separate and distinct section of the cultivation facility grow area, where pollen is not able to travel into other flowering sections of the facility and potentially contaminate other batches of cannabis. The designated flowering zone manager will oversee the flowering of all plants from seed within their designated batch.

1. Plants will be monitored daily for sign of being male.
2. Once a plant has been determined to be male, it will be removed from the flowering room and destroyed. If the plant is determined to be good for breeding, it may be cloned prior to being destroyed.
3. Remove a male by placing a plastic trash bag over the entire plant and secure the bag tightly at the bottom of the stem by the base of the plant. Cut at the base and follow green waste procedures.
4. Remove male plant from plant inventory.
5. Dispose of the plant following green waste procedures.
6. Continue to monitor remaining plants, even females, for signs of being male or hermaphroditic.
7. All hermaphroditic plants should be treated just as males and disposed of in the same manner.

Seed Storage

All seeds will be labeled, logged, sealed airtight containers and stored in the genetic storage cooler. The vegetative zone manager is responsible for seed storage.

Feminized vs. Regular:

Feminized seeds are seeds that have been bred by forcing a female plant to become hermaphroditic and fertilize itself in order to produce an all-female crop. These seeds have a greater propensity to be hermaphrodite and must be monitored closely when flowering.

Cloning Cannabis Plants

Clones are genetic copies of the mother plant therefore all mother plants must be determined suitable for cloning by the vegetative manager. The Vegetation Agent (VA) will be responsible for selecting strains to be cloned in order to meet the demands of each flowering zone. Any terminal shoot at least three inches long can be turned into a clone; however, the top of the mother plant will have the freshest, softest material for cloning, and cloning from top down helps avoid mother plants that are too tall for the ceiling height within the cultivation space.

A mother plant is a female plant reserved in a continuous vegetative state for the purpose of taking cuttings. The cuttings from the mother plant are grown and flowered to produce the final product. The vegetative manager will ensure that healthy mother plants are maintained at all times to ensure healthy clones through the following procedures:

Mother plants will be watered with a well-balanced nutrient formula that is high nitrogen. The mother plant will be sufficient in size prior to cloning. Super cropping and topping techniques will be followed to increase the number of cloning sites on each mother plant. Avoid taking too many cuttings from a mother plant; leave at least 2/3 for future cloning and allow at least 1 week between cloning sessions for the mother to recover from stress. Materials needed for cloning: Rubbing alcohol, cutting board, scissors, new razor blades, cloning gel (for organic use honey), small container, distilled or reverse osmosis (RO) water, vinyl work gloves, and cloning medium.

Cloning mediums:

Rockwool cubes, rapid rooter cubes, coco coir cups, aeroponic systems. Procedure for taking clones: The VA will train a dedicated zone manager for the propagation of all clones. The VA will identify and approve a mother plant to be cloned.

Cloning Process

The cloning manager will prepare all tools and surfaces by wiping them clean with 90% rubbing alcohol and will then follow this protocol:

1. Fill clean empty glass with distilled or RO water.
2. Prepare cloning medium by moistening with filtered water.

3. Take clean scissors and place them into the cloning medium 1.25 inches deep to ensure a clean hole for planting the cutting.
4. Place the cutting board on a clean stainless steel-working surface.
5. Place the cloning medium and several brand-new razors next to the cutting board.
6. Select suitable cuttings, which are a minimum of three to four inches in length and have at least three leaf nodes.
7. Using scissors, remove several suitable cuttings from the mother plant.
8. Quickly cut and remove lower leaf nodes and place in the cup of water.
9. Place cup with cuttings next to the cutting board.
10. Remove cutting from the water and prepare to make a final clean cut with the razor blade.
11. Place the cutting on the cutting board and slice the base at a 45- degree angle directly below a leaf node for best results.
12. Cut and remove all lower fan leaves, any large fan leaves near the top should be cut in half.
13. Immediately dip the cut end of the clone into the cloning gel (rooting hormone), and place into the prepared growing medium. (If using an aeroponic cloner, skip the dip, and place the bare stem into the cloning machine.)
14. Place the finished tray of cuttings into the hot house or under a propagation dome. Lighting should be t5 florescent or similar.
15. Ensure humidity remains at 80% and temperature remains at 80 degrees.
16. After 7 days, remove all weak cuttings. Cuttings that are standing strong will enter the tracking system.
17. As soon as a cutting is removed from the mother plant it will be given a unit number, batch number, RFID tracking tag, logged and entered into the tracking systems so tracking can begin.

Watering Clones 10-14 days after cuttings have been taken, the root system should be established enough to allow the uptake of nutrients. From this time until transplanted into containers, the Cloning Agent will ensure proper care is taken to ensure healthy plants for transplanting. When cloning medium begins to dry out, the first watering will consist of beneficial microbes. Mix microbial mixture (Rhysotonic, or great white shark) into living water. Lightly water clones each time the growing medium achieves a 50% moisture level. Aeroponic clones will have Rhysotonic added to the reservoir after visible roots appear. When the substrate begins to show a second sign of dryness, apply a light vegetative nutrient at 25-50% strength.

Cloning Hot House

A minimum of one room within the vegetative area of the cultivation facility grow area will be maintained as a hot house. The hot house will meet all environmental standards and be fully enabled to maintain a room temperature of 80° Fahrenheit and a humidity level of 80%.

Transplanting Clones

Once a clone is fully rooted, it is ready to be transplanted and moved into the V2 zone of the facility. The VA will ensure all clones are transplanted, labeled, tagged with RFID and that each transfer is logged and tracked in the SIS. He/she will prepare all materials needed for transplanting and perform transplanting procedures. The following procedures will be followed whenever transplanting:

1. Collect materials for transplanting clones: Half-gallon to two-gallon pots (size to be determined by cultivation manager), Quantum semi-soil or TLO soil, small shovel, vinyl work gloves, great white shark or similar mycorrhizae product.
2. Ensure entire working area is clean.
3. Determine the number of clones to be transplanted.
4. Fill clean pots half way with planting medium.
5. Sprinkle .25 tsp. of GWS onto surface of planting medium, lightly stir with fingers.
6. Gently place the clone into the pot and cover the root zone and the bottom of the stem with additional soil. The stem could be covered .5 to 1.5 inches and there should be at least one inch of space remaining between the top of the soil and the top of the planting container. Do not pack the substrate; soil should be light and fluffy for the fastest root growth.
7. Ensure each plant is tagged with RFID tracking, labeled and logged into the tracking system, and the data recorded.

Watering Transplants

Post transplanting, plants require special attention in watering to ensure proper root development. The VA will ensure all new transplants are given water and nutrients by the following process:

1. Prepare vegetative nutrient solution.
2. Water plant's current root zone.
3. Wait until nearly dry, water entire container.
4. Wait until nearly dry, add GWS to nutrient solution, water entire container.

Vegetative Phase

The vegetative phase is incredibly important for the final outcome of the plant. During this phase, plants must create healthy root zones, a strong healthy stem, and a robust branching

system. This supportive plant architecture will allow the plant to reach MGP producing large beautiful flowers. Timeliness and consistency throughout the vegetative process will allow for accurate planning throughout the facility and enable patient needs to be met. The Vegetation Agent (VA) is responsible for preparing the plants for all future flowering zones. Each plant should reach its pre- determined full size prior to being transferred into its designated flowering zone. The VA must have full awareness of the timeliness and demands set forth by the flowering schedule and plan accordingly.

Early Vegetative (V2)

During the early vegetative phase, the main focus is establishing an inner root ball within a smaller container and pruning the plant to achieve a robust branching system. All plants in V2 will be in one-gallon containers for a three to four-week period. Lighting in the V2 stage will consist of t5s, 315 ceramics, 600-watt metal halides with blue spectrum, or induction lighting. All plants will be tracked by scanning RFID tags and documented into the tracking system upon being transferred from V2 to V3. Data will be recorded.

Late Vegetative/Pre-flowering (V3)

As the cannabis plant grows in size, the root zone will need to expand. When seeking to achieve MGP, the substrate demands increase to allow for larger more robust root zones. The Vegetation Agent (VA) will ensure pre-flowering vegetative plants are transplanted so that there will be 25-30 gallons of substrate per flowering light. During the pre-flowering stage, plants are transplanted into the final container size to allow for larger growth. Conditions in pre-flowering need to mimic flowering conditions so plants can be prepared to produce large healthy flowers in their final phase of growth.

Transplanting Vegetative Plants

Once the root zone has matured, a plant is ready to be transplanted into a larger container. A plant can only flourish while its roots zone is healthy and growing. The VA will transplant into the final phase container a minimum of two weeks prior to flowering.

Container Size: The VA will utilize 20-30 gallons of substrate per light for final phase growth in order to achieve MGP.

Choosing container size

Determine how many plants will be grown under each light in the flowering zone. Plant numbers are based on a plant growth speed; i.e. if a cannabis strain grows very slowly, the number of plants must be increased to meet the timeline of the cultivation facility. Indicas typically grow slower so it is assumed there may be smaller plants per light, whereas sativa plants grow quicker so there may be fewer larger plants per light. Once the number of plants per light is determined, calculate the amount of substrate and container size:

- 7-9 plants: 3 gallons
- 6 plants: 4 gallons
- 5 plants: 5 gallons

- 3-4 plants: 7 gallons

Materials: Containers, substrate (TLO or QSS), small shovel

Transplanting process

The VA will oversee the transplanting process as follows:

1. Thoroughly clean the transplanting area and any containers that are not new.
2. Move the batch of plants to be transplanted into the transplant area.
3. Fill several containers half way with substrate.
4. Sprinkle mycorrhizae onto surface of substrate and mix with fingers.
5. Place the stem of the plant between your fingers and turn the plant upside down.
6. If the plant does not slip out of the container with ease, gently squeeze the sides of the container.
7. Once the plant slips out, place your fingers under the root ball in the center and gently spread the roots.
8. Place the plant in the large container.
9. Using the small shovel, cover the small plant until the stem is covered a minimum of 1 inch by substrate. There should be 1.5-2 inches of space left at the top of the pot.
10. Hand water with vegetative nutrient solution. 11. Scan tag and move into the V3 zone designated for the batch. Record data.

Pre-Flowering (V3)

The pre-flowering phase is the final phase of vegetative growth. During this phase, we are focused on creating a full canopy before plants enter the flowering zone. The VA will ensure plants have strong lighting, CO₂, quality nutrients, and ample space in order to gain sufficient size. 1,000-watt metal halide lamps with blue spectrum bulbs are currently recommended for this phase of growth. Prior to being transferred from V3 to any flowering zone, all plants must have their RFID scanned and location moved within the tracking system. All data will be recorded at the time of transfer.

Flowering F1-F20

The designated flowering zone is where a batch will be induced into a flowering state by receiving 12 hours of un-interrupted darkness. The Flowering Zone Agent (FZA) will ensure all lighting is of the highest quality, the environmental controls are perfectly set and working, and each zone remains clean. The FZA will ensure proper plant manicuring and fertilization occur within each flowering zone. Flowering zones are separated into nine distinct rooms based on the average length of time plants spend producing flowers.

Late Flowering

During the late flowering stage, the FZA will prepare the plant for harvest via the following processes:

Flushing: During the flushing phase, the flowering zone manager will stop giving plants all nutrients and instead seek to purge all remaining nutrients from the substrate by forcing fresh water through the plant's root system. The following process will be used through each flowering zone to prepare plants for harvest and ensure the highest quality finished product:

- o Determine the plants to be flushed a minimum of 14 days prior to harvest.
- o Water each plant at its normal watering schedule with an abundance of fresh water.
- o Sufficient run-off should be attained during each flushing session in order to strip away all remaining sugars and salts.

Materials for flushing finished plants: 2 gallons of living water for every gallon of substrate within each zone.

ENVIRONMENTAL STRESSES

The following environmental stressors can affect the growth of cannabis. It is imperative to maintain a consistent environment in order to prevent the following:

Over-feeding (nutrients)

Nutrient burn occurs when a plant has been fed too many nutrients, especially nitrogen. Leaves will turn a deep, dark green, wilt or begin to show burnt tips. Overfeeding does not make the plant grow faster or bigger. When a plant is given too many nutrients, or not enough, then it starts showing signs of stress. This is caused by mineral imbalances which prevent the plant from carrying out its normal functions. Common signs of nutrient stress are burnt brown or yellow leaf tips, yellowing leaves or other unusual coloring/spotting, leaves falling off and slowed growth. As plants get older, they need fewer nutrients and may be more likely to show signs of nutrient stress. An older cannabis plant will need fewer nutrients than a younger one. Sometimes plants appear to be suffering from a nutrient deficiency, but treatment fails to solve the problem. This creates chemical reactions that lock up nutrients, making them insoluble and preventing them from being absorbed by the roots. When this occurs, balance can be restored by flushing the plant with twice the amount of water as the size of the container. Salts will wash out of the medium and the plant will be able to absorb the proper amount of nutrients again.

Root Bound

The roots of a cannabis plant require enough grow medium to stretch out and absorb nutrients. When a plant is in a container that is too small to allow the roots to grow, the plant is root bound. Growth is stunted, and the plant suffers. Transplanting the plant into a larger container will allow the roots to develop and revive the growth of the plant. The

minimum requirement for root zone size is approximately 1 gallon per month of growth but is also dependent on final size and energy input.

Light burn

Light burn occurs when the cannabis plant is too close to the grow lights or touches the bulb. Plants use light as energy. Chloroplasts are special organs inside leaf cells that capture the red and blue spectrum waves and use them to power photosynthesis. In this process plants take elements from water and air to make sugar while releasing free oxygen. The sugar is used to build tissue, including flowers. The lighter the plant has the faster the chloroplasts can function. As long as the plant is supplied with enough water, carbon dioxide and nutrients it will increase production when it receives more light. Cannabis plants require, at a minimum, 50 watts of HPS or MH light per square foot, but if the lights are too close to the plants, any wattage will scorch the plants.

Over-watering

When cannabis plants are over watered, an anaerobic condition is created where the roots of the plant are receiving no oxygen. Roots don't use carbon dioxide, but they do use oxygen. They obtain it from the air spaces between the soil particles. When they are deprived of oxygen they cannot function properly and gradually lose their vigor. The roots are easily attacked by pathogens when the plant is overwatered, as well as becoming more likely to develop mold issues.

Under-watering

Cannabis roots should never dry out. An under watered cannabis plant will quickly wilt, dry up and die. The amount of water that a plant needs and how often it should be watered depend on its size, the size of the container, canopy, root level and room temperature, humidity and the stage of growth. Larger plants require more water and larger containers need to be watered less frequently. Plants use less water in the last few weeks of flowering.

Heat burn Indoors, cannabis plants prefer moderate temperatures - between 70-75 degrees when the lights are on, and a slightly cooler set point, no more than 15 degrees, when the lights are off. Plants can withstand high temperatures when they have a large and healthy root system that can draw up enough water to keep the plant cool through transpiration. During vegetative growth, when the plant is growing bigger and stronger and not yet producing flowers, temperatures in the 80's and 90's will result in stem elongation, preventing the plant from developing a strong and compact stem. During the flowering phase of growth, high temperatures result in airy, undeveloped flowers that do not provide quality medicine. The room temperature of the cultivation space is not as important as the temperature between the lights and the plants. If this space is too warm, increasing air conditioning, ventilation and raising the lights will get the temperature to return to normal levels.

- **CO2 burn** Cannabis plants absorb carbon dioxide and release oxygen. The plant uses the CO2 for growth and is the essential building block for photosynthesis. Increasing CO2 in the cultivation space increases yields and plant growth. Supplemental levels of CO2 over 1,200 PPM will increase growth and yields by up to 20% by assisting the plant in absorbing more light. CO2 also assists the plants and cultivators by allowing the plant to tolerate higher temperatures and maintain normal growth cycles in temperatures that are not ideal, which can lower HVAC and power costs. When CO2 ppm is too high, cannabis plants can suffer greatly, which makes causes them to burn and eventually die. CO2 usage should be constantly monitored to make sure the plants are receiving the proper amount of carbon dioxide. All regulators and environmental control systems that regulate carbon dioxide emissions must be maintained in good working order and be serviced in accordance with the manufacturer's recommendations in order to regulate CO2 usage and efficiency.

- **pH Imbalance** pH is a logarithmic measure of the acid-alkaline balance in soil or water. A pH of 1 is the most acidic solution, 7 is neutral and 14 is most alkaline. Different species of plants require different pH levels. Cannabis plants are best suited to a pH range between 6.0- 6.5, a slightly acidic solution. All of the plant's nutrients are water soluble in this range so they are readily available to the plants. Outside of this range, the plant, creating nutrient deficiencies and slow growth, won't absorb vital nutrients. Usually, a nutrient deficiency is corrected by flushing the plant's grow medium with properly pH adjusted water, between 5.5-6.2. Cultivators must check the pH of the plant's coco coir, as well as the water used, to maintain proper pH. Water should be pH adjusted after any nutrients are added to the water, since the nutrients affect the pH level of the water. Maintaining the correct pH range is the most important step in the growth cycle of a cannabis plant.

ADVANCED CULTIVATING TECHNIQUES

Both the vegetative and flowering team will use the following techniques in a timely manner to ensure plants reach MGP, maintain product efficacy, and create consistency in dosage:

Topping: Topping a plant consists of removing the top shoot or shoots in order to force a plant to send its energy to lower branches. When a plant is topped, each lower branch becomes a main stem, thus turning one plant into multiple smaller plants that share one main stem and root system. All topping occurs in the vegetative stages of plant growth. The Vegetation Agent (VA) will ensure all plants are topped in order to achieve the appropriate branching structure. Correct topping procedure follows:

1. The first topping will be done when the plant has achieved 3-4 nodes.
2. With scissors, snip off the tip of the plant between the 3rd and 4th node.
3. Remove the bottom nodes so that four branches remain. **Materials for Topping Plants:** Sharp, clean scissors. **Super Cropping** Super cropping is similar to topping a plant in that the goal is to slow down the growth of an aggressive stem in order to allow the lower foliage to catch up, resulting in a bushier plant with more overall colas. The VA will utilize super cropping after the plant has been topped several times, i.e. in the pre-flowering stage of growth to prepare the plant for the flowering stage.

Super cropping process: Super cropping involves the bending of the highest stems in order to equalize the plant's energy between branches resulting in an even upper canopy. The VA will super crop plants in the pre-flowering phase by the following process:

1. Determine the desired canopy height.
2. While wearing gloves, take one of the tallest branches and massage it between two fingers until it starts to weaken and bend. Shaking, pinching, and rolling between the fingers may all be necessary to achieve the proper bend.
3. Try not to snap the stem, but instead weaken it away from the light in order to expose lower tops so they can catch up to the upper canopy.

SCROG "Screen of green" is a variant of the traditional "sea of green" where the goal is to have an all cola garden. The main difference between the two methods is in sea of green, each plant only has one cola, where as in SCROG, plants are encouraged to have multiple colas. Both methods have their place in cannabis gardening as certain varieties reach their MGP under different conditions; meaning, some plants cannot reach MGP unless they are grown to a large size and some plants will reach MGP at smaller sizes. Each flowering zone manager will ensure that the plants within their designated zone are properly SCROG'd by the following processes:

- **Netting** The first step in SCROGing is preparing the screen. Two flowering zone employees will install a net from the frame surrounding each table in the zone. Process for netting:

1. Unwrap netting material and unwind it along the side of the table to be netted.
2. One person on each end will stretch the net open at its width.
3. Carry the net over the top of the plants on both ends.
4. Wiggle the net down into the canopy so that the upper five inches are exposed.
5. Affix the net evenly to the framing using zip ties. Materials for netting: Nylon net, zip ties

- **SCROGing** The SCROGing process involves weaving the plants through the net so that each flowering top receives an equal amount of light in the optimal light zone. The flowering zone manager will SCROG each area so that the maximum numbers of flowering tops receive optimal lighting. SCROGing occurs during the early flowering phase (weeks two to three).

Process for SCROGing

1. Once Plants in the Flowering Room reach a height where the plants branch structure has been pruned enough to determine which branches will be most likely to reach their MGP, netting should be stretched over the plants and anchored to the poles mounted on the outside of the tables. This netting is to provide a structural trellis through which branches may be placed in order to spread the flowers out ensuring each Flower receives optimal lighting.

2. Determine which branches will be threaded through the netting. Be sure to utilize the Step Stool to view the Canopy as a whole.

3. Without damaging or over stressing the plants, gently thread the branches through the netting making sure to utilize the entire surface area of the net. While watering and Pruning, evaluate the current state of each plant and the canopy as a whole and adjust the SCROG accordingly to continually optimize the MGP of each plant. Materials for SCROGing: Vinyl gloves

Product Handling

Harvest, drying, and curing must all be handled with the utmost care to prevent contamination from mold and foreign substances. When a plant is harvested at the cultivation facility, it is carefully placed in a clean carrying vessel to be moved to the laboratory grade trimming and processing room. All plants will immediately have their leaves removed to allow adequate airflow around the flower while it is hung to dry in a room with a humidity level below 50%. Fans move the air while humidity is reduced further over the next few days allowing all flowers to decrease their moisture content to below 15%. Flowers are then safe to place in containers where their moisture content is reduced to less than 10%. During this time, the bud is slowly turned allowing all plant terpenes to be released and evenly coat the entire batch creating a consistent smell and flavor profile. Prior to being trimmed and cured, the processing team will segregate all harvested cannabis flower into their designated pre-determined homogenized batches. All segregated batches will be maintained in a secure, climate-controlled location suitable for the prevention of product contamination or efficacy loss.

Harvesting

The FZA will work with the CA to determine a timeline for each batch within the flowering zone. Once a batch has a confirmed harvest date, the processing manager will initiate the harvest of that particular batch. The Vegetation Agent (VA) will ensure that upon harvest each batch is tag scanned, weighed, transferred and data recorded. The following process will be used to harvest each plant within a batch:

Process for harvesting:

1. Scan tag for harvest.
2. Cut the plant at the base as close to the soil as possible.
3. Weigh the entire plant and record in the log.
4. Place plant on the stainless-steel table. Stainless steel table should be free from debris and wiped with alcohol.
5. Repeat the process until the table is full.
6. Transfer the product to the processing room and record new location and all other pertinent information.

7. Record total batch weight on log sheet and Biotrack.
8. Immediately remove fan leaves and begin trimming and drying process.

POST-HARVEST

Batch Segregation

The Vegetation Agent (VA) will ensure each batch remains segregated to avoid cross contamination and in order to maintain strict inventory control. Each batch will be clearly labeled and tagged with RFID and its exact location will be clearly defined and tracked at all times. The VA will ensure each batch remains segregated to avoid cross contamination and in order to maintain strict inventory control. Each batch will be clearly labeled and tagged with RFID and its exact location will be clearly defined and tracked at all times.

Processing/Wet Trimming

Immediately after harvest all products from a selected batch are processed for drying. The Packaging Agent will follow the following process for trimming all cannabis:

1. Designate staff members that will trim the given batch.
2. Cut the plant into individual stems no longer than 18-inch sections.
3. Remove all fan leaves and place in green waste.
4. Remove sugar trim with sharp/clean scissors and place all sugar trim in the proper sugar trim drying section to be prepared for the extraction process. Place the stem between two fingers and slowly spin each flower toward the scissors to remove fan leaf.
5. Ensure each cannabis pistillate inflorescence has all yellow or brown material removed.
6. Hang each trimmed stem from a hanger.
7. Once the batch is trimmed, move each hanger into the designated drying room for the particular batch. Scan and record data, and dispose of unusable waste via the green waste method. Dispose of gloves before leaving the trimming room.

Materials/tools for trimming and processing: Sharp/clean spring-loaded scissors, vinyl gloves, stainless steel working tables, rubbing alcohol, hanging rack, hangers, etc.

Processing/Dry Trimming Immediately after harvest all products from a selected batch are processed for drying.

Dry trimming is ideal for smaller crops. The processing manager will follow the following process for dry trimming all cannabis:

1. Ensure adequate staff members are available to trim the given batch.

2. Ensure that all work surfaces and tools are clean and sanitized. Hangers containing dried flowers still attached to stems should be pulled from the drying room using the Rolling Hanger Cart as instructed by the Cultivation Manager.
3. Select a flower stem from the hanger and move it to the screen table.
4. Remove individual flowers from the stem, placing the stems in a stem storage bucket.
5. Trim fan leaves and material from each individual flower.
6. Trim discolored flowers.
7. Dispose of unusable plant matter via green waste method.

Materials/tools for trimming and processing: Sharp/clean spring-loaded scissors, vinyl gloves, stainless steel working tables, rubbing alcohol, hanging rack, hangers, etc.

Drying

The drying process consists of slowly removing the majority of moisture from finished cannabis in a manner that preserves and increases the efficacy of each batch. Harvested cannabis has moisture content of approximately 80%. During the drying process the moisture is slowly reduced to 15% and then moved into the curing phase to further reduce the moisture content to 8% so it can be safely sealed.

Stem drying cannabis

Cannabis that has been trimmed on the stem can also be dried on the stem. Stem drying ultimately creates the highest quality finished product.

1. Prepare hanger by labeling with batch RFID and all pertinent information including strain.
 2. After trimming, hang individual stems on a hanger until the hanger is loosely full.
 3. Hang hangers on wall rack designed for stem drying.
 4. Scan batch tag and record location and all pertaining data in SIS. Materials for stem drying: Hangers, vinyl gloves, wall hanging system
- Screen drying cannabis When it is necessary to trim cannabis flowers off the stem, the processing manager will utilize a screen drying system to remove moisture from the flowers and prepare each batch for final curing.
1. Label screen with batch RFID and all pertinent information including strain type and harvest date.
 2. After flowers are trimmed, place on drying screen and insert screen into racking system.
 3. Scan batch RFID and record location and all pertaining data in the inventory tracking system for screen drying: Drying screen system, vinyl gloves.

Curing

Curing is the process of slowly removing moisture content from 15% down to 8% in order to remove the remaining chlorophyll and sugars from flowers and prepare them for packaging or processing into extraction form. The processing manager will utilize the following process to ensure cannabis is cured properly:

1. Label container with batch tag and all pertinent information including strain and harvest date.
2. Place cannabis into container no higher than the fill line.
3. Seal the container and log moisture level.
4. Scan Batch barcode tag and record location and all other pertinent information.
5. When moisture level increases by 10 points, open the valve on the lid and allow moisture level to reduce. May take one to five hours.
6. When moisture level holds firm at pre-determined level for two days, cannabis is properly dried.
7. Open lid valve every two days for remaining days in the 14-day period.
8. Rotate container daily.
9. After 14 days, cannabis will be sealed to await testing and test results. Materials for curing: Curing containers, vinyl gloves.

Secured Storage

After the Packing Agent has determined that a batch has been fully dried and cured, that batch will be weighed, sealed, and secured within the storage vault until the batch has been tested and approved for distribution. The Packing Agent will scan each batch and record all data in the SIS. Sealing Product Each batch of cannabis must be sealed and stored after it has dried and cured in order to maintain optimal moisture content. The processing team will seal each batch of dried and cured cannabis through the following process:

1. Prepare a sample from each batch prior to sealing. See testing.
2. Place empty storage vessel on scale and determine tare weight.
3. Fill vessel with cannabis.
4. Record weight and location of cannabis in the tracking system.
5. Label container with batch, strain, and weight.
6. Place lid tightly on container.
7. Insert vacuum into insertion hole on container lid.

8. Turn on vacuum for the appropriate amount of time to remove all air from the vessel. Materials for sealing: Vacuum, cannabis containers, large capacity scale.

Testing

After curing and before any processing or packaging, the processing manager will make samples from each batch available to an independent laboratory for testing. The sample will be weighed, RFID scanned, and all data will be recorded on the SIS prior to be removed from the secured curing area. The laboratory employee will select and prepare several random samples from every batch sample in order to ensure the quality, purity, and consistency of dose through a statistical approach. The laboratory staff will then test each random sample for harmful microbiological contaminants, mycotoxins, heavy metals and pesticide chemical residue. In addition, each sample will also be tested for active ingredients including but not limited to cannabinoid profiling for the following: THC, THCa, CBD, CBDa, and CBN. Under no circumstances will cannabis batches awaiting contamination results and active ingredient analysis be included in a cannabis product or sold to a retail dispensary facility prior to the time that the laboratory has provided those results, in writing, to the dispensary management team. If samples from a batch are tested and do not fall within state accepted health and safety levels for any of the above-mentioned contaminants or any additional contaminants the state does not deem for distribution, it is the cultivation facility's policy to destroy and remove any contaminated product in a manner consistent with state compliance for the policy for disposal of green waste. As soon as a batch sample passes the microbiological, mycotoxin, heavy metal and pesticide chemical residue test, the entire batch will be released for immediate manufacturing, packaging and labeling for transport and sale to a dispensary facility. An electronic copy of all test results will be filed by laboratory staff for any batch that does not meet the standards set for microbiological, mycotoxin, heavy metal or pesticide chemical residue tests. These results will also be sent to dispensary staff within the same time frame. The laboratory staff will also maintain a comprehensive record of test results and make them available to state and local officials, and or the public, as needed. The Chief Compliance Officer (CCO) will provide test results for each batch of cannabis used in any product purchased by a dispensary facility to that dispensary facility to be made available upon request to all qualifying patients, primary caregivers, and any physician who has certified a qualifying patient.

Packaging

The cultivation facility will not release or sell any part of a lot of usable cannabis until all required assurance testing has been completed in compliance with 935 CMR 500.130. All cannabis is to be held in the secured pre-testing storage vault while awaiting test results.

1. All usable cannabis will be packaged in child-resistant packaging.
2. Label is opaque so that the product cannot be seen from the outside of the packaging
3. Protect the contents from contamination and will not impart any toxic or deleterious substance to the usable cannabis or cannabis product

4. Contains no more than ten milligrams tetrahydrocannabinol for one dose, serving, or single wrapped item.

5. No manufactured cannabis product that is sold in a pack of multiple doses, servings, or single wrapped items, or any containers of oils, will contain a total of more than one hundred milligrams of tetrahydrocannabinol per pack or container.

• Labeling specifications 935 CMR 500.130 each package will be labeled using only black lettering on a white background with no pictures or graphics and will include:

1. Information about the contents and potency of the cannabis and cannabis product, including but not limited to:

A. Net weight in ounces and grams or volume and also the equivalent weight of the cannabis used to produce the cannabis product

B. The concentration of tetrahydrocannabinol or $\Delta 9$ tetrahydrocannabinol, total tetrahydrocannabinol and activated tetrahydrocannabinol-A, and cannabidiol

2. The cultivation facility license number and name of the production center where the cannabis was produced

3. The batch number and the date of packaging

4. A computer tracking inventory identification number barcode generated by tracking software

5. Date of harvest or manufacture and “Use by date”

6. The instructions for use

7. The specific phrases “Not for resale or transfer to another person”

8. Warnings must be included in labelling:

A. “This product may be unlawful outside the State of Massachusetts and is unlawful to possess or use under federal law”

B. “This product has intoxicating effects and may be habit forming”

C. “Smoking is hazardous to your health”

D. “There may be health risks associated with consumption of this product”

E. “This product is not recommended for use by women who are pregnant or breast feeding”

F. “Cannabis can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of this drug” “When eaten or swallowed, the effects of this drug may be delayed by two or more hours”

9.The name of the independent laboratory that performed the testing

10.The information from 1-7 will appear on the package and the rest of the information will appear on the package insert.

11.The cultivation facility will not label as organic any cannabis unless permission has been granted by the US Department of Agriculture in accordance with the Organic Foods Production Act.

Emergency Procedures

This section will outline steps to be taken in case of an emergency. It will detail actions for owners or occupational licensees in case of a fire, chemical spill or other emergency.

Fire Emergency • If fire is small and isolated, try to exhaust the fire with one of the fire extinguishers. • In case of a fire emergency, dial 911 for Fire Department.

Chemical Spill • Try to use chemical spill kit for smaller incidents of chemical spill. • If chemical spill is large or you do not know how to handle the situation, escalate to your manager.

Other Emergencies • Contact 911 for break-ins or burglaries.

Record Keeping/Documentation This section will detail how to maintain clear and comprehensive records of the name, signature, and owner or occupational license number of every individual who is engaged in any step related to the creation/production of a production batch of cannabis and the step that individual performed.

Documentation/Records Needed Record and maintain accurate records of employees and owners or occupational license numbers. These records will be kept by the manager and stored in the office. Make sure you are following all laws, rules and regulations. Fill out daily production logs for our records. Fill out daily transfer to center logs for our records. Fill out daily wholesale logs for our records.

Packaging and Labeling

Management will ensure full compliance with all applicable regulations relating to packaging and labeling within the cultivation facility. All cannabis products and manufactured cannabis products will be packaged and labeled according to all applicable state and local laws and regulations. Below are State Regulations pertaining to packaging and labeling requirements; management will ensure that all employees are properly trained on packaging and labeling requirements and procedures.

Packaging and Labeling of Cannabis

- All usable cannabis will be packaged in child-resistant packaging.
- Label is opaque so that the product cannot be seen from the outside of the packaging

- Protect the contents from contamination and will not impart any toxic or deleterious substance to the usable cannabis or cannabis product
- Labeling specifications pursuant to code, each package will be labeled using only black lettering on a white background with no pictures or graphics and will include:

Information about the contents and potency of the cannabis and cannabis product, including but not limited to:

- Net weight in ounces and grams or volume and the equivalent weight of the cannabis used to produce the cannabis product
- The cultivation license number and name of the production center where the cannabis was produced
- The batch number and the date of packaging
- A computer tracking inventory identification number barcode generated by tracking software
- Date of harvest or manufacture and “Use by date”
- The instructions for use
- Warnings must be included in labelling:
 - “This product may be unlawful outside the State of Massachusetts and is unlawful to possess or use under federal law”
 - “This product has intoxicating effects and may be habit forming”
“Smoking is hazardous to your health”
 - “There may be health risks associated with consumption of this product”
 - “This product is not recommended for use by women who are pregnant or breast feeding”
 - “Cannabis can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of this drug”
- The name of the independent laboratory that performed the testing
- The information from 1-7 will appear on the package and the rest of the information will appear on the package insert.
 - The cultivation facility will not label as organic any cannabis or manufactured cannabis product unless permission has been granted by the US Department of Agriculture in accordance with the Organic Foods Production Act.

CULTIVATION FACILITY STORAGE

Storage of cannabis will comply with all applicable state and local regulations. All cannabis will be stored in a secure access area for nightly storage at the close of operations each day. All storage areas will have adequate lighting. This is also explained in the facility layout section. After cannabis flower and trim are processed, the facility manager secures them within the facility secure double key locked room to wait for testing and shipment. After the cannabis passes required laboratory testing, they will be transferred to a retail facility for sale and distribution

Storage

JCC will:

- Maintain all cannabis in a secure area or location within the center accessible only to specifically authorized personnel, which will include only the minimum number of employees essential for efficient operation;
- Keep all approved safes, vaults, or other equipment or areas used for the production or storage of cannabis securely locked or protected from entry, except for the actual time required to remove or replace cannabis;
- Keep all locks and security equipment in good working order;
- Not allow keys to be left in the locks and not store or place keys in a location accessible to persons other than specifically authorized personnel;
- Not allow other security measures, such as combination numbers, passwords or electronic or biometric security systems, to be accessible to persons other than specifically authorized personnel; and
- Keep the center securely locked and protected from unauthorized entry at all times.
- If a center presents special security issues, such as extremely large stock of cannabis, exposed handling or unusual vulnerability to diversion, theft or loss, the department may require additional safeguards, such as supervised security service.
- If a loss, theft or diversion of cannabis has occurred from a center, the center will notify the department and the nearest SP district immediately. The department will determine the appropriate storage and security requirements for all cannabis in the center and may require additional safeguards to ensure the security of the cannabis.
- Any center whose permit is revoked or not renewed will dispose of its entire stock of cannabis under conditions approved by the department.
- Any area of a center containing cannabis, including a room with an approved safe or approved vault, will have a sign posted at all entryways, which will be a minimum of 12 inches in height and 12 inches in length and will state: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.

- Notwithstanding the requirements of this Section, nothing will prohibit members of the department, local law enforcement or other federal, State or local government officials from entering any area of a center if necessary to perform their governmental duties, or persons authorized by the department.
- Centers will provide current copies of center floor plans to the Massachusetts Cannabis Control Commission and local law enforcement that have jurisdiction in the area where the center is located.

Product Information

Pursuant to 935 CMR 500.300 for each batch of cannabis sold and/or transported, the following information will be made available to the purchasing dispensary upon or prior to delivery:

- The batch numbers
- Whether the batch originated from cannabis seeds or cannabis cuttings
- Strain of the cannabis seeds or cannabis cuttings planted
- Number of cannabis seeds or cannabis cuttings planted
- Date on which the cannabis seeds or cuttings were planted
- List of all chemical additives used in the cultivation center, including, without limitation, nonorganic pesticides, herbicides and fertilizers
- Number of cannabis plants grown to maturity
- Harvest information, including, without limitation:
 - o Date of harvest;
 - o Final yield weight of processed usable cannabis; and
 - o Name and cannabis establishment agent registration card number of the cultivation facility agent responsible for the harvest.

Transportation:

Pursuant to 935 CMR 500.120 the record of clear and unbroken chain of custody needs to be maintained at all stages. Prior to transporting any cannabis, our cultivation center will in accordance with code:

Complete a shipping manifest using a form prescribed by the department that lists the components required by the department's tracking system. Only the cannabis that are listed on the manifest will be transported. Cannabis that are being transported will:

- o Only be transported in a locked safe and secure storage container.
- o Have a copy of the manifest in the interior and on the exterior of the container.

Any motor vehicle transporting cannabis will travel directly from the cultivation center to the dispensary facility, or a testing laboratory, and will not make any stops that are not on the manifest. Exceptions will include a stop for refueling or, in case of an emergency. In case of emergency, the agents will report the emergency immediately to law enforcement through the 911 emergency system and the cultivation center, which will immediately notify the department.

Our cultivation center will ensure that all delivery times and routes are randomized and reduce the possibility of theft or diversion. Each delivery team member will have access to a secure form of communication with personnel at the cultivation center and the ability to contact law enforcement through the 911 emergency systems at all times that the motor vehicle contains cannabis.

Our cultivation center will staff all transport motor vehicles with a minimum of two employees. At least one delivery team member will remain with the motor vehicle at all times that the motor vehicle contains cannabis. For the transport between or among dispensary facilities, the transport package will be packed, secured, and loaded and unloaded and unpacked in front of full view of security surveillance cameras. If there are any discrepancies between what is received and the manifest, they will be reported immediately to the department.

Each delivery team member will possess his or her department issued identification card at all times when transporting or delivering cannabis and will produce it for the department or department's authorized representative or law enforcement official upon request.

Product Recall Plan

If the cultivations center cannabis proves to be non-conforming upon retest pursuant to 935 CMR 500.300, the cultivations center will initiate a recall in accordance with the guidelines put forth by Massachusetts Cannabis Control Commission (CCC). Manufacturers, importers, distributors and retailers of consumer goods are liable for the products they provide to consumers and face the potential of product recalls for potentially dangerous or hazardous products. The same is true for JCC as a cultivator of cannabis. As a result, the company may need to conduct a product recall in the future. For consumer products, the recall process is handled and regulated by the CCC, for all intents and purposes JCC recall plan will follow the guidelines of the CCC. Firms often learn of potential product safety problems at an early stage. For this reason, companies involved in the manufacture, importation, distribution, or sale of consumer products should develop a system for maintaining and reviewing information about their products that might suggest that their product has a defect or poses an unreasonable risk of serious injury or death. Such information includes, but is not limited to, consumer complaints, reports of production problems, product testing, or other critical analyses of products. Experts have shown that one of the best ways to ensure that a product recall is effective is to have a recall plan already in place and to execute the plan as quickly as possible. A well thought out, well-executed recall plan can save lives and prevent injuries in addition to limiting damage our company's brand and bottom line. The CCC has compiled resources to assist companies that manufacture, import, distribute, retail, or otherwise sell consumer products.

Become familiar with their reporting requirements;

Help learn how to recognize potentially hazardous consumer products as soon as possible; and

Develop and implement "corrective action plans" that address the hazards if we discover we have manufactured, imported, distributed, or retailed such products. Recall 935 CMR 500.300: JCC will establish, maintain and comply with the policies and procedures contained in the Operations and Management Practices Plan, approved by the Department, for the production, security, storage, inventory and distribution of cannabis. The policies and procedures will include methods for identifying, recording and reporting diversion, theft and loss, and for correcting all errors and inaccuracies in inventories. We will include in our written policies and procedures a process for the following:

- Handling mandatory and voluntary recalls of cannabis or manufactured cannabis products. The procedure will be adequate to deal with:
 - o Recalls due to any action initiated at the request of the department and any voluntary action to remove from the market defective or potentially defective cannabis or cannabis infused products, or any product that has failed laboratory testing as required by this Part or has been found to have a reasonable probability that its use or exposure will cause serious adverse health consequences; and
 - o Any action undertaken to promote public health and safety by replacing existing cannabis or manufactured cannabis products with improved products or packaging. Recall: A dispensing organization must establish a policy for communicating a recall for cannabis or a cannabis-derived product that has been shown to present a reasonable or a remote probability that use of or exposure to the product will cause serious adverse health consequences.

Our policy will include: A mechanism to contact all customers who have, or likely have, obtained the product from the facility. The communication will include information on the policy for return of the recalled product;

- A mechanism to contact us;
- Communication with the department within 24 hours; and
- Outreach via media, as necessary and appropriate.
- Any recalled cannabis product will be disposed of by the dispensing organization.

When to Recall Cannabis Products - As a manufacturer, distributor, and/or retailer of consumer products, JCC has a legal obligation to immediately report the following types of information to the CCC:

- A defective product that could create a substantial risk of injury to consumers;
- A product that creates an unreasonable risk of serious injury or death;

- A product that fails to comply with an applicable consumer product safety rule or with any other rule, regulation, standard, or ban under the CCC or any other statute enforced by the CCC;
- An incident in which a child (regardless of age) chokes on a marble, small ball, latex balloon, or other small part contained in a toy or game and that, as a result of the incident, the child dies, suffers serious injury, ceases breathing for any length of time, or is treated by a medical professional; and
- Certain types of lawsuits.
- Failure to fully and immediately report this information may lead to substantial civil or criminal penalties. CCC's staff advice is "when in doubt, report." JCC will ensure communication with the Division within 24 of becoming aware of the need for a product recall. JCC will then proceed to recalling protocol and how to recall the product.

How to Recall Cannabis Products

JCC will develop a recall plan following guidance from the Recall Handbook provided by the CCC. Once the need for a product recall has been determined, JCC will proceed with the product recall Corrective Action Plan (CAP). If the need for a product recall arises, we will have inventory management systems in place to determine and pinpoint which products to recall, how many of those products are in the supply chain and will be able to determine exactly where those products are within the supply chain. The inventory management systems and procedures required by State Regulations will ensure a streamlined recall process if ever necessary.

Corrective Action Plan (CAP)

A corrective action plan is defined as improvements to an organization's processes taken to eliminate causes of non-conformities or other undesirable situations. The goal of a corrective action plan should be to retrieve as many hazardous products from the distribution chain and from consumers as is possible in the most efficient, cost-effective manner. The CAP will outline the procedures and steps JCC needs to take once a product recall is required.

- **Step One: Industry Notification** If cannabis or manufactured cannabis products are believed to need to be recalled, JCC will contact all wholesale partners and dispensing organizations to make them aware of the situation and the need for product recall. JCC will also contact the CCC within 24 hours of obtaining reportable information. As the wholesaler of the product needing to be recalled, contacting the end users of the recalled product will prove difficult if not impossible. At this stage of the recall, dispensing organizations will need to ensure that they have a proper recall process in place to contact the end users of the product being recalled.

- **Step Two: Public Notification** JCC will post notifications about the product recall on its website as well as making partnering dispensary centers and dispensing organizations aware

of the product recall. The actual recalling processes will be handled by the cultivation facility with help and support from the dispensary center. As the dispensing organization issuing a recall notice it will be important to reach the end users or the recalled product. JCC will post notification about the recall on JCC websites and social media as well as post written notices of the recall on location for patients and customers to view. The recall notice will include all pertinent information regarding the product being recalled, contact information and other information relating to the recall. Information will include but not be limited to:

- Product name
- Product batch number
- Dispensing date range of recalled product
- Dispensing organization locations - Once the recall notification has been issued to all applicable dispensing organizations, JCC will wait to receive recalled products from dispensing organizations. Once recalled products have been received, JCC will properly dispose of all recalled products.
- Step Three: Procurement - The cultivation facility issuing a product recall to cannabis consumers will need to be ready to obtain and secure recalled products. Consumers should be able to bring in the products being recalled to the facility's location. It will be at the facility's discretion whether to issue a refund, replace the recalled product at no cost, or to take other measures.
- Step Four: Documentation and Record Retention - JCC will maintain all documentation and records regarding any and all product recalls issued.
- Step Five: Disposal - JCC will ensure that any and all recalled cannabis are disposed of according to all state and local regulations. JCC will follow waste destruction and disposal procedures outlined below for proper disposal of recalled cannabis and manufactured cannabis products.

CANNABIS WASTE

Destruction and Disposal

All waste, including waste composed of or containing finished cannabis, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations including but not limited to section. The cultivation facility will maintain a record of all disposals for a minimum of six years. Facility management will ensure proper training and implementation of destruction and disposal procedures and protocols.

Waste Processing Center

The cultivation facility will contain a designated waste holding and processing room designed to keep waste secured and segregated from the rest of the cultivation facility. The entire waste processing center will be recorded on high definition video and remain locked at all times. The processing center will contain a shredder/grinding machine, multiple containment

vessels, at least two mixing containers, additional processing medium/substrates, and interior entrance and exterior exit points. Preparation of waste will be contained within the secured processing center in order to prevent any cross-contamination with any cultivation facility areas and avoid any possibility of product diversion.

Secured Waste Collection

The following process explains how the cultivation facility staff will maintain security and avoid diversion. Green waste will be collected throughout the day in designated receptacles that are secured, locked and tracked on video. At the end of the day the on-site quality Chief Compliance Officer (CCO) along with another staff member will collect all the waste and weigh it out on video. All information will be recorded including, weight, time, date, employee names and signatures. The green waste will then be stored within a locked and secured designated waste processing room and continuously monitored on video until the time of disposal. All cannabis will be rendered unusable prior to disposal by following the methods for green waste disposal.

Disposing of Waste

A minimum of seven days prior to rendering the secured green waste unusable and disposing of said waste, an agent from the cultivation facility team will utilize the traceability system. Immediately before the green waste is processed for disposal it will be re-weighed by the quality control manager and at least one other staff member and all information will be recorded including, weight, time, date, employee names and signatures. After capturing all pertinent data, logging, and entering into the company tracking system, all waste will be rendered unusable and prepared for either compostable or non-compostable disposal. The cultivation facility compliance manager will oversee the entire green waste disposal process and ensure it is done. All waste processing and disposal will be recorded on video surveillance.

Materials Needed for Processing Green Waste Compostable materials:

Food waste, yard waste, vegetable grease or oils, other waste approved by the Department of Agriculture such as biodegradable paper products.

Non-compostable materials: Paper waste, cardboard waste, plastic waste, soil or other waste approved of by the Department.

Process for Rendering Cannabis Unusable

Place cannabis in grinder and mulch until all pieces are smaller than .5 centimeters in length. Mix the cannabis thoroughly with other ground materials so that the resulting mixture is a minimum of 50% non-cannabis waste from the above list or other waste approved by the department.

Disposal of Cannabis Waste Rendered Unusable

Once waste has been processed in a manner consistent with company policy and department policy, it will be transported to a permitted waste facility for final disposal. All compostable waste will be delivered to compost, anaerobic or other facility approved by the jurisdictional health department. All waste prepared for non-compostable disposal will be delivered to an approved landfill, incinerator, or other facility with approval from the jurisdictional health department.

Liquid Waste

The Chief Compliance Officer (CCO) will ensure all liquid waste is disposed of in a manner consistent with requirements placed within the Massachusetts Cannabis Control Commission specific to the substance being disposed of.

Hazardous Waste

The cultivation CCO will ensure that all hazardous and chemical waste is disposed of in a manner consistent with federal, state, and local laws. State Regulations Cannabis and manufactured cannabis products will be destroyed by rendering them unusable following the methods set forth in this section. At least seven days prior to rendering cannabis unusable and disposing of it, the cultivation organization will notify the Director of Horticulture (DoH). Notification will include the date and time the cannabis will be rendered unusable and disposed. If the dispensing organization's policy designates the destruction of cannabis on the same day and time weekly, communication of that day and time will be sufficient to comply. Any change in the date and time must be communicated to the DoH. The allowable method to render cannabis waste unusable is by grinding and incorporating the cannabis waste with other ground materials so the resulting mixture is at least 50% non-cannabis waste by volume. Other methods to render cannabis waste unusable must be approved by the CCO before implementation. Material used to grind with the cannabis falls into two categories, compostable waste and non-compostable waste.

Compostable Mixed Waste

Cannabis waste to be disposed as compost feedstock or in another organic waste method (for example, anaerobic digester) may be mixed with the following types of waste materials:

- o Food waste;
- o Yard waste;
- o Vegetable based grease or oils; or
- o Other wastes as approved by the Division (e.g., agricultural material, biodegradable products and paper, clean wood, fruits and vegetables plant matter).

Non-compostable Mixed Waste

Cannabis waste to be disposed in a landfill or by another disposal method may be mixed with the following types of waste materials:

- o Paper waste;
- o Cardboard waste;
- o Plastic waste;
- o Soil; or
- o Other wastes as approved by the Division (e.g., non-recyclable plastic, broken glass, leather).

Cannabis waste rendered unusable following the methods described in this section can be disposed. Disposal of the cannabis waste rendered unusable may be delivered to a permitted solid waste facility for final disposition.

Examples of acceptable permitted solid waste facilities include:

- o Compostable Mixed Waste: Compost, anaerobic digester or other facility with approval of the jurisdictional health department.
- o Non-compostable Mixed Waste: Landfill, incinerator or other facility with approval of the jurisdictional health department.

All waste and unusable product will be weighed, recorded and entered into the inventory system prior to rendering it unusable. Verification of this event will be performed by an agent-in-charge and conducted in an area with video surveillance. Electronic documentation of destruction and disposal will be maintained for a period of at least six years

CULTIVATION RECORDS

Pursuant 935 CMR 500.120, the cultivation facility will keep and maintain upon the permitted premises for a six-year period true, complete, legible and current books and records, including but not limited to the following:

- ☐ Inventory tracking including transport of Company cannabis
- ☐ Sales and compliance with regulations pursuant to 935 CMR 500.120
- ☐ Financial records including Company income, expenses, bank deposits and withdrawals, and audit reports;
- ☐ Logs of entry and exit for cultivation facility
- ☐ Employee records
- ☐ Security recordings will be retained a minimum of one year.

The cultivation facility will submit quarterly reports on the 15th of each quarter, thus, on January 15, April 15, July 15, and October 15. (Reports will be considered on time if submitted the next day if the 15th is a Saturday, Sunday or a State holiday.) Reports will include, but are not limited to pursuant to 935 CMR 500.300:

- ☐ Records of entry and exit for all individuals who entered
- ☐ the facility Amounts by category of cannabis
- ☐ A list of all cannabis or unusable cannabis materials that have been destroyed or will be destroyed by the cultivation facility
- ☐ A summary of the financial statement
- ☐ Laboratory results of all tests that were conducted
- ☐ Description of any breach or halt in the cultivation facility security system and tracking system
- ☐ Any additional/other information requested by the department

Tracking/Logging Workflow and Pertinent Data

All workflow will be tracked and recorded for daily review by the cultivation facility manager.

The following logs will be utilized by designated cultivation facility employees to track workflow through the cultivation facility. In addition to logging, all information will be entered into the tracking system.

Information Recording Logs

The cultivation facility CCO will work with each section manager (cultivation and processing) to ensure that all logs are utilized and maintained to track all facility workflow.

☐ Visitor Log

The company CCO is responsible for ensuring any authorized personnel visiting the cultivation facility use a visitor log. The visitor log will be located inside the main secured entrance- to the cultivation facility.

☐ Cleaning Log

The DoH is responsible for overseeing the use of a daily cleaning log to track cleaning within all zones of the cultivation facility.

☐ Maintenance Log

A facility maintenance log will be utilized to track maintenance and upkeep on all equipment within the cultivation facility.

☐ Light intensity Log

To ensure all cultivation facility lighting is maximized, the light produced by each lamp must be checked on a monthly basis by the cultivation facility staff. The Cultivation Manager will

work with each zone manager to measure lighting throughout each cultivating zone in the cultivation facility.

☐ Pest Control Log

Plant cultivation zone managers will be responsible for tracking and logging all pest and disease control measures within the cultivation facility.

☐ Feed Schedule Change Log

Plant cultivation zone managers will be responsible for tracking feeding schedules in all cultivation zones for which they are responsible. Any change or variance in the respective plant-zone feed schedule must be noted and brought to the attention of the cultivation facility manager.

☐ Transplant Log

The transfer log tracks all plant movement throughout the cultivation facility. The Vegetative Agent is responsible for tracking plant movements before flowering begins.

☐ Harvest Log

All flowering zone harvest schedules are tracked on the cultivation facility harvest log. The flowering zone management team is responsible for updating this log and noting any variances to the CFM.

☐ Daily Inspection Log

All zone managers are responsible for performing daily inspections and communicating all variances to the cultivation facility manager. All zones must comply with the information designated in the cultivating environment and quality control section. The daily inspection log includes:

- o Room temperature: zone manager
- o Humidity: zone manager
- o CO2: zone manager
- o Electrical and lighting: zone manager
- o Pest and disease: zone manager
- o Photoperiod: zone manager

☐ Curing Log

A curing log will be maintained by the processing manager to track the time specific strains and batches are in the curing area. In addition to time, environmental conditions such as temperature and humidity are also recorded.

☐ **Testing Log**

A testing log will be maintained by the processing manager to keep track of all batches, their respective test dates and results.

☐ **Finished Batch Log**

The following information will be collected pursuant to 935 CMR 500.130 in order to maintain records for company R&D, tracking purposes, as well as relaying all pertinent data to the dispensary to which any part of a batch is sold.

o For each batch of cannabis cultivated, the following information will be collected:

- ☐ **Batch number**
- ☐ **Whether the batch originated from cannabis seeds or cannabis cuttings**
- ☐ **Strain of the cannabis seeds or cannabis cuttings planted**
- ☐ **Number of cannabis seeds or cannabis cuttings planted**
- ☐ **Date on which the cannabis seeds or cuttings were planted**
- ☐ **List of all chemical additives used in the cultivation, including, without limitation nonorganic pesticides, herbicides and fertilizers**
- ☐ **Number of cannabis plants grown to maturity**
- ☐ **Harvest information, including, without limitation:**
 - o **Date of harvest;**
 - o **Final yield weight of processed usable cannabis; and**
 - o **Name and cannabis establishment agent registration card number of the dispensary agent responsible for the harvest**

Liability Insurance Compliance Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

Short Term Goals

1. The policy to be obtained will include general and product liability insurance coverage of no less than \$1 million per occurrence and \$2 million in aggregate annually. The deductible for each policy will not be higher than \$5,000 per occurrence.
2. Receive Quote for Policy
3. Receive Final License and activate the insurance policy

Long Term Goals

1. Have a zero claims
2. Keep all policy's current

Program Policy & Procedures

Execution:

1. Contact a minimum of 5 liability insurance companies specifically for the cannabis industry.
2. Obtain quotes from each company with the required coverages and choose the best quote.
3. Once the best company is chosen, the policy will be initiated as the down payment for the policy is made.

Measurement & Accountability

1. K.S.K. Insurance Agency Inc. has been contacted and a quote of our acceptance has been given. Once JustinCredible Cultivation is awarded its provisional license, this insurance policy shall be activated. (Please see attached quote for confirmation)
2. Have signs to remind employees to Lock all doors at each door and cabinets
3. Send all documented infractions to chairman of advisory board. The advisory board will keep management liability and create a level of checks and balances between owners and the company
4. Audit Video Quarterly on random shifts to check for missed infractions



All Risks, LTD.
10150 York Rd, 5th Floor
Hunt Valley, MD 21030

Insurance Proposal

Cost Summary

General Liability Premium	\$9,140.00
Policy Fee	\$250.00
Carrier Policy Fee	\$150.00
MA Surplus Lines Tax	\$365.60
Total Policy Cost	\$9,905.60

Minimum Earned

Note: There may be a minimum earned on this policy. Please refer to the carrier quote for more details on the minimum earned percentage.

Kinsale Insurance Company

A.M. Best Company Rating: A- (Excellent)
Financial Size Category: VIII

All Risks, Ltd. - Hunt Valley, MD - Jacquelyn Borsje

QUOTE

RE: Justin Credible Cultivation LLC
0 Powell Road
Cummington, MA 01026

Submission #:01303416
Quote Letter #:04072905
Quote Date:09/05/2018

We are pleased to offer the following quote. This quote is valid until 10/01/2018 unless extended and agreed to in writing by us. Please read carefully as the terms and conditions of coverage may differ from those requested. **THIS IS NOT A BINDER OF INSURANCE.**

Company: Kinsale Insurance Company

Policy Term: 10/01/2018 - 10/01/2019

Coverage Form: Commercial General Liability - Claims Made

Retro Date: 10/01/2018

Description Of Operations: Marijuana Cultivator

Limits:

Each Occurrence Limit	\$1,000,000
Damages to Premises Rented to You Limit	\$100,000
Medical Expense Limit	Excluded
Personal & Advertising Injury Limit	\$1,000,000
General Aggregate Limit	\$2,000,000
Products / Completed Operations Aggregate Limit	\$2,000,000

Deductible:

Per Claim	\$5,000
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Coverage Enhancements:

Primary / Non-Contributory Endorsement

Rate	3.66
Premium	\$9,140
Company Fees	\$150
Total Due at Inception	\$9,290
Min. Earned Premium At Binding	25.00%

Company Fees are fully earned.

Premium is 100.00% minimum and deposit.

Taxes, fees and surcharges are the responsibility of the broker.

Policy Subject to Annual Audit.

Basis of Premium

Class Description	Exposure Base	Exposure Units
Marijuana Products - Growing, Processing and Cultivating	per \$1,000 Gross Sales	2,500,000

Contingencies:

This Quote is subject to our receipt and acceptance of the following items:
Subject to favorable inspection and compliance with recommendations.

Subject to receipt of Kinsale's NKLL upon binding. Any additional adverse loss activity not currently reported to us may affect our pricing and/or acceptability of this risk.

Signed and dated ACORDs/Supplement upon binding.

SL Tax Filing Form upon binding.

Prior to binding, please provide a sampling of warning labels that appear on products.

Comments:**Exclusions and Endorsements:**

CAS1001-0618 - Commercial General Liability Declarations - Claims Made
ADF9013-0815 - Notice - Where To Report A Claim
ADF4001-0110 - Schedule of Forms
CG0002-1001 - Commercial General Liability Coverage Form
CAN2002-0218 - Warranty Endorsement - Licensing Compliance
CAS2004-0110 - Deductible Endorsement
CAS2007-0817 - Common Conditions - Casualty
CAS2008-0110 - Amended Duties in the Event of a Claim or Suit - (Commercial General Liability - Claims Made)
CAS2009-1111 - General Liability Changes-Claims Made to Claims Made and Reported
CAS2013-0215 - Extended Reporting Period
ADF4002-0817 - Basis of Premium
ADF4005-0212 - Composite Rate Endorsement
CAS4004-1016 - Amendment - Supplementary Payments Inside Limits of Insurance
CAS4018-0411 - Minimum Policy Premium
CAS4029-1212 - Amendment - Premium Audit Conditions
ADF3003-0110 - Exclusion - Absolute Pollution and Pollution Related Liability
ADF3010-0110 - Exclusion- Nuclear, Biological or Chemical Materials
ADF3011-0115 - Exclusion of Other Acts of Terrorism Committed Outside the United States; Exclusion of Punitive Damages Related to a Certified Act of Terrorism; Cap on Losses from Certified Acts of Terrorism
ADF3013-0611 - Exclusion - Collection of Personal Identification Information
CAN3001-0218 - Additional Policy Exclusions - Cannabis
CAN3002-0218 - Exclusion - Cannabis Health Hazard
CAN3003-0218 - Exclusion - Ingredients or Additives - Cannabis
CAN3004-0218 - Exclusion - Impairment
CAS3002-1016 - Exclusion - Assault and Battery
CAS3009-0110 - Exclusion-Medical Payments
CAS3011-0110 - Exclusion- New Entities (Commercial General Liability)
CAS3097-0110 - Exclusion - Intellectual Property
CAS3098-0110 - Exclusion- Named Insured vs. Named Insured
CAS3108-0814 - Exclusion - Access or Disclosure of Confidential or Personal Information and Data-Related Liability - General Liability

CAS3124-0616 - Exclusion - Violation of Statutes That Govern E-Mails, Fax, Phone Calls or Other Methods of Sending Material or Information
CG2167-1204 - Fungi or Bacteria Exclusion
CAN5001-0218 - Additional Insured - State or Political Subdivision
CAN5002-0218 - Additional Insureds - Vendors
CAS5003-0717 - Additional Insured - Primary and Non-Contributory Endorsement
ADF9010-0115 - Notice of Terrorism Insurance Coverage
IL0021-0908 - Nuclear Energy Liability Exclusion Endorsement (Broad Form)
IL0985-0115 - Disclosure Pursuant to Terrorism Risk Insurance Act
ADF9004-0110 - Signature Endorsement
ADF9009-0110 - U.S. Treasury Department's Office of Foreign Assets Control (OFAC) Advisory Notice to Policyholders

This quote is subject to the specified conditions and may be withdrawn at any time prior to acceptance and in no event will it remain open beyond the quote expiration date unless extended by us in writing. Changes in classifications, operations, exposure or risk specific information require notification to us and may result in changes to this quote. Coverage may not be bound without written confirmation from us.

Once bound, coverage may not be cancelled flat and the minimum earned premium will apply.

Kinsale Insurance Company
P. O. Box 17008
Richmond, VA 23226
(804) 289-1300
www.kinsaleins.com



All Risks, LTD.
10150 York Rd, 5th Floor
Hunt Valley, MD 21030

Insurance Proposal

Cost Summary

Property Premium	\$6,253.00
MA Surplus Lines Tax	\$250.12
Carrier Inspection Fee	\$250.00
Policy Fee	\$250.00
Total Policy Cost	\$7,003.12

Minimum Earned

Note: There may be a minimum earned on this policy. Please refer to the carrier quote for more details on the minimum earned percentage.

Compensation Disclosure

In the process of reviewing and attempting to place insurance for your client, we may perform any number of tasks that may or may not include: the review and assessment of your application, losses and risk profile, communicating with various insurance carriers or their representatives, risk analysis, policy or coverage comparison, inspections, reviewing coverage terms offered, policy issuance and servicing of the policy post binding. We may charge a fee for these services in addition to any commission that may be payable to us by the Insurance Carrier with whom we bind your client's business.

Any fees charged are fully earned at inception of the policy and will not be returned unless required by applicable law. Fees may be applicable to any transaction requiring additional premium including audits and endorsements as well as new and renewal policies. All fees will be itemized separate from premium in our Quotes. Insureds are under no obligation to purchase insurance proposed by us including a fee and insurance carriers are under no obligation to bind any insurance proposed in our Quotes. The fees we charge are not required by state law or the insurance carrier.

The insurer with whom your insurance is placed may have an agreement with All Risks, Ltd. to pay additional compensation. This compensation will be in addition to the fees and commissions earned on the business we are placing for your Client's insurance. The calculation of this additional compensation is determined based on a number of factors including, but not limited to: premium volume, loss experience, general profitability and renewal retention. The calculation contemplates the amount and performance of all insurance business placed with the insurance carrier by All Risks, Ltd. during the term of the agreement and is not calculated on a per policy basis but rather on a portfolio basis after a set period of time has expired.

Kinsale Insurance Company

A.M. Best Company Rating: A-(Excellent)

Financial Size Category: VIII

All Risks, Ltd. - Hunt Valley, MD - Jacquelyn Borsje

QUOTE

RE: Justin Credible Cultivation LLC
0 Powell Road
Cummington, MA 01026

Submission # 1303420
Quote Letter # 1
Quote Date 09/20/2018

We are pleased to offer the following quote. This quote is valid until 10/20/2018. Please read carefully as the terms and conditions of coverage may differ from those requested on your application or submission. THIS IS NOT A BINDER OF INSURANCE.

Company: Kinsale Insurance Company

Eff. Date: 10/01/2018
Exp. Date: 10/01/2019

Limits	\$962,000 Per Occurrence
Deductibles	\$5,000 AOP Per Occurrence Wind/Hail Per Occurrence Subject to a \$10,000 minimum
Total Insured Values:	\$962,000

Total Premium:	\$6,253	Minimum Premium Earned:	35.00%
Terrorism (Optional):	\$313		
Inspection Fees:	\$250		
		Coinsurance PD:	80%
		BI:	80%

Company and inspection fees are fully earned.
Taxes, fees and surcharges are the responsibility of the broker.

Risk of Direct Physical Loss or Damage Excluding Earthquake , Flood , Equipment Breakdown , Asbestos , Cyber Risk , Mold , Pollution , Terrorism

Valuation:
Replacement Cost - PD Actual Loss Sustained - BI/EE

Premium Adjustment
Submit to Underwriter for acceptance and premium

This quote is subject to the specified conditions and may be withdrawn at any time prior to acceptance and in no event will it remain open beyond the quote expiration date unless extended by us in writing. Changes in classifications, operations, exposures or risk specific information require notification to us and may result in changes to this quote. Coverage may not be bound without written confirmation from us. Once bound, coverage may not be cancelled flat and the minimum earned premium will apply.

Warranties

Subject to receipt of a favorable assessment of risk from an inspection report

Exclusions and Endorsements:

For copies of forms visit us at: <http://broker.kinsaleins.com>

Form	Version	Description	
PRP1000	0310	Declarations - Primary Property Policy	
PRP9003	0815	Notice - Where To Report A Claim	
ADF4001	0110	Schedule of Forms	
PRP2025	1217	Valuation Limitation - Finished Stock	
CP0010	0607	Building and Personal Property Coverage Form	
CP1030	0607	Causes of Loss - Special Form	
PRP2017	0110	Common Conditions- Property	
ADF9009	0110	U.S. Treasury Department's Office of Foreign Assets Control (OFAC) Advisory Notice to Policyholders	
ADF9004	0110	Signature Endorsement	
PRP3012	1217	AUTHORITIES EXCLUSION	
PRP3001	0110	Nuclear, Biological or Chemical Materials Exclusion	
IL0952	0115	Cap on Losses From Certified Acts of Terrorism	
IL0985	0115	Disclosure Pursuant to Terrorism Risk Insurance Act	
ADF3002	0110	Exclusion -Terrorism	
PRP2002	0110	Minimum Premium Endorsement	
PRP2020	0510	Occurrence Limit of Liability Endorsement- Primary Policy	
IL0415	0498	Protective Safeguards	See attached.
CP0030	0607	Business Income (and Extra Expense) Coverage Form	
PRP3006	0110	Mold, Fungi and Bacteria Exclusion	
PRP3003	0110	Cyber Risk Exclusion	
PRP3002	0110	Electronic Data Recognition Exclusion	
PRP2001	0110	Electronic Data Processing Media Valuation	
PRP3005	0110	Pollution Exclusion	
CP1032	0808	Water Exclusion Endorsement	

Basis of Premium

Class Description	Exposure Base	Exposure Units
Marijuana Products - Growing, Processing and Cultivating	per \$1,000 Gross Sales	2,500,000

Contingencies:

This Quote is subject to our receipt and acceptance of the following items:
Subject to favorable inspection and compliance with recommendations.

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Prior to binding, please provide a sampling of warning labels that appear on products.

Comments:**Exclusions and Endorsements:**

CAS1001-0618 - Commercial General Liability Declarations - Claims Made
ADF9013-0815 - Notice - Where To Report A Claim
ADF4001-0110 - Schedule of Forms
CG0002-1001 - Commercial General Liability Coverage Form
CAN2002-0218 - Warranty Endorsement - Licensing Compliance
CAS2004-0110 - Deductible Endorsement
CAS2007-0817 - Common Conditions - Casualty
CAS2008-0110 - Amended Duties in the Event of a Claim or Suit - (Commercial General Liability - Claims Made)
CAS2009-1111 - General Liability Changes-Claims Made to Claims Made and Reported
CAS2013-0215 - Extended Reporting Period
ADF4002-0817 - Basis of Premium
ADF4005-0212 - Composite Rate Endorsement
CAS4004-1016 - Amendment - Supplementary Payments Inside Limits of Insurance
CAS4018-0411 - Minimum Policy Premium
CAS4029-1212 - Amendment - Premium Audit Conditions
ADF3003-0110 - Exclusion - Absolute Pollution and Pollution Related Liability
ADF3010-0110 - Exclusion- Nuclear, Biological or Chemical Materials
ADF3011-0115 - Exclusion of Other Acts of Terrorism Committed Outside the United States; Exclusion of Punitive Damages Related to a Certified Act of Terrorism; Cap on Losses from Certified Acts of Terrorism
ADF3013-0611 - Exclusion - Collection of Personal Identification Information
CAN3001-0218 - Additional Policy Exclusions - Cannabis
CAN3002-0218 - Exclusion - Cannabis Health Hazard
CAN3003-0218 - Exclusion - Ingredients or Additives - Cannabis
CAN3004-0218 - Exclusion - Impairment
CAS3002-1016 - Exclusion - Assault and Battery
CAS3009-0110 - Exclusion-Medical Payments
CAS3011-0110 - Exclusion- New Entities (Commercial General Liability)
CAS3097-0110 - Exclusion - Intellectual Property
CAS3098-0110 - Exclusion- Named Insured vs. Named Insured
CAS3108-0814 - Exclusion - Access or Disclosure of Confidential or Personal Information and Data-Related Liability - General Liability

CAS3124-0616 - Exclusion - Violation of Statutes That Govern E-Mails, Fax, Phone Calls or Other Methods of Sending Material or Information
CG2167-1204 - Fungi or Bacteria Exclusion
CAN5001-0218 - Additional Insured - State or Political Subdivision
CAN5002-0218 - Additional Insureds - Vendors
CAS5003-0717 - Additional Insured - Primary and Non-Contributory Endorsement
ADF9010-0115 - Notice of Terrorism Insurance Coverage
IL0021-0908 - Nuclear Energy Liability Exclusion Endorsement (Broad Form)
IL0985-0115 - Disclosure Pursuant to Terrorism Risk Insurance Act
ADF9004-0110 - Signature Endorsement
ADF9009-0110 - U.S. Treasury Department's Office of Foreign Assets Control (OFAC) Advisory Notice to Policyholders

This quote is subject to the specified conditions and may be withdrawn at any time prior to acceptance and in no event will it remain open beyond the quote expiration date unless extended by us in writing. Changes in classifications, operations, exposure or risk specific information require notification to us and may result in changes to this quote. Coverage may not be bound without written confirmation from us.

Once bound, coverage may not be cancelled flat and the minimum earned premium will apply.

Kinsale Insurance Company
P. O. Box 17008
Richmond, VA 23226
(804) 289-1300
www.kinsaleins.com



IL0415 – Protective Safeguards Wording – Grow Operations

P2 Central Station Fire Alarm

P9:

- 1) Active and Operational Central Station Burglar Alarm with 24/7 interior & exterior video surveillance - Video surveillance must be provided for past 14 days prior to loss. All entryway must be protected.
- 2) All entryways, doors and windows are locked and secured during non-business hours.
- 3) Approved Safe.

Restricting Access to age 21 and older

Age Limit and restriction is important to maintain the health and wellbeing of all individuals under the age of 21 years old. We will use the methods below to help ensure our product does reach under age individuals.

1. Labeling the product correctly and legible will be key so that there is no confusing our products. Even though our product will only be sold to dispensaries and manufactures, labeling can help deter and promote under age restrictions.
2. Training will allow our employees and owners the ability to demonstrate how the handling of products should be done at all time. Once everyone is properly trained the possibility of error will decrease substantially.
3. For all visits to the facility, each person must be ID and documented.
4. Documentation will provide an important part of restriction, documenting everyone who visits and leaves, if for any reason, a minor enters the facility we will have documentation to review and find a solution to how the incident can be avoided in the future.
5. Updated examples of the minimum age ID required.

Quality Control & Product Testing Compliance Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

Short Term Goals

1. Train all employees on the processes of cleaning and maintaining worksites
2. Receive all SOPs on Quality Control and Testing Compliance from employees signed and dated recognizing they have a clear understanding of all expectations and ramifications within the business practices regulated by our plan.
3. Pass our first Quality Test
4. Pass the CCC's final licensing inspection

Long Term Goals

1. Process marijuana in a safe and sanitary manner.
2. Comply with the sanitary requirements of the 935 CMR Cannabis Control Commission.
3. Ensure proper testing of marijuana.
4. Test clean on all Quality Testing
5. Pass all site inspections

Program Policy & Procedures

1. **Marijuana processing (of the leaves and flowers of the female marijuana plant only) policy and procedures are as follows:**
 - Well cured and generally free of seeds and stems.
 - Free of dirt, sand, debris, and other foreign matter.
 - Free of contamination by mold, rot, other fungus, and bacterial diseases.
 - Prepared and handled on food-grade stainless steel tables.
 - Packaged in a secure area.
2. **Sanitary compliance policy and procedures are as follows:**
 - Any marijuana agent working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:

- All personnel in the building must change into a full body plant handling suit prior to entering any room containing any plants regardless of its stage in life cycle.
- Maintaining 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.
- Hand-washing facilities are convenient and furnished with running water at a suitable temperature.
- Hand-washing facilities are located in the changing station. All employees are provided with effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices in each room.
- Sufficient space is provided for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.
- In order to be compliant with 935 CMR 500.105(12), the marijuana agent must properly remove and dispose of litter and waste so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests.
- Floors, walls, and ceilings are constructed in such a manner that they are easy to maintain, adequately clean and must always be in good repair.
- Luminance intensity controlled and safety lighting is provided in all processing and storage areas, as well as all areas where equipment or utensils are cleaned.
- Buildings, fixtures, and other physical facilities must be maintained in a sanitary condition.
- All contact surfaces, including utensils and equipment, must be maintained in a clean and sanitary condition. Such surfaces must be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils must be so designed and of such material and workmanship as to be adequately cleanable.
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products.
- Water supply is provided and is sufficient for necessary operations. As it is a private water source, it has been inspected and confirmed that it is capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs.

- Plumbing is of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing is in place to properly convey sewage and liquid disposable waste from the Marijuana Establishment. There is no cross-connections between the potable and waste water lines.
- Employees are provided with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair.
- Products that can support the rapid growth of undesirable microorganisms must be held in a manner that prevents the growth of these microorganisms.
- Storage and transportation of finished products will be in sanitary double locked storage container attached to transport vehicle protecting them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety are designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation.

3. Testing of marijuana policy and procedures are as follows:

- JCC will not sell or market marijuana unless tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Testing of marijuana products shall be performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Environmental media (soils, solid growing media, and water) shall be tested in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the DPH.
- If results for contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) are returned, JCC must follow its written policy for responding to such laboratory results. Within the policy, the Commission will be notified within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly. At this point JCC must implement its plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.
- There will be accurate and up to date records of the results of all testing for no less than one year.
- The sale of seeds is not subject to these testing provisions. Any seeds being sold will not be required to follow these regulations.

- Clones are not exempt from these testing regulation, but are exempt from testing for metals.
- All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13). Must be transported by 2 registered transport agents, tracked and monitored by GPS from as agent at the originating facility. All appropriate paperwork must be sent and approved by testing facility prior to transport.
- The facility of testing must maintain a proper environment for the plants to include adequate lighting, ventilation, temperature, humidity, space, and equipment. Separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed. All storage areas shall be maintained in a clean and orderly condition. Storage areas shall be free from infestation by insects, rodents, birds, and pests of any kind. Storage areas shall also be maintained in accordance with the security requirements of 935 CMR 500.110.
- For all excess marijuana, JCC must follow its policy and procedure for waste disposal in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly.

Measurement & Accountability

- All sanitation systems, equipment and procedure protocols will undergo monthly audits to ensure all compliance requirements are met.
- All agents will attend quarterly compliance trainings to maintain updated compliance best practices.
- All documentation and logs will undergo quarterly audits to ensure compliance requirements are being met and record keeping best practices are being followed.
- Transport audits will be conducted quarterly to ensure all vehicles and associated equipment meet compliance standards.
- Audit of Independent Testing Facility protocols and associated documentation will be done quarterly to ensure all compliance standards are met and record keeping best practices are being followed.

Personnel Policy Plan

JustinCredible Cultivation, LLC (JCC) proudly represents all dynamics presented in this category, because of that, we actively promote equality and diversity in our company. JCC will expand and open multiple positions within our company; from record keeping and office work, to having Lady's Day and, teaching women about the great industry of cannabis. Our company is focused on making teaching and creating opportunities for all people a priority. Our staff will be made up of our Officers and Managers. This gives us the ability of upper level hands-on responsibility.

The Chief Operations Officer (COO) shall ensure that all cultivation procedures are standardized, meet the requirements of the Cannabis Control Commission (CCC), and are implemented daily. This procedure outlines the requirements and regulations for Personnel operational and safety trainings.

Personnel Policy Goals

Short Term Goals (within the first 2 years of operation)

1. Create employee handbook that outlines all JCC expectations, requirements, and regulations
This handbook will require employee signature to ensure full understanding and willingness to comply with JCC standards
2. Integrated workplace diversity that coincides with equal employment opportunities that represent and include those from under-represented groups
3. Creating positions that cater to veterans and those with disabilities/ special needs
4. Continuous training reviews from Upper Management to ensure JCC is meeting all compliance requirements and maintaining innovative methods to foster an agile environment as industry standards advance over time
5. Have below 4 documented infractions

Long Term Goals (within 5 years of operation)

1. Become a highly regarded employer within the community
2. Offer 100% employer paid benefits to all full-time/long-term employees
3. Create leadership teams to deploy to flagship locations who will echo the same best practices in all new locations and set the standard of excellence for other JCC cultivation facilities
4. Have below 10 documented policy infractions throughout company's history

Procedures

- Policies
- Training Schedule
- Safety Plan
- Management Positions
- Background Check Requirements

JCC personnel policy requirements:

- Pursuant to 935 CMR 500.120 to entering the cultivation facility, all employees must be identified by security or management personnel at the secured entry point. All employees will enter the facility through the main secure entrance with the head security officer maintaining the secured entry. Once inside the secured entrance area, employees must change into clean working uniforms before entering the working areas of the cultivation facility
- Upon entry all employees must present Agent ID to the main security officer
- All Employees must sign in, with confirmed time and date, the log will include Employees name, badge number, assigned work hours and the signature of the head security officer to confirm the information is correct
- All employees must change into their sanitary cultivation uniforms, leave all unnecessary items in locker and wash hands
- All personnel must attend weekly safety and compliance meetings, where staff will be refreshed on company policies. Fire protection plans, inclement weather procedures and emergency procedures plans
- At a minimum, staff shall receive eight hours of on-going training annually
- Marijuana Establishments shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent
- On or after July 1, 2019, all current owners, managers and employees of a Marijuana Establishment that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a "responsible vendor."
- Marijuana establishments must maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.
- All equipment must not leave the facility
- Any broken equipment or plant matter must be reported to the DoH and COO and either destroyed or replaced
- All reports must be turned in by COB on designated days
- Any reports must have been requested and filed within 24 hours of said request, unless it needs an emergency meeting or requested by any government entity, then it will be expedited
- All personnel must use hand sanitizer, wear a hair net, cultivation coat, and shoe cover while entering the cultivation facility
- Any spills must be cleaned up promptly, no water should be left standing on a floor. If floor is wet, the COO must be notified, and a sign will be placed until dry

- The records room and security room will only be accessible to assigned Security personnel and the CEO.
- All cannabis waste and materials must be under 24/7 HD surveillance
- All cannabis waste must be separated by placing them into “Green Waste” containers and no other waste will be placed in the same container.
- All green waste containers must be weighed, logged and securely stored in their own locked container until it is destroyed
- Waste disposal records as required under 935 CMR 500.105(12); and (g) Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission
- Employees must notify management of all schedule changes before 24 hours of their scheduled shift. If in emergency situations, employees must call and send written explanation of absent as soon as possible
- All none registered agents, emergency personnel or Cannabis Control Commission sanctioned individuals must obtain visitor pass, sign in with a government issued ID and be escorted the entire time they are within the facility
- All none registered agents, emergency personnel or Cannabis Control Commission sanctioned individuals will only be permitted inside of the flower
- room and mother rooms. All other rooms are restricted for registered agents, emergency personnel and Cannabis Control Commission.
- Employees may take a paid 15-minute rest period during each half shift, scheduled at or as near as feasible to the middle of each half shift. Consistent with operating requirements, employees who, at the request of JCC, work two or more hours beyond their regular quitting time shall receive a 15-minute rest period before starting on the next shift, in addition to the regular rest periods occurring during the shift. Each rest period shall not exceed fifteen (15) minutes total. Rest periods shall not interfere with or be detrimental to the public safety.
- Employees shall be granted an unpaid meal period not to exceed one hour during each work shift. Consistent with operating requirements, meal periods shall be scheduled at or about the middle of the work shift. Employees who have their meal period interrupted by JCC to perform required work shall be compensated for their meal period time worked
- Time cards must serve as an accurate record of the time for which each employee is paid wages and overtime. Each employee is expected to record accurately the time spent working on District business. Personal time spent in District offices outside regular working hours should not be recorded. An employee of the District may volunteer

service to the District, and the time involved would not be recorded, ONLY IF the volunteer hours worked DO NOT INVOLVE THE SAME TYPE OF SERVICE which the person is employed to perform for the District. All volunteer activities by employees must be approved in advance, and in writing

- All Licenses shall be posted inside of the facility at an accessible and secure position.
- Any operation hour changes will be reported to all necessary persons or authorities
- If any emergencies are to happen, all employees must exit through the emergency exit door and meet in the designated employee meeting zone. Wait till the building is clear by authorities. All employees must be signed and an annotation must be made to clearly record the emergency and re entry into the building
- After an emergency all equipment, plant matter and procedures must be inventoried and recorded with an annotation of the emergency
- Our facility will be a smoke-free, drug free and alcohol free zone. Any employee caught using or under the influence of cannabis will be written up and management will follow the correct procedures outlined by the State of Massachusetts
- All confidential information will be secured in the records room, clearly labeled and under 24/7 HD surveillance
- Any employee found to repeatedly break policies, divert cannabis or cannabis materials or be convicted of any felony offense dealing with minors or distribution will be immediately removed from facility. If the employee is caught diverting cannabis or cannabis materials while on the premises of the facility, the authorizes will be immediately notified, facility placed on administrative lock down and surveillance made available to authorizes. The Cannabis Control Commission will be notified immediately and a request to temporarily suspend the agents registration until the commission takes over the investigation and acts accordingly. All badges will be confiscated from said employee.
- Board members and Owners profile will be kept up to date on JCC's website once final licensed is approved
- The CSO is responsible for the security of all cash held on sight, there will be a 800+ pound safe secured to the floor where all cash ill be placed in its own separate locked box. The transaction receipts will be given to the CFO, counted on surveillance and logged as correct. Both the CSO and CFO must sign off on all logs with cash transactions. JCC plans on using an online service to handle available transactions dealing with the sale
- All records and files must be recorded and tracked based upon the standards of GAAP accounting principles and the regulations stipulated in the sections of 935 CMR 500.000, in addition to the following: (a) Written operating procedures as required by 935 CMR 500.105(1); (b) Inventory records as required by 935 CMR 500.105(8); (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105

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

Trainings schedule

The Chief Compliance Officer (CCO) will overview the Compliance Training, which will include information on the seed-to-sale process, how to securely lock the cultivation facility, and how to oversee visitors.

The Director of Horticulture (DoH) will overview the issues that would require the plant buds to be contaminated and discarded, how to use the Seed-to-Sale process on each phase, procedures to handle the packaging and storing of the flower, and training on securing the transport of the flower. The DoH will also train employees on which labels must be placed on each packaging, including warnings, restrictions, THC percentages, strain name and type, batch number and time and date of packaging.

Staff Meetings: Team meetings will be implemented organization-wide and will provide opportunities for team members to receive updated training as required by 935 CMR 500.101, and to discuss current trends and ideas on how to make processes more effective or efficient. Team meetings will, at the very least, be held once a week for each facility as well as a weekly meeting between all facility managers.

Shift Meetings: Shift meetings will be held on a daily basis between team members and the facility manager or department leads. A shift meeting will be held prior to the start of business each day to discuss workflow and goals for the shift. A meeting will also be held at the closure of business to discuss the day's operations and to determine if shift goals were achieved.

Safety Plans

In order to protect the organization from costly non-compliance penalties, stabilize worker's compensation costs, enhance productivity, and reduce turnover, a sound safety plan is absolutely required. Paychex will assist in the development of the plan by writing a safety program manual tailored

to the organization's needs and provide on demand WebEx safety trainings. JustinCredible Cultivation will provide training upon hire as well as monthly to each employee including but not limited to:

- Health, safety, and sanitation standards as required by the Massachusetts Cannabis Control Commission
- Security procedures
- Prohibitions and enforcement as described by 935 CMR 500.110.
- Confidentiality and all other provisions of 935 CMR 500.101 that apply to the individual's scope of employment.

Measurement & Accountability (Metrics)

- Company Feedback polling. Surveying and polling the company will be a huge key of our accountability. Hearing directly from the employees and staff is an invaluable piece of data. Regardless of the research being done, JCC will gather the honest opinions of the staff JCC plans to positively impact
- Educate our advisory board on the repercussion of violating personal policies
- Send all documented infractions to chairman of advisory board. The advisory board will keep management liability and create a level of checks and balances between owners and the company
- Collect signed SOP forms from all agents that will operate or management JCC
- Post Rules and Policy's for employees to reference during complex procedures.
- Have signs to remind employees to Lock all doors at each door and cabinet
- Audit Video surveillance Quarterly on random shifts to check for missed infractions
- Personnel performance reviews will be conducted quarterly, trainings and educational tools will be given to improve employees performances, employees must sign all documentations

Record Keeping Compliance Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

1. Short term goals:

- a. Create written operating procedures as required by 935 CMR 500.105(1) to establish good business practices and to be compliant with CCC.
- b. Create inventory records as required by 935 CMR 500.105(8) to establish good business practices and to be compliant with CCC.
- c. Create seed to sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e) to establish good business practices and to be compliant with CCC.
- d. Create Job descriptions for each employee and volunteer positions, organizational charts, and personnel records, a staffing plan, personnel plan, and background check reports to establish good business practices and to be compliant with CCC.
- e. Create and maintain business records of assets and liabilities, monetary transactions, books of accounts, sales records, and salary and wages of employees to begin successful records keeping for proper CCC compliance.
- f. Create waste disposal records as required under 935 CMR 500.105(12) to ensure access to information for all employees when needed.
- g. Create a database for all records following the closure of JCC to be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.

2. Long term goals:

- a. Maintain all record keeping procedures for operations to ensure compliancy and to remain in good standing with the CCC.
- b. Maintain inventory records for organizational purposes, audits, and to remain compliant with the CCC.
- c. Streamline the logging and reporting of each plant to maintain efficiency within operations and to remain compliant with the CCC.

- d. Uphold optimal standards to hire the best candidates for any JCC positions within the 935 CMR 500.00.
- e. Remain financially responsible, ensure the best business practices, be fully prepared for all audits, and to remain compliant with the CCC.
- f. Maintain compliancy with the CCC post JCC operations for up to 1 calendar year.

Program Policy & Procedures

1. Written operating procedures as required by 935 CMR 500.105(1).

A. Security measures in compliance with 935 CMR 500.110.

- Massachusetts codes requires three accessible doors within the facility. JCC will have one front door, and two side exits (steel-bolted doors), which will be emergency exits and upon opening sound an alarm.
- The facility will be monitored 24/7 by HD cameras, all rooms inside the facility (minus the office's bathroom) will be monitored 24/7.
- The front door will be double bolted and secured under an alarm system.
- The CEO, the DoH, and the CSO will be the only individuals with the code to the alarm system.
- There will be a second set of doors to enter the facility's cultivation area. The door will require two keys, one held always by the CSO and the other by the CEO. Once the operations have expanded, the CSO will select and monitor the employees who are chosen to open and close the facility.
- The process of cloning and germinating a seed must be signed off by three individuals, the DoH, CSO, and CEO.
- Every time a plant or any plant like matter moves from one room to the next, the process must be tracked and recorded. The process will be audited weekly and reported to the Board of Directors.
- Once plants are moved from the Flower room to the Trim room they must be trimmed and stored in locked, drying cabinets with keys, held by the CSO and DoH. This process will guarantee that any time flower is being trimmed and stored, it can be tracked and under the responsibilities of our officers.
- Once flower has been dried correctly, it will be packaged and once again locked in a cabinet that has key controlled by the DoH and CSO.

- Transporting the flower will be handled by the transporter company or dispensary if the dispensaries offers the service. Once the transporter arrives, the DoH will sign off on the amounts of the transportation of the flower and escort the transporter and CSO to the vehicle. The DoH will watch until the transporter and CSO leave and the liability will be passed on to the transporter and CSO.
- If our officers are transporting the cannabis flower, then the DoH will background check the individual and audit his/her transport route. Mapping out routes and giving distinct time periods when the driver should deliver the package will be key. Also, the transporter and CSO will have a company issued phone, which they will have tracking on through Location Sharing; which requires a password to disable. Only the DoH and CSO will have access. This will prevent any company transporter from turning off their geo-tracking app and ensuring that we know exactly where our company's product is at all time.
- JCC will track all bulk packages with tracers so that if unforeseen circumstances happen, we have a last line of defense. If the transporter misses the arrival time, fail to answer the phone, and miss three phone calls from our DoH, then we will report the product as missing immediately to the authorities.

B. Employee security policies, including personal safety and crime prevention techniques.

- Pursuant to 935 CMR 500.120 to entering the cultivation facility, all employees must be identified by security or management personnel at the secured entry point. All employees will enter the facility through the main secure entrance with the head security officer maintaining the secured entry. Once inside the secured entrance area, employees must change into clean working uniforms before entering the working areas of the cultivation facility.
- Upon entry all employees must present Agent ID to the main security officer.
- All Employees must sign in, with confirmed time and date, the log will include Employees name, badge number, assigned work hours and the signature of the head security officer to confirm the information is correct.
- All employees must change into their sanitary cultivation uniforms, leave all unnecessary items in locker and wash hands.
- All personnel must attend weekly safety and compliance meetings, where staff will be refreshed on company policies. Fire protection plans, inclement weather procedures and emergency procedures plans.
- All equipment must not leave the facility.
- Any broken equipment or plant matter must be reported to the DoH and COO and either destroyed or replaced.

- All reports must be turned in by COB on designated days.
- Any reports must have been requested and filed within 24 hours of said request, unless it needs an emergency meeting or requested by any government entity, then it will be expedited.
- All personnel must use hand sanitizer, wear a hair net, cultivation coat, and shoe cover while entering the cultivation facility.
- Any spills must be cleaned up promptly, no water should be left standing on a floor. If floor is wet, the COO must be notified, and a sign will be placed until dry.
- The records room and security room will only be accessible to assigned Security personnel and the CEO.
- All cannabis waste and materials must be under 24/7 HD surveillance.
- All cannabis waste must be separated by placing them into “Green Waste” containers and no other waste will be placed in the same container.
- All green waste containers must be weighed, logged and securely stored in their own locked container until it is destroyed.
- Waste disposal records as required under 935 CMR 500.105(12); and (g) Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.
- Employees must notify management of all schedule changes before 24 hours of their scheduled shift. If in emergency situations, employees must call and send written explanation of absent as soon as possible.
- All none registered agents, emergency personnel or Cannabis Control Commission sanctioned individuals must obtain visitor pass, sign in with a government issued ID and be escorted the entire time they are within the facility.
- All none registered agents, emergency personnel or Cannabis Control Commission sanctioned individuals will only be permitted inside of the flower room and mother rooms. All other rooms are restricted for registered agents, emergency personnel and Cannabis Control Commission.
- Employees may take a paid 15-minute rest period during each half shift, scheduled at or as near as feasible to the middle of each half shift. Consistent with operating requirements, employees who, at the request of JCC, work two or more hours beyond their regular quitting time shall receive a 15-minute rest period before starting on the next shift, in addition to the regular rest periods occurring during the shift. Each rest

period shall not exceed fifteen (15) minutes total. Rest periods shall not interfere with or be detrimental to the public safety.

- Employees shall be granted an unpaid meal period not to exceed one hour during each work shift. Consistent with operating requirements, meal periods shall be scheduled at or about the middle of the work shift. Employees who have their meal period interrupted by JCC to perform required work shall be compensated for their meal period time worked.
- Time cards must serve as an accurate record of the time for which each employee is paid wages and overtime. Each employee is expected to record accurately the time spent working on District business. Personal time spent in District offices outside regular working hours should not be recorded. An employee of the District may volunteer service to the District, and the time involved would not be recorded, ONLY IF the volunteer hours worked DO NOT INVOLVE THE SAME TYPE OF SERVICE which the person is employed to perform for the District. All volunteer activities by employees must be approved in advance, and in writing.
- All Licenses shall be posted inside of the facility at an accessible and secure position.
- Any operation hour changes will be reported to all necessary persons or authorities. If any emergencies are to happen, all employees must exit through the emergency exit door and meet in the designated employee meeting zone. Wait till the building is clear by authorities. All employees must be signed and an annotation must be made to clearly record the emergency and re-entry into the building after an emergency. All equipment, plant matter and procedures must be inventoried and recorded with an annotation of the emergency.
- Our facility will be a smoke-free, drug free and alcohol free zone. Any employee caught using or under the influence of cannabis will be written up and management will follow the correct procedures outlined by the State of Massachusetts.
- All confidential information will be secured in the records room, clearly labeled and under 24/7 HD surveillance.
- Any employee found to repeatedly break policies, divert cannabis or cannabis materials or be convicted of any felony offense dealing with minors or distribution will be immediately removed from facility. If the employee is caught diverting cannabis or cannabis materials while on the premises of the facility, the authorizes will be immediately notified, facility placed on administrative lock down and surveillance made available to authorizes. The Cannabis Control Commission will be notified immediately and a request to temporarily suspend the agents registration until the commission takes over the investigation and acts accordingly. All badges will be confiscated from said employee.

- Board members and Owners profile will be kept up to date on JCC's website once final licensed is approved.
- The CSO is responsible for the security of all cash held on sight, there will be a 800+ pound safe secured to the floor where all cash will be placed in its own separate locked box. The transaction receipts will be given to the CFO, counted on surveillance and logged as correct. Both the CSO and CFO must sign off on all logs with cash transactions. JCC plans on using an online service to handle available transactions dealing with the sale.
- All records and files must be recorded and tracked based upon the standards of GAAP accounting principles and the regulations stipulated in the sections of 935 CMR 500.000, in addition to the following:
 - Written operating procedures as required by 935 CMR 500.105(1).
 - Inventory records as required by 935 CMR 500.105(8).
 - Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105
- All registered agents must complete an employee onboarding packet, that will include Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2).
 - Documentation of verification of references.
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision.
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters.
 - Documentation of periodic performance evaluations.
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe cultivation conditions.

- Personnel policies and procedures.
- All background check reports obtained in accordance with 935 CMR 500.030

C. A description of JCC hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.

- Hours of operations will have type of operation modes.
 - A. Mode 1 will be operating hours where only monitoring and feeds plants.
Mondays-Sunday Operating Hours: 6pm-8am
 - B. Mode 2 will be to describe operating during times of transporting, heavy trimming or plant maintenance and harvesting.
Mondays- Sunday Operating Hours: 6am-8pm, 12am-4am
- Emergency Contact information:
 - A. Terrance Hanley (407) 205-7753
 - B. Reginald Stanfield (301) 885-9159

D. Storage of marijuana in compliance with 935 CMR 500.105 (11).

- Storage environments will be separated based on the stage of life cycle of the cannabis.
 - Mother plants will be stored in a 255 square foot air filtered room. These plants will be maintained under 8 luminance intensity controlled lights with a zone controlled AC unit accompanied by humidifiers to maintain perfect growing conditions.
 - All plants in the vegetation stage will be stored in a 408 square foot room. These plants will be maintained under 12 luminance intensity controlled lights with a zone controlled AC unit accompanied by humidifiers to maintain perfect growing conditions.
 - All plants in the flower stage will be stored in a 1002 square foot room. These plants will be maintained under 46 luminance intensity controlled lights with a zone controlled AC unit accompanied by humidifiers to maintain perfect growing conditions.
 - All cannabis curing and prepared for sale will be stored in mason jars in a 119 square foot room with standard commercial lighting with a zone controlled AC unit to maintain perfect storage conditions, and locked in a theft proof safe no less than 800 pounds.

- All cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached shall be stored in a 119 square foot room locked in a theft proof safe no less than 800 pounds until such products are destroyed.
- All room will be cleaned and maintained daily with regulated products and procedures approved by the 935 CMR Cannabis Control Commission. All personnel in the building must change into a full body plant handling suit prior to entering any room containing any plants regardless of its stage in life cycle.
- The growing operations will be help indoors in a fully metal enclosed and regulated building. There will be no windows, and only 2 entry/exit double locked doors to the building. All areas around the building will be treated with the necessary pesticides and animal traps. All personnel in the building must change into a full body plant handling suit prior to entering any room containing any plants regardless of its stage in life cycle. This will minimize infestation by insects, rodents, birds, and pests of any kind.
- In order to be compliant with the 935 CMR 500.110: Security Requirements for Marijuana Establishments, there shall be implementation of sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana.
- The building is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades one through 12, unless a city or town adopts an ordinance or by-law that reduces the distance requirement.
- All rooms containing plants will have limited access and will be identified as such.
- Each room with plants shall be controlled only by the seed to sale software BioTrack to maintain full accountability of each plant in the building.
- The building and all rooms will be under 24 hour video surveillance.
- The building will be outfitted with a central station motion detecting alarm system connected to the nearest law enforcement and emergency agencies.

E. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold.

- 9 week flowering time strains:
 - A. Blue Dream, a sativa - dominant hybrid originating in California, has achieved legendary status among West Coast strains. Crossing a Blueberry indica with the sativa haze, Blue Dream balances full- body relaxation with gentle cerebral invigoration. Novice and veteran consumers alike enjoy the

level effects of Blue Dream, which ease you gently into a calm euphoria. Some Blue Dream phenotypes express a more indica - like look and feel, but the sativa- leaning variety remains most prevalent. With a sweet berry aroma redolent of its Blueberry parent, Blue Dream delivers swift symptom relief without heavy sedative effects. This makes Blue Dream a popular daytime medicine for patients treating pain, depression, nausea, and other ailments requiring a high THC strain.

- Effects:
 - a. Happy
 - b. Relaxed
 - c. Euphoric
 - d. Uplifted
 - e. Creative
- Flavors:
 - a. Blueberry
 - b. Sweet
 - c. Berry
- Hybrid- Sativa Dominant
- 550-650 g/m2 in SOG
- 9 weeks flowering time - Grows tall
- High yield 21oz/m2
- PH 5.5 - 500- 600 PPM
- THC 17%- 24% CBD 2%
- 60%- 70% Humidity 80F/Daytime 68F/Night Time
- \$135oz avg (worldwide) - \$2,160/pd

B. Headband is the love child of cannabis power couple, OG Kush and Sour Diesel. The smooth, creamy smoke is accented by flavors of lemons and diesel while the long- lasting effects are great for pain relief, helping you to relax, and to combat elevated stress levels. Many report that the effects create a slight pressure around the crown of their head and feels as though they are wearing a headband. The effects have been known to come on slow, so pace yourself with this potent hybrid.

- Effects:
 - a. Happy
 - b. Relaxed
 - c. Euphoric
 - d. Uplifted
 - e. Creative
- Flavors:
 - a. Diesel

- b. Lemon
- c. Earthy

- Hybrid- Indica Dominant
- 9 weeks flowering time - Grows medium height
- Yield 18oz/m2
- PH 5.5 - 6.0 500-600 PPM
- THC 20%- 27% CBD 0.07%- 0.2%
- 60%- 70% Humidity 80F/Daytime 68F/Night Time
- \$166oz avg (worldwide) - \$2,656/pd

- 11 week flowering time strains:

A. Super Lemon Haze is a sativa - dominant hybrid of Lemon Skunk and Super Silver Haze and two time Cannabis Cup winner from Green House seeds. Super Lemon Haze is a kief - caked multi - colored wonder. As the name states this strain has real lemony characteristics. The smell is zesty, citrusy, and a little sweet. As for taste, its everything one would expect from the namesake; tart and sweet like lemonheads candy - not quite as sharp as one might expect. The effects are uniquely energetic and lively, may not be the best strain for those of us that are naturally wound - up tight.

- Effects:
 - a. Energetic
 - b. Happy
 - c. Focused
 - d. Euphoric

- Flavors:
 - a. Lemon
 - b. Citrus
 - c. Earthy

- Hybrid - Sativa Dominant
- 500-600 g/m2 in SOG
- 11 weeks flowering time - -Grows medium/Tall
- Yield 28oz/m2
- PH 5.5 750 PPM
- THC 15%- 22% CBD 0-0.1%
- 60%- 70% Humidity 80F/Daytime 68F/Night Time
- \$150oz avg (worldwide) - \$2,400/pd

B. Sour Diesel sometimes called Sour D, is an invigorating sativa - dominant strain named after its pungent, diesel - like aroma. This fast - acting strain delivers energizing, dreamy cerebral effects that have pushed Sour Diesel to its legendary status. Stress, pain, and depression fade away in long -

lasting relief that makes Sour Diesel a top choice among medical patients. This strain took root in the early 90's, and it is believed to have descended from Chemdawg 91 and Super Skunk.

- Effects:
 - a. Happy
 - b. Energetic
 - c. Uplifted
 - d. Creative
- Flavors:
 - a. Diesel
 - b. Earthy
 - c. Pungent
- Sativa Dominant
- 400-500 g/m² in SOG
- 11 weeks flowering time - Grows Tall
- Yield 18oz/m²
- PH 5.5 750 PPM
- THC 22% CBD 0.20%
- 60%- 70% Humidity 80F/Daytime 68F/Night Time
- \$135oz avg (worldwide) - \$2,160/pd

- CBD Strain

A. Pennywise is a high CBD indica cross between Harlequin and Jack the Ripper, a combination that lends this strain its killer clown name. Four phenotypes of this Stephen King - inspired strain exist, some of which have fingerlike buds while others appear more round. Notes of coffee and pepper lift from the purple - fringed flowers with undertones of lemon and bubblegum. Rich in the therapeutic compound CBD, Pennywise is especially effective in treating arthritis, PTSD, epilepsy, neurological disorders, and cancer symptoms. It contains a 1;1 ratio of CBD and THC, so the psychoactive effects are milder and more relaxing. Jack the Ripper's cerebrally focused effects are detectable in Pennywise's genes as euphoria and mental clarity take over with an invigorating buzz.

- Effects:
 - a. Relaxed
 - b. Uplifted
 - c. Euphoric
 - d. Sleepy
 - e. Happy
- Flavors:

- a. Earthy
- b. Pine
- c. Coffee

- Hybrid - Indica Dominant
- 9 weeks flowering period - Grows medium height
- Yield 12-16 oz/m²
- PH 5.5 750 PPM
- HC 12-15% CBD 12-15%
- 60%-70% Humidity 80F/Daytime 68F/Night Time
- \$120oz avg (worldwide) - \$1,920/pd

F. Procedures to ensure accurate record keeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9).

- JCC CCO shall work with each section manager (cultivation and processing) to ensure that all logs are utilized and maintained to track all facility workflow.
 - Visitor Log - JCC CCO is responsible for ensuring any authorized personnel visiting the cultivation facility uses a visitor log.
 - Cleaning Log – The DoH is responsible for overseeing the use of daily cleaning logs to track cleaning within all zones of the cultivation facility.
 - Maintenance Log – A facility maintenance log will be utilized to track maintenance and upkeep on all equipment within the cultivation facility.
 - Light Intensity Log – To ensure all cultivation facility lighting is maximized, the light produced by each lamp must be checked on a monthly basis by the cultivation facility staff. The IM shall work with each zone manager to measure lighting throughout each cultivating zone in the cultivation facility.
 - Pest Control Log – Plant cultivation zone managers will be responsible for tracking and logging all pest and disease control measures within the cultivation facility.
 - Feed Schedule Change Log – Plant cultivation zone managers will be responsible for tracking feeding schedules in all cultivation zones for which they are responsible. Any change or variance in the respective plant-zone feed schedule must be noted and brought to the attention of the DoH.
 - Transplant Log – The transfer log tracks all plant movement throughout the cultivation facility. The Vegetation Agent (VA) is responsible for tracking plant movements before flowering begins.

- Harvest Log – All flowering zone harvest schedules are tracked on the JCC harvest log. The flowering zone management team is responsible for updating this log and noting any variances for the DoH.
- Daily Inspection Log – All zone managers are responsible for performing daily inspection and communicating all variances to the DoH. All zones must comply with the information designated in the quality control section. The daily inspection log includes:
 - Room temperature
 - Humidity
 - CO2
 - Electrical and lighting
 - Pest and disease
 - Photoperiod
- Curing Log – A curing log shall be maintained by the IM to track the time specific strains and batches are in the curing area. In addition to time, environmental conditions such as temperature and humidity are all recorded.
- Testing Log – A testing log shall be maintained by the IM to keep track of all batches, their respective test dates, and results.
- Finished Batch Log – The following information shall be collected pursuant CMR 500.130 in order to maintain records for company research and development, tracking purposes, as well as relaying all pertinent data to the dispensary to which any part of a batch is sold.
 - For each batch of cannabis cultivated, the following information shall be collected:
 - a. Batch number.
 - b. Batch origination from cannabis seed or cannabis cuttings.
 - c. Strain of cannabis seeds or cannabis cuttings planted.
 - d. Number of cannabis seeds or cannabis cuttings planted.
 - e. Date the cannabis seeds or cannabis cuttings planted.
 - f. List of all chemical additives used in the cultivation, including, without limitation non-organic pesticides, herbicides, and fertilizers.

- g. Number of cannabis plants grown to maturity.
- h. Harvest information, including without limitation:
 - i. Date of harvest.
 - ii. Final yield weight of processed usable cannabis.
 - iii. Name and cannabis establishment agent registration card number.

G. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160.

- Quality control will be handled every harvest by sending off samples from each strain to a testing facility for quality and THC potency.
- All reports from testing will be analyzed by the DoH and recommendation for improvements will be reported to the COO. Once approved, the DoH will begin changes. If a decrease or increase in nutrient levels or supplements, the DoH will report changes to the IM.
- Environment and Quality Control Propagation materials used in cultivation operations will be appropriate for use in food production. Cultivation operations will follow the propagation material manufacturer's usage and storage recommendations. To achieve these high standards, JCC is engineered for year-round production.
- All cultivation rooms are all capable of maintaining constant environmental conditions including temperature, humidity, and CO2. In addition, fresh air is introduced through an advanced smell-eliminating air flow system that works in conjunction with other controls such as UV light to avoid all mold, bacteria, mildew, and fungal outbreaks.
- A closed loop ventilation system will lessen the potential of pest contamination and reduce the need for any organic pesticides. The microclimate within each section of JCC must be constantly maintained in order to prevent pest and disease and achieve the highest and purest quality.
- After curing and before any processing or packaging, the processing manager shall make samples from each batch available to an independent laboratory for testing.
 - A. The sample shall be weighed, RFID scanned, and all data shall be recorded on the SIS prior to be removed from the secured curing area.

- B. The laboratory employee will select and prepare several random samples from every batch sample in order to ensure the quality, purity, and consistency of dose through a statistical approach.
- C. The laboratory staff will then test each random sample for harmful microbiological contaminants, mycotoxins, heavy metals and pesticide chemical residue.
- D. Each sample will also be tested for active ingredients including but not limited to cannabinoid profiling for the following: THC, THCa, CBD, CBDa, and CBN.
 - a. Under no circumstances shall cannabis batches awaiting contamination results and active ingredient analysis be included in a cannabis product or sold to a retail dispensary facility prior to the time that the laboratory has provided those results, in writing, to the dispensary management team.
 - b. If samples from a batch are tested and do not fall within state accepted health and safety levels for any of the above-mentioned contaminants or any additional contaminants the state does not deem for distribution, it is the dispensary's policy to destroy and remove any contaminated product in a manner consistent with state compliance for the policy for disposal of green waste.
- E. As soon as a batch sample passes the microbiological, mycotoxin, heavy metal and pesticide chemical residue test, the entire batch will be released for immediate manufacturing, packaging and labeling for transport and sale to a dispensary facility.
- F. An electronic copy of all test results will be filed by laboratory staff for any batch that does not meet the standards set for microbiological, mycotoxin, heavy metal or pesticide chemical residue tests.
- G. These results will also be sent to dispensary staff within the same time frame.
- H. The laboratory staff will also maintain a comprehensive record of test results and make them available to state and local officials, and or the public, as needed.
- I. The Chief Compliance Officer (CCO) will provide test results for each batch of cannabis used in any product purchased by a dispensary facility to that dispensary facility to be made available upon request to all qualifying

patients, primary caregivers, and any physician who has certified a qualifying patient.

H. A staffing plan and staffing records in compliance with 935 CMR 500.105(9).

- All staff JCC plans to employ that necessary for full operations include but not limited to CEO, COO, CSO, CCO, CFO, DoH, cultivation manager, vegetation agent, clone agent, flowering zone agent, processing manager, packaging team lead, packaging agent, logistical manager, inventory manager.
- All employees must be hired based on JCC position qualifications including but not limited to Job descriptions for each employee and volunteer position, as well as organizational charts consistent with job descriptions.
- A personnel record for each marijuana agent must be kept and maintained for minimum 12 months after termination of the individual's affiliation with JCC.
 - A. All materials submitted to the Commission pursuant to 935 CMR 500.3030(2).
 - B. Documentation of verification of references.
 - C. The job description of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time and place he or she received said training and the topics discussed including the name and title of the presenters.
 - D. Documentation of periodic performance evaluations.
 - E. A record of any disciplinary action taken.
 - F. Notice of competed responsible vendor and 8 hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions.
- Personnel policies and procedures.
- All background check reports obtained in accordance with 935 CMR 500.030.

I. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies.

- Definitions:

- A. Disaster/Emergency is any situation that interrupts the normal flow of business.
- B. Disaster/Emergency supplies will include flashlight, first aid kit, battery operated radio, spill containment kit, smoke detection system and fire extinguishers.
- C. R.A.C.E. This acronym will be followed when responding to a disaster or emergency.
 - R. Rescue/remove anyone in immediate danger
 - A. Activate local emergency services by calling 911. In the event of a fire attempt to extinguish with proper equipment
 - C. Close doors, if appropriate, to contain any noxious substances
 - E. Evacuate building if needed
- Procedure:
 - A. Staff will comply with Center policies and procedures.
 - B. CEO or Designee will train Staff in response to disaster or emergency that may occur in the Center following the R.A.C.E. method if appropriate.
 - C. CEO or Designee will implement and document on the Disaster/Emergency Report form the occurrence of disaster/emergency drill twice during the calendar year.
 - D. Staff will participate in disaster/emergency drill.
 - E. CEO or Designee will ensure the Center has basic emergency equipment including fire extinguishers, flashlight, first aid kit, battery operated radio and smoke detection system.
 - F. Staff will call local emergency services (911) to assist when needed.
 - G. Staff trained in CPR/First Aid will provide emergency medical assistance as needed.
 - H. Staff will promptly notify CEO in the event of any Medical Emergency.
 - I. Staff will exit facility and report to the designated relocation area in the event of a Disaster/Emergency.

- J. Staff will complete Disaster/Emergency Report form after such occurrence.
- K. CEO or Designee will review Disaster/Emergency Report and notify Board and insurance company if appropriate.
- L. Facility is a smoke free facility and will not store flammable solvents or highly combustible materials.
- M. Staff will ensure electrical equipment is in good repair or remove from use if there is any safety concern.
- N. Fire Emergency: If fire is small and isolated, try to exhaust the fire with one of the fire extinguishers. In case of a fire emergency, dial 911 for Fire Department.
- O. Chemical Spill: Try to use chemical spill kit for smaller incidents of chemical spill. If chemical spill is large or you do not know how to handle the situation, notify your manager.
- P. Other Emergencies: Contact 911 for break-ins or burglaries.

J. Alcohol, smoke and drug-free workplace policies.

- To assure a safe, clean, healthy environment in which to work, JCC will remain free of chemical (tobacco, alcohol and drug) use in compliance with the Massachusetts Clean Air Act and The Drug-Free Workplace Act.

A. Definitions:

- Tobacco includes smoking or chewing of tobacco products.
- Alcohol consumption is the intake of any intoxicating beverage containing ethanol.
- Drug includes the possession, use or distribution of any chemical substance that adversely affects work performance or safety due to impaired alertness, coordination, judgment, decision making, reaction, response or effort.

B. Procedure:

- Staff will comply with this policy while on the premises to ensure safety and optimal work performance.
- CEO or Designee will promptly request anyone in violation of this policy to immediately leave the facility.

- Staff will report to local law enforcement (and Commission where applicable) any known possession of any illegal drug by anyone on premises.

K. A plan describing how confidential information will be maintained.

- The records room containing confidential information will be maintained behind two double locked doors and under 24 hour HD video surveillance and only accessible by JCC's CSO and COO.

L. A policy for the immediate dismissal of any JCC agent who has:

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

M. A list of all board members and executives of JCC and members, if any, of the licensee must be made available upon request by any individual. 935CMR 500.105 (1)(m) requirement may be fulfilled by placing this information on the JCC website.

- Reginald Stanfield
- Terrance Hanley
- Che'toia Walker
- Jonathan Siberon
- Chederis Polanco
- Adam Richichi
- Alan Sorin

N. Policies and procedures for the handling of cash on JCC premises including but not limited to storage, collection frequency, and transport to financial institution(s).

- Upon receiving payments from dispensaries:
 - A. Transport agent will immediately log, report, and place cash in safe lock box.
 - B. Lock box will then be locked inside of attached vehicle lock box.

- C. Transport agents will follow JCC transport protocol to return to JCC center.
- D. Upon arrival, the cash shall be confirmed as reported under recorded HD video camera surveillance by CSO.
- E. Once properly confirmed and recorded, cash will then be taken to the security room and placed in an 800+ pound 1 hour fire proof safe until transport to bank is required.

- Bank deposits:

- A. Upon removal of cash from the safe, the cash will be reported and logged under recorded HD video camera surveillance by the CSO.
- B. Once logged, the cash shall be placed inside a safe lock box.
- C. Transport agent will then place lock box inside of the lock box attached to the vehicle.
- D. Transport agents will follow JCC transport protocol to transport the cash to required bank.
- E. Upon arrival of the bank. Transport agent will then log and report the cash to be deposited.
- F. Transport agent must obtain receipt of deposit, and report confirmation immediately.

O. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.

- Restricting Access to age 21 and older:

- A. Age Limit and restriction is important to maintain the health and wellbeing of all individuals under the age of 21 years old. We will use the methods below to help ensure our product does reach under age individuals.
- B. 1. Labeling the product correctly and legible will be key so that there is no confusing our products. Even though our product will only be sold to dispensaries and manufactures, labeling can help deter and promote under age restrictions.
- C. Training will allow our employees and owners the ability to demonstrate how the handling of products should be done at all time. Once everyone is properly trained the possibility of error will decrease substantially.

- D. For all visits to the facility, each person must be ID and documented.
- E. Documentation will provide an important part of restriction, documenting everyone who visits and leaves, if for any reason, a minor enters the facility we will have documentation to review and find a solution to how the incident can be avoided in the future.
- F. Updated examples of the minimum age ID required.

P. Policies and procedures for energy efficiency and conservation that shall include:

- Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities.

A. Water consumption:

- Water will be used then run through a reverse osmosis filtration system that can produce and filter out 500 gallons daily, we are only expecting to use 350-400 gallons per watering and filtering the used water will help reduce water us. Any time the water tank has been compromised, the tank must be drained and ran through the reverse osmosis filter.

B. Electricity consumption, strategies and engagement:

- Instead of using HPS lights we have already secured services of a rebate program for energy savings. Cutting our power usage in half by switching to LED.
- Minimizing par value needed during Veg per plant cycle, some plants only need certain par and instead of running a base par for all plants, taking the time to record par and plant growth will give us a précised par that can be lowered and save energy.

C. Environmental controls:

- With specialized ventilation and HVAC systems in place, additional energy savings can be expected due to the increased efficiency of said systems. In addition, by introducing fresh air through an advanced smell-eliminating air flow system in conjunction with other controls such as UV light we are able to avoid all mold, bacteria, mildew, and fungal outbreaks. Our closed loop ventilation system will lessen the potential of pest contamination and reduce the need for any additional organic pesticides.

- Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable.

A. Solar panels have been considered but ruled out at this time as it is cost prohibitive. Plans to implement within 3-5 years.

2. Inventory records as required by 935 CMR 500.105(8).

- Real-time inventory shall be maintained as specified by the Commission and in 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, and flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

A. JCC shall:

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

B. The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

C. JCC shall tag and track all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.

D. No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by an Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

- E. A marijuana establishment that is cultivating, processing or selling marijuana products for medical use as well as marijuana products for adult use must create virtual separation of the products.

At the point of sale, a Marijuana Retailer that is also a RMD must designate whether marijuana products are intended for sale for adult use or medical use through tracking methodology approved by the Commission under 935 CMR 500.000. (h) A Marijuana Retailer that is also a RMD is subject to the laws governing taxation in the Commonwealth, including, but not limited to, the laws regarding taxation, filling, audit and seizure.

3. Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e).

- The seed to sale process shall be tracked with BioTrack. This is a software that automatically Reports Required Data to State System's, creates custom compliance-focused reports, tracks waste, destruction and accounts for conversion and moisture losses, creates transport manifests with all necessary information, does real time product recall, and much more. With this system, the seed to sale tracking process will be effortless, efficient, secure, and compliant with the CCC regulations and state laws.
 - A. Label and tag each seed with RFID to be logged and tracked in the inventory system.
 - B. Record and scan in all essential information per seed on manual log sheet and in Biotrack.
 - C. Place all seeds in clone room after logging complete.
 - D. Once seed grows into plant and is ready for vegetation phase, that plant will be scanned out of the clone room with necessary information logged on manual log sheet and in Biotrack.
 - E. Once scanned out of clone room, immediately scan into vegetation room with necessary data logged both on the manual long and in Biotrack.
 - F. Once plant is ready for flower phase, that plant will be scanned out of the vegetation room with necessary information logged on manual log sheet and in Biotrack.
 - G. Once scanned out of vegetation room, immediately scan into flowering room with necessary data logged both on the manual long and in Biotrack.

- H. Once plant has flowered and is ready for harvest, that plant will be scanned out of the flowering room with necessary information logged on manual log sheet and in Biotrack.
- I. Once scanned out of flowering room, immediately scan into trimming room with necessary data logged both on the manual long and in Biotrack.
- J. Once plant has been trimmed, that plant will be scanned out of the trimming room with necessary information logged on manual log sheet and in Biotrack. All plant matter will be disposed of through green waste and tracked accordingly.
- K. Once scanned out of trimming room, immediately scan into curing room with necessary data logged both on the manual long and in Biotrack.
- L. Once curing process is complete, that plant will be scanned out of the curing room with necessary information logged on manual log sheet and in Biotrack.
- M. Once scanned out of curing room, immediately scan into storage room with necessary data logged both on the manual long and in Biotrack. Securely store each plant and lock plants in commercial grade safe.
- N. Once plants are ready for sale, that plant will be scanned out of the storage room with necessary information logged on manual log sheet and in Biotrack.
- O. In preparation of packaging and transporting, all inventory must be weighed, logged, and accounted for, on video. When videotaping the weighing, logging, and accounting for marijuana products, the video must show each product being weighed, the weight, and the manifest.
- P. Package plants in sealed, labeled, and tamper or child-resistant packaging, and place in secured lock box attached to transport vehicle.
- Q. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.
- R. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall

compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email.

- S. Once product has been delivered to destination establishment, money will immediately be stored and placed in secured lock box attached to transport vehicle.
- T. Transport agents will immediately return to origination facility. Every 30 minutes in route, transport agents must contact originating facility to report status check until arrival.
- U. Once arrived, money must be placed immediately into commercial safe.

4. The following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions.
- A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2).
 - Documentation of verification of references.
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision.
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters.
 - Documentation of periodic performance evaluations.
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and 8 hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions.
- Personnel policies and procedures.
- All background check reports obtained in accordance with 935 CMR 500.030.

5. Business records, which shall include manual or computerized records of:

- Assets and liabilities.
- Monetary transactions.
- Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers.
- Sales records including the quantity, form, and cost of marijuana products.
- Salary and wage 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 JCC, including members of the nonprofit corporation, if any.

6. Waste disposal records as required under 935 CMR 500.105(12).

- JCC will ensure all recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.
- Liquid waste containing marijuana or by-products of marijuana processing shall be disposed of in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26 through 53; 314 CMR 3.00: Surface Water Discharge Permit Program; 314 CMR 5.00: Groundwater Discharge Program; 314 CMR 12.00: Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers; the Federal Clean Water Act, 33 U.S.C. 1251 et seq., the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: Sewer System Extension and Connection Permit Program), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: Industrial Wastewater Holding Tanks and Containers.
- Organic material, recyclable material and solid waste generated at a Cannabis Establishment shall be redirected or disposed of as follows:
 - Organic material and recyclable material shall be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: Waste Bans.
 - To the greatest extent feasible:
 - Any recyclable material as defined in 310 CMR 16.02: Definitions shall be recycled in a manner approved by the Commission.

- Any remaining marijuana waste shall be ground and mixed with other organic material as defined in 310 CMR 16.02: Definitions such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: Site Assignment Regulations for Solid Waste Facilities.
- Solid waste containing cannabis waste generated at a marijuana establishment may be ground up and mixed with solid wastes such that the resulting mixture renders the cannabis unusable for its original purposes. Once such cannabis waste has been rendered unusable, it may be brought to a solid waste transfer facility or a solid waste disposal facility (e.g., landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection or by the appropriate state agency in the state in which the facility is located.
- No fewer than two JCC agents must witness and document how the marijuana waste is disposed or otherwise handled (recycled, composted, etc.) in accordance with 935 CMR 500.105(12). When marijuana products or waste is disposed or handled, the Marijuana Establishment must create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Marijuana Establishment Agents present during the disposal or other handling, with their signatures. Marijuana Establishments shall keep these records for at least three years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

7. Following closure of JCC, all records must be kept for at least two years at the expense of JCC and in a form and location acceptable to the commission.

Measurement & Accountability

1. JCC will hold audits weekly, monthly, annually, as required by the state of Massachusetts for the following: security measures, employee security policies, storage of marijuana, accurate descriptions of all strains, quality control plans, staffing plans and staffing records, alcohol, smoke, and drug-free policies, plan for confidential records keeping, dismissal of agents policy, list of all board members, handling of cash policy, diversion prevention of persons under 21 policy, policies and procedures for energy efficiency and conversion, personnel records, business records, waste disposal records, and closure records data base.
2. JCC will regularly report all records and audit of above mentioned to necessary parties as required by the state of Massachusetts.
3. All employees must undergo necessary trainings in their respective departments to maintain efficient competency.

Maintenance of Financial Records Compliance Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

1. Short term goals:

- a. Create and maintain business records of assets and liabilities, monetary transactions, books of accounts, sales records, and salary and wages of employees in accordance with GAAP guidelines and standards to begin successful records keeping for proper CCC compliance.
- b. In accordance with 935 CMR 500.140(9), no marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160. JCC will create financial records outlining all transactions with Independent Testing Laboratories.

2. Long term goals:

- a. Remain financially responsible, ensure the best business practices, be fully prepared for all audits, and to remain compliant with the CCC.
- b. Maintain detailed and accurate financial records outlining all transactions with Independent Testing Laboratories to ensure all products produced and sold by JCC remains compliant and in good standing with the CCC.

Program Policy & Procedures

- 1. While as a cultivation facility, 935 CMR 500.140 (6) is not applicable as it pertains solely to retail facilities, JCC will create and maintain the following financial records policies and procedures for the handling of cash on JCC premises including but not limited to storage, collection frequency, and transport to financial institution(s).**

- Upon receiving payments from dispensaries:
 - A. Transport agent will immediately log, report, and place cash in safe lock box. This two-step process is as follows:
 - a. Once agent has received receipt, agent will manually enter transaction on the written log located in transport vehicle.

- b. Once agent has manually logged transaction, agent will contact via phone said transaction to agent at originating facility at which time the transaction will be logged into a digital system.
 - B. Upon arrival, the transaction will be confirmed by the CSO and reported under recorded HD video camera surveillance.
 - C. Printed reports outlining all transactions will be provided to CEO for an internal audit in accordance with the requirements outlined by the State of Massachusetts.
- Bank deposits:
 - A. Transport agents will follow JCC transport protocol to transport the cash to required bank. Upon arrival of the bank. Transport agent will then log and report the cash to be deposited.
 - B. Transport agent must obtain receipt of deposit, and report confirmation immediately. This two-step process is as follows:
 - a. Once agent has received receipt, agent will manually enter transaction on the written log located in transport vehicle.
 - b. Once agent has manually logged transaction, agent will contact via phone said transaction to agent at originating facility at which time the transaction will be logged into a digital system.
 - C. Printed reports outlining all transactions will be provided to CEO for an internal audit in accordance with the requirements outlined by the State of Massachusetts.

2. In accordance with 935 CMR 500.140 (9), JCC has established the following financial records policies and procedures for outlining all transactions with Independent Testing Laboratories.

- Tracking transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13) is as follows:
 - Each plant is assigned an RFID and tracked in a digital recording system.
 - Product for testing will be grouped into a batch, at which time all RFIDs will be registered to said batch number and entered into digital recording system.
 - Upon payment of testing services, using a PO system, each batch and subsequent RFID will be assigned a PO number which will track all payments made to Independent Testing Laboratories.

- Printed reports outlining all transactions will be provided to CEO for an internal audit in accordance with the requirements outlined by the State of Massachusetts.

Measurement & Accountability

JCC will hold audits weekly, monthly, annually, as required by the state of Massachusetts for the maintenance of all financial records systems.

1. JCC will regularly report all records and audit of above mentioned to necessary parties as required by the state of Massachusetts.
2. All employees must undergo necessary trainings in their respective departments to maintain efficient competency.

Qualifications Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

Short Term Goals

1. Establish a core practice that can be implemented with expansion
2. Redefine the roles needed inside of JCC

Long Term Goals

1. Have Zero incidents with employees

Program Policy & Procedures

Base Qualifications for all Registered Agents:

1. No registered agents or employees can be convicted of a felony within 5 years of applying for position
2. No registered agents or employees can be convicted of a felony that involves selling to a minor, or involves minor and illegal substances
3. No managers or supervisor can be convicted of a felony that involves hate crimes, sexual assault or fraud
4. Must have reliable transportation
5. Must have some sort of cultivation or horticulture experience
6. Must have an Highschool diploma or G.E.D. Exceptions will be made for those who are from areas of disproportionate impact if said potential hirer can pass a knowledge test.
7. On or after July 1, 2019, all current owners, managers and employees of a Marijuana Establishment that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a "responsible vendor."

Positions

Director of Horticulture or CEO

The Director of Horticulture will be responsible for the direction and oversight of JCC cultivation team. He/she will be responsible for managing the planning, design, construction, and operation. The Director of Horticulture will manage client relationships, and collaborate with the client, their team, contractors, local authorities and regulatory bodies.

Duties and responsibilities

- Responsible for managing JCC's cannabis cultivation facilities
- She/he will oversee all propagation, plant maintenance, plant nutrition, pest management, harvest/dry/cure and inventory-tracking
- Design nutrient recipes and schedules, using both pre-made fertilizers as well as from base salts
- Oversee the design, installation and operation of future advanced automation/environmental control systems.
- Manage, supervise and direct the activities of all cultivation staff, and make decisions regarding hiring, discipline, termination or advancement
- Collect and review data to optimize yields for each strain/harvest and work with senior management to make improvements
- Identify and implement ways to decrease capital and operating expenses through design, process, and equipment
- Update and implement all Cultivation SOPs and related associated documents
- Navigate regulatory and compliance considerations and develop and implement processes and standards based on regulations.

Qualifications

Required Qualifications:

- 10 years+ of cannabis related experience
- 4-year degree from an accredited university
- Expert level knowledge of all growing mediums, nutrient regimens, cultivation methodologies, environmental requirements and cultivation techniques.
- Strong working knowledge of Microsoft Office – strong Excel skills required
- Construction experience, including an ability to read and understand building plans, proficiency in heavy equipment operation, and a working knowledge of HVAC, electrical, and plumbing systems
- Excellent written and verbal communication skills.
- Collaborative nature and ability to work well with others.
- Excellent problem solving and troubleshooting skills.
- Ability to get things done and make decisions in an autonomous work environment without extensive oversight

Chief Compliance officer

The Director of Compliance is responsible for all aspects of JCC Compliance. This role will be working with Cultivation, Legal, and Marketing to ensure ongoing compliance with all state and local regulatory requirements. Additionally, the Director of Compliance is responsible for maintaining and developing standard operating procedures (SOPs), monitoring and oversight of day to day inventory, and completing metrics and reports as needed. The Director of Compliance promotes a work environment that is positive and compliant within the regulations of the State of Massachusetts.

Key Responsibilities:

- Supports the Director of Horticulture in the design and development of programs, policies, and practices to maintain the company's compliance with all state, and local regulatory requirements.
- Supports JCC by monitoring state regulations to determine how changes impact the company and providing recommendations on strategies for compliance.
- Write, regularly review, and revise all corporate policies and procedures on compliance activities.
- Write, regularly review, and revise standard operating procedures (SOPs) company wide and monitor compliance with those SOPs.
- Conducting periodic cycle counts of finished goods, raw materials, and critical supplies.
- Maintaining inventory record accuracy.
- Work with various departments to collect and submit data to appropriate federal and state agencies in compliance with reporting requirements.
- Provide initial and annual re-training to all staff in areas of compliance that impact their jobs.
- Perform annual auditing of compliance programs, including development of corrective and preventative action plans as needed.
- Other activities as assigned by the Chief Compliance Officer or by the JCC Director of Horticulture.

Qualifications:

- Bachelor's Degree.
- 21 years of age or older.
- Must pass a state mandated Background Check.
- 3+ years of demonstrated success of supporting the development of compliance initiatives; implementation and ongoing management of a corporate compliance program. Cannabis experience, a plus.
- Must have the ability to develop and foster strong working relationships throughout all levels of the organization.
- Demonstrated problem-solving skills; the ability to either predict and/or identify and drive problem/issue to resolution.
- Excellent organization and planning skills.
- Excellent people and communication skills (verbal and written), with ability to successfully explain complex matters and provide persuasive support for positions with internal stakeholders, outside partners, and to communicate with all levels of the organization.
- Leading, coaching and performance managing direct reports, a plus.

Skills and Abilities:

- People management/leadership.
- Communication skills at all levels of the organization.
- Excellent analytical and problem-solving skills / methodical and diligent planning abilities.
- Ability to successfully manage a high-volume workload with tight deadlines.
- Self-managed and self-motivated; able to perform job requirements with minimal amount of supervision.
- Very proficient in Microsoft Office Word, Excel and PowerPoint, Access or another relational database experience a plus
- Working knowledge of all current federal and state regulations

Chief Operations Officer

The Chief Operations Officer (COO) is a new leadership role at JCC. This individual will provide the leadership, management, and analytical capability to ensure JCC's full operational efficiency. The COO will be responsible for leading all JCC's operations and staff members.

Position Responsibilities:

- Develop JCC'S current and long-term operational capability to support the company's growth, by assessing and refining the company's operational systems
- Ensure JCC has the proper controls, data procedures, and people systems to function and grow, while integrating the highest level of efficiency and service
- Establish key performance indicators that align with JCC's core values, mission, and organizational objectives
- Support operational leaders through regular professional development, training, coaching, and evaluation
- Manage contracts and serve as the management liaison with all operational partnerships (i.e. external vendors and consultants)
- Provide direction in the execution of operational projects, and deliver guidance for complex operational issues
- Influence operational excellence and professional collaboration across all levels of the organization by exemplifying JCC's mission and culture

Qualifications:

- Minimum of 5+ years of demonstrated experience as a COO or relevant leadership role
- Visionary management skills; ability to influence and engage direct and indirect reports
- Superior organizational skills and attention to detail
- Exceptional writing ability and oral communication skills
- Demonstrated competency analyzing data and leading strategic operations
- Proficient in all Microsoft Office applications

Cultivation Agents

Cultivation Agents are responsible for defoliating plant material before harvest and transporting plants into the dry cure room. The role of the Cultivation Agents is to assist the Director of Horticulture in the preparation of the dry/cure phase of the flower. The Cultivation Agents will be expected to perform a quality check with wet harvest and report any concerns to the Director of Horticulture. This position will require the removal of leaves and transporting plants from the flower room to drying room efficiently all while ensuring the integrity of the plant is intact. Cultivation Agents will assist cultivation by ensuring the quality of the final products is at its highest standard. The Cultivation Agents will follow all company policies and procedures and be responsible for ensuring flower rooms meet the JustinCredible Cultivation expectation with cleanliness and organization during and after harvest.

Other duties may include cleaning, labeling, packaging and other responsibilities that are assigned by management.

Principal Duties and Responsibilities (Essential Functions):**

- Cultivation Agent are responsible for approaching each branch of the plant to ensure all fan leaves that restrict airflow to the flower are removed.
- The Cultivation Agents are responsible for the cutting down of the plant at the base of the pot after the de-fanning phase.
- Responsible for organizing the plants by strain and room, labeling the strain after harvest and ensuring the Metric tag of the plant is intact with the plant after being hung.
- Cultivation Agents will assist with transporting the plants from the flower room to Dry Cure rooms they are assigned to.
- Training will be provided by the Director of Cultivation

Supervision Received:

- Cultivation Agents will report directly to the Director of Horticulture.
- Collaborate with the Cultivation Agents with any changes that will improve efficiencies and work flow.
- Cultivation Agents will receive on-going training and support to ensure job requirements and expectations are fulfilled.

Required Skills:

- Must be able to stand stationary for long periods of time
- Must be able to lift at least 50 pounds
- Depending on the demands of the harvest, evenings may be required.
- Deals with confidential information and/or issues using discretion and judgment.
- Responsible for representing the company in a professional manner.
- Effective and efficient communication skills
-

PREFERRED:

- Experience in a greenhouse, nursery, or landscaping
- As a condition of employment all JustinCredible Cultivation employees or owners must comply with the State of Massachusetts requirements which include providing a copy of your fingerprints in the required format and consenting to an FBI Background check.
- **MUST BE AT LEAST 21 YEARS OLD**

JustinCredible Cultivation is an equal opportunity employer. All qualified applicants will receive consideration for employment without regard to sex, gender identity, sexual orientation, race, color, religion, national origin, disability, protected veteran status, age, or any other characteristic protected by law. JustinCredible will fulfil the requirement to give opportunity to those who are from areas of disproportionate impact

Financial Manager

The FM serves as an integral member of the JCC executive management team. The FM will be responsible for supporting the development and management of the company's forward-looking financial and investment strategy and lead the company's financial planning and budget management functions. The FM will report directly to the company Board Members and CEO.

Essential Functions

- Financial Projections and Optimization:
- Analyze, refine and forecast financial data in real time and on a periodic basis throughout each crop year, including revenue based on market data, capital and operating budgets and strategic plans.
- Recommend strategic optimization plans based upon financial data (i.e., new development, redevelopment, orchard removals, land acquisitions and dispositions, etc.).
- Recommend operational optimization plans based upon financial data.
- Lead the planning, coordination and implementation of the annual capital and operating budget process in collaboration with other department leaders.
- Identify and source new growth opportunities.

Financial Monitoring:

- Refine existing key performance indicators and financial ratios for measuring financial performance of the company and its component parts.
- Develop a standing financial reporting process and report weekly, monthly, quarterly and annually on key financial data.
- Monitor and report on overall financial status by analyzing yield results.

Banking:

- Co-manage banking activities and develop financing alternatives.
- Optimize existing banking portfolio and identify new banking relationships and debt strategies for development.

Other:

- Collaborate with other department leaders on risk management strategies.
- Communicate expectations, provide coaching and feedback, monitor and manage performance and provide development opportunities for direct reports and other team members.

Minimum Requirements:

To perform this job successfully, an individual must be able to perform each essential function and be willing to take on new roles as needed. The requirements listed below are representative of the knowledge, skills, and/or ability required. Reasonable accommodations will be made to enable individuals with disabilities to perform the essential functions.

- Master's degree in Finance or equivalent experience required
- 10 + years of related on the job work experience
- Experience managing staff and communicating job expectations and productivity standards.
- Experience in effectively managing day-to-day financial operations
- Knowledge in such areas as return analysis, financial forecasting, cost/benefit analysis, budgets, capital reporting

- Bottom-line oriented, budget-conscious and metrics-driven to establish, design and implement internal controls and systems for tracking and reporting.
- Experience working with 'Famous' (financial reporting software) is preferred but not required.
- Demonstrated proficiency in Microsoft Office and related software programs.
- Microsoft Excel proficiency required.
- Technologically savvy and able to demonstrate competence in a variety of technological platforms and processes.
- Ability to communicate in a clear, friendly, professional and proactive manner.
- Be creative, flexible, and able to drive/guide change.
- Ability to multi-task and meet deadlines.
- Ability to work in a fast paced, multi-entity and multi-cultural environment.
- Strong team leadership, management and people skills.
- Proven ability to work cooperatively with team members at all levels.

Employee Training

JCC has the benefit of starting small and developing itself in the market before bringing on a full staff when the company expands. All staff has been cultivating privately together for years and will take this experience and develop great practices to build our future workforce

- All personnel who were not involved with the SOP development and planning must complete an 8-hour training process on regulations and compliance
- All personnel will take the Seed-to-Sale training
- All personnel will be trained on emergency procedures
- All personnel will be trained on security measures such as entrances, accessible areas, sanitary procedures and spills
- All agents will be trained on proper wear of uniforms
- All agents will be trained on how to interact with authorizes and individuals sanctioned by the Cannabis Control Commission

Cultivation Agents

- Cultivation agents must be trained on proper trimming techniques, cultivation being an industry of personalized practice. Our agents will be trained on the JCC method of trimming and training.
- Cultivation agents must be trained on all RFID policy's
- Cultivation Agents will receive training on how to remove and destroy green waste
- Cultivation will be trained on watering techniques
- Cultivation Agents will be trained nutrient selection and schedule design
- Cultivation Agents will be trained on proper drying and curing practices
- Cultivation Agents will be trained on packaging and labeling practices
- Cultivation Agent will be trained on how to record all needed documentation throughout an average work day.

Measurement & Accountability

1. All management hires must be approved by board members

Management Positions

Chief Executive Officer/Director of Horticulture: Reginald Stanfield

Experience: Reginald Stanfield has 10 years of agriculture experience, 10 years of accounting experience, 12 years of managerial experience, 5 years of business expansion and development experience, and 3 years of cannabis horticulturalist experience.

Reginald Stanfield was raised in a small town in North Carolina on a family farm where he learned agriculture from the age of 5 until adulthood. Learning how to cultivate fruits, vegetables, and tobacco, he gained a vast knowledge in the field of commercial agriculture. Maintaining water supply, managing pest, and harvesting crops were daily duties acquired throughout his childhood. This experience enables him to use his talents acquired in the work force to develop JustinCredible Cultivation. From 2000-2005 Reginald Stanfield learned firsthand how to care for cannabis on a private personal farm. His experience during this time is perfect because cultivating cannabis has its similarities to tomatoes but the variance in the nutrient upkeep and the need for special attention can only be gained through experience.

Experienced gained relative towards cannabis cultivation:

- Learning multiple training techniques such as Low-stress Training (LST), Lolli-popping, SCROGing, main lining, sea of green & super cropping, will be invaluable in the commercial recreational industry to produce top product efficiency.
- Learning all watering techniques, including top feeding, from individual water supplies, nutrient reservoirs that lead to drain to waste tables on drip systems, reservoirs that water through flood to waste systems, and deep-water culture systems.
- Pest management is a key role with all agriculture; even if it is an indoor cultivation facility. Reginald's experience in organic mixtures that rid spider mites, thrips, and other pests that harm the plants, prepares him to handle all the pest that can harm JustinCredible Cultivation crops.
- Harvesting is one of the most vital parts of the cycle of the commercial cannabis cultivation cycle. The quality of the trim job is important; cannabis is valued by its THC quantity, testing purity, and consistency. The hundreds of hours spent trimming equipped Reginald to become a master of trimming.
- Curing and drying are all personalized techniques each cultivator can produce, but it is important that this process is done correctly. Incorrect drying can destroy the smell of the product, making it less appealing to our customers. Reginald Stanfield will work closely with the Director of Horticulture (DoH) to develop and continue to improve the drying and curing of the cannabis flower.

In 2012, Reginald developed his first business by the name of Masters of Mixology (M2) while still working towards his bachelor's degree in Finance. The bartending industry is dominated by caterers and event planners leaving small room for bartender's service. Overcoming the challenge was hard for Reginald, but he developed a business model that is sustainable and constantly growing. Solving a major problem for the caterers by providing consistency was key to gaining market share. Reginald started by developing bartenders training that was accepted by the Maryland Higher Education Commission (MHEC) and used this training to focus on private events. Most staffing companies use bartenders that were trained to work behind a full bar, but Reginald's training produced bartenders that worked seamlessly with caterers and relieved them of the responsibilities of the bar and the bartending staff. Reginald developed M2 until it expanded from Maryland to Virginia, the District of Columbia, Pennsylvania, and lastly Texas in 2018.

Experience gained from starting and developing Masters of Mixology, LLP:

- Starting a business from ground up
- Making connections with other businesses and supplying them with a service
- Training individuals with limited to no experience to become well trained and experienced workers
- Expanding and targeting customers in a new market
- Business compliance and following industry rules
- Handling large amounts of cash during busy events
- Training Management staff
- Leading a team of Executives

Experienced gain relative to cannabis cultivation:

- Germinating seeds
- Cloning and rooting seedlings
- Testing air quality and monitoring and controlling temperature, humidity, and CO2 levels
- Multiple watering techniques
- In-ground and pipe-feed irrigation systems
- Nutrient management
- Pest and micro bacteria control

- Low-stress Training (LST), Topping, Super cropping, Lolli-popping, SCROGing and sea of green cultivating techniques.
- Trimming, drying, and curing

Financial Manager: Reginald Stanfield

Experience: Reginald's experience with Finance started with his internship at a medium company that handled contracts. The company ended the relationship with their CFO and the person refused to hand over the financial statements and files. During this time, Reginald rebuilt their finances from old statements, receipts, and credit card reports. He also handled a multi-year audit, teamed with a CPA Firm, and received two promotions within the year he was employed. Before leaving the company as their Financial Manager, the CEO offered Reginald the CFO position agreed upon receiving his CPA.

Experienced gained:

- Accounts Receivable and Accounts Payable management
- Payroll processing
- HR employee onboard processing
- HIPPA Training Certification
- Computer Network Management, Server maintenance, and Security software
- Monthly, Quarterly and Yearly Reporting. Including but not limited to Balance Sheet, Cash Flow Statements, Profit & Loss Statements etc.
- Taxation Audit Preparation
- Paychex software, office suite, QuickBooks. etc.

Chief Operations Officer: Che'toia Walker

Experience: Che'toia has worked several years serving in the Federal Government in the areas of Human Resources and Information Technology. She began her professional career as a Technical Writer for the United States House of Representatives in the Chief Administration Office. This position gave Che'toia the opportunity to understand the inner workings of the Federal Government, its policies and regulations, and the aptitude to handle high profile/high visibility projects under strict and conclusive deadlines.

From there, Che'toia went on to pursue her Information Technology degree from the University of Maryland, University College with a minor in Small Business Entrepreneurship. This knowledge equipped her with the versatility to execute in a corporate environment as well as a more intimate start-up environment. Being able to understand the smaller details as well as seeing the bigger picture has served her well in all her professional endeavors.

By 2014, Che'toia was brought onto M3 Consulting Services; a company that helps start-ups and small businesses to reach their full potential. There she held the position as Chief Operations Officer. As the COO, Che'toia was responsible for not only the day-to-day operations of M3 Consulting Services but the overall operations of the affiliated subsidiaries therein. The heaviness of this responsibility gave Che'toia the tools further needed to work under tight time constraints and still deliver noteworthy results.

In conjunction with serving as COO for M3 Consulting Services, Che'toia went on to work for the United States Census Bureau headquarters near Washington, DC. Here she worked as an IT Project Manager for the Telecommunications Office with a special focus in Cyber Security. Although not easily understood by the name, the Telecommunications Office was responsible for the entire network and mainframe for the U.S. Census Bureau as a whole; this covers the U.S. and abroad. Leading a team of 75 and being a part of a team totaling 115 (including management and Chiefs), Che'toia was able to create and implement processes that helped the Telecommunications Office to run more efficiently. She was able to be an active member of the Change Control Board. This Board oversaw, approved, denied, and regulated all changes to the network and every area effected therein. Being able to oversee operations and work together with the different members gave Che'toia the skills necessary to thoroughly run operations on a large-scale. Her special focus in Risk Management is what gave her the edge over other team members. Heavy analytical skills serve as a great tool to create effective processes, foresee potential issues, and implement contingencies in correlation to. All businesses have associated risks, and all operations will need someone who can handle the heavy load while keeping up a strong morale for the team. Even with Che'toia being a single mother of three, she was able to provide excellent skills and services to the US Census Bureau while simultaneously growing M3 Consulting Services and the businesses therein.

Experience gained from Project Management:

- Attention to detail and impeccable multi-tasking/organization skills
- Understanding team building
- Time management and meeting deliverables
- Process Development
- Liaising between teams and C-Suite authorities, etc.
- Facilitating meetings and other platforms to keep team members informed

Experience gained from Risk Management:

- In-depth analytical skill development
- Cyber Security/ system awareness
- Mitigation and Contingency development and implementation
- Training team members

- Creating, following, and implementing compliance standards

Experience gained from Operations Officer:

- Growing businesses from the ground-up
- Understanding various industry Best Practices
- Understanding regulations for different industries
- Internal communications development
- Marketing Strategies

Chief Compliance Officer/Chief Security Officer: Terrance Hanley

Qualifications: Bachelor's in Security Management, Criminal Justice or Military Experience. At least 4 years of security or military experience. No felony or violent crime convictions.

Responsibilities: The CSO is responsible for the security of the cultivation facility and overseeing the transactions between dispensaries and manufacturers. The CSO will be the second key holder to open and close the facility. The CSO will make the schedule for security rotation and monitoring the 24/7 security system. The CSO must background check and clear all visitors inside of the facility.

Experience: Terrance Hanley, a highly regarded military veteran, brings to the table an exceptional blend of both educational background and professional/technical/procedural expertise. His vast experience in security and systems development makes him the ideal team lead for JCC's Compliance Division.

In 2005, Terrance joined the U.S. Air Force as an enlisted member. After nearly five years of service, including two deployments, he earned an honorable discharge in 2010. During his time in the military, Terrance served in several leadership positions. As an element leader in basic training, he had the privilege of leading a group of 15 young Airmen. During his two deployments to Iraq (Operation Iraqi Freedom and Operation Enduring Freedom), Terrance played a key role in multiple security details and missions manned with an average of 20 U.S. Army soldiers to secure and protect the local citizens from imminent danger. Upon completion of his two tours of war, Terrance was entered onto the rolls of the "Order of the Spur" through the U.S. Army, awarded an Air Force Combat Action medal, and an Air Force Commendation medal.

After serving his country, Terrance completed his bachelor's degree in Business. His entrepreneurial mindset, coupled with the experience gained in the air force, paved the way for several successful and highly profitable businesses in subsequent years. Most notable S.E.T. Transport, a vehicle transport business, where Terrance mastered the intricacies of logistics management with acute detail and developed his problem-solving prowess.

He managed high stress problems which would prevent him from having punctual deliveries. Terrance overcame each problem within an average of an hour to ensure customer satisfaction. Terrance had to manage, protect, and safely transport approximately 300 luxury, sport, and repurposed vehicles. The company generated \$200,000 gross revenue under his supervision with just 6 subcontractors.

In 2015, JustinCredible Installs (JCI), an Audio/Visual installation company, was founded by Terrance Hanley and Reginald Stanfield. JCI provides project management services (planning and execution) for large scale installation projects in the commercial industry, including but not limited to, mega churches, college and NBA arenas, college and NFL stadiums, and restaurants. Noteworthy expertise garnered under the umbrella of JCI include the oversight of highly technical & intricate installation procedures, and a detailed understanding of Best Practices in the A/V industry. In the company's first year, JCI generated a gross income of \$84,000. With these projects, Terrance trained workers, solved multiple problems, and lead a team of individuals that reached 10 plus commercial technicians.

Terrance also has construction and renovation experience building photography studios and renovating apartments for non-profit companies.

Expertise garnered while serving in the U.S. Air Force:

- Strong attention to detail
- Hand to hand combat training
- Small arms and rifle training
- Leadership and supervisory skills
- Moderate team administration
- Real world combat experience

Expertise garnered via bachelor's degree in Business:

- Business networking
- Business structure
- Legal practices
- Marketing and branding expertise

Experience gained from S.E.T. Transport:

- Profound logistics proficiency
- Inventory management and tracking
- Problem solving skills

- Business to business relations and compliance

Experience gained from JustinCredible Installs:

- Systems creation and building
- State and city code regulations and compliance
- Large team management
- Construction acumen

Logistics Manager: Jonathan Siberon

Jonathan gained vast experience managing staff in a group home, scheduling work times, specialty doctor visits, and oversaw all facets of treatment necessary to provide a nurturing environment for residents. Jonathon developed behavior plans, provided medical oversight and HIPPA medical records.

Experience Relative to Cultivation business:

- Scheduling and record keeping
- System tracking of items
- Staff Supervision
- Standard operating procedure development and implementation
- Travel coordination
- System Audits

Jonathan has also helped develop a business from the ground up, playing major roles in clientele acquisitions, business-to-business relation, employee scheduling, large event coordination, inventory ordering, and employee development. Jonathan has helped expand our business Master of Mixology (M2) and understands the challenges the company will meet entering a new Market

Experience gained relative to the Cannabis Business:

- Employee Scheduling
- Hiring and onboarding
- Logistic management
- Business-to-Business development

JustinCredible Cultivation, LLC

To: The Woman's Fund
From: Reginald Stanfield
CC: Cannabis Control Commission

The purpose of this document is to record the proposed donation from JustinCredible Cultivation, LLC to the Women's Fund of Western Massachusetts.

I, Reginald Stanfield, CEO of JustinCredible Cultivation, hereby pledge **one percent** of our annual sales to the non-profit organization named The Women's Fund of Western Massachusetts.

WOMEN'S FUND of Western Massachusetts
1350 Main St, Suite 1006
Springfield, MA 01103
(413) 529-0087

I, Donna Haghighat, of WOMEN'S FUND of Western Massachusetts, hereby accept the **one percent** pledge as stated in this document.

JustinCredible Cultivation

X 

Women's Fund of Western Massachusetts

X  4/17/19

Diversity Plan

In accordance with 935 CMR 500.101(1)(b)(10), JustinCredible Cultivation, LLC (JCC) has developed short term and long term plans to diversify and help raise the diversity in the cannabis industry by providing opportunities that will increase the number of Veteran, Women, LGBTQ and other minority groups working in the cannabis industry.

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

Overall Goals:

1. Provide funding,
2. Provide mentorship,
3. Increase the number of individuals in the demographics of minorities, veterans, women and individuals of the LGBTQ community employed by JCC,
4. Conduct Business to Business transactions with the demographics of minorities, veterans, women and individuals of the LGBTQ community business owners to provide steady business

PROGRAMS – All Programs will target minorities, veterans, women and individuals of the LGBTQ community demographics

1. JCC Ad Program - will seek employees utilizing platforms such as Indeed, Glassdoor, Linked In and iHire. These platforms will only allow users over the age of 21 access. This process will allow JCC the ability to target individuals based on the demographics as they appear in our overall goals. The platforms and JCC website will provide information on becoming an agent.
2. JCC Social Media Program - will have an active blog, social media, and group communication messaging apps, to provide management the ability to communicate instantly. We will use these applications to post topics and information for our employees, and in workshops to increase skill and experience. JCC will only utilize platforms that restrict access to information (only allowing individuals over the age of 21 years of age). No cannabis, pricing, or solicitation shall be permitted through our program.

Social media – By having an active social media manager who can communicate with our target audience we can provide an environment that changes based on the reviews. Social media is the most common source of information in 2019, so using this resource will be provide JCC with the ability to reach our target market communicate with them and attract them to open opportunities within the company.

Blogging – Lack of information or information individuals do not have the access to can deter or limited the opportunities given to minorities. JCC will keep an updated blog so individuals can learn how to become agents, which business support minority owned businesses and all future openings and programs offered by JCC.

3. JCC Networking Program – JCC Executive Staff will participate with organizations that promote cannabis cultivation. JCC will through participation and hosting of events will raise awareness of the opportunities in the cannabis industry and partner with local businesses, particularly those of minorities, veterans, women, and the LGBTQ community. JCC will

Diversity Plan

only participate with organizations that meet CCC regulations. No cannabis, pricing, or solicitation shall be permitted through our program.

MEASUREMENTS - All Measurements will target minority, veteran, women and individuals of the LGBTQ community demographics

JCC Board members will hold strict standards for the management team, which will ensure JCC completes the goals set within this document. The metrics include, but are not limited to the following:

1. Minimum 45% of employment, job creation, and expansion shall be from the targeted demographics.
2. Number of individuals hired will not decrease the percentage of the employees in the targeted demographics.
3. JCC will attend a minimum of two (2) community outreach events per year. All programs must adhere to 935 CMR 500.105(4).
4. JCC will contract with at least one (1) business that will provide JCC with Business to Business needs (supplies and wholesale) from organizations owned by businesses from the targeted demographic.
5. JCC Social Media Program will post a minimum of two (2) times a week with targeted marketing, directly to employees of the targeted demographic. JCC will only utilize platforms that restrict access to information (only allowing individuals over the age of 21 years of age). No cannabis, pricing, or solicitation shall be permitted through our programs.
6. All plans and programs shall be reviewed and audited to assess plans, progress, and success. They shall be prepared for submission to the Commission at the end of each fiscal year.
7. JCC will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

Short term goal – Year 1 (August, 2019 to August, 2020) of operations: deploy entrepreneurship program for young adults from the targeted demographic to provide leaders to help them understand the process of beginning a business and how to maintain a successful business [see attached] and donate one percent (1%) of annual sales.

Long term goal – Become a staple minority hirer and employer in the community

Diversity Plan

JustinCredible Cultivation Entrepreneurship Workshop Itinerary Outline

In today's society, more and more people are deviating from the usual day-to-day, 9 to 5 careers and gravitating towards Business Ownership. However, many lack the knowledge to move forward confidently and successfully.

Our workshops are geared towards promoting **Entrepreneurship Awareness**. The knowledge and skills developed from our program will prepare all for what lies ahead on the Business Ownership path.

JustinCredible Cultivation, LLC is a firm proudly grounded in ethics and philanthropy. We specialize in innovating management while infusing morality into business.

Below is our Itinerary outline to give an overview of the topics we discuss in our workshops:

◇ **Who we are and what we stand for**

◇ **What it really means to be an "Entrepreneur"**

◇ **The different Entrepreneur paths**



◇ **How to adequately choose a College or form of Continued Education to secure your entrepreneur path**

◇ **Entrepreneur Life vs. The traditional career path (Pros, Cons, Risks, etc.)**

◇ **Question and Answers**

